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# FRAUD AND WHISTLEBLOWING IN THE MANAGEMENT OF STUDENT FUNDS

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#### ARTICLE INFORMATION

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#### **ABTRACT**

The aim of this study was to find out whether there is the potential for fraud and whistleblowing in the management of student funds as a way to detect fraud in universities. The type of research used in this study was descriptive qualitative research. Data collection was done through interviews, observation, and documentation. This study was conducted at one of universities located in Central Java by describing several variables including fraud, whistleblowing and management of student funds.. The data was analyzed using fraud triangle framework and the fraud scheme based on the ACFE classification. The results of this study show that in the management of student funds there was the potential for fraud, such as misuse of financial statements and corruption. There was indication of fraud, but it did not happen. Potential for whistleblowing was not found because they assume that if fraud occurs it is better to discuss it in a family manner and will not report it.

Keywords: Fraud, Whistleblowing, Management of Student Fund

#### 1. INTRODUCTION

The world of education has always been in the spotlight of the wider community because it is considered quite vulnerable to fraud. This is evidenced by the many cases of fraud that occurred in the world of education. For example, a School Principal was arrested by the Lappariaja Kejari Bone Branch Prosecutor's Office regarding the misuse of School Operational Assistance (BOS) funds for the 2014 fiscal year which resulted in a state loss of IDR 108 million (Hasrat 2016). In addition, ICW also revealed 425 cases of corruption in the education world and 214 of them were corruption cases in the education office from 2005 to 2016 (Asikin 2017).

University, as one of the non-profit organizations engaged in education services, in its financial management, is obliged to make financial reports on

the funds it receives to funders as a form of accountability. Law No. 20 of 2003 article 48 concerning management of education funds explains that the management of education funds must be based on the principles of fairness, efficiency and public accountability. With these principles, it is expected that each education fund management can be better and in accordance with the rules. Even though there have been rules regarding the management of education funds, there are still many fraud cases in it. One of the most recent cases of fraud that occurred at the university was where the Corruption Eradication Commission (Indonesia: Komisi Pemberantasan Korupsi/KPK) had named former Chancellor of Airlangga University (Airlangga University) Fasichul Lisan as a suspect in a corruption case of the construction and procurement of

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Page. 126-136

medical devices at the Teaching Hospital of Airlangga University in 2007-2010 (Rakhmawaty, 2016).

Whistleblowing is one way that is considered capable of reducing the potential for fraud. Dyck et al. (2010), explains that the existence of whistleblowing is considered important in revealing fraud that occurs in the 21st century. Whistleblowing is the disclosure of information by members or former members of an organization that is seen as illegal and immoral practices (Miceli, Near, and Dworkin 2008).

Research related to fraud in education funds was conducted by Puspitasari, Haryadi, and Setiawan (2015). research revealed that there was fraud in the Student Activity Unit (Indonesia: Unit Aktivitas Mahasiswa/UKM) in financial management, particularly in the high costs in the accountability report. Meanwhile, research related to whistleblowing as a means of mitigating fraud was conducted by Seifert et al. (2010). The research showed that disclosure of fraud using whistleblowers had proven to be more effective than using other methods, such as internal audit or external audit. Meanwhile, Dyck et al. (2010) concluded that the role of employees as whistleblowers could reveal 17 percent of fraud, while external auditors only revealed 10 percent of 216 cases of fraud.

Based on the background described above, this study is intended to find out the potential for fraud in the management of student funds at ABC University, as well as the potential for whistleblowing that is used as a form of fraud mitigation. This research was conducted on 13 student organizations in this case called the Faculty Student Senate (Indonesia: Senat Mahasiswa Fakultas / SMF) in the hope of seeing an overall picture related to the management of student funds. ABC University was chosen because it had been awarded institution accreditation with the score A. With the accreditation score A, the risk of fraud can be mitigated properly. The results of this study are expected to contribute to student organizations in particular and university leaders and faculty leaders in general to be able to provide information related to the potential for fraud and whistleblowing that occurs in the management of student funds, in addition to adding to the accounting behavior literature in the field of audit.

