TEXT CONTENTION BEHIND SHARIA SUPERVISORY BOARD REPORTS: A CRITICAL DISCOURSE ANALYSIS

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Abstract

Sharia Supervisory Board Reports (SSBRs) have an interest in convincing the public that entities supervised by a Sharia Supervisory Board (SSB) are sharia-compliant and reflective of Good Corporate Governance (GCG) practices. Failure in public convincing will be detrimental to Islamic banks' reputation as well as the SSB's image and credibility. This study aimed to critically assess how the SSB produces reports as texts to persuade the public using Critical Discourse Analysis (CDA). We analyzed four SSBRs from two Islamic Commercial Banks (ICBs) and two Islamic Business Units (IBUs) owned by other ICBs as well as interviews for data triangulation. We employed three of Halliday's CDA structures for data analysis: text as microstructure as well as the context of situation and the context of culture as macrostructure. The results are as follows. First, microstructure analysis on SSB members' performance and personality shows that language practices used to build their character and positive image at semantic and syntactic levels are in place. Second, the context of situation trilogy reveals that the SSB only focuses on language compiling practices to direct readers into a desired direction while maintaining its existence and legitimacy. Third, the context of culture indicates that the SSBRs become more concerned with formality than substance, annexing a manipulative potential on reality. Also, it is identified that the SSBRs serve only as a fullfilment of regulations or internationally applied guidelines of SSB roles

Keywords: *Critical Discourse Analysis, Sharia Supervisory Board, Sharia Supervisory Board Report, Islamic Bank, Good Corporate Governance*

Abstrak

Laporan Dewan Pengawas Syariah (LDPS) berkepentingan meyakinkan publik bahwa entitas yang diawasi oleh Dewan Pengawas Syariah (DPS) telah menerapkan prinsip Syariah sebagai cerminan penerapan *Good Corporate Governance (GCG)*. Kegagalan DPS meyakinkan publik berpotensi

menurunkan reputasi bank syariah termasuk citra dan kredibilitas mereka sendiri. Penelitian ini bertujuan menilai secara kritis bagaimana DPS menghasilkan laporan sebagai teks dalam memersuasi publik menggunakan metode *Critical Discourse Analysis* (CDA). Data terdiri dari dua laporan DPS BUS dan DPS UUS serta hasil wawancara DPS sebagai triangulasi. Analisa data menggunakan tiga struktur CDA Halliday yaitu *text* (sebagai struktur mikro), serta *context of situation* dan *context of culture* (sebagai struktur makro). Hasil penelitian menunjukan bahwa, pertama, melalui analisa tematik struktur mikro teks atas informasi personal dan kinerja DPS, ditemukan praktik bahasa sebagai upaya membangun karakter dan citra positif DPS. Kedua, dari pembacaan trilogi konteks situasi DPS hanya fokus menyusun praktik bahasa dengan tujuan membawa pembaca teks kearah yang diinginkan terutama untuk mempertahankan eksistensi dan legitimasi. Ketiga, pada konteks budaya, LDPS lebih mementingkan formalitas daripada isi, sehingga berpotensi memanipulasi realitas, serta sekedar memenuhi regulasi dan berbagai pedoman atas peran DPS yang dijalankan secara internasional.

Kata Kunci: *Critical Discourse Analysis,* Dewan Pengawas Syariah, Laporan Dewan Pengawas Syariah, Bank Syariah, *Good Corporate Governance*

INTRODUCTION

Governance in Islamic banks has a unique concept on the attachment of *tauhid* ideology and obligation emphasis to comply with sharia principles in all products, instruments, and management (Arif et al. 2018; Ibrahim et al. 2004; Rama 2018). To realize sharia-compliant governance, the existence of a Sharia Supervisory Board (SSB) is compulsory (Kasi and Mahmood 2019). Hence, the SSB is a unique feature that exists only in Islamic institutions, guaranteeing that all activities are sharia-compliant (Nathan Garas and Pierce 2010) and directly accountable to the banks, the National Sharia Board (NSB), and the public.

