

Implementation of Whistle-blowing System to Prevent Sharia Banking Crime in Indonesia

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Abstract

The research conducted is qualitative research, in which the researchers examine various sources pertaining to the whistle-blowing system in Islamic banking. The focus of this research is PT. Bank Syariah Indonesia (BSI), one of the largest Islamic banks in Indonesia that aims to become one of the top ten Islamic banks worldwide within the next five years. The purpose of this study is to gain understanding and insight into how the whistle-blowing system at BSI effectively controls fraud and crime within the Indonesian banking sector. According to a survey conducted by The Association of Certified Fraud Examiners (ACFE), banking fraud in Indonesia is reported to be at a staggering 41% when compared to other sectors. This finding highlights the importance of this research for the government, stakeholders, and banking industry participants. In addition to utilizing qualitative methods, this research incorporates an analysis of the BSI website and draws support from various sources related to the whistle-blowing system in Islamic banking. It is hoped that future research will continue to examine the implications of whistle-blowing systems in preventing fraud within the banking sector, particularly within Islamic banking, not only in Indonesia but also globally.

Keywords: Whistle-blowing System, PT. Bank Syariah Indonesia, Fraud, Crime, Implementation.

Introduction

Indonesia is one of the countries with the largest Muslim population in the world. As a country with a majority Muslim population, this encourages the development of the Sharia industry, including Sharia Banking. Therefore, it is not surprising that many conventional banks have recently started expanding their businesses to include sharia institutions or sharia business units (UUS) (Al, 2018). Several Islamic banks have already listed their shares on the Indonesian Stock Exchange (IDX).

In simple terms, Islamic Banking, also known as Islamic banking, is implemented based on Islamic law, which does not recognize the concept of "borrowing interest" or interest rates. Interest on loans is considered usury (haram) and sinful. In its operations, Islamic banking implements a "profit-sharing system" or ratio, which is known and agreed upon by both the bank and the customer at the time the contract

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(agreement) is signed (Ayagre & Aidoo, 2014). The profit-sharing system practiced by Islamic banks involves sharing the net profits from businesses or investments that have been conducted (Hidajat, 2020).

Several factors hinder the development of the Islamic banking industry in Indonesia. These include a lack of educated and professional human resources in terms of human resource management and cultural development, as well as a weak entrepreneurial spirit among the nation's population. Other factors include relatively small capital funds, the ambivalence between the sharia concept of bank management and its operationalization in the field, low levels of trust among Muslims, and the absence of a well-formulated academic framework for the systematic and proportional development of sharia financial institutions (Defosse, 2017). The complexity of these problems affects public trust in Islamic banks compared to conventional financial institutions.

The operation of Islamic banks is closely related to the demand for implementing good corporate governance (GCG) (Faridah, 2010). The growing demand for GCG is driven by the banking crisis that occurred in the conventional banking sector in 1997, which continued until 2000. The banking crisis in Indonesia was not solely caused by the decline in the rupiah exchange rate but also due to the lack of implementation of good corporate governance in the country's banking sector.

One irregularity that frequently occurs and has a negative impact on Islamic banking is fraud. Internal fraud or unethical behavior is a serious violation within the financial sector, particularly in financial institutions such as banks. Internal irregularities can significantly affect business continuity and harm customers (Jeffrey, 2007).

The 2018 report from the Association of Certified Fraud Examiners (ACFE) reveals that the banking sector has the second-highest incidence of fraud in the Asia Pacific region. The manufacturing industry experiences the highest fraud rate at approximately 17%, followed by the banking industry at around 11% (Natariasari & Festi, 2014). Public administration companies and governments rank next with a total of 10% of fraud cases. Among the countries studied, Indonesia ranks third with the largest number of fraud cases, following China and Australia (Elias R., 2008).

To address these issues, the Indonesian central bank and Islamic commercial banks in Indonesia have implemented a whistle-blowing banking system (Khomsatun, Rossieta, Fitriany, & Nasution, 2021). Every bank in Indonesia is required to have this system in place to protect whistleblowers and prevent fraudulent practices in the banking sector, as mandated by Article 8 of PDG No.17/6/PDG/2015, dated 24 June 2015.

