



RMU 4U

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RECTOR'S NOTE



Prof. Dr Roshima Said
Acting Rector

"Together we advance knowledge with integrity, creativity, and purpose—many voices united to shape a brighter, sustainable future."

Assalamualaikum warahmatullahi wabarakatuh,

Alhamdulillah, with gratitude to Allah SWT, I am pleased to welcome you to the fourth volume of RMU4U e-Bulletin. This publication continues to serve as a reflection of our vibrant intellectual community at UiTM Kedah, bringing together voices from diverse disciplines and perspectives. In this issue, with 42 insightful contributions, we witness not only the richness of research topics but also the strength of our shared purpose. While the papers range from sustainability in fashion and design, digital literacy, and artificial intelligence to law, economics, and cultural heritage, they are united by a common aspiration: to advance knowledge that is meaningful, ethical, and impactful for society.

Our academic journey is significant because of this harmony amid diversity. Whether addressing contemporary challenges in technology and governance or celebrating the timeless values of culture and tradition, our scholars demonstrate that knowledge is most powerful when it is connected, when different fields meet at the crossroads of innovation, integrity, and service to the community.

As Rector, I am profoundly inspired by the dedication, innovation, and scholarly excellence demonstrated by our academics and researchers. You are not only advancing knowledge within our university but are also fulfilling UiTM's noble mission, creating impactful ideas that serve the nation and uplift the ummah.

Your work reflects a deep commitment to relevance, integrity, and service. Let us continue to nurture a culture of collaboration, creativity, and excellence, ensuring that our contributions remain forward-looking, transformative, and rooted in the needs of society. Together, we are shaping a brighter, more sustainable future through education, research, and innovation.

Congratulations to all the dedicated contributors whose passion and perseverance have brought this volume to life. My heartfelt appreciation goes to the Research Management Unit for their steadfast leadership and solid commitment in making this achievement possible. May RMU4U continue to shine as a beacon of knowledge, uniting diverse voices in a shared mission of discovery and excellence. Together, may we be inspired to reach even greater heights in the pursuit of impactful research and innovation.

One purpose. One vision. Many voices, one future.

Sincerely,
Prof. Dr Roshima Said
Acting Rector,
Universiti Teknologi MARA Keda

A MESSAGE FROM THE CHIEF EDITOR



Dr Azyyati Anuar
Chief Editor,
RMU4U E-Bulletin

"RMU4U Volume 4 celebrates diverse scholarship, uniting research, innovation, and culture to inspire collaboration, sustainability, and inclusive growth."

We are pleased to present Volume 4 of RMU4U, a platform dedicated to showcasing research, innovation, and thought leadership across diverse academic disciplines. This issue reflects the dynamic intellectual ecosystem we strive to cultivate, highlighting contributions that bridge theory and practice while addressing pressing contemporary challenges. In the Business, Accounting, and Finance section, we feature 15 insightful papers that explore the evolving landscape of global markets, financial resilience, sustainable accounting practices, and digital transformation in business operations.

These works not only provide empirical findings but also propose actionable frameworks for industry adoption, underscoring the vital role of research in shaping competitive and ethical enterprises. The Designer Thoughts segment presents 6 stimulating papers that merge creativity with problem-solving. From design thinking methodologies to innovation in product aesthetics and usability, these contributions remind us that design is not merely about form but about crafting meaningful user experiences.

This section will be of particular interest to those who value the intersection of artistry, functionality, and human-centered solutions. Our IR 5.0 category brings together 6 pioneering papers examining the fusion of automation, artificial intelligence, and human capital development in the context of the Fifth Industrial Revolution. The authors challenge readers to consider how technology can be harmonized with ethical and inclusive practices, ensuring that digital progress translates into equitable societal benefits. In the Law and Policy section, 7 comprehensive papers analyze legal reforms, governance frameworks, and policy innovations that respond to shifting socio-economic realities.

The breadth of topics from regulatory compliance in emerging industries to community rights in a globalized economy reflects the critical role of law as both a safeguard and an enabler of change. The Literature and Culture segment enriches this volume with 8 thought-provoking papers that delve into narratives, identities, and cultural dialogues shaping societies today.

