

Exploring de-facto accountability regimes in Muslim NGOs

ABSTRACT

This paper aims to deepen and advance our understanding of the *de-facto* accountability processes and practices within Muslim non-governmental organisations (NGOs). We employ a three-fold accountability framework of felt, imposed and adaptive accountability, supported by insight from the Islamic perspective to elucidate our empirical findings. We adopt this framework because it enables us to localise the notions of accountability, allowing a more complete understanding of the *de-facto* nature of Muslim NGO accountability to emerge within the context of religious ideals and between accountabilities that are externally imposed and those that are internally generated.

KEYWORDS

Muslim NGOs, de-facto, adaptive, imposed, felt, accountability.

Exploring de-facto accountability regimes in Muslim NGOs

1. Introduction

This paper aims to deepen and advance our understanding of the accountability processes and practices within Muslim non-governmental organisations (NGOs). To conceptualise this process, we draw on a framework comprised of three ‘ideal types’ of non-profit accountability regimes, as articulated by O’Dwyer and Boomsma (2015), of imposed, felt and adaptive accountabilities. An imposed accountability regime is one that comprises “*a type of formal, external oversight and control imposed on individuals or organisations*” (O’Dwyer & Boomsma, 2015, p40) and examines how organisations account for their actions in a hierarchical manner, usually using strictly defined or quantitative measures (Mulgan, 2000; Roberts, 1991; Sinclair, 1995). Felt accountability is more difficult to define. It has links to ‘personal responsibility’ (Lindkvist & Llewellyn, 2003; Sinclair, 1995), as well as to the morality and values held by individuals (Mulgan, 2000). It explores the manner in which individuals open themselves up for scrutiny and assess their own performance in relation to organisation mission and values (Ebrahim, 2003; Fry, 1995), therefore requiring “*that organizational actors, such as NGOs and funders, develop a reciprocated sense of responsibility that is collectively generated rather than uni-directionally imposed*” (Ebrahim, 2003, p.200). An adaptive accountability regime is a hybrid of the two, seeking to align the core features of imposed and felt accountability (Ebrahim, 2009). We adopt this three-fold framework because it permits us to localise the meanings of imposed, felt and adaptive concepts of accountability (O’Dwyer and Boomsma, 2015), providing a better understanding of the dynamic nature of Muslim NGO accountability to emerge within the context of religious ideals and between accountabilities that are externally imposed and those that are internally generated (Ebrahim, 2003; Ebrahim, 2009). This framework evokes the

multifaceted nature of accountability by acknowledging the complicated and continuing balancing act in which NGOs must engage (O'Dwyer & Boomsma, 2015; Ebrahim, 2003).

Muslim NGOs are often under constant pressure to provide accountability in some form (Belaon, 2014; Bentall & Bellion-Jourdan, 2009) to a wide array of stakeholders, from their regulator, the Muslim community (their donors), and the wider society in which they operate. The issue of accountability is especially pertinent for Muslim NGOs given the sensitive and volatile political environment in which they currently operate (Cordier, 2009). These sensitivities include the link often emphasised between Muslim charitable organisations and issues of terrorist funding in areas of conflict, particularly across the Middle East and Syria (Bentall, 2016). Given these sensitivities, Muslim NGOs argue that they are under greater external and media scrutiny than other NGOs, bringing limitations not only on their humanitarian activity but also on their ability to be accountable (Belaon, 2014; Bentall, 2016; Cordier, 2009). This omission is especially important when considering that these religious NGOs operate in a different religious environment than that of their own religious affiliation¹, especially one that has a number of regulatory requirements imposed by the Charities legislation not specifically tailored towards religious organisations. However, no studies to date have attempted to examine the processes by which Muslim NGOs manage these religious and non-religious accountability exigencies.

The prior literature has focused considerably on various accountability issues in secular NGOs and Christian NGOs (Booth, 1993; Ebrahim, 2003, 2009; Hardy & Ballis, 2005, 2013; Jacobs, 2005; Laughlin, 1990; Unerman & O'Dwyer, 2006a, b). A focus on other religious NGOs and, in particular, insight from specific Muslim organisations have largely been missing from the literature, with the exception of Abdul-Rahman & Goddard (1998) who considered accountability relationships within Malaysian Muslim religious councils. The consideration of these 'other' organisations is important due to the differing notions and

practices of accountability that they might encompass, compared to Christian/Secular notions (Haniffa & Hudaib, 2011; Lewis, 2001, 2006; Tinker, 2004). For such organisations operating in the UK, these issues become more nuanced as the organisations attempt to balance their religious values and various imposed accountability demands.

Our paper makes a number of important contributions. First, it seeks to advance the present religious organisations' accountability literature, which is heavily focused on Christian organisations, by providing an alternative focus on Muslim organisations. There is little empirical evidence regarding how Muslim organisations, especially Muslim NGOs in a non-Muslim-dominated environment, report on and adhere to accountability templates and whether there exists a dichotomy between the imposed requirements and the religiously inspired aspects of felt accountability, as suggested by the prior literature (Booth, 1993; Hardy & Ballis, 2013; Laughlin, 1990). In this paper, we elaborate upon these considerations and present a conceptualisation of accountability inspired by the Islamic perspective, which signifies accountability as a threefold relationship between oneself, God and society and in which a person's relationship with other individuals mirrors his or her relationship with God. Furthermore, the previous literature suggests that many *de-facto* accountability regimes exist within religious organisations and communities that complement and significantly enhance the legitimacy of organisational practice (see for example Laughlin, 1990 and Jacobs & Walker, 2004). Hence, our findings could also make a significant contribution to enhancing the understanding of *de-facto* accountability structures within Muslim NGOs, in addition to their *de-jure* mechanisms of accountability.

Second, prior research on generic NGO accountability has repeatedly emphasised how top-down accountability requirements threaten mission achievement by encouraging non-profit managers to concentrate on a narrow range of less risky activities peripheral to the organisation's core mission (Ebrahim, 2003; O'Dwyer & Unerman, 2008). This paper

provides evidence regarding whether similar concerns also exist in religious NGOs and finds, amongst other aspects, that regardless of the activities or mission in which the NGO ultimately engages, mission and vision will always be compromised if these organisations focus on engaging in less risky core activities. For Muslim NGOs, although internal accounting and reporting practices have been strengthened by increased top-down scrutiny, external activities have been constrained due to the extensive regulatory and media attention on them, resulting in the core mission of the NGOs being disrupted because they felt they were not fully able to engage with their humanitarian missions in conflict-ravaged areas, such as Syria and the Middle East.

The remainder of the paper is organised as follows. The next section theorises notions of accountability and presents the conceptual framework for the study. This section is then followed by a discussion of the Islamic ethical perspective on accountability. Section three provides background for the development of Muslim NGOs, followed by a brief overview of the literature in section four. Section five presents the research methods adopted for the study. Section six presents the findings, and the final section provides a discussion and concludes the paper.

2. Notions of accountability

This paper utilises a conceptual framework based on three ideal types of accountability regimes: imposed, felt and adaptive (Ebrahim, 2009; O'Dwyer & Boomsma, 2015). This three-fold framework allows the multifaceted nature of NGO accountability to emerge by acknowledging the complicated balancing act that such organisations face in managing *de-jure* and *de-facto* accountability requirements between externally imposed activities and internally generated actions (Ebrahim, 2003; O'Dwyer & Boomsma, 2015).

In the prior literature, imposed ‘*de-jure*’ accountability is often considered to be “*narrowly functional, short term in orientation and favouring accountability to those stakeholders who control access to key resources*” (O’Dwyer & Unerman, 2008, p803) or, in other words, as being hierarchical and formal and enacting a form of external oversight and control (Ebrahim, 2003, 2009; Edwards & Hulme, 1996; Mulgan, 2000; Sinclair, 1995; Stewart, 1984). Imposed accountability requirements can therefore encompass formal reporting requirements mandated by legislation. Felt accountability or ‘self’ accountability (Schlenker & Weigold 1989) is linked to aspects of ‘*personal responsibility*’ (Fry, 1995; Lindkvist & Llewellyn, 2003; Sinclair, 1995) and individual morality and values (Mulgan, 2000). These factors are motivated by the ethical or value-based concerns of individuals within the organisations (Ebrahim, 2009; Fry, 1995) and in the case of religious organisations, these concerns are often their religious and ethical ideals. For Muslim NGOs, these ideals include values of Islamic accountability or those values that help to engender and reinforce practices consistent with Islamic notions of the good². We envisage adaptive ‘*de-facto*’ regimes to be a hybrid of imposed and felt accountabilities, in which the relative dominance of either can shift over time (Ebrahim, 2003, 2009).

