WHISTLEBLOWING SYSTEMS AS AN EFFORT TO PREVENT FRAUD IN STATE UNIVERSITIES WITH LEGAL RIGHTS (PTN-BH)

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Science and Technology Index

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Abstract
The Integrity Zone was created to eliminate fraud, and one of the channels to prevent fraud was the whistleblowing system. This research aims at obtaining an overview of the implementation of the Whistleblowing System at Legal Entity State Universities (PTNBH) and the impact of its implementation on preventing fraud. The urgency of this research was to find out how much influence the whistleblowing system had as a mechanism for preventing fraud. This research methodology used a qualitative approach using in-depth interviews, the human resources used were the leaders of SPI ITB, IPB, and UGM, and then the data was analyzed using source triangulation and data triangulation. The results of this research found that with strong internal controls at the three PTNBHs, the whistleblowing system was not the main mechanism for preventing fraud. However, a whistleblowing system was still needed as public/stakeholder control to create good university governance.

INTRODUCTION

Fraud is defined as abuse of position to gain personal gain through misuse of organizational resources or assets (ACFE, 2018). Various kinds of laws and regulations were created to eradicate cases of fraud, but this did not reduce the level of fraudulent practices (Prasasthy, 2021). Fraud and irregularities that occurred were a big problem in Indonesia. If we referred to the 2020 Association of Certified Fraud Examiners (ACFE) report on fraud cases that occurred in the Asia Pacific region, 18% of fraud occurred in Indonesia. Meanwhile, based on the 2022 Corruption Enforcement Trend Monitoring Report from Indonesia Corruption Watch (ICW), the trend could be seen in Figure 1 below (ACFE (Association of Certified Fraud Examiners), 2020):
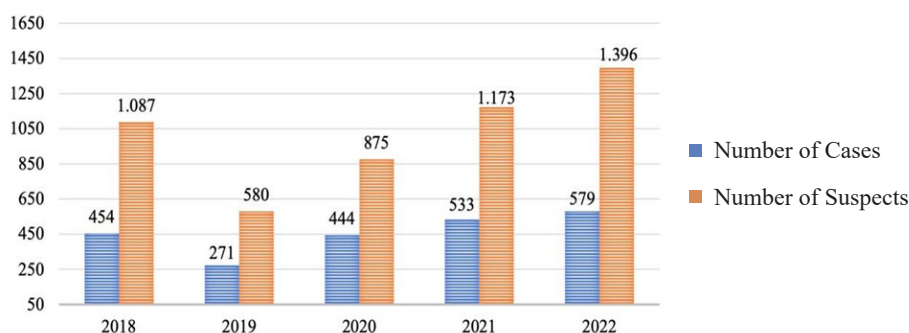
Figure 1. Corruption Enforcement Trends (source: ICW:2021)

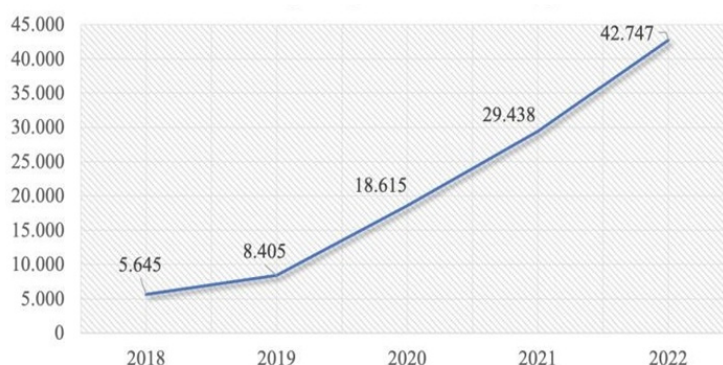Potential state losses due to corruption see the following picture:

Figure 2. Potential State Losses (Source: ICW:2020)

This increasing trend in Figure 2 showed that corruption was still rampant with a fantastic increase from year to year. ACFE revealed that misuse of organizational assets or resources can be misused by someone to enrich themselves through intentional or unintentional misuse or in other words a distortion of the benefits a person obtains by presenting something that was not under the actual situation. Deviations can take the form of non-compliance with regulations which may be caused by ignorance of an applicable regulation or because there is justification for a mistake that is commonly committed. So that deviation was an act of fraud or error committed by a person or an entity who knew that the error could result in losses for that person or an entity of another party (Arshad et al., 2015).