Waluyo (2016) and Haniffa (2010) noted the three main roles of the SSB in Islamic banks. First, it acts in *ex ante* audits, or in reviews of sharia compliance before the occurrence of contracts or transactions with all parties, with the aim of ensuring that all contracts are according to sharia principles. The second role is in *ex post* audits, or the supervision of sharia compliance after transactions by examining the activity reports and financial statements of Islamic banks. Third, it plays a role in the calculation of zakat payments. These roles are then outlined in a written report, hereinafter referred to as the Sharia Supervisory Board Report (SSBR). It is a treatise of the SSB's periodic activities and performance as a proof of accountability to the public, investors, shareholders, creditors, and regulators (Widyanto 2010).

Indeed, Islamic banks have more detailed responsibilities in terms of disclosure (Hanum and Sholihin 2019), including through the SSBR. Although it is not the only report submitted by Islamic banks, the SSBR has a vital role in gaining public legitimacy and informing investor decisions (Misbach 2015). Technically, the SSBR, in general, contains information in the form of a scope description of the nature of work and an opinion paragraph on the entity as a guarantee that the bank has operated under sharia principles (Hadi 2017).

Despite regular SSBR submission, SSB performance often garners negative attention. A study by Grais and Pellegrini (2006) on Islamic banks in sixteen countries shows several weaknesses in the internal mechanisms of corporate governance regarding SSB performance, mainly due to a lack of competence. Meanwhile, Muhammad (2018) shows more explicit problems in Malaysian Islamic banks, such as the SSB working not full time and technically coming to the bank only when giving sharia opinions without looking at the substance and the effects of issuing such opinions. On the other hand, Islamic Financial Institutions (IFIs) seem to be less

concerned with this minimum role played by the SSB. Also from Malaysia, Hasan (2011) states that the Gulf Corporation Council (GCC) and the UK find that IFIs rarely review or evaluate the SSB's contribution and performance when their contracts are extended. This implies that the existence of an SSB in an IFI is only regarded as a complement to the IFI as a sharia-labeled entity.

Indonesia, Bahrain, Qatar, the UAE, Kuwait, Jordan, Palestine, Pakistan, Nigeria, Malaysia, Brunei, and Bangladesh are 12 out of 25 member countries of the Organization of Islamic Cooperation (OIC) which are considered to have adequate frameworks for sharia supervision regulations both at the national and institutional levels. Meanwhile, Syria, Oman, Yemen, Libya, and Iraq only have regulatory frameworks at the institutional level. The rest, Saudi Arabia, Turkey, Egypt, Morocco, Tunisia, Lebanon, Thailand, and Kazakhstan, do not have any regulatory framework for sharia supervision at all (Grassa 2015).

In Indonesia, there are also negative perceptions of SSB performance, the first of which concerns independence. The appointment and remuneration of SSB members by bank management for assessment and review services have the potential for conflicts of interest that can damage SSB independence, individually (Hamza 2013). For example, it is a peculiar case when SSB members are appointed and paid by Islamic banks and at the same time required to issue a fair opinion when a violation of sharia is taking place, which can damage their as well as the company's image (Jusup 2014).

The second concerns competence. Many SSB members are appointed on the basis of their popularity and charisma. This means that more of them are chosen not because of their competence and scientific background in the fields of economics and sharia law (Fauzi and Supandi 2019; Hidayat 2016).

The third concerns ethics. Technically, many SSB members seldom come to the bank, even in months (Rahmat 2017). More extremely, some SSB members can only be contacted by phone because of their busy schedules outside their position in the SSB. As a result, a great degree of malfunction in tasks performance is taking place (Ana Nurwakhidah 2020; Astuti 2015).

The fourth concerns dual positions. SSB members rarely attend meetings or carry out their daily job because they assume another concurrent position, either as an SSB member of another bank or as a lecturer, or because they play an active role another organization that can interfere with their supervisory function (Kuswanto 2018; Rokan 2018).