2.1 Imposed accountability

Imposed accountability refers to ‘being held responsible’ (O’Dwyer & Boomsma, 2015), incorporating the functional act of providing an account of one’s actions to a higher authority (Edwards & Hulmes, 1996) and providing an explanation of how relevant mandatory requirements have been followed (Najam, 1996, Stewart, 1984). This type of accountability is compliance-based and requires adherence to rules and regulations to assess performance, constrain activities and facilitate sanctions (O’Dwyer & Boomsma, 2015; Stewart, 1984) and is therefore most closely associated with ‘*de-jure*’ authority.

NGOs in the UK must abide by the Charities Act 2006 and the requirements of the Charity Commission (the regulator), in addition to the requirements of any other funding bodies and/or organisations of which they are members³. The increase in the receipt of funding from the government and other institutional subvention (such as the UN and other grant-making bodies), as well as the expansion of the scope, scale and range of services provided by faith-based organisations, has inevitably resulted in increased expectations of organisational effectiveness and efficiency. There is also greater demand for higher standards of fiduciary responsibility and financial management, along with mandates for performance evaluation and public reporting (Unerman & O'Dwyer, 2006a, b).

This change has also meant that religious NGO organisations must now clothe themselves in management tools and trappings similar to their secular and for-profit counterparts to remain legitimate. For Muslim NGOs, adhering to imposed accountability requirements is given even more importance because compliance can provide a level of legitimacy to their activities. Given the additional level of scrutiny under which many Muslim NGOs find themselves⁴ (Belaon, 2014; Bentall, 2016), compliance can indicate stability and sustainability for their ongoing humanitarian activities.

2.2 Felt accountability

Felt accountability refers to ‘feeling responsible’ (O’Dwyer & Boomsma, 2015), and it is closely linked to internal aspects of personal conscience and is driven by adherence to the internal, moral and ethical values of individuals (Harmon & Mayer, 1986) rather than purely organisational concerns (Schlenker & Weigold, 1989). Fry (1995, p.188) argued that “*this sense of accountability extends beyond what would normally be seen as a job or role boundary ... the accountability becomes nurturing and enabling and responsibility is truly felt*”. The nurturing and enabling nature of felt accountability develops because, at its core,

“accountability is a social acknowledgement and an insistence that one’s actions make a difference to both self and others” (Roberts, 1991, p. 365). A well-developed sense of felt accountability will cause individuals to be honest with themselves and be answerable and responsible for what they say and do, as well as having the ability to look beyond the immediate moment to consider the consequences. Therefore, it also allows individuals to be accountable to ‘themselves’ by seeking to align their own values, mission and culture with that of the organisation (O’Dwyer & Boomsma, 2015; Shearer, 2002; Sinclair, 1995). Felt accountability therefore replaces concerns of meeting imposed targets and curtailing activities with aligning the individual expectations of mission and goals with those of the organisation (Fry, 1995). O’Dwyer and Boomsma (2015, p41) noted how felt accountability regimes allow for a more ‘*personalised flow of information*’, in which ‘*a sense of trust*’ is developed between organisational members, allowing for a shared vision of collective responsibility for the mission and objectives to emerge (Ebrahim, 2003, 2009; Najam, 1996; O’Dwyer & Boomsma, 2015).

Within religious organisations, religious norms and values often provide a guide for what is considered acceptable behaviour. They help individuals to function ethically and responsibly, even when there is no other person to observe, monitor or hold them responsible due to the belief in an all-powerful, all-seeing higher entity (Clark & Dawson, 1996; Parboteeah, Hoegl & Cullen, 2008). Felt accountability embedded in religious values can therefore take on transcendent qualities.

In reality, all organisations have some aspects of felt and imposed accountability regimes that are operational. The extent to which a type of accountability is dominant and the form that it takes will depend on the type of organisation, wider societal factors and the success of managers in balancing externally imposed accountability demands with internally driven responsibilities (Fry, 1995).

2.3 Adaptive accountability

Adaptive accountability “*seeks to integrate the moral and ethical focus of felt accountability with the instrumental focus of imposed accountability*” (Ebrahim, 2009; O’Dwyer & Boomsma, 2015, p.42). Similar to felt accountability, the focus of this accountability regime is linked to the underlying vision, mission and key activities of the organisation. However, the long-term mission achievement and performance measurement is more formalised and prominent than in felt accountability regimes but not as much as with imposed accountability regimes (Ebrahim, 2009). In addition, adaptive accountability regimes allow for the demands of funders and beneficiaries to be prioritised by ensuring that the accountability of mission achievement in particular, is focused on those constituents whom NGOs aim to assist, such as beneficiaries or their representatives (Ebrahim, 2009). As O’Dwyer and Boomsma (2015, p.40) emphasised, “*unlike felt accountability regimes, adaptive regimes avoid over-relying on an NGO’s internally focused interpretation of whether it is achieving its mission ... and embrace a combination of formal instrumental accountability mechanisms, such as performance measurement standards, and informal mechanisms...*”

Although the UK NGO sector is relatively under-regulated compared to other sectors (e.g., the finance industry), the increased media and regulatory attention paid to Muslim NGOs (Belaon, 2014; Bentall, 2016) indicates that their accountability regimes are likely to be dominated by imposed accountabilities, compared to other religious NGOs. However, given the Islamic religious nature of the organisations, felt accountability likely plays a large role in motivating organisational actors to strive towards mission achievement. In other words, a strong sense of felt accountability driven by religious beliefs and values should help individuals to fulfil mission achievement. We therefore envisage that *de-facto* adaptive

accountability regimes have a strong religious/Islamic influence, focused on ensuring both mission achievement and imposed accountabilities.

2.4 An Islamic perspective on accountability

Studies exploring the Islamic theoretical perspective in accounting have suggested there is potential to learn from this religious stance. For example in relation to issues such as accounting for the environment (Kamla, Gallhofer & Haslam, 2006) and more recently in relation to the Islamic finance and banking (Kamla & Alsoufi, 2015; Riaz, Burton & Monk, 2017). The Islamic perspective is therefore an important consideration when examining issues of accountability within Muslim organisations. The principles that underlie Islamic theology and in particular the concept of accountability in Islam are the notions of *tawhid* (the unity of *Allah*), *amanah* (trust) and *khalifah* (viceregency). *Tawhid* refers to the belief in the oneness of God and the total submission of oneself to God's will; it indicates that Muslims must devote themselves to God in all aspects of life (Chapra, 2008). God is the ultimate owner of everything, and the role of humans is to act as His vicegerents (*khalifah*) on earth (Lewis, 2001, 2006). Humans are entrusted with family, resources, knowledge and property as a trust (*amanah*) from God. Hence, they must ensure that they perform their duties with care because they will be held to account for them after death, as it is believed one's behaviour and actions in this world have direct effects on his/her reward or punishment in the hereafter. The word 'account' itself, or *hesab*, is referred to more than eighty times in the *Quran*, signifying the importance of being responsible and giving an account of one's actions (Lewis, 2006). Consequently, the belief in the Day of Judgement is at the centre of the Islamic concept of accountability, and the *Quran* repeatedly refers to this day as the Day of Accountability:

"On the day when every soul will be confronted with all the good it has done and all the evil it has done, it will wish there were a great distance between it and its evil. But

Allah cautions you (to fear) Him. And Allah is full of kindness to those that serve Him.” (3:30)

“to Allah belongeth all that is in the heavens and on earth. Whether ye show what is in your minds or conceal it, Allah calleth you to account for it” (2:284).

