



## **IMPLEMENTATION OF WHISTLEBLOWING SYSTEM TO PREVENT SHARIA BANKING CRIME IN INDONESIA**

ZULFIKAR HASAN

Department of Islamic Banking and Center for Research and Community Service at STAIN Bengkalis Riau Indonesia. E-mail: [zulfikarhasan61@gmail.com](mailto:zulfikarhasan61@gmail.com)

SAIFUNNAJAR

Department of Al-Ahwal Al-Syakhshiyah STAIN Bengkalis Riau, Indonesia

NUR AZLINA

Department of Islamic Banking STAIN Bengkalis Riau Indonesia, Indonesia

MUHAMMAD AL MANSUR

Department of Al-Ahwal Al-Syakhshiyah STAIN Bengkalis Riau, Indonesia

SAIFULLAH

Department of Islamic Economics STAIN Bengkalis Riau, Indonesia

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### **ABSTRACT**

The research made is qualitative research, where researchers look at various sources related to the whistleblowing system in Islamic banking. The object of this research is PT. Bank Syariah Indonesia (BSI) one of the largest Islamic banks in Indonesia, and targets to become the 10 largest Islamic banks in the world in the next 5 years. This research is needed to understand and see how the BSI whistleblowing system controls fraud and crime in the Indonesian banking world. Based on a survey from The Association of Certified Fraud Examiners, the level of banking fraud in Indonesia reaches 41% when compared to other sectors. This is one of the things that can be taken into account by the government, and stakeholders in banking. In addition to using qualitative methods. This study analyzes the BSI website with support from various sources related to the whistleblowing system in Islamic banking. Hopefully, in the future, there will be continued research looking at the implications of the

whistleblowing system to prevent fraud in banking, especially Islamic banking, both in Indonesia but also abroad.

**Keywords:** Whistleblowing 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, of course, this will encourage the improvement of the performance of the Sharia industry, including Sharia Banking. Lately, many conventional banks have begun to expand their business to sharia institutions or sharia business units (Al-Haidar and Gale, 2018). Several Islamic banks have already listed their shares on the Indonesian Stock Exchange (IDX).

In simple terms, Islamic Banking means that the banking implementation has a legal basis according to Islamic law. The Islamic banking does not recognize the "borrowing interest" or interest rates. The reason is that the loan interest is a value of *usury*/haram and that will be sinful. Thus, the Islamic banking implements a "profit-sharing system" or ratio, which the process is known and approved by the bank, and the customer at the time the contract/agreement is signed (Aidoo, 2014). The profit-sharing system in the Islamic banking refers share net profits from businesses or investments that have been carried out (Hidajat, 2020).

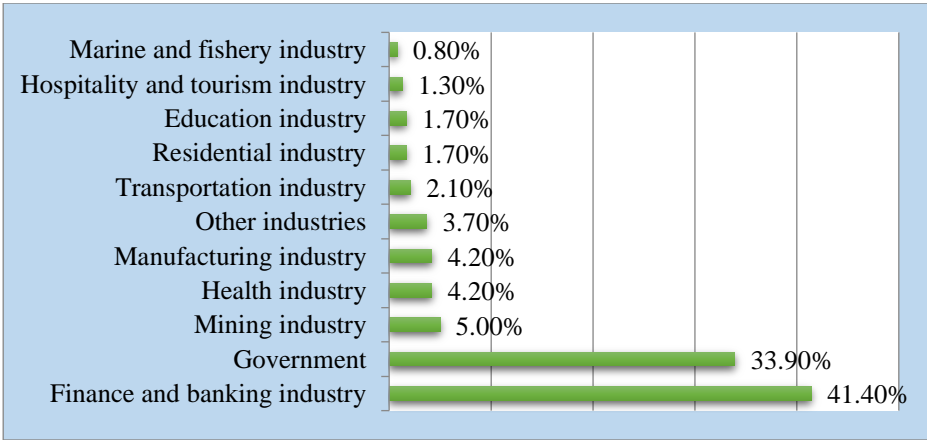
Several factors hinder the development of the Islamic banking industry in Indonesia, including inadequate educated and professional human resources, regarding human resource management and cultural development as well as the entrepreneurial spirit of nation which is still weak, capital (funds) relatively small, and limited the existence of ambivalence between the sharia concept of bank management and operationalization in the field, the level of trust is still low from Muslims and academically it has not been perfectly formulated to develop sharia financial institutions systematically and proportionally (Defossez, 2017). The complexity of the problem has an impact on public trust in the existence of Islamic banks among conventional financial institutions.