### 2. LITERATURE REVIEW AND HYPO-THESIS

#### Fraud

In the accounting and auditing literature, fraud is a fraudulent practice which is interpreted as disobedience and deviation (Priantara 2013). According International Standards on Auditing (ISA) section 240, fraud is defined as a deliberate act by the company that acts as the leader of the company, employees or third parties who commit fraud to gain profit by justifying all means. Rezaee (2005) defines fraud as a deliberate and contrived act by an entity that can result in ownership of illegal profits. Fraud is carried out for three reasons: pressure, opportunity, and rationalization. These three factors are known as The Fraud Triangle (Arens, Randy, and Mark 2008).

According to the Association of Certified Fraud Examiners (ACFE, 2017), fraud is any attempt to trick other parties in order to get benefits. Fraud scheme according to ACFE is classified into three: asset misappropriation, fraudulent financial statements, and corruption. Asset misappropriation is company assets that are abused by parties inside and outside the company. This type of fraud is the easiest type to know because it is tangible and can be measured and calculated. Fraudulent financial statement is presenting incorrect company financial statements deliberately intended to trick users of the financial statements. Corruption is an abuse of authority or a conflict of interest, bribery, illegal acceptance, gratuity, and extortion.

#### Whistleblowing

Whistleblowing is the disclosure of information, by members or former members of an organization, that is seen

as illegal practices to the organization or the community (Miceli, Near, and Dworkin 2008). Whistleblowing can run effectively if it meets four elements: the existence of a whistleblower, fraud cases must be reported clearly accompanied by evidence of relevant case information, the existence of individuals or groups of people in the organization who commit fraud, the presence of other parties or authorities who receive complaints and evidence of fraud committed (Dasgupta Kesharwani 2010). Siringoringo (2015) defines whistleblowing as an act of reporting violations within an organization to other parties both inside and outside the organization. Park, Blenkinsopp, Oktem, and Omurgonul (2008) classify whistleblowing in three dimensions: internal, external and unidentified or anonymous Whistleblowing.

The famous whistleblowing case in Indonesia occurred in the Indonesian police regarding the scandal of case broker. Another case was related to reporting bribery information in the election of BI Senior Deputy conducted by members of the House of Representatives (Wardah, 2012). The second role of the whistleblowers is very important in protecting the country from greater losses and violations of the law (Rustiarini, Wayan, and Sunarsih 2015). This further shows that the role of whistleblowing has a significant impact, even though being a whistleblower is considered not easy because some people view the whistleblower as an act that does not obey the norms of organizational loyalty. In addition, there are also those who view the whistleblower as a hero to the values that are considered more important than lovalty to the organization (Bagustiantoi, Rizki, and Nurkholis 2013). Heungsik and Blenkinsopp (2009) reveal that the risk of retaliation that may be received by whistleblowers can indirectly affect individual intentions to reveal existing fraud. However, some argue that whistleblowing is a behavior that benefits the organization and society (Appelbaum et al., 2007).

#### **Management of Student Funds**

Student organization is an organization consisting of students to accommodate the talents, interests, and potential of students carried out in extracurricular activities (Purnami, Sulindawati, and Marvilianti 2017). The role of student organizations is also quite significant for the development of the university. In addition to helping raise the name of the university itself, the student organization is also a place to produce quality students (Saptarengga 2014). In each of its activities, Faculty Student Senate (Indonesia: Senat Mahasiswa Fakultas / SMF) is funded by the university which is then referred to as a student fund. Student funds are funds provided by the university to faculties and then distributed to student organizations which will be managed for student support activities, both professional and humanistic activities. In addition, student funds for activities are also obtained from business to obtain funds (Indonesia: Usaha Dana / USDA). Stages of student fund management starts from the planning which is marked by the activities of the Work Meeting and Coordination Meeting, followed by the implementation which contains the submission of activity proposals and their implementation, as well as the stages of accountability as a form of responsibility for student activities. This management stage is not specifically regulated by the University, so this research classifies the stages of student funds management to facilitate analysis.

#### 3. METHODS

The type of research used in this study was descriptive qualitative research. Data collection was done through interviews and observation. Interviews were conducted with the speakers from the University Student Senate Treasurer, the Faculty Student Senate (SMF) Treasurer, the Activity Committee, and the Head of the University Student Affairs as the donor of funds to confirm the flow of student fund management. Observation was carried out by being directly involved in the committee, because the committee's

activities were also part of the SMF, as the executor of the program designed by the SMF.