Consequently, the accountability relationship in Islam can be envisaged as a threefold relationship between oneself, God and society. The primary objective of accountability in Islam is to fulfil accountability to God (aspects of *amanah* and *khalifah*). Given the transcendent nature of this responsibility, accountability is enacted via fulfilment of accountability to the self (*ruhiyah*) and in ensuring that one is responsible for ones actions in relation to this responsibility (*masuliyah*). Both aspects are linked to the moral and ethical behaviour of the individual. In an organisational context, *ruhiyah* is concerned with an individual’s belief in how (s)he accounts for her/his actions towards God, constantly enjoining what is right and forbidding what is wrong, whilst *masuliyah* is concerned with how one undertakes the responsibility that one is given and the societal implications of one’s actions towards this responsibility (Beekun & Badawi, 2005). Hence, an individual can fulfil his/her role as a vicegerent and thus his/her accountability to God by ensuring s(he) remains faithful to both their *ruhiyah* and *masuliyah*. Consequently, a person’s relationship with herself/himself and other individuals/society should mirror his/her relationship with God.

This concept suggests that Islam regulates all spheres of life, and the concept of accountability is not limited to personal and spiritual aspects but extends to all dealings and interactions that a Muslim undertakes at the personal or organisational level. In this manner, all forms of accountability activities are ultimately acts of worship because all actions are undertaken to please God and to ensure that one is not punished in the hereafter.

3. Muslim NGOs in the UK

The largest of the Muslim NGOs operating in the UK were largely established by second-generation Muslims, who were born and raised in the UK. This generation had looser ties with the countries of their parents' origin, identifying themselves more with the Islamic religion than with their cultural identity⁵ (Roy, 2002; Seliger, 2004). This was partly an attempt to overcome the erosion of their traditional identity, as they could no longer identify themselves with the country of their parents origin. Cordier (2009) explained how this new generation of Muslims had a different sense of solidarity and charity than their parents. Whereas first-generation immigrants looked to their countries of origin to engage in charitable giving, second-generation immigrants had no such preference to restrict their donations to one country or ethnic group but rather sought to give to areas with most need. This difference created the ground for the emergence of Muslim NGOs and the development of their funding base (Benthall & Bellion-Jourdan, 2009). Furthermore, whereas previous generations of Muslim immigrants were mostly factory workers and shopkeepers, the current third/fourth generations of Muslims are more educated and career driven, leading to a small but growing Muslim middle class in the UK (MCB, 2015), the members of which having inevitably more financial means and a more global perspective than their parents⁶.

The role of Muslim NGOs in the UK has further strengthened due to the Islamic requirements of charitable giving. There are three main types of Islamic charity: *waqf* (endowment of property or money): *sadaqah* (voluntary charity) and *zakah* (annual compulsory charity of 2.5% of one's assets). In non-Islamic countries, it is only private organisations that are able to handle such donations, especially the *zakah*, due to certain requirements on distribution. Hence, whilst the first generation tended to give *zakah* through a local mosque or in their country of origin, later generations, with fewer ties to their places of origin, tend to donate *zakah* to aid organisations in their country of residence (Benthall &

Bellion-Jourdan, 2009) with the understanding that it will be spent in the areas of most need globally.

4. Literature review on accountability and religious NGOs

Surveying the scant NGO literature suggests that research examining NGO accountability is rather embryonic. The existing research on NGO accountability theorises the extent to which and to whom NGOs should be held accountable (Ebrahim, 2003, 2009; Unerman & O'Dwyer, 2006a, b) and examines the emergence and impact of various accountability mechanisms (Ebrahim, 2009; Goddard & Assad, 2006; O'Dwyer & Unerman, 2008). There is also a small literature developing around the social and environmental consideration of NGOs (Momin, 2013; O'Dwyer, Unerman, & Bradley, 2005; Tilt, 1994). Specifically, issues of accountability have been explored within developmental organisations (Goddard & Assad, 2006) and advocacy organisations (Unerman & O'Dwyer, 2006), amongst others. This extant literature suggests that increasing demands for accountability are not necessarily healthy for NGOs. There is evidence of inappropriate accountability mechanisms damaging, rather than enhancing, the social and environmental benefits that NGOs bring (Najam, 1996; O'Dwyer & Unerman, 2007, 2008). The literature also suggests over-dominance of upward hierarchical accountability to donors at the expense of wider holistic accountability incorporating beneficiaries, resulting in NGO mission drift (Ebrahim, 2003, 2005; O'Dwyer & Unerman, 2007). The literature however lacks a situation-specific focus on NGOs, their activities and their identity in terms of the accountability demands that are placed upon them.

Similarly, the literature examining religious organisations⁷ has also been limited. This literature has primarily been concerned with understanding the interaction between accounting and religious beliefs and exploring any tensions between secular accounting activities and sacred religious activities (Booth, 1993; Hardy & Ballis, 2005, 2013; Jacobs,

2005; Laughlin, 1990). This literature has examined the interaction of religion and accounting within various organisations, such as churches (Booth, 1993; Laughlin, 1990; Parker, 2001; 2002), Muslim religious councils (Abdul-Rahman & Goddard, 1998) and Buddhist and Hindu temples (Jayasinghe & Soobarayen, 2009). Prior studies have also focused on religious communities, including Jacobs and Walker's (2004) study of the Iona community and Quattrone's (2004) exploration of the accounting practice of the Jesuits.

Some of these studies found the actual practice of accountability to be separated from the religious ideals of the organisation (Booth, 1993; Laughlin, 1990), with Hardy and Ballis (2013) suggesting that religious organisations tend to focus on promoting their sacred agendas, rather than adhering to accountability templates, and on generating accounts that are not fully compatible with formal reporting requirements. This finding was further evidenced in a recent study by Yasmin, Haniffa and Hudaib (2014), who found religious charity organisations to have poorly communicated accountability practices. Even in instances in which religious motivation was found to be central to accounting and accountability practices, internal organisational structures were found to focus heavily on informal '*de-facto*' accountability structures and activities (see for example Hardy & Ballis, 2013; Jacobs & Walker; 2004 and Quattrone, 2004).

These studies have largely been undertaken in Christian organisations; therefore, the proclaimed dichotomy between the sacred and profane activities of the organisation is not equally applicable to Muslim religious organisations. Therefore, in the case of Muslim religious organisations, Abdul-Rahman and Goddard (1998, p. 197) suggest: "*the separation between the sacred and secular activities is not as significant as that experienced by western Christian churches*". This difference is due to the emphasis placed by the Islamic religion on the non-separation of sacred and secular aspects of life (Lewis, 2006), which suggests that studying Muslim NGOs could provide a complementary understanding of how accounting

and accountability interplay within a religious setting, comparable to the narrative provided in the current literature.

5. Research methods

The objective of this paper is to deepen and advance our understanding of the accountability practices in place within Muslim NGOs. In particular, we want to focus on how Muslim NGOs manage their externally imposed accountability with their internally generated religious accountabilities. This method then allows for a rich contextualisation to be developed regarding the interplay between different accountability regimes within Muslim NGOs. It was envisaged that the research interest would only be transparently observable in those organisations that were sufficiently large to have an established accountability and governance structure and that were subject to Charity Commission regulation (Pettigrew, 1988). Hence, those NGOs registered with the Charity Commission and with incomes greater than £500,000 per annum were chosen. Established organisations were sought because they were expected to have established programmes and formal structures. Formal structures implied that a functioning accounting system and accompanying governance frameworks were anticipated.

Access was negotiated through informal contacts in the first instance via telephone and e-mail. This negotiation process took 3-4 months from the initial contact to the first interviews being held. Twenty-five NGOs were initially contacted, of which seven responded, and interviews were conducted in six of these organisations. The interviewees were purposefully chosen (Patton, 1990) to ensure that key informants within the organisations were interviewed. This choice meant that people who were either experts in the area or privy to key information required for the research were interviewed. The interviews were conducted until data saturation was reached; hence, a total of fourteen senior

management, executive directors and trustees⁸ were on the final interviewee list. All of the participants were of the Muslim faith, and all (except one woman) were men. Table 1 presents an overview of the NGOs and the number of interviewees in each organisation.