The operation of Islamic banks is inseparable from the demands for the implementation of good corporate governance (GCG). The main trigger for this increase in demand was the crisis that occurred in the

banking sector in 1997 which continued until 2000. The banking crisis that hit Indonesia was not the result of the decline in the rupiah exchange rate. exchange rate, but because the practice of Good Corporate Governance has not been implemented in Indonesian banking circles. One of the irregularities that often occurs and has a bad impact on Islamic banking is fraud. Internal fraud or fraud is unethical behavior and a serious violation in the financial sector. In financial institutions such as banking, internal irregularities can have a major impact on business continuity, which in turn can harm customers or customers (Jeffrey, 2007).

The Association of Certified Fraud Examiners (ACFE) report 2018 shows that the banking sector is the second sector with the highest incidence of fraud in the Asia Pacific. The highest fraud was experienced by the manufacturing industry or around 17 percent, while the banking industry experienced fraud at around 11 percent (Natariasari and Festi, 2014). While public administration companies and governments are in the next position with a total of 10 percent of cases. From the number of frauds studied, Indonesia ranks third with the largest number of fraud cases after China and Australia (Elias R. , 2008).

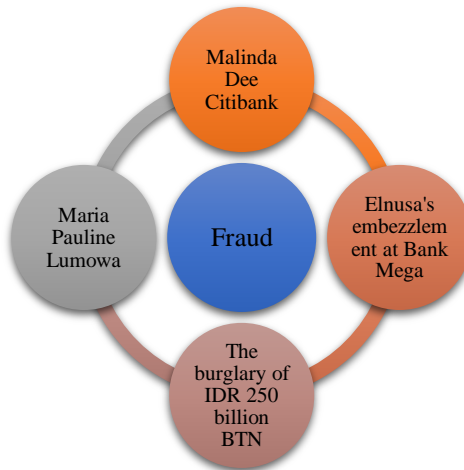
One of the steps taken by the Indonesian central bank and Islamic commercial banks in Indonesia is to establish a banking whistleblowing system (Khomsatun and Nasution, 2021). Every bank in Indonesia is required to have this system following Article 8 of PDG No.17/6/PDG/2015 dated June 24, 2015. Where banks protect whistleblowers to avoid fraudulent practices in banking.



**Figure 1 :** Types of Industry that are most disadvantaged by Fraud in Indonesia

From figure 1 above, the banking and financial sector is one of the sectors most prone to fraud because it does not have adequate supervision and technology. Even though banks have advanced technology, fraud still occurs in this financial sector. This is one of the things that can forbidden the banking sector, especially Islamic banking.

Several cases of fraud and criminal acts in banking that had become the attention of the Indonesian people a few years ago include:



**Figure 2 :** Several cases of fraud in Indonesian banking

Based on the information obtained from the figure, it strengthens the evidence that the banking industry is very vulnerable to cases of fraud, especially types of corruption. For this reason, Indonesia must be able to improve the system and develop a better anti-fraud strategy, to reduce the number of fraud cases. Fraud practices in Islamic banking can occur due to various factors, both internally and externally. If viewed from the internal side, the thing that might trigger an unintentional act of fraud lies in the competence of its human resources. Does human resources understand sharia and banking science well or not. From outsiders, such as family, where there is an urgent need that forces him to commit fraud (Khalil, 2017).

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 and 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 because the customer is financially disadvantaged (Semendawai and Abdul, 2011).