There are three channels of qualitative data analysis: data reduction, presentation, and drawing conclusions (Miles & Huberman, 1994). In this study, Data reduction process was carried out in the results of the interview with the aim to take the essence of the results of interviews and observations, in addition to discarding the results of interviews that were not relevant to the research problem. Then the data was presented in the form of narrative text (in the form of field notes), in which excerpts from interviews were made as supporting evidence. After the data was presented, the data was then analyzed using the reference of fraud triangle framework and the classification of fraud according to ACFE on the results of interviews and observations that had been obtained from the field to determine the potential for fraud and whistleblowing in the management of student funds at ABC University. From the results of the analysis, the conclusions were drawn and used to answer the research problem.

# 4. RESULT AND DISCUSSION General Description of the Research Object

ABC University is one of the private universities in Central Java Province which has 13 faculties and 62 study programs. Each faculty has student organizations, one of which is called Faculty Student Senate (SMF). SMF is an executive institution at the faculty level that coordinates student activities at the faculty or study program level. SMF has the duties and authority: a) preparing and submitting a budget work program based on the rules that apply at the faculty level at the beginning of the period to the University Student Senate (Indonesia: Senat Mahasiswa Universitas/SMU) through the Faculty Student Representatives (Indonesia: Badan Perwakilan Mahasiswa Fakltas / BPMF) to be coordinated; b) implementing the work program that has been set at the coordination meeting; c) providing accountability reports to SMU through BPMF at the end of the period; d) intensifying faculty student activities as the basis of student academic activities; e) representing faculty students in activities inside and outside the faculty; f) providing periodic reports on the progress of the implementation of work programs and budgets to SMU through BPMF; g) providing advice and critical, creative, realistic and non-conformist thinking to faculty leaders; h) conveying the aspirations of students at the faculty level; i) formulating and proposing a draft of BPMF regulation to be discussed and approved by BPMF; j) making SMF rules; k) making an SMF decision. SMF itself is part of student organizations that regulate and manage student funds in the committee.

# Identification of potential fraud in the management of student funds at the stage of planning

Planning is the stage in the preparation and submission of work programs and budgets. In general, all faculties have the same way in preparing the budget, but there are several different things depending on the needs of each faculty. Each year the student funds received by the faculty are always different depending on the number of students per class. Besides, there is another difference in the involvement of the planning process. Although there are no written rules regarding this planning process, from the results of interviews in general all faculties involve: 1) Treasurer of the SMF; 2) Daily Management Board (Indonesia: Badan Pengurus Harian / BPH) as the supervisor of the work program, and SMF budget; 3) Commission C (part of the budget); 4) Chair of the SMF. However, there are some faculties that do not involve all elements of the existing functionaries in the planning process, as happened in Faculty A. This is consistent with DW's statement as the treasurer of Faculty A:

"Those involved during planning process were only the SMF Treasurer, the faculty

secretary and the faculty treasurer".

Another case occurred in Faculty B which only involved treasurers and secretaries. This is in accordance with the statement delivered by BS, the SMF treasurer of Faculty B. After the planning was done, it was continued with a Coordination Meeting which was attended by all members of SMF. Furthermore, the work program and its budget were agreed and approved by the Vice Rector 3 (PR 3) for student affairs.

In the planning stage, the potential for fraud that might occur is the lack of involvement of all elements in student organizations. The involvement of all elements in student organizations will make the planning process better, because the representation of all members can be fulfilled. This means that the planning stage is the initial stages of the entire program of activities and the budget is agreed upon. By not involving all elements of the student body, there is possibility that the priority activities are focused only on the interests of certain parties. In this case, the weakness of the student body itself is the absence of official rules related to personnel involved in the planning stage, so that sometimes the design of activities and budgets is based only on the previous period's data. The planning stage ends with a Coordination Meeting which is only a plenary formality related to sharing budget for activities and does not accommodate any changes.

# Identification of potential fraud in the management of student funds at the stage of implementation

The implementation stage begins with the formation of a committee for each activity that has been budgeted at the planning stage. The activity committee will make an activity proposal and then submit it to Commission C as part of the program. In the process of making the budget, the committee already has a price standard set by the SMU party as a price standard. Next, the activity committee sends activity and budget proposals to the SMF Treasurer

and the SMF Secretary to be corrected and signed by the relevant parties, namely Head of University Student Affairs, the Chair and Treasurer of the SMU, and also to Vice Rector 3 to be approved. Then the approved budget by Vice Rector 3 will be realized by the Finance Department and the funds will be transferred to the faculty. The funds received are not all in cash but there are some that are directly transferred to the account of the committee or the committee in charge, then the committee will pay for the purchase to vendor by transferring, with the mechanism that the committee members provide proof of transaction notes, then the committee in charge will transfer the funds to the vendor concerned. This is in accordance with the results of interviews conducted with DL, the treasurer of SMF of Faculty K as follows:

"Now the system used, in addition to cash, is transfers, such as budgeting for clothes. Then the method for paying is not in cash but by transfer system to the vendor's account".