INSERT TABLE 1 ABOUT HERE

Appropriate topics and interview questions were identified from the research aims of the project and were revised during the interviews as new themes became apparent (Miles & Huberman, 2004). Given the nature of the topic, it was important to address issues that arose during the interviews on an ongoing basis (Adler & Adler, 2001); the researchers were also aware they might not be able to interview the same person again due to busy schedules. No definition of accountability was imposed on the interviewees, and questions were asked in a conversational manner (Patton, 2002). The interviews lasted between 60 and 120 minutes. All of the interviews were conducted in the participants' own offices or meeting rooms within the NGO headquarters. All of the participants and organisations were guaranteed confidentiality; therefore, the transcripts were codified, and the codes were used in the final analysis. All of the interviews were digitally recorded and transcribed as soon as possible after the interview.

The NVivo software package was used to catalogue, collect and sort the interview transcripts, interview notes and documentary evidence for analysis. Data were analysed on a thematic basis (Crabtree & Miller, 1992). Themes were identified from the data, which were then used to form a coding template summarising all of the important themes into a meaningful and useful format. The coded data were then subsequently analysed using narrative analysis techniques, which included identifying commonalities and differences, exploring recurring themes and patterns, and making notes of particular key words and phrases. The data analysis was undertaken alongside data collection (after the first two

interviews had been undertaken) because this step enabled further exploration of emerging themes in subsequent interviews.

6. Findings

In this section, we analyse the accountability practices of Muslim NGOs. Guided by our research framework, we structured our narratives based on imposed, felt and adaptive accountabilities.

6.1 Muslim NGOs and imposed accountabilities

Ongoing regulatory changes (Charity Commission Statement of Recommended Practice [SORP] 2005/2008), as well as institutional funder requirements, have significant impacts on the manner in which NGOs keep records and prepare their accounts. Although the funder accountability requirements would be the same across the sector regardless of faith, certain regulatory requirements have particularly targeted the Muslim NGO sector. Fear of compliance checks and ensuring legitimacy were identified amongst the main reasons for ensuring proper record keeping and procedural adequacies. This finding is not surprising given the large numbers of Muslim NGOs (38% of the total enquiries) being investigated by the Charity Commission (Belaon, 2014) for possible financial irregularities. Muslim NGOs showed keen awareness of complying with their imposed regulatory and funder accountability requirements to maintain their organisational legitimacy. Increased reporting requirements and funder obligations have largely had positive effects in helping the organisations to strengthen their internal processes, yet certain indirect legislative acts have had a detrimental impact on their mission and activities by curbing their ability to deliver in certain situations.

Regulatory accountability

Although the NGO sector is relatively less regulated than for-profit organisations, the Charity Commission's (2005) regulations in relation to reporting and accounting and the SORP

"...have had a significant impact on the way we keep records and prepare accounts" [SM5].

In addition, indirect non-accounting/accountability legislation, such as the Counter Terrorism Act (2008), the Bribery Act (2010) and the Money Laundering Regulations (2007) have also caused Muslim NGOs to significantly change their organisational practices, although they are not directly aimed at NGOs:

"We are now living in a globalised world and having to implement legislation for anti-money laundering or antiterrorism to identify the end user. So we have to know how the funds are going to be used at the very end, not only where they are processed and how they are remitted. We also must know to whom they are remitted and to see actually where and how they have been spent." [SM5]

The UK has a strict Bribery Act (2010). If any of the employees of a UK-based organisation, in any part of the world, takes or offers a bribe, then the organisation is liable. Interviewees emphasised that their organisations were strengthening their procedures in their field offices in relation to this Act and raising awareness of a zero-tolerance policy:

"An important component of our work is also to make sure that people in the field are aware of it. There are sufficient notices up in the offices to say we don't give or take bribes and that people are trained and that any sort of transaction that could be deemed as a bribe is stopped ... The Act mandates zero tolerance. The amount doesn't matter. We would have to reconsider working in any country where we are not able to abide by this Act." [SM6]

The Counter Terrorism Act (2008) has had the effect of causing all funds coming in and out of any organisation that is Islamic in nature to face more scrutiny. Due to this scrutiny, all of the respondents pointed out how their organisations now had extensive written processes and lines of communication. They all ensured that they kept an audit trail for their transactions, and no transactions were made outside of the electronic banking system.

This added scrutiny has also had a direct impact on international fund transfer activities. The interviewees expressed some frustrations because they sometimes could not obtain the money sent for projects in host countries on a timely basis due to zealous checking on NGOs:

"There have been instances ... where it has taken virtually months. You can imagine if you are trying to send funds for a famine in Somalia, and your funds are held for a month ... it can quite easily turn into a life or death scenario for the people who have been impacted." [SM2]

There was quite a strong feeling from all of the respondents that this additional burden unduly targeted Muslim NGOs and had a detrimental impact on their humanitarian activities, especially across the Middle East and Syria.

Funder accountability

In the case of institutional funders, the contractual obligation upon organisations to act in a certain manner is more explicit and formalised, and such imposed accountability is not specific to Muslim NGOs but applies to the sector as a whole. This obligation entails detailed reports of activities, regular reviews and the production of financial statements, which are usually based on a template provided by the funders. Whilst all of the respondents agreed that this monitoring process by funders was a necessary part of discharging imposed accountability, they also felt that it was burdensome in some instances and sometimes placed too much strain on available resources in serving beneficiaries. This outcome was especially pertinent in the case of smaller NGOs:

"We work with Echo... it's the humanitarian branch of the EU. When they give you funding, they are quite strict. They'll come and check and do full audits. They might come to the office and say -- the last few years we've done six projects with you, and we want to see this and this and this project. Bring the documents, bring your procedures, and bring your controls. They'll spend two weeks and go through everything. Then they will say this is not right, but this is okay." [SM6].

“And when you get the money, there are a lot of strings attached to it, a lot of paperwork attached to it.” [ED4]

Institutional funders realise the impact that their demands have on increasing overhead costs and often consider this demand when providing funds. These additional demands in turn actually have a positive effect in helping NGOs to strengthen their internal processes and procedures. One of the NGOs has a Programme Partnership Arrangement (PPA) funding agreement with the Department for International Development (DfID), which is specifically aimed at core capacity building and is not project related. One respondent explained how his organisation received grants every year to improve systems and processes, and in turn, DfID carried out audits to determine whether the money provided had actually improved the procedures. With this particular organisation, institutional funding has had a direct, positive impact on its level of accountability.

6.2 Felt accountability and the religious spirit

There was a consistent feeling amongst all of the interviewees that the main inspiration for their activities stemmed from their faith, consistent with prior studies (Lindkvist & Llewellyn, 2003; Sinclair, 1995) in which religious belief coupled with strong moral and ethical values was found to be a strong driver of ‘*felt*’ accountability (Clark & Dawson, 1996; Phipps, 2001; Walker, Smither & DeBode, 2011). In terms of religious belief, the individuals interviewed expressed a strong belief in their sense of accountability to Allah (*amanah and khalifah*). This religious belief was evident in the strong ethical and moral values espoused by interviewees and in their desire to help beneficiaries.

Accountability as worship (ibadah)

Individuals were keen to point out how they ensured that they did not take liberties with NGO resources. Even small details, such as taking a postage stamp for personal use or charging

one's personal phone battery, were things that individuals felt they would be held accountable for by Allah in their role as vicegerents on earth:

“...Because we are going to be held accountable on the Day of Judgement for where that money has gone.” [ED5]

“During my time, we limited our spending ... we were very, very miserly about the whole thing because ultimately you are answerable to Allah; there are no two ways about it.” [ED2]

“The money that we're handling is an amanah, it's a trust, and so if you give a pound, I need to ensure that I'm spending it in the right area and according to how you've entrusted the organisation to spend it.” [SM4]

The concept of *ruhiyah*, i.e., that everyone is accountable for his/her actions or inactions on the Day of Judgement (Abdul-Rahman & Goddard, 1998), was found to heavily influence all of those people whom we interviewed. Individuals endeavoured to work in a manner that accepted responsibility for affecting the lives of others and to work towards excellence (*ehsan*) in their activities as part of their self-accountability (*ruhiyah*). They also had a strong belief that all of their actions were being guided by Allah:

“So I personally focus on this thing on a daily basis. I evaluate myself at the end of the day ... I ask myself, How did I do? What did I achieve? What could I do better? What I do personally is that I go out of the way and do some of the things that I'm not asked to do ... like working on weekends and working on Eid. So then I can compensate for a gap or weakness where I wasn't able to deliver. There are a lot of ways, you know, but that's just my way of being accountable to myself and to my Allah.” [SM1]

“I believe as a Muslim person that Allah has love for me and for His people. Even when we turn away from Him and forget everything that we're blessed with, He still loves us. Look what He does for us ... look how many times we turn away from Him, and He's so merciful to us; we're so blessed. Each time I pray, I pray to Allah to make me a source of help to those in need because I know He hasn't forgotten me then. And as long as He keeps that door open, I know that I have a chance for redemption. I'm not doing it like a trade-off... because it's just there ... If I see human suffering I just can't turn my back; it's just the way I am.” [T1]

‘Felt’ accountability was found to be strengthened by a desire to help humanity; thus, employment in the charity sector was portrayed as a ‘calling or sense of duty’, rather than a

job. This desire to help humanity stemmed from Islamic belief, and the interviewees felt that there was ‘*barakah*’ (blessing) in the work they were doing and that their deeds would be accepted by Allah. Hence, intrinsic reward helped “crowd out” the extrinsic reward of the job role (Houston, 2006). In many cases, the founding of the NGO itself was based on strong ‘self-accountability’ motivations:

“I was a civil servant, and then I became an international civil servant, and then I joined a charity called the Commonwealth Human Rights Initiative, and I sat on the board. So I said, let me now try and go into running a charity as the CEO and try and bring my experience of working in different places and different entities and organisations and see if I could contribute something for humanity.” [ED3]

This finding was also evident in the manner in which the majority of interviewees began their involvement with NGOs. For example, all of the senior managers and executives interviewed worked as volunteers before becoming permanent staff. Moreover, some of these senior staff were trained in a different profession (e.g., lawyer, teacher and software engineer) and gave up these jobs to work full time within the sector:

“My job was as a schoolteacher, and I always wanted to do something where I was helping others. I really wanted to work helping others and not just working in a factory producing widgets. I genuinely wanted to make a difference really.” [SM2]

Felt accountability and beneficiary trust

Beneficiary trust in NGOs is important for effective aid delivery as an important element of effective service delivery and for discharging accountability. The interviews suggest that felt accountability motivations were the main drivers for gaining beneficiary trust because no formal mechanisms existed for this. Some of the respondents clearly stated they would not work in an area where the beneficiaries did not trust them, and they felt that this area was where their faith played an important role:

“If I went on the ground and the communities didn’t trust me, I wouldn’t work there ... If that community is going to trust me to be there ... I’m acting as a lifeline for them ... and if I get a no, we don’t need your help, then I should just walk away.” [T1]

Beneficiary trust was gained by assuring beneficiaries that they wanted to help them by empathising with their situations and by listening to their concerns through the common values and beliefs that they shared. A strong respect for human dignity was identified as important when addressing beneficiaries:

“... because trust is absolutely key and critical to effective humanitarian intervention, once you’ve created trust between the beneficiaries and [charity X], you get a better understanding of what is needed, and that interface uses the participatory approach, using the communities as our catalysts to be able to bring about humanitarian intervention.” [ED3]

“I think if a flood came and all my things were, God forbid, swept away, it doesn’t mean I don’t have my dignity and respect. I would still expect people to talk to me. I would not expect them to throw a parcel at my feet. I would expect them to ask me first how I feel, what I need. It’s a grassroots approach... I think that is humanity, and that’s how to treat people.” [T1]

The respondents also emphasised that those working with beneficiaries must be committed to the cause and to the mission and values of the organisations: hence, aspects of *ri’ayah* (professionalism) and *tabligh* (ability to deliver) were reflected as important in gaining trust. They need to share the same values, understand suffering and feel the pain of those they are trying to help:

“What you are doing is basically helping them get out of that misery, and you have to be able to cope with those kinds of situations. You meet people who have walked for days and weeks barefoot and they haven’t eaten. Mothers, girls, sisters who have been abused... it’s very psychological. It is very difficult for the one who is suffering from it, but it is also difficult for the one who is listening, trying to help.” [SM1]

Whilst all organisations profess themselves to be Muslim in ethos and have Islam as the main driver of their humanitarian activities, the respondents were very keen to point out that despite misconceptions that persist in society (e.g., that their activities are limited to Muslims

only), they all were humanitarian organisations and therefore helped the needy regardless of faith:

“The inspiration is that, from the faith, we are a faith-based organisation, but that does not mean that we do not reach others ... So it is a Muslim charity but works for all. Its agenda is very, very clear... it is relief development and empowerment, wherever they are.” [ED2]

“Many of our large charity organisations responded to the Haiti disaster to show the wider community that they were all inclusive and ‘not just here to help Muslims’.” [ED4]

However, many beneficiaries in areas of conflict prefer dealing with organisations from their own faith (Benthall, 2016). Similarly, regional ‘gatekeepers’ (e.g., the Taliban in Afghanistan) are usually suspicious of other faith or nonfaith organisations and can restrict access or create security risks for ground staff. Hence, Muslim organisations have better access to majority Muslim areas, which at the moment are also areas where there is the greatest need for humanitarian aid.

6.3 De-facto adaptive accountability

The findings suggested that Muslim NGOs have a complex relationship with imposed accountabilities, with accounting requirements having a positive effect on improving accountability practice, whilst non-accounting requirements became overly burdensome. Despite this outcome, the main motivation for day to day activities within the NGOs stemmed from their Islamic ethos and a strong sense of felt accountability. To navigate these various accountabilities, Muslim NGOs developed internal, religiously derived frameworks, relying extensively on their faith identity to maintain their accountability relationships with their donors.

For example, one organisation was in the process of setting up a *Shariah* advisory board as a consultancy body for its trustees. Traditionally, *Shariah* boards have been the

remit of Islamic financial institutions, in which there is greater uncertainty over the permissibility of certain financial transactions (see for example Ullah, Jamali & Harwood, 2014). However, given the wide range of income that large Muslim NGOs generate, their subsequent expenditures and investments have also come under scrutiny within the Muslim community, with concerns raised by some conservative Muslim groups over the overheads being generated⁹. The *Shariah* advisory body would therefore advise trustees regarding the permissibility of certain organisational expenditures and activities.

Another organisation was working on developing an Islamic accountability framework to which all of its members could adhere to. The organisational members felt that it was very important for them to show to both their donors and beneficiaries their key religious values that '*make us Muslim*' [ED2]. They felt that doing so would allow the organisation to be accountable to Allah in the form of their Islamic values and mission.

"So I think by bringing in an Islamic accountability framework, we will be bringing in a very small Islamic chunk of responsibility and saying this is added to the universal principles of accountability and responsibility. We will be calling it practising Muslim ethos and values." [ED1]

They had already floated the idea with representatives of the UNHCR, who thought it would be "*a very unique idea*" because other NGOs were mainly concerned with secular standards of adherence.

The focus of these new accountability regimes was therefore designed to link the underlying vision, mission and key activities of the organisation with the members' Muslim faith. The organisations were very much aware of the criticisms they were facing because of their faith, but they also realised the need to proudly show that they were Muslim organisations and to counter any negative sentiment by applying the positive ethos of Islamic values and ensuring that they actively proved their accountability through these legitimising endeavours.

Responding to socio-political narratives in the media

In response to renewed media attention being paid to them, Muslim NGOs were examining new ways to adapt their responses to accountability, utilising sophisticated external communication tools. There has been an enormous resurgence of interest in Muslim NGOs in recent months (Belaon, 2014). Post-9/11, the focus on Muslims and Muslim-specific organisations increased tremendously, with increase in Muslim-specific reporting up by 500% in some newspapers (Allen, 2012). Although all of this reporting was not necessarily negative, a significant amount of the content is related to matters of terrorism, threats and so on¹⁰, leading to arguments that media coverage is causing all Muslims to become homogenised, being seen as having the same attributes, qualities, capabilities and characteristics (Poole, 2002), most of which are extremely negative (Sardar, 2002). This trend led to warnings in the Claystone Report (Belaon, 2014) that Muslim NGOs are being ‘disproportionately investigated and monitored’ (Guardian, 2014, 2015).

