



Evaluation of Internal Audit Role as a Governance, Risk and Compliance Partner, Trusted Advisor and Value Driver to Implement Strategy (Case Study of Indonesia's Social Health Insurance Provider)

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Abstract

This study aims to evaluate the alignment of the scope of internal audit activities with the strategy of Indonesia's Social Health Insurance Provider (BPJS Kesehatan). The perception of the added value provided by the internal audit is often described as hazy and enigmatic. Therefore, Eulerich and Lenz (2020) defined the internal audit role into three scopes: Governance, risk and compliance (GRC) partner, trusted advisor and value driver. This qualitative research uses a case study method by collecting internal organisational documents, questionnaire surveys and interviews. The results show that BPJS Kesehatan's internal audit can act as both a GRC partner and a trusted advisor. However, its internal audit activity is not prepared and aligned with the implementation of the organisation's strategy. The internal audit function is nevertheless moving towards aspects in which it may add more value to the success of the organisation's strategy.

Keywords: GRC partner; strategy; trusted advisor; value drive

INTRODUCTION

The COVID-19 pandemic had a significant impact on Indonesian society, especially the health sector. According to data compiled by the Indonesian General Insurance Association (AAUI), health insurance

premiums grew by 5.7% YoY in the first quarter of 2020 compared to the last quarter of the previous year (Lestarini, 2021). It is therefore clear that the pandemic also impacted the health insurance industry.

Indonesia has commercial and social types of health insurance. The Indonesia's Social Health Insurance Provider (*Badan Pengelola Jaminan Sosial (BPJS) Kesehatan*) holds full responsibility for the implementation of social health insurance. Participation in social health insurance is mandatory for all Indonesians, as stated in Law No. 24 of 2011 concerning Social Security Administering Bodies.

According to data compiled by Dewan Jaminan Sosial Nasional (2022), membership coverage as of December 2021 stood at 86.96% of the total population of Indonesia. This membership of the *Jaminan Kesehatan Nasional (JKN)* health insurance programme establishes BPJS *Kesehatan* as the most prestigious social health insurance provider in the world (Ramadhan, 2020).

Given its size and the importance of the JKN programme's success for all Indonesians, the control and supervision of this institution are critical. Based on the internal regulations of BPJS *Kesehatan*, four external auditors are assigned to its audits, including internal audits.

To actualise the success of its strategy, an organisation's governing body needs various functional units to

support the predetermined objectives. The Institute of Internal Auditors (IIA) (2020) identified three lines within the organisation that can support its goals: management in charge of managing risk on the first line, management in charge of monitoring risk on the second line, and internal auditors on the third line.

In the third line, an internal audit provides objective and independent assurance along with advice. However, there has been a shift in the traditional perception of the focus of internal audit on compliance, internal control, risk management and financial audit (i.e. as a governance, risk and compliance (GRC) partner). The fact is that the dynamic business environment often challenges the contribution of internal audits in terms of added value and tests the relevance of the profession (Eulerich & Lenz, 2020).

Previous research by IIA Netherlands and KPMG (2015) revealed that the internal audit profession has undergone many changes over recent decades, including in its selection of subjects to determine the audit programme. A striking development has been the shift from a previously held perception that an internal audit focuses solely on hedging to the perception that it focuses on value creation. The value

creation in question can be delivered through strategy-related audits. This aligns with Betti and Sarens (2018), who stated that organisational strategy determines the internal audit plan.

Obstacles are routinely encountered when seeking to align organisational strategy with internal audit practices. One such obstacle that may be overlooked is the agency problem. Agency conflict can occur due to differences between management behaviour and the owner's expectations (as the agent). The internal audit thus plays a vital role as a mediator and is believed to reduce the conflict of interest between the two (Jensen & Meckling, 1976).

Eulerich and Lenz (2020) stated that the value created by an internal audit remains vague and enigmatic. Complementing the two previous studies, Eulerich and Lenz (2020) described three types of audit activity coverage as distinguished by the level of added value: GRC partner, trusted advisor and value driver. The primary purpose of an internal audit is to drive value for the organisation. In this scope, an internal audit is considered to add value in terms of supporting the achievement of the organisation's strategic success.

IIA Netherlands and KPMG (2015) and Betti and Sarens (2018)

agreed on how organisational strategy affects the scope of internal audit. However, auditing related to strategy continues to be both rare and indispensable for developing the internal audit profession. Therefore, the framework in this study intends to fill the void in the literature and explore the scope of internal audit activities through the three audit scope concepts proposed by Eulerich and Lenz (2020). This study will also evaluate the alignment of the internal audit's scope with the organisation's strategy. The organisation chosen in this study is the world's largest social health insurance provider, namely BPJS *Kesehatan*. The author uses a year limit of 2021 to identify the most recent developments in audit activity and their accordance with the current environmental dynamism.