Deviations gave rise to errors of evaluation or maintain existing errors of judgment to induce someone to enter into a contract. This was done because it involved deliberate self-enrichment by secretly reducing the value of assets (Rorwana et al., 2015). Deviations in resource management were a problem that often occurred, both deviations in asset management and deviations in financial management. Managers who committed deviations might do so intentionally or because of a lack of understanding in management. However, some managers justified their wrong habits in managing resources. These actions would result in waste and losses so that budget performance becomes inefficient and ineffective (Arshad et al., 2015). Thus, deviations could occur due to a person's perception of the actions they took with anti-fraud values, including anti-corruption. Currently, anti-corruption education was being carried out something the university was actively doing. Universities must be responsive to phenomena that occurred and must be dynamic in responding to rapid changes. To be able to respond quickly to changes, through the Republic of Indonesia Government Regulation Number 4 of 2014 concerning the Implementation of Higher Education, it was stated in article 27 that there were three patterns of management of Higher Education Institutions (PTN), namely: State Higher Education Institutions with the management of state finances in general, State Higher Education Institutions with the pattern of public service agencies, and State Universities which were legal entities.

From the three patterns above, Legal Entity State Universities (PTN-BH) had the widest possible autonomy in various matters. The autonomy given to PTN-BH aims at enabling universities to adapt quickly to existing dynamics, including in their management (Yusuf et al., 2021). Autonomy provides flexibility both for improving academic quality and for other things that can support excellence in the academic field, including finances, resources, facilities, and so on. Wisdom in the financial sector includes being able to collect funds from the community and being able to manage finances independently. Management funds and other autonomy

provided by the government open up space for unscrupulous state universities to commit 'fraud'. The Corruption Eradication Commission (KPK) in 2014 named UI's Deputy Chancellor for Human Resources, Finance and General Administration as a suspect in abuse of authority in procuring an IT procurement project with a project value of 21 billion. In 2023, Unila's leadership was sentenced to ten years in prison for the bribery case for admitting new students to the Faculty of Medicine (NN: 2023).

From the two cases above, we could see that corrupt practices still occurred in higher education environments. (Kurnia et al., 2020) stated that the potential for corruption occurs in activities in higher education, namely: (1) Procurement of goods and services; (2) Grant Funds or CSR; (3) Research Funds; (4) Internal Budget; (5) Education Contribution Fund. The abuse that occurred not only caused a loss of state money but also had an impact on access, quality and equality of education. Another important thing, misuse can reduce the level of trust in universities which should be a source of honesty and integrity (Yusuf et al., 2021).

The Ministry of Education, Culture, Research and Technology was trying to create Integrity Zones, where higher education leaders were committed to realizing Corruption-Free Areas (WBK) and Clean and Serving Bureaucratic Areas (Clean and Serving Bureaucratic Areas-WBBM). The Integrity Zone was created to eliminate fraud, and one of the channels to prevent fraud was the whistleblowing system. The urgency of research regarding the application of whistleblowing in the Integrity Zone environment lay in the importance of strengthening integrity, transparency and accountability in institutions, especially in the higher education sector. Since whistleblowing served as an important mechanism for detecting and addressing fraud, corruption and misconduct, its effective implementation within the Integrity Zone was critical to foster a culture of integrity and combating unethical practices. Furthermore, this research aims at highlighting the unique challenges and opportunities associated with implementing a whistleblowing system in state universities with legal entities (PTN-BH), which had a significant level of autonomy. This research sought to differentiate itself from existing research by focusing specifically on the PTN-BH context and examining the ins and outs of the whistleblowing mechanism within the Integrity Zone framework. This aims at providing new insights and practical recommendations tailored to the needs of PTN-BH institutions, thereby contributing to the advancement of knowledge and best practices in the field of anti-corruption and organizational governance.