Form of payment by transfer is one form of control against cash theft. And the transfer payment is usually sourced from faculty or university funds. Therefore, the students sometimes look for loopholes to commit fraud by using other funding sources, such as business for funds or USDA. The USDA is a funding source that is commonly used to support activities if funding sources from faculties or universities are still inadequate. The USDA mechanism is regulated by the university which includes the amount of USDA funds that can be done only at a maximum of 30 percent of total revenue.

The USDA mechanism itself is carried out in various ways, some are done by selling food or drinks, selling used clothing, doing live music in cafes, or busking at roadside or restaurants. The activity committee usually sets a target for sales per committee member. If the activity committee does not meet the target, a fine will be charged as much as the profit from the sale of USDA. And if there is a delay

in collecting USDA, the activity committee will give an additional fine with the amount that has been set together. They do it to cover the lack of funds needed. Such as USDA mechanism sometimes burdens committee members, as disclosed by DM, a committee member, as follows;

"I have ever participated in the committee and was fined IDR 300,000 just because I could not reach the target. I think it was very burdensome. Every problem always ended with a fine. Up to one week I just drank 'energen', because the money was used to pay fines".

However, this mechanism is not all carried out by the faculties, such as the Faculty L, the informant said:

"To start an activity normally not by USDA, because it is useless if done by the USDA. In the end only a few will sell and they will be fined. Instead of using USDA, our friends in the activity committee prefer to use contribution fee to cover the shortcomings. So, per committee member will later be subjected to money amounting to IDR 100,000 up to IDR 400,000 depending on the amount of the lack of funds in the committee".

USDA itself is actually not required by the university, but in carrying out activities, the USDA is always held. That is because the event organizing committee always wants the best event but the budget provided by the university is usually insufficient. This is what ultimately led the activity organizing committee to conduct the USDA. This is in accordance with the statements of BS and BR, as the secretary and treasurer of Faculty B:

"We have very little funding. The number of our students is very small so that we get very little funds. The price of materials to run the activity program last year was expensive, so the money was not enough. Therefore, we needed to hold a USDA".

In addition to the reasons for the lack of funds obtained from the university / faculty, the university itself is sometimes also late in disbursing funds for committee activities which results in the USDA being an important matter related to the running of a student activity. This is in accordance with the statement of RW as SMF treasurer in Faculty I:

"In the past period, university funds for activities were not yet disbursed when the activity began, so we had to borrow money to start the activity".

The same statement was also expressed by ES who participated in the committee activities of this period:

"Yesterday I joined the committee but the funds for the activities were not yet disbursed until the event was finished. In the afternoon we were told that the funds were just disbursed".

To get around this, the activity committee can borrow money from the student body's cash obtained from the previous period when the activity had an excess of USDA funds. So the rest of the USDA funds will usually be given to the student body's treasury as a savings fund that can be used if there is a shortage or the funds have not been disbursed. This is in accordance with the statement revealed by KK, the speaker from Faculty F:

"To overcome funds that have not yet disbursed from the university, we usually use last year's savings, borrow the money from the USDA in the past according to our needs, then when the funds are disbursed we will return it."

The same statement was also expressed by PD as treasurer of Faculty G:

"The remaining money from the past activity must be returned to LK's cash. This is done so that LK has a reserve of funds when there is activity but the funds have not been disbursed, so it can be helped from LK's cash funds".

This not only occurred in the two faculties above, but also in H and K faculties. The faculties also require that the remaining USDA money be returned to the student body's treasury. The purpose of returning the rest of the USDA money is as a reserve fund that can be used if there

is a shortage in the committee or an urgent need, given that the funds sometimes have not gone down during the activity. So there are indeed a number of faculties that use the remaining USDA money from last period as a savings fund that can be used for sudden needs. However, other faculties stated that the remaining money from the USDA was the committee's right, so it was up to the committee's policies regarding the use of these funds. This is in accordance with the statement conveyed by BS and BR as SMF treasurers of Faculty B:

If the USDA has excess money, it is for the committee, and it's the committee's rights. It is the committee who work but the money ultimately enters the LK treasury. That's a pity.