**Table 1.** Statistics on Handling of Alleged Banking Crimes

Activity Stage	Quarter III-2020					
	Bank Office (KB)		Case (PKP)		Total	
	BU	BPR	BU	BPR	KB	PKP
Accepted PKP	3	2	4	5	5	9
PKP in the process of analysis *)	3	1	2	2	3	4
PKP returned before tipibank special inspection	2	2	2	5	3	7
PKP that is subject to special inspection by tipibank *)	3	3	3	8	6	11

\*) Including carry over PKP received from the previous year's period  
Deviation from Banking Provisions (PKP)

Source: OJK

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 that researchers are interested in examining various possibilities of fraud that occur in banking operations, especially 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 and Rafidi, 2017).

The whistleblower must have good performance, be taught proper depth, act as a supervisor, and have higher moral reasoning than someone who is an inactive fraud supervisor. However, there are still many people who do not dare to become whistleblowers because they have the potential to cause negative consequences for informants, such as job loss, threats of revenge, and segregation from work. Whistleblowers are prohibited from disseminating statement data to other parties, different organizations, or the mass media when they have disclosed alleged violations to whistleblowers. This is so that the relevant institutions can secure it, and the report can be examined further. By being included in the witness protection system, informants have the rights they deserve (Sakinah & Ponirah, 2021).

Fraud is an act that is done consciously and intentionally to misuse everything at the same time, for individual happiness and then presenting information to hide the act. Fraud is one example of a problem that all companies experience. Fraud is mostly defined as cheating, disorder, deception, or misappropriation by people or groups for personal gain (Krystella & T, 2015).

In Indonesia, banks are required to implement corporate governance. First, banks play a dominant role in the economy, especially as engines of economic growth. Competitiveness by doing the best possible business arrangement. 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 must be owned and maintained by banks 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 December 9, 2011, regarding the Implementation of 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 to detect and investigate fraud cases. In the Circular Letter of Bank Indonesia No.13/28/DPNP dated December 9, 2011, regarding the Implementation of Anti-Fraud Strategy for Commercial Banks, it is explained that one of the early detections of the existence of fraud is through a violation reporting mechanism (Whistleblowing System) (Salehi and Molla, 2019). The Whistleblowing 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 October 5, 2006, concerning the Implementation of GCG for Commercial Banks (Noviani and 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 Whistleblowing System is expected to increase the level of employee participation in reporting violations (Triantoro and Joseph,

2020) (Palumbo and Manna, 2020). In addition, organizational leaders could address problems internally first, before they occur spread to the public sphere which can affect the reputation of the organization.

De George (1986) in Hoffman and Robert (2008) establishes three criteria for fair whistleblowing. The first is an organization that can cause harm to its workers or the wider public interest. Second, the error must be reported first to an internal party who has higher power, and third, if the deviation has been reported to the internal authority but no results have been obtained, and even the deviation continues, then reporting the deviation to an external party can be referred to as an act of citizenship the good one (Nawawi and Salin, 2018).

Nurhidayat and Kusumasari (2018) uses two aspects of whistleblowing, namely views on whistleblowing perceptions and whistleblowing intentions. Robbins explains perception as a process carried out by an individual to organize and interpret the impressions captured by his five senses to give meaning so that the perception of whistleblowing is defined as a process to determine whether whistleblowing will have a good or bad impact on the individual himself or the environment (Noviani and Sambharakreshna, 2014).

Whistleblowing perceptions can be measured by the level of seriousness of the actions assessed by considering the magnitude of the social violations committed in each case. The level of responsibility for reporting violations is assessed by considering whether reporting the suspicious actions is an employee's duty as part of the company or is a personal obligation (Smaili and Arroyo, 2021) (Smaili and Arroyo, 2021) explains that whistleblowing intention is a desire to do whistleblowing which is one form of seriousness in a situation, the responsibility to report violations, and the negative impacts that will be received because of the reporting. The desire to reporting a violation is assessed by assuming the respondent as an employee who is aware of suspicious actions in these cases (Semendawai and Abdul, 2011).