The Theory of Planned Behavior and Prosocial Behavior Theory underlay this research. The theoretical and practical contribution of implementing the Whistleblowing System (WBS) in Legal Entity State Universities (PTN-BH) extended strategically to both the academic world and the public sector. His theoretical contribution lay in enriching an understanding of the dynamics of organizational governance in the higher education sector, particularly in addressing fraud and corruption. Exploring the effectiveness of WBS at PTN-BH, improved the theoretical framework regarding fraud prevention mechanisms, institutional accountability, and ethical leadership in complex bureaucratic structures (Hermiyetti, 2010). Moreover, the practical implications were enormous, as these findings provide actionable insights for university administrators, policymakers, and anti-corruption agencies. Implementing WBS not only strengthens internal control mechanisms but also fostered a culture of transparency, integrity and accountability. This research underscored the strategic importance of PTN-BH to take proactive steps in combating fraud, thereby maintaining public trust, improving the quality of education, and encouraging sustainable development in the higher education sector.

In the Integrity Zones set by the Ministry, including universities, there was a Whistleblowing System (WBS). WBS was needed to prevent deviations that caused problems in resource management. In Riyanto and Arifin's (2022) research, one of the conclusions stated that WBS had a significant influence on fraud prevention. The research was conducted at BPK with BPK auditor respondents. The results of this research indicated that WBS had an important role in fraud prevention. With the large number of fraud cases occurring in universities and based on obligations and awareness, many universities were implementing WBS, including the University of Indonesia (SIPDUGA UI). Gadjah Mada University (SIAP UGM), IPB, ITB and others. Based on the phenomenon that had been described, the research question was: "Could the Whistleblowing System (WBS) be applied to state universities that were legal entities?" (PTN-BH) prevent fraud?"

The practical aim of this research at obtaining an overview of the implementation of WBS at PTNBH and the impact of its implementation on fraud prevention. Meanwhile, for academics, it was to provide new knowledge regarding the application of the Whistle Blowing System in preventing PTN-BH Fraud. With this research, PTN-BH could maximize WBS and/or develop it following the main goal of creating good university governance.

METHODS

This research was conducted at Legal Entity Colleges in Indonesia in 2023. This used a qualitative approach, qualitative research was an approach or search to explore and understand a central phenomenon which in this case had a more focused and in-depth discussion scope. Sekaran & Bougie, (2017) explained that the qualitative

approach was an approach in research that was used to discuss a problem with a more general scope, has a large data area, and had a complex level of variation but lay on the surface. Based on existing assumptions, this research began with phenomena or events that occurred, namely phenomena related to fraud prevention at PTN-BH. Apart from the phenomena that occurred, this research was also closely related to the scope of the researcher's work so writers had an interest in knowing more about the description of fraud prevention. such as problems, symptoms, facts, events and realities, thereby giving rise to new understanding. This also used in-depth interview techniques in data collection, then the data was analyzed using source triangulation and data triangulation. In this research, the type of research used was case study research (Bogdan & Taylor, 1992). Research procedures or stages in general could be explained by researchers through the following diagram:
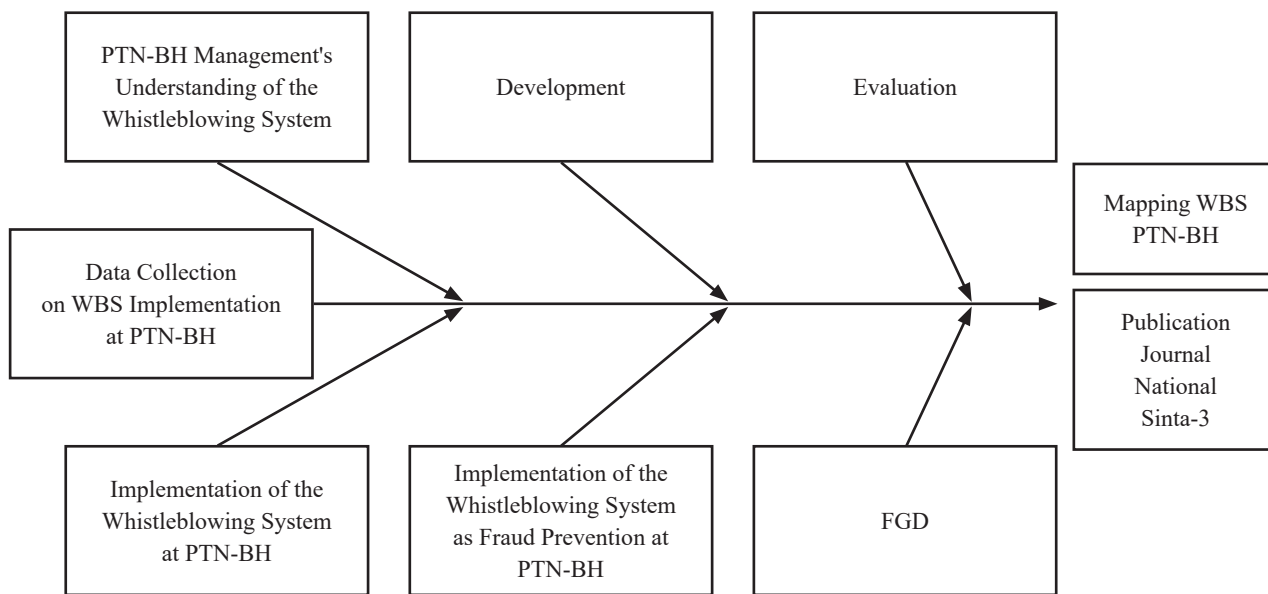