The same statement was expressed by SR as treasurer of Faculty I;

"In the previous periods the remaining USDA money was returned to LK's cash, but it was once questioned by the activities committee because it was our own money, the USDA was conducted by the committee, the fine was also paid by the committee itself. So, for this period the remaining USDA money is returned to the committee, it is up to the committee to use what ".

The remaining USDA money that is not returned to student organization is usually used for committee dissolution or distributed in cash to committee members. This is in accordance with HD's statement as one of the speakers who joined the committee at Faculty A:

"At that time there was money left over from the committee activities, and it was planned for the dissolution of the committee and meals, but because some members were busy and could not come, the money was divided per member to Rp. 200,000.00".

The same statement was also expressed by the SMF treasurers of Faculty D and E: "In our faculty, if there is left over money, it will be returned to the members of the committee directly, in the form of money or meals".

From the results of interviews with the faculties, there are no written rules that prohibit the allocation of USDA funds. However, if this continues, it will potentially deviate from the main objectives of the USDA that to cover the lack of activity funds does not mean to gain personal or group benefits by under the guise of the dissolution of the committee or the remaining money to be shared privately. The potential for fraud at this stage is more due to the rationalization motives with the reasons for having collected funds personally and even sacrificing time and energy, so it is natural that if there are funds remaining then used for personal or group interests, such as the dissolution of the committee, making uniforms and giving cash-back. The potential fraud that may occur at this stage can be seen from the USDA which is used as a financing component in the implementation of activities. The USDA fund collection is no longer seen from the side of the interests of the activities, but the aim has deviated to meet personal and group needs.

# Identification of potential fraud in the management of student funds at the accountability stage

The final stage in the management of student funds is accountability. The process of making Accountability Reports (LPJ) begins by collecting expenditure notes during activities in accordance with the source of income funds. Funds received from the university / faculty will be separated from other funds in the accountability report. In making accountability report, expense notes must be attached. Based on the standard, on the expense notes there must be a letterhead, name, address, telephone number, stamp, price per item, signature, and date. Notes that are not in accordance with standards will be returned by the SMF Treasurer to the activity committee to be corrected. In the process of making accountability report there are several conditions that indicate fraud, for example in the high price used

in the budget proposal even though the realization always uses the lowest price at the time of purchase. This results in a price difference that is potentially used for off-budget needs. This is consistent with the statement stated by IC, treasurer of Faculty E:

"Last year we lacked funds to buy faculty needs. So, because in this period there was still a lot of excess money, then it was used to buy tripot, so that the funds were not returned to the faculty, and even we also raised the price in the expense notes. The real price was around one hundred and fifties but in the expense note we wrote three hundred so that there was no leftover money."

Another example of the potential for fraud in the accountability stage is as stated by ES who has ever participated in committee activities:

"I used to raise the price of rent in the receipts when renting chairs. I budgeted two hundred thousand, even though the rent for the chair was only fifty thousand. I made my own receipt, and I wrote my own telephone number. Then I asked the rental owner to sign on the note, because he already knew. At first, I was worried I would be confirmed by the treasurer, but in fact I was never called, and this became a habit every time I joined the committee."

The potential for fraud occurred because there was no confirmation to the third party regarding the expense notes attached on the accountability report collected. If the standard requested by the SMF Treasurer has been met then there is no need for confirmation, because it is felt to be burdensome and takes a long time.

However, it is proven that there is still one faculty that makes confirmation in process of accountability report making. This was revealed by EL, as SMF Treasurer of Faculty D;

"At that time when I became the treasurer of activities, when there were incorrect notes or did not meet the correct classification of notes, I immediately confirmed directly to the shop, such as confirmation of purchase or if there was something lacking such as

a stamp, signature, or when there was a scribble I immediately came to the shop to ask the new one".

From interviews with all faculties, other phenomena that indicate misuse of the accountability report are indicated by marking up prices, changing the date of the purchase notes so that they are not reported to the accountability report, using a blank note so that the nominal between expenditure and budget is the same. This is consistent with the results of the interview with the SMF Treasurer at Faculty B:

"To get around the same budget and LPJ, we usually ask for a blank note, or we change the price in the expense note. For example, the difference is fifteen thousand, then we look for a note that the price can be raised".