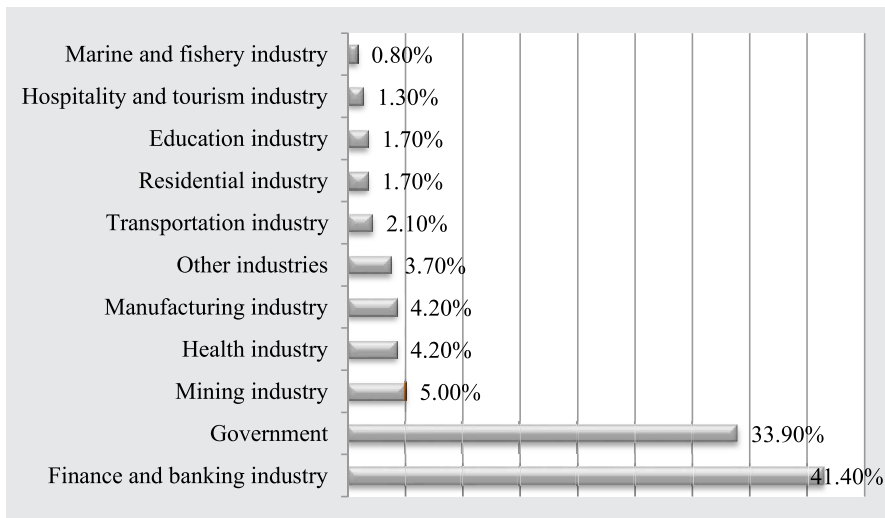


Figure 1: Types of Industries that are most disadvantaged by Fraud in Indonesia.

Sources: <https://acfe-indonesia.or.id>.

From Figure 1 above, it can be seen that the banking and financial sector is one of the sectors most prone to fraud due to inadequate supervision and technology. Despite having advanced technology, fraud still occurs in this sector, posing a significant risk to the banking sector, particularly Islamic banking.

Several cases of fraud and criminal acts in the banking sector caught the attention of the Indonesian people a few years ago. These cases include:

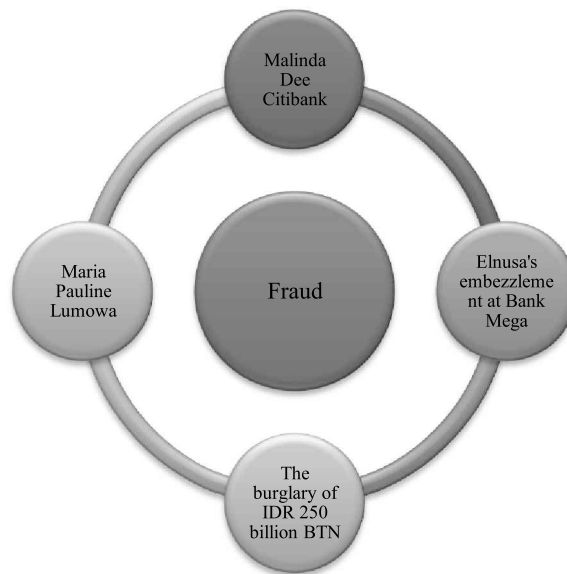


Figure 2: Several cases of fraud in the Indonesian banking.

Sources: Author's own work.

Based on the information obtained from the table, it is evident that the banking industry, including Islamic banking, is vulnerable to fraud, particularly corruption (Khalil & O, 2017; Lee & Fargher, 2013). Therefore, Indonesia must improve its system and develop a better anti-fraud strategy to reduce the number of fraud cases. Internal and external factors can contribute to fraudulent practices in Islamic banking. Internally, fraud may occur due to the incompetence of human resources in understanding Sharia and banking principles. Externally, fraud may occur due to environmental factors, such as urgent family needs that force individuals to commit fraud (Khalil & O, 2017; Lee & Fargher, 2013).

The impact or consequences of fraud in Islamic banking can also be felt by internal and external parties. From the internal side, bank operations will be disrupted if the intensity of fraud that occurs is very high (Shonhadji & Maulidi, 2021). From external parties, fraud can cause the absence or reduction of the customer's sense of trust in the management of funds carried out by the bank, as customers are financially disadvantaged (Semendawai & Abdul, 2011).

One of the examples of cases and phenomena that have been described previously makes researchers want to find out more about fraud and how to implement the

whistleblowing system that has been implemented by Islamic banking in Indonesia (Tyastiari, 2017). This research is still rare to be raised as a topic of problems in Islamic banking operations, so researchers are interested in examining various possibilities of fraud that occur in banking operations, especially in Sharia (Tyastiari, 2017).