Figure 3. Overall Data Analysis Diagram

Details of the research stages could be explained in the following stages:

Table 1. Research Stages

Pre-Field Stage	The writer determined the formulation of the problem to be researched, then carried out a literature study of journals or articles as well as books and other information under the scope of the research discussion. The scope of discussion in the research was regarding Fraud and Whistleblowing Systems (WBS). Next, determine and develop the research methods that would be used, including: (i) selecting a research approach; (ii) data collection methods; (iii) determining the data sources used; (iv) sources to be contacted, And; (v) formulate draft questions that would be asked during data collection.
Field Stage	Collect data from predetermined data sources. Data collection was carried out using semi-structured interviews with sources from the PTNBH Internal Supervisory Unit. This interview was carried out by asking questions that the researcher had prepared at the pre-field stage. Writers adjusted these questions to research indicators. Apart from interviews, data collection was also carried out through document study. The document study in this research was carried out by studying documents related to the implementation of e-procurement and agency SOPs as a whole.
Data Analysis Stages	Writers carried out qualitative data analysis by grouping interview data into tables according to keywords (coding). From these keywords, the writer would draw conclusions which would be the final results of the research. Data analysis used source triangulation and data triangulation to test the validity of the data.
Data Credibility Testing Stage	Researchers tested the credibility of the data using the Triangulation method. The triangulation methods used were method triangulation and source triangulation. Writers carried out method triangulation by comparing data obtained from several data collection methods used. Meanwhile, in source triangulation, writers compared data obtained from several data sources.

In this case, the data sources in the research consisted of primary data sources and secondary data sources. Primary data sources could be interpreted as data sources that came from first-hand or were obtained directly by researchers from related parties. The primary data source that the researcher used was a research source determined by the researcher using the purposive sampling method. The way to obtain data was by in-depth interviews, and interviewing the first parties. Purposive sampling was carried out by considering the internal control work unit. Secondary data sources were data sources that come from second parties or in this case referred to data that had been previously collected from existing sources (Albercht et al., 2012) Secondary data sources that writers used were written materials such as government publications, news media websites, as well as notes or documentation related to procurement management and source agency websites.

Sampling data sources in qualitative research could be done using purposive and snowball techniques. The purposive technique was carried out by considering its relationship to the research, while the snowball technique was carried out by collecting a little data at the beginning of the research and then adding a certain amount of data according to the informant's recommendations (Sugiyono 2005: 54). In this research, a purposive sample selection technique was used, taking into account that the internal supervisory unit knew all university activities.