A similar statement was also expressed by SMF treasurer at Faculty K:

"Faculty K usually also uses blank notes to balance between the nominal in accountability report and the nominal in proposals. But in this period, we changed the date in the note. The rule from the faculty states that purchase memorandum could not be included in accountability report if it is more than thirty days, because it is considered expired and will be a problem. So, we changed the date so that it would not be included in the accountability note, or we balanced to the nominal as needed so that it could be fit, so we just manipulated accountability report."

The results of interviews show that in all faculties such cheating is familiar to them. In fact there was one faculty that even taught the activity treasurer to manipulate financial report data so that the proposal budget and accountability report were the same. This was revealed by BS and BR as treasurers of Faculty B:

"When the treasurer of activities experiences difficulties, we sometimes help him directly, especially when making accountability reports, by providing input on how to make the nominal in the accountability report and the proposal be balanced."

Thus it can be seen that in the stage of making accountability report at some faculties, there has been the same potential for fraud. The motive is by looking for ways or loopholes so that the budget and accountability have the same value, either by using any means. The main purpose of accountability carried out by students is the balance in the numbers between budget and realization. One of the motives for doing this is because of pressure. If there is money left over then the budget for the next period will be cut. Besides, rationalization is also a reason in which they think that it is natural and it has become a hereditary culture of each generation.

### Identification of the Potential Whistleblowing in the Management of Student Funds

Based on the results of the identification of potential fraud that has been described, this study also intends to assess the potential for existing whistleblowing. Open fraud has never been found or even brought to the realm of law, but what happens is the potential for fraud that is almost the same for every activity. Even in general the university tends to close the eyes to the potential for fraud committed by students in the management of student funds, because the scale of the loss experienced is considered insignificant and also due to the university's ignorance regarding this form of fraud. This also underlies the lack of intention to conduct whistleblowing in this study. As the results of interviews that show that the interviewees do not have the intention to disclose the existing fraud in managing student funds. This was revealed by PD as Treasurer of Faculty G:

"We have no applicable rules like SP when there is fraud, and choose not to report, but it is settled within the family within the LK, so it does not reach to the top".

The same thing was also expressed by SMF treasurer of Faculty L:

"If there is an act of fraud within the committee, we will usually reprimand and resolve in a family manner, there will be no blacklist or SP, and it will only be resolved

in our LK unit, not to be reported".

Based on the results of interviews in Faculties C, D E, F, M, they tend to remain silent when they encounter fraud, especially those that have become a hereditary culture as is in the case in the USDA and accountability report. Although there are some faculties that claim to report fraud, in reality they have never reported any fraud. In addition to becoming a heredity culture, it is also due to the absence of a systematic fraud reporting mechanism.

#### 5. CONCLUSION

Overall there is potential for fraud either in the planning, implementation, or accountability stages. However, research focuses more on both stages: the implementation stage related to USDA funds and the accountability stage related to the misuse of financial statements by falsifying notes and marking up the price. If this is allowed to continue, it will lead to bad morals, especially to students, because they can collect the USDA money only for the dissolution of the committee or other matters and not focus on the committee. Their motive for doing that is because they feel it is a natural thing and has become a hereditary culture. In addition, the potential for whistleblowing is not found. All informants saw the potential for fraud, but they were reluctant to disclose, let alone to report it to the university, because there was an assumption that if there was potential for fraud it would be better to discuss it in a family way.

The limitation of the research is that there is no data triangulation, such as obtaining supporting evidence in the form of notes, accountability report, or proposals, because it is considered very sensitive and the informants are less open in providing answers during the interview process related to the topic of fraud. Therefore, it is suggested that further researchers expand the object of research not only in one university but many universities, or deepen only in one stage and only focus on one type of fraud.