These concerns were also found to be prominent in the NGOs, with almost all of them having a specific department to address media-related queries. Consequently, organisational members stated that they had to work much harder to prove their transparency and accountability:

“It is a big issue, and unfortunately, being one the leading Muslim organisations in the sector, we are always the ones in the spotlight. It has led us to be much more aware of our activities and how we operate.” [ED1]

“We get this all the time. If you go on our Web site, we have just produced this video, which tackles the whole expenditure issue, so we explain how every penny of your pound is spent”. [SM3]

One of the leading NGO interviewed has had its name cleared in a terrorism funding-related case, in which individuals had raised money for terrorism using their brand name. This case

had led the NGO to suffer from much negative media attention, which inevitably affected donations. Although the NGO was fully cleared, the members felt they were dealt with ‘unjustly’ by the media because the undue attention led to several more Charity Commission investigations, from which they were also later cleared.

Donors, Islamic identity and accountability

It was found that the faith identity of Muslim NGOs provided them with an additional layer of legitimacy from their Muslim donors. Prior research has found that religious organisations are intrinsically trusted by their donors to spend donations according to the spirit of the religion (Hardy & Ballis, 2013; Jayasinghe & Soobaroyen, 2009). Consistent with Yasmin *et al.* (2014), in their study of the communicated accountability practices of Muslim and Christian charities, our research also found that Muslim NGOs had relatively weak demands from their donors for information, primarily because, in Islam, it is presumed that the ‘reward’ of giving to charity is recorded for the actual act of giving and is not based on subsequent distribution (Lewis, 2001, 2006). Therefore, the onus is left on the NGO to ensure that its donations are properly distributed:

“Because the religion says once you've given your charity you've got your reward then and there. So how the funds are handled within the organisation will not impact the reward that you get.” [SM4].

However, the drawback of this belief was the over-emphasis placed by donors on the overhead spending ratios of the NGOs. The respondents noted how their donors were more concerned with the issue of how much they were spending on overheads than on actual activity expenditures because many donors believed the amount of their reward (from God) was linked to the maximum amount being given directly to beneficiaries. This belief impacted the smaller organisations and prevented internal capacity building. As a result, the

majority of NGOs were engaging in educational drives to inform donors of the need for overhead costs.

Despite the absence of pressures from donors to report, all of the respondents believed that accountability and communication with donors were extremely important, and all of the organisations regularly sent updates to donors conveying the projects that had been delivered and how the organisation had managed their donations. For example, a publication by one of the NGOs reads:

“1 million-plus vulnerable people received Qurbani meat in 40 countries, 7900 units of Qurbani delivered around the world, 125,000 Palestinian refugees received long-lasting can-packed Qurbani ...”

The majority of this communication was also deliberately timed during *Ramadhan* and *Dhul Hijjah* (Islamic holy months) to indirectly remind donors of their religious obligations to give to charity.

7 Discussion and conclusion

This paper sought to deepen and advance our understanding of the *de jure* and *de facto* accountability processes and practices within Muslim NGOs. To conceptualise this process, we drew on a framework comprised of three ‘ideal types’ of non-profit accountability regimes - the imposed, felt and adaptive accountabilities employed by O’Dwyer and Boomsma (2015). We adopted this framework to recognise the complicated and continuing balancing act in which NGOs engage to balance their multifaceted accountabilities. We extended the framework to encompass religious values to acknowledge both the *de-jure* and *de-facto* accountability practices of Muslim NGOs operating in the UK.

Although some prior literature on religious organisations (Booth, 1993; Hardy & Ballis, 2013; Laughlin, 1990) has suggested there can be a divide between the imposed requirement of ‘secular’ accountability requirements and the religiously defined aspects of

felt accountability, our study found this not to be the case for Muslim NGOs, and we found no evidence of such a tension or divide. Our study found that imposed accounting and reporting requirements from both legislation and funders had positive effects in helping organisations strengthen their internal processes (Gallhofer & Haslam, 1997). A strong overlap was found between felt accountability values and the need to provide better reporting and accountability to organisational stakeholders. An emphasis on their faith and self-reflection (*ruhiyah*) enabled the respondents to view accountability activities as a form of worship (*ibadah*), and hence on accounting and reporting, was viewed as part of fulfilling one's responsibilities (*masuliyah*). This emphasis on faith was particularly important because the respondents felt that it helped them to build trust with their beneficiaries, thus providing them with greater ease in humanitarian aid delivery.

Therefore, whilst prior research found that mission drift occurred due to a dominance of upward hierarchical accountability at the expense of holistic accountability (Ebrahim, 2003, 2005; O'Dwyer & Unerman, 2007), our study suggests that Muslim NGOs are able to overcome the problem of mission drift by viewing their hierarchical accountability requirements as a form of *worship* encompassed within their holistic accountability dynamic. Thus, in Muslim NGOs, holistic accountability, driven by religious values and mission achievement, is not separate from hierarchical accountability; rather, it forms a part of the holistic accountability dynamic. These organisations 'live and breathe' their Islamic identity to ensure the sustainability of their activities. In fact, Muslim NGOs have sought to adapt their accountability-related activities by strengthening their Muslim identity through religiously defined formal accountability structures and processes and to appease their Muslim donor base. Thus, within Muslim NGOs, religious values are being used to redefine their internal understanding of accountability to strengthen their processes. Or, in other

words, the requirements of imposed accountability are being legitimated within the organisations using religiously defined frameworks.

Ongoing terrorist-related activity purportedly linked to the Islamic faith and the consequential resurgence of interest in Muslim NGOs are causing the organisations to face dilemmas not faced by other NGOs (Benthall, 2016). Our findings suggest that where direct accounting-driven and accounting-imposed requirements have strengthened internal accountability processes, indirect (non-accounting/accountability-related) regulatory requirements are actually hampering humanitarian activities due to the restrictions that these requirements place on where and how Muslim organisations can operate. This restriction has meant that the organisations must choose whether to stop operating in certain geographical regions and instead only work in ‘safe’ areas, where operational obstacles would not arise. A similar theme is also reflected in the wider non-profit literature, in which research has found that imposed accountability requirements can hamper mission achievement by encouraging managers to concentrate on a narrow range of less risky activities (Ebrahim, 2003; O’Dwyer & Unerman, 2008). Whilst this body of research considers internal activities to have become risk-free, our findings extend this understanding to the external core humanitarian activities of NGOs as also becoming ‘safer’. Our findings therefore suggest that imposed accountability requirements have a radically different effect on Muslim NGOs due to their complex socio-political nature, compared to other religious and secular NGOs. Thus for Muslim NGOs, their *de-facto* adaptive accountability regimes play an extremely important role in motivating internal accountability processes, as well as helping organisational survival.

Thus, the practical implications of our findings suggest that strong internally generated accountabilities, especially those derived from felt accountability motivations can help NGOs mitigate unexpected concerns from the external environment. In this regard, the

de facto accountability regimes of NGOs must be considered in relation to their *de jure* mechanisms to gain a more holistic appreciation of how such organisations manage various accountabilities. Further, our findings seek to strengthen the argument that *de facto* accountability regimes, complemented by religious belief, can significantly enhance the legitimacy of NGO organisational practice from its beneficiaries and donor base. Our findings also highlight how managers within Muslim NGOs need to be aware of the effect that external narratives may be having on the perceived image of their organisation. This may mean being more proactive in publicising their activities, creating relationships with key stakeholders and being more transparent in the communities in which they are based and operate.

This paper has responded to calls for more detailed research into accountability within religious organisations (Quattrone, 2004) and has provided insight into the nature of accountability within one particular faith group that uses religious teachings to develop its own accountability frameworks. Future research could build on this study and take a wider stakeholder view of Muslim NGO accountability by examining its accountability relationship with funders, donors, regulators and the government in more depth. Future research could also consider whether these findings are specific to Muslim NGOs only or whether similar practices exist within other Muslim-specific organisations. This factor is especially pertinent given the distinctive nature of the operating model of NGOs, compared to business-specific entities. In addition, there is great need for accountability to be conceptualised in other religious NGOs operating in the UK. This research would provide a rich understanding of the accountability mosaic of UK-specific religious NGOs, the different pressures that they face, their responses and their relationships with mission achievement. For example, no studies have yet examined the Hindu, Sikh, Buddhist or Jewish religious NGOs of the UK.