To optimize fraud detection, Bank Indonesia has made a surprise audit one of the efforts to detect fraud in banking institutions. Surprise Audit is an audit process that is carried out suddenly without giving notice to the object of the audit that an audit will be conducted. The target of the surprise audit is every sector that is prone to fraud (Triantoro and Joseph, 2020).



The whistleblowing system is a violation reporting system that is still relatively new to be implemented in Indonesia. In 2008 KNKG (National Committee on Governance Policy) issued a Whistleblowing System (WBS) Manual that can be used by companies to develop a manual violation reporting system. One form of internal control in preventing or disclosing fraud in a company is the implementation of a whistleblowing system regarding Good Corporate Governance (GCG). A whistleblowing system can be used by every company, especially in the banking industry, which is 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 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 and Rafidi, 2017).

Fraud behavior can occur to anyone involved in the company, from ordinary employees to the board of directors' company management. Because fraud detection is not easy to do, the whistleblowing system program alone is not enough. Especially at the top management of the company. According to (Tofangsaz, 2021) as a banking observer from the National Association of Commercial Banks, the whistleblowing program is the key to many disclosures of fraudulent acts in a bank. But unfortunately, this program has no prospects because in major cases involving the theft of state finances carried out by conglomerates including owners' banks through banking, mostly 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**

In this study, the author only provides an overview of Islamic banks in Indonesia and how to apply the whistleblowing system to prevent fraud. The object of this research is the website of PT. Bank Syariah Indonesia. This research is included in the quantitative descriptive category, namely: describing the numerical data that has been collected. In this study, the information used is secondary data obtained from information on the

annual Good Governance Corporate report which is accessed from the official website <https://www.bankbsi.co.id/>.

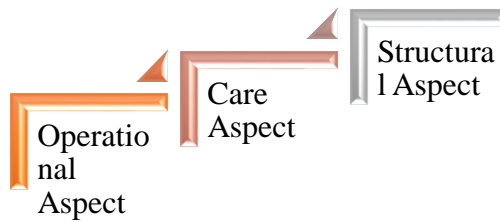
This study tries to describe how the whistleblowing system is applied to prevent fraud in the banking world, especially at Bank Syariah Indonesia (BSI). The approach used is descriptive qualitative. Data collected directly from the source; the researcher becomes part of the main instrument of analysis. Furthermore, the data is in the form of words in sentences or pictures that have meanings that can be explained according to the research theme (Sutopo, 2017). Sources of data taken in the study include the BSI website, interviews with BSI staff, and information from various sources. Several published references are also needed, such as journals or books related to the whistleblowing system.

## RESULT

Research conducted by researchers is one of the descriptive qualitative research. This study looks at the role of Bank Syariah Indonesia (BSI) in tackling and protecting from criminal fraud in the banking world in Indonesia. The results of the analysis that the author has done regarding the implementation of the whistleblowing system in Indonesian banking. In this case, the author has decided to explain several banks in Indonesia that implement a whistleblowing system to prevent fraud. The banking object of this research is PT. Bank Syariah Indonesia.

Bank Syariah Indonesia is committed to continuing to maintain, encourage the application of Islamic banking principles that are fair, balanced, and beneficial under Islamic law. This principle is always applied massively to meet the expectations of all stakeholders. As the largest Islamic bank in the country, BSI guarantees that these Islamic principles have been implemented in banking practice. An example is the implementation of *Murabaha* or the activity of buying and selling goods at the original price with additional profits that have been agreed upon between the seller and the buyer.

Bank Syariah Indonesia realizes that fraud can result in losses for the bank and affect its reputation bank. Fraud can have an impact on the work productivity of the bank's ranks and the business continuity of the Bank as a whole. Therefore, employees must actively participate as a conduit of initial information through the whistle-blowing system for indications of fraud that occurred.