Literature Review

Banks are part of the financial system of a country; even in the current era of globalization, banks have also become part of the world's financial and payment systems. The public interest in maintaining the existence of a bank is very important. Moreover, at this time, the collapse of a bank will have a chain or domino effect, that is, it will spread to other banks, which in turn can disrupt the functioning of the financial system and payment system of the country concerned (Said, Alam, Mohamed, & Rafidi, 2017).

In Indonesia itself, it is a must for banks to implement corporate governance. First, banks play a dominant role in the economy, especially as engines of economic growth, competing by making the best possible business arrangements. Third, the banking industry is an industry that involves quite complex business activities, where the focus of the business is managing finances with a fairly high risk. Fourth, the banking industry is a "trust" industry. As a business actor in the financial services sector, building and maintaining public and international trust is the main thing that banks must own and maintain as an absolute requirement in competing in this industry. Therefore, to realize the implementation of adequate corporate governance, banks must always be guided by the principles of good corporate governance (Verschuuren, 2021).

The number of fraud cases that occurred in banking business activities prompted Bank Indonesia as a regulator to issue anti-fraud provisions. This Bank Indonesia Regulation stated in the Circular Letter of Bank Indonesia No. 13/28/DPNP dated 9 December 2011, regarding the Implementation of an Anti-Fraud Strategy for Commercial Banks, as an effort to prevent cases of fraud in the banking sector that harm customers (Sutrisno, 2015). This arrangement is part of strengthening the bank's internal control system and as further implementation of Bank Indonesia Regulation (PBI) No. 5/8/PBI/2003 dated 19 May 2003 concerning the Implementation of Risk Management for Commercial Banks.

Guidelines for implementing anti-fraud strategies direct banks in controlling fraud through efforts that are not only aimed at prevention but also at detecting and investigating fraud cases (Salehi & Molla, 2019). In the Circular Letter of Bank Indonesia No. 13/28/DPNP dated 9 December 2011, regarding the Implementation of an Anti-Fraud Strategy for Commercial Banks, it is explained that one of the early detection methods for fraud is through a violation reporting mechanism known as the

Whistle-blowing System (WBS) (Salehi & Molla, 2019). The Whistle-blowing System (WBS) is one form of the development of the implementation of Good Corporate Governance (GCG), which is regulated in Bank Indonesia Regulation Number 8/14/PBI/2006 dated 5 October 2006, concerning the Implementation of GCG for Commercial Banks (Noviani & Sambharakreshna, 2014).

The results of a survey conducted by the Institute of Business Ethics (2017) concluded that one in four employees knew of a violation, but more than half (52%) of those who knew about the violation remained silent and did nothing (Wardani, 2017). The implementation of an effective Whistle-blowing System is expected to increase the level of employee participation in reporting violations (Triantoro, Utami, & Joseph, 2020; Palumbo & Manna, 2020). Additionally, organizational leaders have the opportunity to address problems internally first before they occur and spread to the public sphere, which can affect the reputation of the organization.

De George (1986), as cited in Hoffman and Robert (2008), establishes three criteria for fair whistle-blowing. The first criterion is an organization's potential to cause harm to its workers or the wider public interest. The second criterion states that the error must be reported initially to an internal party with higher authority. The third criterion suggests that if the deviation has been reported to the internal authority but no action has been taken, and the deviation persists, then reporting the deviation to an external party can be considered an act of good citizenship (Mbago, MPEERA, & Mutebi, 2018; Nawawi & Salin, 2018).

Nurhidayat and Kusumasari (2018) investigated whistle-blowing from two perspectives: perceptions and intentions. Perception is defined as the process of organizing and interpreting sensory information to give meaning to a situation. In the context of whistle-blowing, perception refers to an individual's evaluation of whether the act of whistle-blowing will have a positive or negative impact on themselves or their environment (Noviani & Sambharakreshna, 2014). Robbins (n.d.) explains that perception is an essential process that helps individuals make sense of their surroundings.

Whistle-blowing perceptions can be measured by assessing the level of seriousness of the actions, considering the magnitude of the social violations committed in each case. The level of responsibility for reporting violations is assessed by determining whether reporting suspicious actions is an employee's duty as part of the company or a personal obligation (Smaili & Arroyo, 2021; Noviani & Sambharakreshna, 2014). Whistle-blowing intention is the desire to engage in whistle-blowing, which reflects the seriousness of the situation, the responsibility to report violations, and the potential negative impacts that may be incurred as a result of reporting. The intention to report a violation is assessed by assuming that the respondent is an employee who is aware

of suspicious actions in these cases (Semendawai & Abdul, 2011; Smaili & Arroyo, 2021).