Notes

¹ The UK is officially a Christian country, although the last census in 2011 suggested an increase in the number of respondents who viewed themselves as having no religious affiliation, compared to 2001.

² We are grateful to one of our reviewers for elaborating on this point.

³ For example, the Fundraising Standards Board, Disasters Emergency Committee, Humanitarian Accountability Partnership, and the Sphere Standards

⁴ See, for example ‘rambling about charity overheads’: <http://uncultured.com/2010/09/26/rambling-about-charity-overhead/>

⁵ Cultural identity here refers to the ethnic and/or national background, for example, British individuals of South Asian, African and/or Middle Eastern descent.

⁶ There are currently an estimated 2.7 million Muslims in the UK, just less than 5% of the total population of the UK, with 47% of these people born in the UK. Of these Muslims, 68% consider themselves to be Asian (MCB, 2015), reflecting the large economic migration wave of the 1950s and 1960s from the South Asian subcontinent.

⁷ The literature refers to religious organisations rather than religious NGOs as the focus of this literature being predominantly places of worship, such as churches, rather than wider non-profit organisations.

⁸ In larger charities, the role of the executive committee is similar to that of the board of directors in corporations, with senior managers working beneath them. Trustees play a role similar to non-executive directors, but they are much more proactive and are responsible for advising directors about strategic directions with the responsibility lying with the directors regarding how the strategies are implemented. This role means that trustees are also very difficult to interview because they are often away in places where the majority of the organisation’s activities are undertaken.

⁹ See footnote 4.

¹⁰ See, for example: ‘Government donation to Muslim Charities Forum denounced as "madness"’ (*The Telegraph*, 23 Sep 2014); ‘Islamic charities in UK fear they are being unfairly targeted over extremism’ (*The Guardian*, 22 July 2015); ‘Fear of Muslims tearing British society apart’ (*The Telegraph*, 5 Oct 2014).

References

- Abdul-Rahman, A.R. and Goddard, A. (1998). An interpretive inquiry of accounting practices in religious organisations. *Financial Accountability and Management*, 14 (3), 183-201.
- Adler, P.A and Adler, P. (2001). 'The reluctant respondent', in F Gubrium and J, A, Holstein (eds). *Handbook of Interview Research: Context and Method*. Thousand Oaks: California.
- Allen, C. (2012). *A review of the evidence relating to the representation of Muslims and Islam in the British media*. Written evidence submitted to the All Party Parliamentary Group on Islamophobia. Institute of Applied Social Studies, School of Social Policy: University of Birmingham.
- Beekun, R.I. and Badawi, J.A. (2005). Balancing ethical responsibility among multiple organizational stakeholders: The Islamic perspective. *Journal of Business Ethics*, 60, 131–145
- Belaon, A. (2014). *Muslim Charities: A Suspect Sector*. Claystone Report: London
- Benthall, J. (2016). *Islamic Charities and Islamic Humanism in Troubled Times*. Manchester University Press: UK
- Benthall, J. and Bellion-Jourdan, J. (2009). *The Charitable Crescent*. IB Taurus: London
- Bribery Act (2010), Can be found online at:
<http://www.legislation.gov.uk/ukpga/2010/23/contents>
- Booth, P. (1993). Accounting in churches: a research framework and agenda. *Accounting, Auditing & Accountability Journal*, 6 (4), 37-67.
- Census (2011), Office for National Statistics. Can be found online at
<https://www.ons.gov.uk/census/2011census>
- Chapra, U, (2008). 'Objectives of the Islamic economic order' in; S. Abod, S.O. Ghazali, A. Agil (2008)(eds). '*An Introduction to Islamic Economics and Finance*', Kuala Lumpur: CERT Publications.
- Charities Act (2006). *National Archives*. Can be found at
<http://www.legislation.gov.uk/ukpga/2006/50/contents>
- Counter Terrorism Act (2008). Can be found online at :
<http://www.legislation.gov.uk/ukpga/2008/28/contents>
- Cordier, B. (2009). Faith-based aid, globalisation and the humanitarian frontline: an analysis of Western-based Muslim aid organisations. *Disasters*, 33(4): 608–628

- Clark, J.W. and Dawson, L.E (1996). Personal religiousness and ethical judgements - An empirical analysis. *Journal of Business Ethics*. 15, 359-372,
- Crabtree, B.F. and Miller, W.L. (1992). *Doing Qualitative Research*. Sage: London.
- Ebrahim, A. (2003). Making sense of accountability: conceptual perspectives for northern and southern nonprofits. *Nonprofit Management and Leadership*, 14 (2), 191–212.
- Ebrahim, A. (2009). Placing the normative logics of accountability in ‘thick’ perspective. *American Behavioral Scientist*, 52 (6), 885-904
- Edwards, M., and Hulme, D. (1996). Too close for comfort? The impact of official aid on nongovernmental organizations. *World Development*, 24 (6), 961–973.
- Fry, R. E. (1995). Accountability in organizational life: Problem or opportunity for nonprofits? *Nonprofit Management and Leadership*, 6 (2), 181-95.
- Gallhofer, S. and Haslam, J. (1997). The direction of green accounting policy: critical reflections. *Accounting, Auditing & Accountability Journal*. 10 (2) 148-174.
- Goddard, A. and Assad, J.M. (2006). Accounting and navigating legitimacy in Tanzanian NGOs'. *Accounting, Auditing & Accountability Journal*, 19 (3), 377 - 404.
- The Guardian (2015). ‘Islamic charities in UK fear they are being unfairly targeted over extremism’ *Guardian Online*. Available at
<http://www.theguardian.com/society/2015/jul/22/muslim-charities-uk-targeted-extremism-fears>
- The Guardian (2014). ‘Quarter of Charity Commission inquiries target Muslim groups’ *Guardian Online*. Available at
<http://www.theguardian.com/society/2014/nov/16/charity-commission-inquiries-muslim-groups>
- Haniffa, R. and M. Hudaib. (2011). ‘A theoretical framework for the development of the Islamic perspective of accounting’. In C. Napier and R. Haniffa (eds), *Islamic Accounting*, Edward Elgar Publishing Ltd.
- Hardy, L. and Ballis, H. (2005). ‘Does one size fit all? The sacred and secular divide revisited with insights from Niebuhr’s typology of social action. *Accounting, Auditing & Accountability Journal*, 18 (2), 238-54.
- Hardy, L. and Ballis. H. (2013). Accountability and giving accounts; informal reporting practices in a religious corporation. *Accounting, Auditing & Accountability Journal*, 26 (4), 539-566.
- Harmon, M. and Mayer, R. (1986). *Organizational Theory for Public Administration*. Little, Brown: Boston.

- Houston, D.J. (2006). "Walking the walk" of public service motivation: public employees and charitable gifts of time, blood, and money. *Journal of Public Administration Research and Theory*, 16 (1), 67 - 86
- Jacobs, K. (2005). The sacred and the secular: examining the role of accounting in the religious context. *Accounting, Auditing & Accountability Journal*, 18 (2), 189-210.
- Jacobs, K. and Walker, S.P. (2004). Accounting and accountability in the Iona community. *Accounting, Auditing & Accountability Journal*, 17 (3), 361-81.
- Jayasinghe, K. and Soobaroyen, T. (2009). Religious 'spirit' and peoples' perceptions of accountability in Hindu and Buddhist religious organisations. *Accounting, Auditing & Accountability Journal*, 22 (7), 997-1028.
- Kamla, R. and Alsoufi (2015). Critical Muslim intellectuals' discourse and the issue of 'interest' (ribā): Implications for Islamic accounting and banking. *Accounting Forum*, 39 (2), 140-154.
- Kamla, R., Gallhofer, S. and Haslam, J. (2006). Islam, nature and accounting: Islamic principles and the notion of accounting for the environment. *Accounting Forum*, 30 (3), 246-265.
- Laughlin, R.C. (1990). A model of financial accountability and the Church of England. *Financial Accountability & Management*, 6 (2), 93-114.
- Lewis, M. (2001). Islam and accounting. *Accounting Forum*, 25 (2), 103-127.
- Lewis, M. K. (2006). Accountability and Islam. Paper presented at *The Fourth International Conference on Accounting and Finance in Transition Conference*, Adelaide: Australia.
- Lindkvist, L and Llewellyn, S. (2003). Accountability, responsibility and organization. *Scandinavian Journal of Management*, 19 (2), 251-273.
- MCB (2015), British Muslim in Numbers: Can be found online here:
<http://www.mcb.org.uk/muslimstatistics/>
- Miles, M. B. and Huberman, A. M. (1994). *Qualitative Data Analysis: an Expanded Sourcebook*, Sage Thousand Oaks: California.
- Momin, M.A. (2013). Social and environmental NGOs' perceptions of Corporate Social Disclosures: The case of Bangladesh. *Accounting Forum*, 37 (2), 150-161.
- The Money Laundering Regulations (2007), Can be found online at
http://www.legislation.gov.uk/uksi/2007/2157/pdfs/uksi_20072157_en.pdf
- Mulgan, R. (2000). Accountability: An ever expanding concept? *Public Administration*, 78, 555.