**Figure 3:** Whistleblowing System Implementation Guidelines

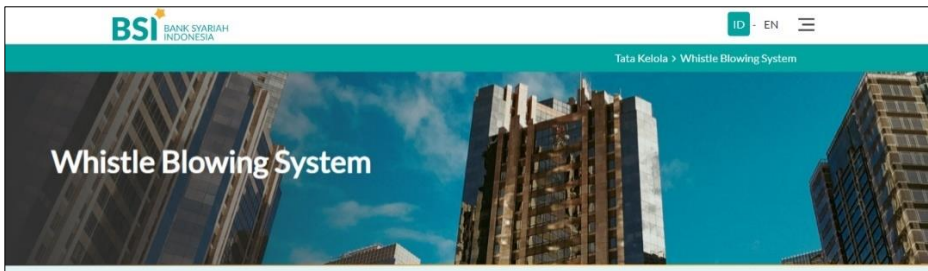
In implementing the reporting system or whistleblowing system, companies in Indonesia are guided by the guidelines made by the National Committee on Governance Policy. The guidelines include standard-compliant procedures for how a reporting system is in progress. Through these guidelines, whistleblowers will feel safe and have protection so that the number of whistleblowers will also increase. The rules regarding the reporting system made by the National Committee on Governance Policy are general and are divided into 3 parts, namely structural aspects, operational aspects, and maintenance aspects.

The structural aspects of the guidelines for implementing the reporting system cover the basics of creating the system. In this aspect, several indicators can be said to be fundamental and have relevance to all parties in the company, such as commitment statements, whistleblower protection policies, violation system management structures, and resources. Statement of commitment to implement the reporting system must be written and kept by the personnel, this is to prove the company's commitment to implementing the reporting system. Likewise, the whistleblower protection policy must be made in its entirety, correct, and has a clear legal footing.

The operational aspects in the guidelines for implementing the reporting system are about how the standard rules are set in the implementation of the reporting system. The operational aspects in the guidelines for implementing the reporting system are about how the standard rules are set in the implementation of the reporting system. This aspect regulates starting from the legal obligation to report violations to the process of launching a whistleblowing system.

The last aspect in the guidelines for implementing the whistleblowing system is the maintenance aspect. In this aspect, several

indicators aim to maintain a system from the whistleblowing system that has been implemented. Some of these indicators include training and continuing education, regular communication, incentives for whistleblowers, monitoring of program effectiveness and improvement, and the last one is benchmarking. In these indicators, it must be ensured starting from how all company employees and stakeholders know how important the role and mechanisms of the reporting system are, to keep the system running effectively and efficiently.



**Figure 4 :** Display of the Whistleblowing System of Bank Syariah Indonesia website

Submission of reports of alleged irregularities by the Reporting Party must consider 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, notarial deed;
  - b. Witness written statement;
  - c. Written statement of the perpetrator;
  - d. Evidence of instructions, including electronic documents and/or their printouts, CCTV, voice recording, 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 2.** The scope of irregularities reported in the Whistleblowing System are:

Type	Information
Acts of irregularities classified as fraud	<ul style="list-style-type: none"> <li>▪ Embezzlement.</li> <li>▪ Theft.</li> <li>▪ Fraud, the forms of action include cheating, engineering, forgery, manipulation, fictitious, limit solving/splitting, mark up.</li> <li>▪ Leakage of bank information and/or customer confidentiality.</li> <li>▪ Extortion.</li> <li>▪ Banking crimes, the forms of which include violations of the maximum limit for providing financing, false records, money laundering crimes, <i>risyah</i> related to the distribution of funds, bank guarantees or withdrawals of funds exceeding the limit.</li> </ul>
	<ul style="list-style-type: none"> <li>▪ Bank employees intentionally give signatures on reports or documents that are known to be fabricated.</li> <li>▪ Bank employees deliberately give approval for financing which is known to be fictitious.</li> <li>▪ Bank employees intentionally authorize or override a transaction or search that is known to be fictitious.</li> </ul>
Specific deviation actions include:	<ul style="list-style-type: none"> <li>▪ Actions that violate laws and regulations, among others: use of narcotics/addictive substances/psychotropics, liquor, money laundering, gambling.</li> <li>▪ Immoral/immoral acts, such as sexual perversion,</li> </ul>