#### **REFERENCES**

- ACFE. (2017). What Is Fraud? Retrieved June 6, 2017, from http://www.acfe.com/fraud-101.aspx
- Appelbaum, M. K., Law, J. B., Jones, D., Barnacz, A., Johnson, A., & Keenan, J. P. (2007). "I think I know what you mean." The role of theory of mind in collaborative communication. Interaction Studies: Social Behaviour and Communication in Biological and Artificial Systems, 8(2), 267–280.
- Arens, A., Randy, E., & Mark, B. (2008). Auditing dan Jasa Assurance Pendekatan Terintegrasi. In *Auditing* dan Jasa Assurance Pendekatan Terintegrasi. Jakarta: Erlangga.
- Asikin, I. (2017, April). ICW Ungkap Korupsi di Dunia Pendidikan, Dinas Pendidikan urutan Teratas. *Tribun News*.
- Bagustiantoi, Rizki, & Nurkholis. (2013). Faktor-Faktor yang Mempengaruhi Minat Pegawai Negeri Sipil (PNS) untukMelakukan Tindakan Whistleblowing. *Jurnal Ilmiah Mahasiswa FEB.*, 3(1).
- Dasgupta, S., & Kesharwani, A. (2010). Whistleblowing: A Survey of Literature. *IUP Journal of Corporate Governance*, 9(4), 57–70.
- Dyck, Alexander, Morse, & Zingales, L. (2010). Who blows the whistle on coporate fraud? *The Journal of Finance*, 2213–2253.
- Hasrat, W. (2016). Diduga Tilep Dana BOS, Kepsek Ini Ditahan Jaksa. Retrieved from https://daerah.sindonews. com/read/1126660/192/didugatilep-dana-bos-kepsek-ini-ditahanjaksa-1469611974
- Miceli, M. P., Near, J. P., & Dworkin, T. M. (2008). *Whistleblowing in Organizations*. New York: Rotledge.

- Miles, M., & Huberman, A. (1994). Miles and Huberman Chapter 2. In *Qualitative Data Analysis*.
- Park, H., & Blenkinsopp, J. (2009). Whistleblowing as planned behavior A survey of south korean police officers. *Journal of Business Ethics*, 85(4), 545–556. https://doi.org/10.1007/s10551-008-9788-y
- Park, H., Blenkinsopp, J., Oktem, K. M., & Omurgonul. (2008). ultural Orientation and Attitudes Toward Different Forms of Whistleblowing: A Comparison of South Korea, Turkey, and the U.K. *Journal of Business Ethics.*, 82, 929–939.
- Purnami, G. A. K. M., Sulindawati, N. L. G. E., & Marvilianti, P. E. (2017). Akuntabilitas Pengelolaan Keuangan Organisasi Kemahasiswaan Keluarga Mahasiswa Hindu Dharma Yowana Brahma Vidya Universitas Pendidikan Ganesha. *Universitas Pendidikan Ganesha*, 8(2).
- Puspita, Y. R., Haryadi, B., & Setiawan, A. R. (2015). Sisi Remang Pengelolaan Keuangan Organisasi Mahasiswa. *Jurnal Akuntansi Multiparadigma*, 6(1), 133–144. https://doi.org/10.18202/jamal.2015.04.6011
- Rakhmawaty, P. (2016). Eks Rektor Unair Tersangka Korupsi Pengadaan Alkes. Retrieved from https://nasional. sindonews.com/read/1096984/13/ eks-rektor-unair-tersangka-korupsipengadaan-alkes-1459343409
- Rezaee, Z. (2005). Causes, consequences, and deterence of financial statement fraud. *Critical Perspectives on Accounting*, 16(3), 277–298. https://doi.org/10.1016/S1045-2354(03)00072-8

- Rustiarini, Wayan, N., & Sunarsih, N. M. (2015). Fraud Dan Whistleblowing: Pengungkapan Kecurangan Akuntansi Oleh Auditor Pemerintah. In Simposium Nasional Akuntansi XVIII.
- Saptarengga, H. (2014, November). Mengkaji Dana Kemahasiswaan. Setarnews.
- Seifert, D. L., Sweeney, J. T., Joireman, J., & Thornton, J. M. (2010). The influence of organizational justice on accountant whistleblowing. *Accounting, Organizations and Society*, 35(7), 707–717. https://doi.org/10.1016/j.aos.2010.09.002
- Siringoringo, W. (2015). Pengaruh Penerapan Good Governance dan Whistleblowing System Terhadap Kepatuhan Wajib Pajak Orang Pribadi dengan Resiko Sanksi Pajak sebagai Variabel Moderating (Studi Empiris terhadap Wajib Pajak Orang Pribadi di Kota Bekasi). Jurnal Akuntansi Universitas Tarumanegara, 19(2), 207–224.
- Wardah, F. (2012). Jaksa: Miranda Goeltom Terlibat Penyuapan Anggota DPR. Retrieved June 25, 2019, from https://www.voaindonesia. com/a/jaksa-miranda-goeltomterlibat-penyuapan-anggotadpr/1444061.html