Whether revisiting classic literature through modern lenses or exploring contemporary cultural phenomena, these works invite readers to appreciate the role of the humanities in fostering empathy, critical thinking, and cultural continuity. Collectively, these 42 scholarly contributions affirm the breadth and depth of academic engagement within our community. They underscore our commitment to advancing knowledge that is relevant, impactful, and forward-looking. This volume is not only a testament to our contributors' dedication but also a resource for policymakers, practitioners, educators, and learners who seek informed perspectives and innovative solutions. We extend our heartfelt appreciation to all authors, reviewers, and editorial team members whose collective efforts have made this publication possible. We hope that RMU4U Vol. 4 will spark dialogue, inspire collaboration, and contribute to the enrichment of both academic scholarship and practical application.

Let us continue to explore, innovate, and contribute, together shaping a future where knowledge serves as the foundation for sustainable and inclusive growth.

Warm regards,
Dr Azyyati Anuar
Chief Editor,
RMU4U E-Bulletin



QUO WARRANTO IN MALAYSIA: A LANDMARK CASE IN ADMINISTRATIVE LAW

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Quo warranto, a Latin term meaning “by what authority”, is a common law remedy used to challenge an individual’s legal right to occupy a public office, and it remains highly relevant within the Malaysian administrative law framework. The writ of quo warranto is one of several remedies available to the High Court when addressing ultra vires decisions or appointments (Che Jamaludin Mahmud & Md Pauzi, 2022). It serves as a judicial mechanism to ensure that public offices, particularly those involving executive or statutory authority, are held only by individuals who possess legitimate and legally recognized appointments. According to Gan (1999), quo warranto operates as a legal remedy that allows the courts to examine whether someone is lawfully occupying a public office. To initiate such a claim, the applicant must demonstrate a sufficient legal interest in the matter, a requirement grounded in the Rules of Court 2012 and the Courts of Judicature Act 1964 (p. 150).

In Malaysia, quo warranto falls within the broader framework of judicial review and serves as one of several tools the courts may use to address abuses of administrative power. Governed by Order 53 of the Rules of Court 2012 and supported by the Courts of Judicature Act 1964, it offers a legal avenue for members of the public to hold individuals accountable for unlawfully occupying public office (Rahman & Anuar, 2018). As noted by Yeoh (2021), this mechanism plays a vital role in safeguarding the integrity of public administration by enabling challenges against unauthorized appointments. Its significance lies in its ability to uphold legitimacy, enforce accountability, and protect the public interest, although the process can be legally demanding due to the burden placed on applicants to prove that the officeholder lacks proper authority (Gan, 1999).

A notable and landmark example of *quo warranto* in action is the case of Dato’ Seri Ir Hj Mohammad Nizar Jamaluddin v. Dato’ Seri Dr Zambry Abdul Kadir [2010] 2 CLJ 925. In this case, Nizar contested the legitimacy of Zambry’s appointment as the Menteri Besar of Perak, arguing that he had neither resigned nor lost the support of the State Legislative Assembly through a formal vote of no confidence (Malaysian Bar, 2009). He also maintained that his request to dissolve the assembly was valid under the Constitution. One of the remedies he sought was a writ of quo warranto, compelling Zambry to explain the legal basis for his claim to the office. However, the courts ruled that when the Sultan rejected Nizar’s request to dissolve the assembly, Nizar was constitutionally required to resign under Article XVI(6) of the Perak Constitution.



His failure to do so meant that the position was deemed vacant, thereby validating Zambrý's appointment and rendering the writ of quo warranto ultimately ineffective ([2010] 2 CLJ 925, pp. 928-933). This decision is widely regarded as a landmark case in Malaysian administrative law as it demonstrates both the potential and the limits of quo warranto proceedings. Although the writ failed to overturn Zambrý's appointment, the case of Nizar v. Zambrý reaffirmed the importance of the writ as a mechanism to challenge the legitimacy of public officeholders. While it provides a formal legal channel to challenge authority, its effectiveness depends heavily on constitutional interpretation and judicial discretion. The case further illustrates the delicate balance between legal accountability and the exercise of royal prerogative within Malaysia's constitutional monarchy (Malaysian Bar, 2009; Gan, 1999).



Overall, quo warranto remains essential in Malaysian administrative jurisprudence as it safeguards the legitimacy and integrity of public offices. It empowers judicial oversight of public appointments, promotes accountability, and protects the public interest. As Malaysia's legal framework continues to evolve, quo warranto plays a crucial role in upholding good governance and the rule of law.

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