	<p>infidelity, sexual harassment, and others.</p> <ul style="list-style-type: none"> <li>▪ Violation of the code of conduct (conflict of interest, abuse of office, insider behavior).</li> <li>▪ Violation of social norms.</li> <li>▪ Misuse of company assets.</li> <li>▪ Other actions that may pose a material or non-material risk.</li> </ul>
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**Relationship with Good Corporate Governance Principles**

The whistleblowing system guideline is a soft structure that regulates how to carry out reports of alleged violations at Bank Syariah Indonesia (BSI). In its implementation, it is supported or includes the principles of good corporate governance, including:

**1. Transparency**

The implementation of the whistleblowing system is made with a transparent and open system. Every report of alleged violations that comes in every year is always reported in the Annual Report as a form of transparency to the public. These reports include the number of incoming reports, the number of reports that meet the criteria, the number of reports processed, and the number of reports that have been processed. The existence of reporting as a form of company transparency is made so that the public believes in the performance of the whistleblowing system of PT. Indonesian Islamic Bank. PT. Bank Syariah Indonesia provides a receipt for the report on the alleged violation as a form of disclosure to the reporter that the report has been processed by the bank. Reports can be submitted to email : [complaint@bankbsi.co.id](mailto:complaint@bankbsi.co.id). Tel/SMS/WhatsApp: 0811-9-146-146.

**2. Accountability**

The principle of accountability in the whistleblowing system of PT. Bank Syariah Indonesia is fully implemented in the WBS system management structure of PT. Indonesian Islamic Bank. In the management system, each member of the team consists of different divisions such as the legal division, division, compliance, HR division, and internal control unit, but each of these divisions is combined to be given responsibility for the division. Part of the whistleblowing system management team has divided

the position, authority, duties, and flow of the performance. Therefore, each section is responsible for its respective duties in managing the whistleblowing system.

### **3. Responsibility**

The responsibility for implementing the violation reporting system is implemented through various activities in the whistleblowing system process. BSI is fully responsible for reports of alleged violations that enter through the whistleblowing system by guaranteeing the protection of the whistleblower, including the security of data from the reporter to avoid things that are not desirable. Prior to investigating reports of alleged violations, PT. Bank Syariah Indonesia has also clarified the incoming reports and conducted preliminary research first as a form of responsibility in processing existing reports.

### **4. Independence**

The principle of independence in the implementation of the whistleblowing system of BSI is applied to the investigation process. In carrying out the investigation, to ensure the objectivity and independence of the manager, the steering team will appoint an investigation team under the reported party. Therefore, there is no attachment between the reported party and the person investigating the case.

### **5. Fairness**

Fairness or justice in the implementation of the whistleblowing system of BSI is stated in the whistleblower protection policy which is made for everyone without exception and regardless of position. Besides this, a means of reporting violations is also made for all elements of society, both internal to the company and the general public. Does not limit to certain parties who may report and certain parties who are given protection from the whistleblower protection policy.

The existence of socialization that BSI continues to carry out to employees and the public through managers and information on the website, is able to optimize understanding related to the whistleblowing system. This supports the results of (Smaili and Arroyo, 2021) research with the title Violation Reporting System and Organizational Performance which gives the result that understanding regarding the whistleblowing

system has a positive effect on the implementation of the whistleblowing system. Where these understandings can be achieved, one of them is by providing regular and periodic socialization. Bank Syariah Indonesia maximizes the role of the Code of Conduct which becomes a reference for every employee to comply with it. The Code of Ethics at BSI is a form of the company's commitment to implementing a violation reporting system. Moreover, the guidelines are signed by employees every year on stamp duty.

Bank Syariah Indonesia maximizes the role of managers in providing examples of the socialization of the implementation of the violation reporting system, which is one of the strategies that can streamline the violation reporting system. According to research by (Triantoro et al, 2020) with the title Strengthening the Effectiveness of the Whistleblowing System, Studies on the Implementation of Anti-Corruption Policy in Indonesia, which resulted in that leadership is one of the factors that can have a positive effect on the success of the implementation of the whistleblowing system. When managers have good leadership by setting a good example and following a code of ethics, employees are less likely to commit fraud.