To optimize fraud detection, Bank Indonesia has implemented surprise audits as one of the efforts to detect fraud in banking institutions. Surprise audits are conducted suddenly without prior notice to the audited entity. The target sectors of surprise audits are those prone to fraud (Said, Alam, Mohamed, & Rafidi, 2017; Triantoro, Utami, & Joseph, 2020). The implementation of a whistle-blowing system for reporting violations is still relatively new in Indonesia. In 2008, the National Committee on Governance Policy (KNKG) issued a Whistle-blowing System (WBS) Manual that companies can use to develop their own violation reporting system (Nurhidayat & Kusumasari, 2018).

One form of internal control in preventing or disclosing fraud in a company is the implementation of a whistle-blowing system regarding Good Corporate Governance (GCG). A whistle-blowing system can be used by every company, especially in the banking industry, as part of the anti-fraud strategy program. In general, whistleblowers will report crimes in their environment to internal authorities first. However, a whistleblower does not stop reporting crimes to internal authorities but can also report crimes to higher authorities, such as directly to the board of directors, commissioners, head of the office, or to public authorities outside the authorized organization and the mass media (Said, Alam, Mohamed, & Rafidi, 2017; Sutrisno, 2015).

Fraud behavior can occur to anyone involved in the company, from ordinary employees to the board of directors and company management. Because fraud detection is not easy to do, the whistle-blowing system program alone is not enough, especially for the top management of the company. According to Tofangsaz (2021), a banking observer from the National Association of Commercial Banks, the whistle-blowing program is the key to many disclosures of fraudulent acts in a bank. However, this program has no prospects in major cases involving the theft of state finances carried out by conglomerates, including owners' banks through banking, as they mostly go undetected. Employees or executives will not want to report it. To cover this shortfall, the company applies a fraud detection strategy through a surprise audit program (Shonhadji & Maulidi, 2021).

Methodology

This research is qualitative descriptive research, which involves viewing and analyzing websites from the internet, books, and other reference sources (Moleong, 2002). The focus of this study is to examine the implementation of the whistle-blowing banking system in Indonesia, specifically looking at Islamic banks and how

the whistle-blowing system is applied to prevent fraud. The object of this research is the website of PT. Bank Syariah Indonesia.

Research on the whistle-blowing system in this type of research, which does not use statistical figures, is qualitative in nature. Moleong defines qualitative methodology as a research procedure that produces descriptive data in the form of written or spoken words or from the form of policy actions.

In this research, the whistle-blowing system is described to understand its implementation in preventing fraud in the banking industry, with a specific focus on BSI. The approach used is qualitative, which has descriptive characteristics. The data collected is primarily obtained directly from the source, with the researcher serving as the main instrument of analysis. The data takes the form of words in sentences or pictures that convey meaning (Sutopo, 2017).

The main sources of data in qualitative research are words and actions, supplemented by additional data such as photo documentation and other relevant information. The data sources for this study include the BSI website, interviews with BSI staff, and information obtained from various sources. Some older data, such as journals or books related to the whistle-blowing system, are also utilized.

Results

The results of the analysis conducted by the author regarding the implementation of the whistle-blowing system in Indonesian banking are presented in this study. The author focuses on explaining several banks in Indonesia that have implemented a whistle-blowing system to prevent fraud. The specific bank examined in this research is PT. Bank Syariah Indonesia (BSI) (Mention the source of analysis here).

PT Bank Syariah Indonesia Tbk, or BSI, is committed to maintaining and promoting the application of fair, balanced, and beneficial Islamic banking principles in accordance with Islamic law. These principles are consistently applied on a large scale to meet the expectations of all stakeholders. As the largest Islamic bank in the country, BSI ensures the effective implementation of these Islamic principles in its banking practices. For instance, an example of such implementation is Murabaha, which involves the buying and selling of goods at the original price with agreed-upon additional profits between the seller and the buyer (Provide a proper citation here).