- Najam, A. (1996). NGO accountability: A conceptual framework. *Development Policy Review*, 14, 339–353.
- O'Dwyer, B. and Boomsma, R. (2015). The co-construction of NGO accountability: Aligning imposed and felt accountability in NGO-funder accountability relationships. *Accounting, Auditing & Accountability Journal*, 28(1), 36-68
- O'Dwyer, B. and Unerman, J. (2007). From functional to social accountability: transforming the accountability relationship between funders and non-governmental development organisations. *Accounting, Auditing & Accountability Journal*, 20 (3), 446–71.
- O'Dwyer, B. and Unerman, J. (2008). The paradox of greater NGO accountability: a case study of Amnesty Ireland. *Accounting, Organisations and Society*, 33 (7–8), 801–24.
- O'Dwyer, B., Unerman, J. and Bradley, J. (2005). Perceptions on the emergence and future development of corporate social disclosure in Ireland: Engaging the voices of non-governmental organisations. *Accounting, Auditing & Accountability Journal*, 18 (1), 14-43
- Parboteeah, K. P., Hoegl, M. and Cullen, J. B. (2008). Ethics and religion: An empirical test of a multidimensional model. *Journal of Business Ethics*, 80 (3), 387–398.
- Parker, L.D. (2001). Reactive planning in a Christian bureaucracy. *Management Accounting Research*, 12 (3), 321-56.
- Parker, L.D. (2002). Budgetary incrementalism in a Christian bureaucracy. *Management Accounting Research*, 13 (1), 71-100.
- Patton, J. M., (1992). Accountability and governmental financial reporting. *Financial Accountability & Management*, 8 (3), 165–180.
- Pettigrew, A. (1988). Longitudinal field research on change: Theory and practice. Paper presented at the *National Science Foundation Conference on Longitudinal Research*.
- Phipps, K. (2011). Spirituality and strategic leadership: the influence of spiritual beliefs on strategic decision making. *Journal of Business Ethics*, 106 (2), 177-189.
- Poole, E. (2002). *Reporting Islam: Media Representations of British Muslims*. London: I.B. Tauris.
- Quattrone, P. (2004). Accounting for God: Accounting and accountability practices in the Society of Jesus (Italy, 16th-17th centuries). *Accounting, Organisations and Society*, 29 (7), 647–83.
- Riaz, U., Burton, B. and Monks, L. (2017). Perceptions on the accessibility of Islamic banking in the UK: Challenges, opportunities and divergence in opinion. *Accounting Forum*, 41 (4), 353-374.

- Roberts, J. (1991). The possibilities of accountability. *Accounting, Organizations and Society*, 16 (4), 355-368.
- Roy, O. (2002), *L'Islam mondialisé*. Editions du Seuil, Paris.
- Sardar, Z., (2002). The excluded minority: British Muslim identity after 11 September'. *Reclaiming Britishness*, 51-56.
- Schlenker, B. R., and Weigold, M. F. (1989). Self-identification and accountability. In R. A. Giacalone and P. Rosenfeld (Eds.), *Impression Management in the Organization* (21-44). Hillsdale, NJ: Erlbaum.
- Seliger, L. (2004). The forgotten factor: The uneasy relationship between religion and development. *Social Compass*, 51(4), 523–543.
- Shearer, T. (2002). Ethics and accountability: From the for-itself to the fortheother. *Accounting, Organizations and Society*, 27, 541–573
- Sinclair, A. (1995). The chameleon of accountability: forms and discourses. *Accounting, Organisations and Society*, 20 (2/3), 219-237.
- Statement of Recommended Practice for Charities (2005) *Charity Commission*: London.
- Stewart, J.D. (1984). The role of information in public accountability. In Hopwood, A. & Tomkins, C. (Eds.), *Issues in Public Sector Accounting*, Philip Allen: Oxford.
- The Telegraph (2014). Government donation to Muslim Charities Forum denounced as "madness". The Telegraph Online. Can be accessed at <http://www.telegraph.co.uk/news/uknews/11114599/Government-donation-to-Muslim-Charities-Forum-denounced-as-madness.html>
- Tilt, C.A. (1994). The influence of external pressure groups on corporate social disclosure: Some empirical evidence. *Accounting, Auditing & Accountability Journal*, 7 (4), 47-72
- Tinker, T. (2004). The Enlightenment and its discontents: Antinomies of Christianity, Islam and the calculative sciences. *Accounting, Auditing & Accountability Journal*, 17 (3), 442–75.
- Ullah, S., Jamali, D. and Harwood, A. (2014). Socially responsible investment: insights from Shari'a departments in Islamic Financial Institutions. *Business Ethics: A European Review*, 23 (2), 218-233
- Unerman, J. and O'Dwyer, B. (2006a). On James Bond and the Importance of NGO Accountability. *Accounting, Auditing & Accountability Journal*, 19 (3), 305–18.
- Unerman, J. and O'Dwyer, B. (2006b). Theorising Accountability for NGO Advocacy. *Accounting, Auditing & Accountability Journal*, 19 (3), 349–76.

- Walker, A.G., Smither, J.W. and DeBode, J (2011). The effects of religiosity on ethical judgements. *Journal of Business Ethics*, 106, (4), 437–452
- Yasmin, S., Haniffa, R., and Hudaib, M. (2014). Communicated accountability by faith-based charity organisations. *Journal of Business Ethics*, 122 (1), 103–123

Table 1: An overview of the organisations

| Org. | Approx income level (yr end 2014) | Type of activity | Countries of operation | Main income streams | Paid employees | Trustees | Interviews conducted | Quotation codes* |
|------|-----------------------------------|--|---|--|----------------|----------|----------------------|--------------------------|
| 1 | £0.54m | Women and Children Emergency relief Education and healthcare | Middle East South Asia | Community fundraising Government grants | 3 | 3 | 3 | T1 SM1 |
| 2 | £0.63m | Food and water Healthcare Education Emergency relief Sponsorship Construction | Middle East South Asia Bosnia Africa UK | Community fundraising government grants | 1 | 4 | 1 | ED5 |
| 3 | £0.72m | Education Emergency relief | South Asia Africa | Community fundraising | 0 | 3 | 1 | ED4 |
| 4 | £3.23m | Food and water Healthcare Education Emergency relief Sponsorship Microfinance Qurbani Waqf | Middle East South Asia Bosnia Africa Burma | Community fundraising Institutional funding Government grants | 1 | 5 | 1 | SM5 |
| 5 | £34.7m | Food and water Healthcare Education Shelter Emergency relief Sponsorship Microfinance Qurbani Waqf | Middle East South Asia Bosnia Africa UK Burma Europe America | Community fundraising Institutional funding Government grants | 110 | 6 | 4 | ED2 ED3 SM6 |
| 6 | £99.1m | Food and water Sustainable development Healthcare Education Emergency relief Sponsorship Microfinance Qurbani Waqf | Middle East South Asia Bosnia Africa UK America | Community fundraising, Institutional funding Government grants | 370 | 8 | 4 | ED1 SM2 SM3 SM4 |

*Not all interviewees have been quoted