Based on the researcher's analysis, the implementation of the whistleblowing system has not been able to reduce the number of fraud optimally, this is due to the possibility that the sanctions imposed by Bank Syariah Indonesia on internal fraud perpetrators have not provided a deterrent effect. Banks implement a policy of whistleblowing system mechanism as an effort to detect fraud as early as possible. Although this policy has been implemented for years before the merger of Bank Syariah Indonesia from three banks (Bank Syariah Mandiri, BRI Syariah, and BNI Syariah) it still has not provided a deterrent effect to Bank Syariah Indonesia employees, and this is a joint evaluation. Is there an error in the system or indeed there are other factors that affect it? Whereas the work environment in Islamic banking should be different from conventional banks, an Islamic work environment is full of honesty. However, this is not a benchmark for all employees to behave properly and honestly.

From the findings that you have obtained, it can be concluded that there are 3 types of fraud in the banking sector. First, Field of Operations, There have been many cases of fraud in banking operations lately. One of the banking activities that are very prone to fraud is funding



activities, customer trust is used by bank employees for personal gain and profit. In addition, another form of fraudulent activity is the disbursement of deposits that cannot be made by the customer because the funds have been disbursed and the account is frozen without the customer knowing. Examples of recent cases of fraud in the field of operations are the disappearance of customer funds of Bank Mega Bali amounting to Rp56 billion, or the case of Citibank Melinda Dee.

Second, in the field of credit, another fraudulent act is in the field of bank credit. Fraud in this field is exemplified by the activities of providing fictitious credit, fictitious collateral by customers, overvaluing collateral, changes in interest so that the cost of funds increases and is transferred to bank employee accounts, and other credit lending techniques. Third, in the field of technology and information, the rapid development of increasingly advanced technology has been followed by the development of information theft in an increasingly sophisticated way. Cases of theft of customer data using this technology are very common until now. Complaints and losses experienced by customers are always there. Fraud in the use of debit and credit cards also includes skimming crimes that often occur at ATM service machines. Crimes using this method have been going on for a long time, but until now there are still many victims who are harmed. Therefore, as a form of security guarantee from banks, the banking sector is currently trying to make improvements and innovations to the security features of their customers' transactions. To ensure the security of customer funds in the banking industry, currently, anti-fraud strategy regulations have been regulated in POJK 39/2019 which applies to commercial banks.

Some actions such as fraud, embezzlement of assets, fraud, banking crimes, and others are classified as fraudulent acts. Therefore, banks are currently also required to develop and implement effective anti-fraud strategies to deal with the potential for fraud. The strategy that must be prepared and determined must at least contain four pillars, namely: prevention, detection, investigation, reporting and monitoring sanctions, evaluation, and follow-up. In addition, banks are also required to submit a report on the implementation of anti-fraud every semester and submit a report of fraud with a significant impact no later than three days. Potential losses due to fraud, both internal and external, have a significant impact on optimizing the company's development. Good and consistent GCG

socialization is expected to support a more transparent and reliable banking system. Analysis, as well as organizational evaluation and employee opportunities to commit fraud, must also be carried out properly as a form of anticipation of fraud.

## CONCLUSION

The limitations of the research that we run, only focuses on the Whistleblowing system at Bank Syariah Indonesia (BSI). From the discussion on the whistleblowing system at Bank Syariah Indonesia above, several conclusions can be formulated. Bank Syariah Indonesia is the largest Islamic bank in Indonesia and is targeting the next 5 years to become the 10 largest banks in the world. Many challenges will be faced by Islamic banks in Indonesia, especially during the COVID-19 pandemic, in addition to monitoring which must be evaluated every month, it also requires capable technology to avoid crime in the world of Islamic banking. One of the crimes that often occur in the banking world is the crime of fraud, this crime can be committed not only by other people but also very large by the banking sector itself. For this reason, Bank Syariah Indonesia has built a whistleblowing system to avoid things that are not wanted, besides those customers and stakeholders can also make complaints to the number and email listed on the Bank Syariah Indonesia website.

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