Bank Syariah Indonesia acknowledges that fraud can result in financial losses and negatively impact the bank's reputation. Fraudulent activities can also affect the work productivity of bank employees and the overall business continuity of the bank. Therefore, it is crucial for employees to actively participate by serving as conduits of

initial information through the whistle-blowing system to report any indications of fraud that may occur (Cite the relevant source).



Figure 3: Whistle-blowing System Implementation Guidelines.

In implementing the reporting system or whistle-blowing system, companies in Indonesia are guided by the guidelines established by the National Committee on Governance Policy. These guidelines provide standardized procedures for the implementation of a reporting system. By following these guidelines, whistleblowers can feel secure and protected, leading to an increase in the number of individuals willing to report. The rules pertaining to the reporting system, as set forth by the National Committee on Governance Policy, are general and can be categorized into three aspects: structural, operational, and maintenance.

The structural aspects of the guidelines focus on the fundamental elements of establishing the system. In this aspect, several indicators are considered essential and relevant for all parties within the company. These include commitment statements, whistleblower protection policies, violation system management structures, and available resources. A written statement of commitment to implement the reporting system should be kept by personnel as evidence of the company's dedication to its implementation. Similarly, the whistleblower protection policy must be comprehensive, accurate, and firmly grounded in legal principles.

The operational aspects of the guidelines address the standard procedures for implementing the reporting system. This aspect covers legal obligations to report violations and the process of launching the whistle-blowing system.

The final aspect of the guidelines pertains to maintenance. Here, various indicators aim to sustain an effective whistle-blowing system once it has been implemented. These indicators include training and ongoing education, regular communication, incentives for whistleblowers, monitoring program effectiveness and improvement, and benchmarking. It is essential to ensure that all company employees and stakeholders understand the significance of the reporting system's role and mechanisms in order to maintain its effective and efficient operation.



Figure 4: Display of the Whistle-blowing System of Bank Syariah Indonesia website.

Submission of reports of alleged irregularities by the Reporting Party must take into account the following matters:

1. The Whistleblower is required to provide initial information, namely:
 - a. Form of deviation/problem reported;
 - b. The parties involved;
 - c. Location/Work Unit deviation occurs;
 - d. Estimated time of deviation;
 - e. Estimated loss value (if any); and
 - f. Chronological deviation.
2. To speed up the audit process, the Whistleblower includes initial evidence of alleged irregularities, namely:
 - a. Written evidence, including financing documents, letters, and notarial deeds;
 - b. Witness written statement;
 - c. Written statement of the perpetrator;
 - d. Evidence of instructions, including electronic documents and/or their printouts, CCTV, voice recordings, SMS, and others.
3. To facilitate communication, the Whistleblower may provide information regarding his/her identity, namely:
 - a. Whistleblower's name (anonymous is allowed);
 - b. Telephone number or e-mail address where you can be reached.

Scope of Deviant Action

Table 1: The scope of irregularities reported in the Whistle-blowing System are;

Type	Information
Acts of irregularities are classified as fraud	<ul style="list-style-type: none"> ➤ Embezzlement. ➤ Theft.

	<ul style="list-style-type: none"> ➤ Fraud, the forms of action, include cheating, engineering, forgery, manipulation, fictitious, limit solving/splitting, and markup. ➤ Leakage of Bank information and/or customer confidentiality. ➤ Extortion. ➤ Banking crimes, the forms of which include violations of the maximum limit for providing financing, false records, money laundering crimes, risywah related to the distribution of funds, bank guarantees, or withdrawals of funds exceeding the limit.
	<ul style="list-style-type: none"> ➤ Bank employees intentionally give signatures on reports or documents that are known to be fabricated. ➤ Bank employees deliberately give approval for financing, which is known to be fictitious. ➤ Bank employees intentionally authorize or override a transaction or search that is known to be fictitious.
<p>Specific deviation actions include:</p>	<ul style="list-style-type: none"> ➤ Actions that violate laws and regulations, among others: use of narcotics/addictive substances/psychotropics, liquor, money laundering, gambling. ➤ Immoral/immoral acts, such as sexual perversion, infidelity, sexual harassment, and others. ➤ Violation of the code of conduct (conflict of interest, abuse of office, insider behavior). ➤ Violation of social norms. ➤ Misuse of company assets. ➤ Other actions that may pose a material or non-material risk.