Research instruments were the most important part of the research. In this case, tools, techniques and informants (humans) were the most important elements in research that used qualitative methods. For interviews, writers used semi-structured interview techniques (Hariandja, 2002). The semi-structured interview technique in this research was used with the consideration that the questions asked could be more in-depth because the writer could improvise in doing this but also remained focused on the subject matter to be researched. Research informants were determined through purposive sampling. Purposive sampling was carried out with various considerations, by the research objectives (Yusuf et al., 2020).

Researchers carried out qualitative data analysis by grouping interview data into tables based on keywords (coding). From these keywords, the researcher would draw conclusions which would be the final results of the research. The triangulation method was carried out to explore and validate data from various sources, methods, perspectives and different theories (Financial & Agency, 2008). In-depth interviews were conducted with the leadership of the Legal Entity State University Internal Monitoring Unit (PTN-BH), with the first parties being human resources from the Bandung Institute of Technology, Bogor Agricultural Institute, and Gadjah Mada University.

RESULTS

Before conducting an in-depth interview, the writer first distributed questionnaires to 12 personnel in the Internal Supervisory Unit at PTNBH intending to get an initial picture of the implementation of the whistleblowing system (Nordiawan, 2006). The benefit was to determine research questions in interviews with the first party. Based on the results of a questionnaire distributed to see a picture of the Internal Oversight Unit at PTNBH that understood and was in the Whistleblowing System (WBS), the following picture was obtained:
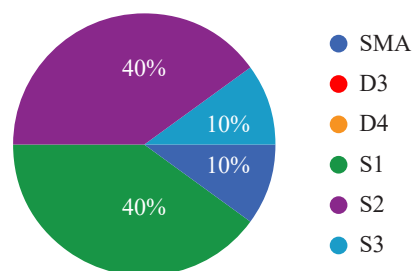

Figure 4. Background on SPI Education Levels

From the education level in Figure 4, it could be seen that the majority of internal auditors had a Bachelor's and Master's educational background (Scheetz et al., 2020). The background of the respondents' study programs was quite varied, not only with economic backgrounds but also auditors with non-economic/financial educational backgrounds. It could be concluded that auditors were multidisciplinary considering that the field being audited was not only the financial sector. To support their profession as internal auditors, they received adequate training. The results of the WBS Access questionnaire showed that 50% of respondents answered that WBS access was good, for lecturers, education staff, students and stakeholders. This showed that PTN-BH, which was the interview respondent, had opened up its widest role to all parties to provide information related to fraud or other activities that needed to be improved by the Institution (Rabi'u Abdullahi, 2020).

In addition to the questionnaire, the research team conducted in-depth interviews regarding WBS and fraud prevention with informants. Those interviewed were the chairman and members of the Internal Audit Unit (SPI). The selection of sources was based on the researcher's consideration that SPI had complete information about the organization. Based on Government Regulation Number 65 of 2013 concerning the Statute of the Bandung Institute of Technology, the objectives of ITB's internal control and supervision system are: (1) Ensure accountable financial and asset management; (2) Ensure efficient utilization of resources; (3) Ensure the accuracy of data and information from sources for decision-making.

Of course, this goal was inherent in SPI to be able to know and ensure that the activities of non-academic organizations run well, with minimal errors and zero fraud. This inherited function was of course inseparable from other SPI functions, namely preventing fraud. One of the efforts to prevent fraud is through the Whistleblowing System (WBS). WBS was something that was no longer foreign to the ITB community, this was something that had been studied at ITB. The results of the interview illustrated that the Bandung Institute of Technology had established and maintained WBS. A good WBS was very helpful for improvement even though not many things were reported. The lack of reporting via WBS showed that ITB had minimal fraud and minimal bad service provided by lecturers and administration. The ITB WBS system was managed by the Information and Documentation Management Officer (PPID). PPID opened a complaint channel for the academic community and the general public. Complaints could be submitted in the form of academic and non-academic complaints, as well as financial and non-financial complaints which could be opened on the page https://ppid.itb.ac.id.