Last but not least, in a more pragmatic and rational modern life, religious working environments are not always in line with morals or ethics, especially for those who do not have a complete and deep understanding of their own religion. Without a balance of ethics and religion, there will be a void between values and meanings (Nizar 2018).

These negative perceptions encourage researchers to critically examine how SSBs report their performance to the public in maintaining both their image and the company's. This is where the SSB as the subject of the act of producing (text) SSBRs can be biased. In social activism, bias implies that someone tries to manipulate a report because of certain motivations (Meiden 2016). In recent years, narrative studies on report texts as in content disclosure and language style have been increasingly used by companies to build an image in arriving at a certain position (Meutia and Putra 2017; Riley and Yen 2019).

On this basis, a critical study on SSBRs is crucial because the existing studies on this topic have mostly been descriptive and interpretive. This study used Halliday's Critical Discourse Analysis (CDA) to critically assess how text

producers (SSBs) devote their time and attention to choosing language and building and maintaining their image as well as that of Islamic banks through SSBRs.

As indicated previously, in producing SSBRs, selection of meaningful words is carried out continuously to form a linguistic system (Halliday and Hasan 1985; Meyer et al. 1987). Wuryaningrum (2020) asserts that the linguistic system appearing through discoursive features in grammatical forms has two-part messages: to be conveyed or to be hidden. Therefore, SSBs, through reports that are drawn up in such a way, can cover the various weaknesses in their performance. In the production of reports in a way that seems normal and reasonable through various reporting functions, the ideology of the text producer works by making social relations seem real and natural, hence unknowingly accepted as truth and drowning out the weaknesses of their performance (Mubaligh 2011).

This study aimed to critically assess the contention behind the production of an SSBR as a persuasive text to the public. It raises awareness and provides input for SSBR disclosure, especially as one of the structures of good governance practices. SSBs should not be interpreted only as a 'stimulation tool' to influence readers, but as a reflection of good performance as a Good Corporate Governance (GCG) practice. The question posed in this research is thus how SSBRs can be critically assessed as persuasive texts to the public, of which the answer is derived through a Critical Discourse Analysis.

LITERATURE REVIEW

Islamic Good Corporate Governance

GCG aims to control and improve the company's performance, protect the interests of stakeholders, and improve compliance with the law and generally accepted ethical values (Faozan 2013). This is in agreement with what was expressed by Wolfensohn (1999): GCG aims to provide justice for all stakeholders through greater transparency and accountability (Prastiwi 2017).

The theory of Islamic Corporate Governance (ICG) is a further development of GCG through presentation of a rule or system that ensures the company works in accordance with all principles and policies. From the ICG perspective, humans as company drivers have a role not only to accumulate wealth, but also to position the company as a place to worship Allah (ﷻ) (Hasanah and Kurniawan 2019; Larbsh 2015; Nomran and Haron 2020a). Hence, the need for SSB members of high competence and integrity in the pursuit of sharia-compliant ICG is inevitable.

SSB Performance Disclosure in Reports

Disclosure in a broad sense is intended to provide information. Disclosure of information can provide a sufficient explanation and can represent the actual situation within a corporate entity (Abadi and Janani 2013). The technical presence of an SSB is an important governance mechanism of Islamic banks because it has a major role in managing the risk of non-compliance with sharia rules. In the Islamic banking practice, the most formal way to provide information for users regarding sharia compliance is through SSBRs as a component of the annual report that should reflect what the SSB has done; in other words, SSBRs can also reflect SSB performance (Febianto 2011; Nomran and Haron 2020b).