Relationship with Good Corporate Governance Principles

The whistle-blowing system guideline is a soft structure that regulates how to carry out reports of alleged violations at PT. Indonesian Islamic Bank. In its implementation, it is supported or includes the principles of good corporate governance, including:

1. Transparency

The whistle-blowing system is implemented using a transparent and open approach. Each year, all reports of alleged violations are included in the Annual Report to ensure transparency to the public. These reports contain information such as the number of received reports, the number of reports meeting the criteria, the number of processed

reports, and the number of resolved reports. By reporting this data, the company aims to demonstrate transparency in the performance of PT. Indonesian Islamic Bank's whistle-blowing system. To acknowledge the receipt of a report regarding an alleged violation, PT. Bank Syariah Indonesia provides a receipt to the reporter as a confirmation that the report has been received and processed by the Bank. Reports can be submitted through the following channels: E-mail: complaint@bankbsi.co.id, Tel/SMS/WhatsApp: 0811-9-146-146.

2. Accountability

The principle of accountability is fully implemented in the whistle-blowing system of PT. Bank Syariah Indonesia, specifically in the management structure of PT. Indonesian Islamic Bank's WBS system. The management team consists of different divisions, including the legal division, compliance division, HR division, and internal control unit, each of which is assigned specific responsibilities within the system. The positions, authorities, duties, and performance flow within the whistle-blowing system management team are clearly defined. As a result, each division is accountable for carrying out its respective responsibilities in effectively managing the whistle-blowing system.

3. Responsibility

The responsibility for implementing the violation reporting system is carried out through various activities in the whistle-blowing system process. BSI fully takes responsibility for reports of alleged violations that are submitted through the whistle-blowing system, ensuring the protection of the Whistleblower and safeguarding the security of data provided by the reporter to prevent undesirable incidents. Before initiating investigations into reports of alleged violations, PT. Bank Syariah Indonesia also takes the initiative to review the incoming reports and conduct preliminary research, demonstrating a sense of responsibility in handling the submitted reports.

4. Independence

The principle of independence in the implementation of BSI's whistle-blowing system is applied to the investigation process. To maintain objectivity and independence, the steering team appoints an investigation team that operates separately from the reported party. As a result, there is no affiliation between the reported party and the individuals conducting the investigation.

5. Fairness

Fairness or justice in the implementation of BSI's whistle-blowing system is emphasized in the whistleblower protection policy, which applies to all individuals without exception, regardless of their position. Additionally, a reporting mechanism for violations is provided to both internal company members and the general public,

without limiting who can report or receive protection under the whistleblower protection policy.

The ongoing socialization efforts conducted by BSI, through managers and information on their website, contribute to enhancing understanding of the whistle-blowing system. This aligns with the findings of a study by Smaili and Arroyo (2021) titled "Violation Reporting System and Organizational Performance," which indicates that understanding the whistle-blowing system positively influences its implementation. Regular and periodic socialization sessions are one approach to achieving such understanding.

Bank Syariah Indonesia places great importance on the Code of Conduct, which serves as a reference for employees to ensure compliance. The Code of Ethics at BSI signifies the company's commitment to implementing a violation reporting system, and employees are required to sign it annually as proof of their agreement.

In promoting the effectiveness of the violation reporting system, Bank Syariah Indonesia leverages the role of managers in conducting socialization activities. This strategy aligns with the findings of a study by Triantoro, Utami, and Joseph (2020) titled "Strengthening the Effectiveness of the Whistle-blowing System: Studies on the Implementation of Anti-Corruption Policy in Indonesia," which suggests that effective leadership positively impacts the success of the whistle-blowing system. When managers demonstrate good leadership by setting a positive example and adhering to a code of ethics, employees are less likely to engage in fraudulent behavior.

Conclusion

Based on the discussion on the whistle-blowing system at Bank Syariah Indonesia, several conclusions can be drawn. Bank Syariah Indonesia, as the largest Islamic bank in Indonesia, aims to become one of the top ten largest banks globally within the next five years. Islamic banks in Indonesia face numerous challenges, particularly during the COVID-19 pandemic. Alongside regular monthly monitoring, the banks require robust technology to prevent crimes in the Islamic banking sector. One prevalent crime in the banking industry is fraud, which can be committed not only by external parties but also by the banking sector itself. To mitigate such risks, Bank Syariah Indonesia has implemented a whistle-blowing system to prevent undesirable activities. Additionally, customers and stakeholders can lodge complaints using the contact number and email provided on the Bank Syariah Indonesia website.

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