Figure 5. PPID website

On the website, there was a complaint form that could be filled out by all parties who had interests or complaints of an academic, financial and other nature. PPID would accommodate all complaints and distribute them to units that must be followed up. Based on information from the Chair of KAI, starting in 2020 there were no complaints regarding fraud submitted to the Internal Audit Office - the name of the Internal Monitoring Unit at ITB. The lack of complaints based on the results of interviews was due to ITB management holding coordination meetings every week to discuss obstacles improvements and organizational development that must continue to be carried out. The discussion was not only related to academics but also related to non-academics. These regular and tiered meetings make ITB responsive in following up on problems and responsive in determining steps for changes that occur (Putri et al., 2021).

The General Chairperson of KAI also said that at every meeting he was always invited to attend so that internal auditors had the latest information regarding the problems, obstacles and targets of the organization. By holding weekly meetings, transparency of information was created, and programs could be aligned and responsive to the dynamics of the ITB organization. After the leadership meeting was held, each leader would then hold a coordination meeting to follow up on the results of the meeting.

Figure 6. Complaint Form

A superior organizational culture that included effective communication and Information transparency allowed ITB to continue to make improvements in a gradual and structured manner, which in the end can minimize errors and deficiencies in all aspects of ITB.

The Whistleblowing System (WBS) at IPB was located in the Communications Bureau. Complaints at IPB were not only from WBS but also through the help centre managed by the Communications Bureau.

Figure 7. IPB Information and Documentation Management Center website

The PPID website provided access to various channels ranging from WhatsApp, email, mail and applications. The many channels for submitting complaints made it easier for interested parties to submit complaints to IPB. With the implementation of the Integrity Zone, IPB improved complaint services by opening a Whistleblowing System (WBS) specifically provided to accommodate all complaints from various groups. WBS was an obligation for universities (Pamungkas et al., 2017). IPB as a university was obliged to implement an integrity zone of which the WBS was an inseparable part. According to the Chairman of KAI IPB in his interview, "If there was a complaint problem, the Communications Bureau would convey it to the Internal Audit Office (KAI). Since the establishment of WBS, KAI IPB had not received any complaints at all."

Figure 8. IPB WBS

The absence of complaints regarding matters within the scope of KAI occurred because these units had created awareness to comply with applicable regulations. This could be seen from the results of an interview with the KAI leadership who said, "There were those who asked for an audit, units that had complaints immediately ask for an audit from the KAI leadership." The existence of an audit request showed that awareness of compliance was high enough so that there were no complaints submitted by students, parents, the community or other parties (Beach, 2018).

To help all activities comply with regulations, KAI IPB carried out 2 types of audits, the first was a routine audit and the second was an audit based on request. The unit requested to be audited through the chancellor, then the chancellor sent an audit assignment letter to KAI. The identity of the requesting party would of course be kept confidential. Based on interviews with KAI, IPB had separated the supervisory function from the risk management function, so that IPB has a risk management office. Risk management lowered the second line which was very important in managing risks and calculating risks (Putri et al., 2021).

Table 2. Questions to IPB Auditors

No	Question	Answer
1	What atmosphere does IPB create that makes auditees happy?	In recent years, KAI had assisted all units at IPB. KAI was a pathway that carried out improvements first inward before external auditors arrived. The position itself as a unit partner, but independence was maintained. Because the intention was to maintain the good name of IPB, so they were also open when they were audited. The number of auditors at KAI was only 9 people, full staff. IPB was close to the center so it was often audited by the BPK. Maybe the auditee was aware because he was often audited by external auditors. So awareness grew. They understood the importance of audits.
2	Does this culture ultimately result in the WBS that has been prepared not having any reports at all, because the units at IPB are satisfied with their KAI?	Maybe what I heard was true ma'am, for example, from a procurement perspective it was very risky, but things like development and so on at IPB could be said to be clean.
3	Is this also related to the appropriate take-home pay?	IPB lecturers could receive 18x their annual salary, 12x their normal salary and 6x their additional salary. There would be a reward system calculation. The same applied to employees. IPB employees had double cover for their health insurance, BPJS and Ramayana, so double cover.
4	Apart from welfare factors, are there other factors that make fraud prevention at IPB a culture?	For example, our seniors, in this era of rapid development, there was nothing like that. Nothing was ever revealed, maybe that's what we should use as an example. One of IPB's taglines was innovation with integrity.
5	What about socialization is it done regularly?	This socialization was only carried out this year, and we also invited PwC as a resource.