Halliday's Critical Discourse Analysis

CDA departs from critical linguistics in reference to Halliday's analytical method, including systemic functional linguistics and language content and considered as social semiotics. Language in Halliday's view is closely related to social structure and socio-cultural background. Therefore, functional grammar has an impact on critical discourse analysis (Halliday 1978; Xie 2018). On a very concrete level, language does not contain sentence, but "text" or "discourse" and "exchange of
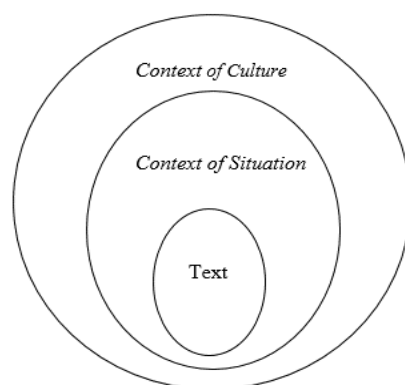
Figure 1
Halliday's Systemic Functional Linguistic Model
Source: (Butt et al. 2012; Halliday and Hasan 1985; Wuryaningrum 2020)

meanings" in interpersonal contexts. Studying a language is essentially paying attention to the text or discourse. Social semiotics itself essentially studies three interrelated aspects: text, the context of situation, and the context of culture (Halliday 1978; Santoso 2008).

Halliday and Hasan (1985) argue that the path to understanding language lies in the study of texts. Text is a language that carries out certain tasks in the context of situation. A text can be realized in addition to the lower levels of the lingual system, such as the lexicogrammatical and phonological systems; it is also the realization of the higher levels of interpretation and so on (Halliday 1978; Meyer et al. 1987). It is the nature of the text to look as if it consists of words and sentences, when it actually consists of meanings (Halliday and Hasan 1985; Meyer et al. 1987; Pennycook 2021).

The context of situation, in Halliday's view (1978), consists of three elements called the situation context trilogy: (1) the field of discourse, referring to the social activities currently taking place and the institutional setting in which the language unit appears; (2) the tenor of discourse, referring to the nature of the relationship between participants, including the understanding of their roles and status in social and lingual contexts; and (3) the mode of discourse, referring to the part of the language that is being played in the situation, including the chosen channel,

whether it be spoken or written (Meiden 2016; Pennycook 2021; Salzmann et al. 1999; Santoso 2008).

In text interpretation, there is still a broader background that must be referred to: the context of culture. The context of culture refers to the actual situational context, the arrangement of certain fields, and the actors and means that have formed the text, not a random collection of characteristics but a whole package that is uniquely coupled in a culture (Halliday and Hasan 1985). In a critical view, a discourse is produced, understood, and interpreted in a certain context (Halliday 1978; Wuryaningrum 2020).

Halliday (1978) explicitly explains the reciprocal relationship between the microstructure, the text, and the macrostructure, the context of situation and culture, which is determinative. The critical approach has a theoretical basis in viewing the interrelationships between microevents and the macrostructures that produce microevents. With the dialectic between macrostructure and microstructure, CDA can reveal the naturalizations that occur and make clear of explanations on social determinations as well as the influence of discourse on participants (Pennycook 2021; Santoso 2008).

Halliday's view can be traced to the premise that discourse is essentially a power struggle. In the critical paradigm, every discourse that appears in the form of text is not seen as natural and neutral, but is a form

of power struggle. Every trivial discourse is a power struggle (Wuryaningrum 2020). Halliday is of the view that studying language is essentially studying language acts. Discourse is a form of interaction, and it has never been a social vacuum or even internal. This has two implications. First, discourse is seen as something that has a purpose, whether to influence, persuade, or refute. Furthermore, Meiden (2016) wrote clearly about Halliday's thoughts in the realm of critical language models; first, language grammar carries a certain ideological position and meaning; second, ideology is a way to win public support; and, third, language is a categorization system, in which the choice of words presents meaning.

METHODS

Paradigm and Data Sources

This study uses a qualitative approach with CDA. The data consist of two SSBRs from Islamic commercial banks (ICBs) in Indonesia, Bank A and Bank B, and two Islamic business units (IBUs) owned by Islamic banks in Indonesia, the IBUs of Bank X and Bank Y, combined with the results of semi-structured interviews with four SSB members, one from each bank, as part of data confirmation and triangulation (Halliday 1978; Meiden 2016; Santoso 2008). Due to the pandemic, we conducted the interviews by phone for approximately one hour each.

Generally, CDA employs three levels of data analysis (Dada and Onyas 2021; Musolff 2021; Pennycook 2021; Salzmann et al. 1999). Likewise, this study employed Halliday's three CDA structures; text as microstructure and the context of situation and the context of culture as macrostructure (Halliday and Hasan 1985; Meyer et al. 1987). Observation of the microstructure of the text is carried out by looking at the thematic similarities in the structure of SSBR disclosure and then focusing on language practices that come with various local meanings in semantics that are to be presented to the readers of the text. The

presentation starts from the way the subject uses various elements such as details of words and symbols (Pennycook 2021; Wuryaningrum 2020). Furthermore, observations are also performed on the use of sentence structures in syntax, such as coherences and pronouns. Also, observations on the choice of words in stylistic terms and the way of emphasis in rhetoric terms, as in the use of emphasis in language practices as well as the use of metaphors, are carried out (Halliday 1978; Meiden 2016; Santoso 2008; Wuryaningrum 2020).

Furthermore, the macrostructure of the context of situation is observed using the trilogy approach. The context of situation trilogy is then used to investigate what functions are being executed in the SSBR texts of the four research objects. The other macrostructure, the context of culture, and conversation texts are linked in a wider scope as a discussion of general context (Halliday 1978; Meyer et al. 1987; Pennycook 2021; Salzmann et al. 1999).

The validity of the data in this study is determined using four categories (Sari and Asmendri 2020). First, it is believed that the author credibility is unquestionable and the data are right in focus. Second, results transferability enables the data to be later used as a reference for further investigations. Third, the research depends on the data obtained. Fourth, it concerns the certainty of the validity of the results in the cases or phenomena investigated in this study as have occurred in the field.

RESULTS AND ANALYSIS

Microstructure Analysis of Language Practices in SSBR Texts

To understand the language practices reflected in the microstructure of the texts, the first step to be taken is to see what content is presented by each report. The thematic similarities in the contents of the reports are identified to facilitate discussion. For this purpose, the contents of the reports of the Islamic banks in this research are shown in Table 1.

Table 1
SSBR Structure

Topic	ICB		IBU	
	Bank A	**Bank B**	**Bank X**	**Bank Y**
SSB Personal Information	SSB Criteria	SSB member criteria and requirements	SSB criteria	SSB member requirements
	Disclosure of Multiple Positions at Other Islamic Financial Institutions in 2020	Disclosure of multiple positions	Disclosure of concurrent positions at other islamic financial institutions in 2020	Disclosure of concurrent position of ssb
SSB Performance	Implementation of SSB duties and Responsibilities	Implementation of ssb duties and responsibilities	Implementation of SSB duties and responsibilities	Implementation of SSB duties and responsibilities
	SSB meeting	SSB meeting	SSB meeting	SSB meeting
	SSB opinion regarding compliance with sharia principles	SSB opinions and recommendation	SSB recommendation for 2020	Frequency and method of giving advice and supervision of compliance with sharia principles in the capital market to issuers or public companies

Source: processed data

Table 1 presents the elements of SSBR disclosure under similar themes. Two major themes are identified: **a) information about SSB personnel** and **b) SSB performance**. Then these two topics will be analyzed in each sample using the microstructure analysis of Halliday's text dimensions to determine the language practice used (Halliday, 1978; Pennycook, 2021; Salzmann et al., 1999), as presented in Table 2.

As is shown in the two tables above, SSB personal information is presented in such a way to leave the impression of "meaning" that the SSB members of the Islamic bank are "qualified" in readers.

"It is understood that all SSB members in Islamic banks have passed the test. This means that they have integrity and competence. They also take part in competency development training every year. So, with Allah's permission, they are competent at understanding sharia principles."