The results of the interview showed that in the WBS provided by IPB until the interview was conducted, there had not been a single complaint submitted by interested parties. This was because IPB had implemented good risk management so the governance carried out was quite good. Apart from that, IPB leadership (tone of the top) can set an example of integrity, so that people were very reluctant to commit fraud (Chen et al., 2009).

Public Relations had an admin to distribute to each unit regarding existing complaints or grievances.

Table 3. Questions and Answers from UGM

No	Question	Answer
1	What atmosphere does IPB create to make auditees happy?	Complaints might only come 2-3 times a year. Regarding fraud, if there were no complaints it meant there was a problem. However, we were currently investigating the potential misuse of these funds. However, it was rarely included in the WBS. But there were two possibilities that not many people complained about throughout the year. Or when the WBS complaint process entered the system but was private and it was handed over to another unit to be resolved, so it had not yet reached us.
2	Regarding this, an email must be received. Where did the email come from, and was it not limited to the UGM community?	Yes, because complaints could come from outside sources. For example, regarding sexual violence.

3	Do 3-4 complaints help identify fraud or are most of them just complaints without facts?	Actually, with that little data, we could not yet judge whether it was effective or not. However, there were several possibilities, the choice was whether he would report or remain silent. You could also go through informal channels. So it could not be concluded that the system could provide us with feedback because sometimes it was not clear.
4	Regarding fraud prevention, our research topic suspects that the WBS channel is a tool that can reduce fraud. However, for some BH universities, the WBS channel is not the main channel for fraud prevention. Meanwhile for UGM itself, especially SPI, to suppress fraud prevention apart from WBS, what about you? thinking about?	For the preventive process, socialization was recently carried out regarding employee discipline, procedures and fund accountability models. I thought that's part of the outreach, not only to implementers but also to lecturers, etc. Preventatively, that's what we conveyed, sometimes only on the website regarding suggestions, or in several meetings (Jalil, 2018). Technically there were several things such as budget recognition approval that could only be done by someone in a higher position. For the preventive process, socialization was recently carried out regarding employee discipline, procedures and fund accountability models. I thought that's part of the outreach, not only to implementers but also to lecturers, etc. Preventatively, that's what we said, sometimes only on websites related to appeals or some meetings. Technically there were several things such as budget recognition approval that could only be done by someone in a higher position.
5	Everywhere is vulnerable in terms of procurement. So many complaints, are most of them in the procurement sector or are they the same as other units?	There were not many complaints, but they were varied. The first was related to the arrangement of street vendors around campus, and lecturers who obstructed students regarding their thesis and procurement.
6	Do you hold regular leadership meetings?	There was a Leadership Meeting every Monday morning which discussed various matters. Various problems, including fraud.
7	At UGM, are risk management and SPI separated? When the results of the complaint come in, do they go to risk management first or do they still have to be followed up with SPI?	Audit and Risk Management at UGM were still one unit and could not be separated. The risk was in the hands of SPI, even the newest one used to have 2 divisions, one audit and monitoring, the second consulting and risk management. So, indirectly, risk management had become SPI's responsibility. Legally we had violated the law, but in terms of activities, we were still carrying out it. Over the next few months, we hired a risk management consultant.
8	For UGM itself, especially SPI, to suppress fraud prevention other than WBS, what is that?	For the preventive process, socialization was recently carried out regarding employee discipline, procedures and fund accountability models. I think that was part of the outreach not only to implementers but also to lecturers, etc. Preventatively, that's what we do.

DISCUSSION

ITB had a Public Administration and Information Bureau, this bureau opened a channel for complaints from the academic community and the general public. The complaints were varied, both academic and non-academic, financial and non-financial (Singleton et al., 2006). All incoming complaints were sorted by type and forwarded to the appropriate column to follow up on the complaint. WBS at ITB has been implemented by PPID (Information and Documentation Management Officer of the Bandung Institute of Technology) via the Bandung Institute of Technology Public Information Services website (https://ppid.itb.ac.id). On the website, there was a complaint form that could be filled out by all parties who had interests or complaints of an academic, financial and other nature. PPID will accommodate all complaints and will distribute them to units that must be followed up. Since 2020, no complaints regarding fraud had been submitted to ITB's SPI (Internal Monitoring Unit), this showed that ITB had minimal fraud and/or had been resolved during the audit (Kultanen, 2017).