(source: interview transcript of SSB member 2)

Table 2
SSBR Language Practice

Topic	ICB		IBU	
	Bank A	Bank B	Bank X	Bank Y
SSB Personal Information	1. Observation of semantic meanings in the writing of the words "has", "fulfill", and "requirements" juxtaposed with the regulation of the Bank of Indonesia (15/13/PBI/2013) in the text of SSB qualifications. 2. The presence of the word "effective" and the repetition of the word "independent" in the SSB interview. 3. The presence of picture visualization to create closeness with the readers of the text 4. Embedding the title of Hajj in the description of the names of SSB members	1. The presence of background in the text of SSB qualifications to describe a strong character 2. The choice of words "various" and "program" in the SSB qualifications text as a strategy to increase readers' confidence 3. The presence of picture visualization to complete the legitimacy	1. Observation of sentences in semantic structures; the use of the Indonesian prefix "me" in [following] and [doing] in the SSB qualifications text as an attempt to produce a positive image that the SSB has carried out its functions well 2. The use of active sentences in SSB answers in interviews regarding SSB qualifications which can be assessed as the attitude of the text producer in forming a good image to maintain a high self-assessment	1. The choice of words "all", "mandatory", and "criteria" in the opening of the SSB qualifications text which can be construed as an effort to create an initial impression that all SSB members have met the qualifications in the regulation of the Bank of Indonesia No. 11/33/PBI/2009 2. The presence of two languages, the Indonesian language and English, in one table of information across multiple positions can leave an impression of convenience. The independent presentation of tables may also give off the impression of easy presentation.
SSB Performance	1. The choice of words "exceeds", "according to", and "increase" in the disclosure of SSB activities in 2020 described in the use of the colon symbol as a sign of detailed information	1. Observation of the syntactic arrangement of sentences; the presence of passive sentences to emphasize the activities that have been carried out by the SSB, contained in the	1. Observation of semantic meanings: the use of the colon symbol in the text of SSB performance is intended to indicate properly maintained performance. This is an attempt to produce a positive image.	1. At the semantic level, the presence of the words "run", "to put forward", and "implementation" in the performance text is an effort to present the impression that the SSB has carried out its duties and functions well.

Topic	ICB		IBU	
	Bank A	Bank B	Bank X	Bank Y
	2. Syntax observations of the language logic; the presence of passive sentences with the highlighting of events that are considered beneficial on the topic of SSB performance	text of the SSB performance and interview results 2. Highlighting what the SSB has done in graphic elements such as the use of bold fonts and the use of different fonts in the performance text as an effort to control attention	2. Presenting language rhetoric by creating language metaphors related to SSB performance in an interview is a sign of an effort to create a positive image of the SSB in carrying out its duties.	2. The repetition of the word "run" in the SSB performance text can also imply that the text producer has intended to highlight what the SSB has done to give assertiveness. 3. The tabulation of information on multiple jobs served as an organizer of ideas to leave the impression of convenience.

Source: processed data

The ideological language practice is presented by the text-producing subjects as they are considered to have full power over the SSBR texts (Pennycook 2021; Santoso 2008; Wuryaningrum 2020), which is used in the context of persuasive communication with the readers of the texts (Dada and Onyas 2021; Halliday 1978; Meyer et al. 1987; O'Keefe 2016; Salzmann et al. 1999; Sherif and Hovland 1961). Thus, we find that the language practice can then be construed as a strategy of building a positive image for the SSB through SSBRs.

Macrostructure Analysis on the Context of Situation in SSBR Texts

Text is a language function in that it carries out a certain function in a context of situation. In the situation context trilogy analysis, the field of discourse, the tenor of discourse, and the mode of discourse are used to find out what function the SSBR texts are serving (Halliday 1978; Meiden 2016; Wuryaningrum 2020). In this research, maintaining a good image is the most common goal for each situation because the SSB technically and intentionally possesses the power to do so. Thus, in the structure of the SSBR texts, both in the opening and in the content, there are some indications that the choice of words as outlined in the SSBR texts is deliberate and is carried out in such a way that the readers has the impression that the SSB has done a good job (Deng et al. 2021; Jucker 1997; Nwagbara and Belal 2019). When validity and actuality should be presented (Dada and Onyas 2021).

Field of Discourse

As a part of GCG implementation, it is compulsory according to the regulation of the Bank of Indonesia No. 11/33/PBI/2009 to establish an SSB in a corporate structure. This regulation allows the SSB to direct and supervise the activities of Islamic entities, providing a logical consequence for presenting a report.

"Every product issued by Islamic banks must be reviewed and examined first by the Sharia Supervisory Board, then an opinion is given on that product. So, if the bank, in this case the Islamic bank, launches a new product, it is sharia-compliant."
(Source: interview transcript of SSB member 1)

This practice includes the implementation of applicable rules, such as one requiring to produce an SSBR and present it before the bank and the NSB, which can be seen as a way to make an adjustment to the external environment (Wuryaningrum 2020) as well as to adapt the bank to the world circle of Islamic banking in Indonesia (Hasan 2011; Ibrahim et al. 2004; Jusup 2014).

This adaptation departs from a motive for superiority before the NSB and the bank itself, resulting from the emergence of a business activity that is full of subjective interests as well as the interest of Islamic banks in prolonging their existence in the pursuit of business sustainability while remaining sharia-compliant (Meiden 2016; Santoso 2008; Wuryaningrum 2020) as the field of discourse is a place where the text is played to achieve an interest (Halliday 1978; Meyer et al. 1987).

Tenor of Discourse

The tenor of discourse refers to the relational nature between participants, including the understanding of their roles and status in social and lingual contexts. The actors involved are, of course, SSB members who have sharia authority over the bank in the sense that they are those who hold power over the bank's sharia statements, addressed to stakeholders in general (Halliday 1978; Halliday and Hasan 1985; Meyer et al. 1987; Nwagbara and Belal 2019). Thus, the essential feature of an SSBR text is the interaction between discourse participants. In this interaction there is a semantic struggle between the individuals involved. For this reason, the text of the SSBR will never be a social vacuum, but something that aims to influence, refute, or persuade (Jucker 1997;

Nwagbara and Belal 2019; Sherif and Hovland 1961).

> "We have discussions like once in a monthly meeting with the board of directors, and once every three months there is a meeting with the director of compliance."

(source: interview transcript of SSB member 3)

Mode of Discourse

The mode of discourse refers to the part of the language that is being played in the context of situation. Its meanings are derived from the textual elements when the SSBR reflects the mode in the particular role the text is playing regarding the situation or how the SSB uses this language function in its context (Halliday and Hasan 1985). It is reflected in the language practice of the text producers in the SSBR production process as well as the language practice in the form of written speech (Nwagbara and Belal 2019).

This whole language practice is a mode of an effort to build a positive image of the text producers on their performance. On the other hand, the results of the observation of the substantial micro-structure are still considered weak (Meiden 2016). It is as reflected in the text of SSB performance which does not describe what the SSB should do in the realm of *ex-ante* and *ex-post* duties, nor does it include disclosure of qualifications explaining required competences in detail (Meiden 2016; Santoso 2008; Wuryaningrum 2020).

Text Contention: Domination and Misrepresentation

From the context of the situation trilogy, the text in an SSBR does not come on its own, nor does it exist independently in a clear position. The presence of SSBR constitutes a dialectical relationship in compliance with regulations as an adaptation to the outside world within the scope of Indonesian banking to obtain or maintain existence (Halliday and Hasan 1985; Wuryaningrum 2020). For this reason, there is text contention as a mode of discourse, where the SSB is considered to only focus on developing language practices as an effort to produce a positive image and avoid negative ones to lead the reader of the text in a desired direction (Jucker 1997; Nwagbara and Belal 2019; Sherif and Hovland 1961).

Meanwhile, at the stage of language practice presentation, there is a semantic struggle in the interaction of meaning exchange to choose certain codes so that language is made of a set of political and ideologal elements (Santoso 2008; Wuryaningrum 2020). There is a situation where speakers in their power are acting as interfering smugglers so that language can be used as an instrument to do something (Halliday and Hasan 1985), resulting in an unequal or unfair discourse in which the text producer and the text consumer do not have a balanced relationship.