In the context of information disclosure, program alignment and responsiveness to ITB organizational dynamics, a leadership meeting was held every week, and after the leadership meeting, each leader would hold a coordination meeting to follow up on the results of the leadership meeting (Ojua, 2016). leadership meeting. With regular meetings and coordination, findings could be obtained every week too. Based on Government Regulation Number 65 of 2013 concerning the Statute of the Bandung Institute of Technology, the objectives of ITB's internal control and supervision system are (Rorwana et al., 2015): (1) Ensure accountable financial and asset management; (2) Ensure efficient use of resources; (3) Guarantee the accuracy of data and information for decision-making.

One thing about internal controls, this was our third year being audited by PwC. To control whether IPB runs with the system. At that time, what Finance did was strengthen their respective lines (Harwida, 2015). This year writers were reviewing financial reports every month. At IPB, the Chancellor and the staff above have implemented cultural elements such as honesty and others that have been implemented in previous years. Writers also applied persistence, hard work, not giving up easily, a spirit of cooperation, empathy and commitment at IPB. Therefore, the understanding was increasingly ingrained in this matter. The first and second ranks of IPB also understood very well that from the start writers had to be right. To become a good IPB, not only KAI. But all units, even the smallest units, had a tremendous impact (Zamzami et al., 2016).

Complaints might only come 2-3 times a year. Regarding fraud, if there were no complaints it meant there was a problem. However, writers were investigating the potential misuse of these funds. It was rarely included in the WBS. There were two possibilities, throughout the year there were not many complaints and when the WBS complaint process entered the system, it was personal so it had been handed over to another unit to be resolved so it had not yet reached us (Marks & Ugo, 2016). For the preventive process, socialization was recently carried out regarding employee discipline, procedures and fund accountability models. The writer thought that was part of the outreach, not only to implementers but also to lecturers, etc. Preventatively, that was what writers conveyed, sometimes only on the website regarding suggestions, or in several meetings. Technically there were some things, such as approving budget recognition, that could only be done by someone in a higher position.

This research was in line with several previous studies which emphasized the importance of whistleblowing in organizational internal control. Fitriyah Resource (2016) showed that whistleblowing is an important mechanism for identifying fraud that was not detected by traditional internal control systems. Their research also highlighted the importance of protection for whistleblowers to ensure the effectiveness of the WBS.

In addition, research by Mahmudi et al., (2007) found that organizations with strong and effective internal control systems often had a lower number of complaints, because potential fraud could be prevented from the start. However, they also emphasized that the existence of a well-functioning WBS remained important as a safety net for dealing with violations that escape the internal control system.

CONCLUSIONS

The conclusion from the research results was that the Whistleblowing system was a complaint channel that could help strengthen PTNBH's internal control. One indicator of the strength of internal control at PTNBH was the minimal number of complaints via the WBS channel. A whistleblowing system could be an important channel for detecting and dealing with fraud if there were weaknesses or gaps in the internal control system that could not be identified through other internal mechanisms. Therefore, although a strong internal control system could help prevent fraud, a Whistleblowing system remained relevant and needed to be maintained to ensure that any violations or unethical actions could be immediately disclosed and acted upon. To achieve maximum fraud prevention, it was important to maintain a balance between a strong internal control system and an effective Whistleblowing System (WBS) (Rasmini et al., 2022).

The theoretical implication of this research was the increasing understanding of fraud prevention from the whistleblowing system. The stronger the internal control of whistleblowing, the lower the quantity of occurrence. The practical implication of this research was to increase awareness of the importance of strengthening internal control at PTNBH. The limitations of this research were the lack of time and money for writers to carry out field observations at the PTNBH that the writers interviewed. Suggestions for further research were to explore reporting systems in whistleblowing that allowed stakeholders to convey findings with guaranteed security for whistleblowers.

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