Furthermore, when the words of SSB members are seen in their natural meanings that appear normal and reasonable to the public, indeed they are being manipulated. The producer of the text acts as a superior because they dominate the text presented to the reader as a dominant party (Wuryaningrum 2020). The report only acts as a tool of persuasion and lacks substance in performance (Meiden 2016).

Also, there are patterns in language practices indicating weak disclosure of substantial qualifications and performance (Hasan 2011; Ibrahim et al. 2004). To this extent, legitimacy is considered important to have business operations run sustainably. Thus, there is a mutually beneficial relationship between the bank and the SSB despite the misrepresentation of SSBR contents regarding the SSB's performance practices (Czerny 2020; Endraswati 2017; Hasan 2011).

Macrostructure Analysis in the Context of Culture

Compliance for Existence

In the broader scope of international-scale regulations, the Accounting and Auditing Organization of Islamic Financial

Institutions (AAOIFI) in the Governance Standard for Islamic Financial Institutions (GSIFI) Number 1 Paragraph 2 provides a fairly clear explanation on the SSB's existence in the governance structure of Islamic banking through its appointment, composition, and SSBRs (Ali Rama 2015). Thus, compliance with this regulation is tied to the ongoing context of culture as in the local context of banking that implements GCG (Baklouti 2020; Hamza 2013; Prastiwi 2017). So, the establishment of the SSB and SSBRs is also a step or effort to adjust to the external global environment, which is considered necessary for a more comprehensive defence of existence, so that it can be accepted and get more recognition from stakeholders.

Subjective Interests Preservation of SSBR Text Producers

In the SSBR production process, the SSB is also faced with the duty of presenting a noble organizational culture in the form of a mundane behavior reflecting the original culture in a transparent and accountable way (Grais and Pellegrini 2006; Muhammad 2018; Rokan 2018; Waluyo 2016). Otherwise, the SSB can just neglect the duty and manipulate the text with the language practice for their subjective interests (Meiden 2016) in the pseudo-consciousness context of the situation. And when it happens, to cover its weak performance, this report is shifting its nature from being informative to being opportunistic (Riley and Yen 2019). Such consciousness is nothing more than an effort to preserve their short-term subjective interests.

CONCLUSION

This study aimed to assess the contention behind the production of an SSBR as a text. We find that, first, in terms of the microstructure of the text, the thematic analysis on the topic of personal information and performance, the language practices at the semantic and syntactic levels are presented in the form of

affirmation of compliance with the law, variations in the writing of the text using bold fonts and different font sizes, as well as presentation of logic, language, stylistics, metaphors, and visualization. All of them are assessed as efforts to build the character and positive image of the SSB in a report.

Second, in macrostructure analysis through the reading of the context of situation trilogy, the SSB is considered to only focus on compiling language practices in reports as an effort to produce a positive image to bring the reader of the text in a desired direction. The report is intended as a strategy to build the image of the SSB, and more broadly Islamic banks that are supervised, to maintain their existence and gain legitimacy amid weak qualifications and performance, so that what is presented is a misrepresentation.

Third, the macrostructure analysis of the context of culture shows that there is an effort to align existence for the sake of preserving the interests of the text-producing subject as practiced internationally. In the context of preservation of existence, the SSBR text becomes a manipulative field reflecting the reality that the report is more concerned with the content to cover up the reporter's weak performance in carrying out supervisory functions on Islamic banks.

This study raises awareness and provides input for SSBR disclosure, especially as one of the structures of GCG practices. SSBRs should not be interpreted only as a 'stimulation tool' to influence readers, but as a reflection of good performance. So, instead of just fulfilling or following national and international regulations as formality, SSBRs should reflect the reality.

Finally, as with other studies, limitations do exist in this research. First, this research employed only a limited number of research objects. Second, this research was conducted during a pandemic, leaving conducting interviews by phone as the only option, and this was coupled with an unstable internet network. Third, there

was a low diversity in reporting. Lastly, a greater effort to fully apply Halliday's CDA is needed. We encourage future studies to investigate this critical emerging issue by expanding the research objects, conducting in-depth interviews, going deep into the data, and applying Halliday's CDA as a whole.

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