LITERATURE REVIEW

IIA's Three Lines Model 2020

IIA (2020) redesigned the three lines of defence concept into a 'three-line model' applicable to organisations of all shapes and sizes. The three lines of defence model had conceptual or substantive weaknesses that led to problems during implementation in many companies (Bantleon, D'Arcy, Eulerich, Hucke, & Pedell, 2020). Some of these weaknesses included: the description of individual functions

was not very clear, the model was too static (Bantleon et al., 2020), it lacked the concept of integration and coordination between functions (de Zwaan, Stewart, & Subramaniam, 2011) and it could not be applied in all forms of companies or organisations (Eulerich, 2021).

Deloitte (2020a) outlined the six new principles defined by the IIA for the three-line model to align organisational activities through communication, coordination, cooperation and collaboration. These comprise the following:

1. Governance Principles

According to Eulerich (2021), governance principles aim to create a goal-oriented management and monitoring structure as the basis for organisational stability and security.

2. Principles of Governing Body

The governing body delegates its authority to management and establishes an internal auditor to achieve organisational goals. The larger the organisation, the wider the delegation of management; additional hierarchical levels can also be applied (Eulerich, 2021).

3. Management Principles and the First and Second Lines

The first- and second-line roles can work separately or be blended as required. The first line has direct

relationships with customers to provide products/services and manages organisational risks, while the second line, which contains control functions, supports, monitors and assists in risk management (Kashyap & Iveroth, 2021).

4. Third Line Principle

The third line function provides objective and independent assurance. According to Deloitte (2020b), the third line must assess whether the first and second lines are operating effectively.

5. Third-line Independence Principle

The third line must carry out its duties objectively and independently. According to IPPF standard 1100, this independence is reflected in its accountability to the governing body, unlimited access to resources and data needs and freedom from intervention from other parties.

6. Value Creation Principle

Anderson, Head, and Ramamoorti (2017) stated that internal audits must coordinate and collaborate with the other two lines to carry out assurance activities. According to IIA (2020), this principle also encourages the creation of added value through alignment and a focus on the expectations of stakeholders.

Agency Theory

Agency theory arises based on potential differences in interests between the owners of capital (principals) and management (agents). According to Eisenhardt (1989), the conflict of interest that exists between the agent and principal raises new problems in the form of asymmetric information. Information asymmetry results from the unequal distribution of information between the two parties.

In the agency context, the role of internal audit is crucial in ensuring an agent acts based on the principal's expectations. Sarens and Abdolmohammadi (2011) stated that internal audit performs a monitoring role in corporate governance and can reduce information asymmetry between the audit committee and management.

Internal Audit Activities

In Standard 1000 of *The International Professional Practices Framework* (IPPF), the nature of internal audit assignments is split into assurance and consulting services. According to Eulerich and Lenz (2020), most of the activities capable of providing the greatest value for the organisation come from assurance service activities. However, there may be variations in scope in

terms of the quality and focus of the assurance service activities provided by the internal audit function (IAF).

Scope of Internal Audit Role

Stakeholder satisfaction is one of the main challenges of internal audits. Therefore, it is important to understand the expectations of each stakeholder. Eulerich and Lenz (2020) introduced the following new concepts for the internal audit role based on value proposition:

1. Internal Audit as a GRC Partner

The core task of a GRC partner is to focus on the protection of value as opposed to the creation of additional value. An internal auditor thus provides assurance that all the controls required by an organisation exist and are operating properly.

2. Internal Audit as Trusted Advisor

As a trusted advisor, an internal auditor strives to improve the efficiency and effectiveness of the organization. In addition, the IAF seeks to develop modern audit activities or approaches. It also considers improvements to business processes and structures to ensure they run optimally through, for example, continuous auditing or automation.

Table 1. Audit Scope Matrix

Scope	Explanation	Activity Type
GRC Partner	Assurance on governance, risk and internal control	<ol style="list-style-type: none"> 1. Risk-based approach 2. Focus on traditional GRC audits 3. Efficient monitoring and assessment of other assurance functions
Trusted Advisor	Suggestions for process improvements	<ol style="list-style-type: none"> 1. Data-driven analytics approach 2. Focus on improving efficiency/effectiveness 3. Comparative study of leading practice 4. Positive image of internal audit
Value Driver	Strategy support	<ol style="list-style-type: none"> 1. Strategy-based approach 2. Support for strategic projects 3. Data modelling instead of data analysis 4. Always trying to be one step ahead

Source: Eulerich and Lenz (2020)

3. Internal Audit as Value Driver

After becoming established as a trusted advisor, the IAF may become a value driver. For this, the internal auditor must be able to align his activities more fully with the organisation’s strategy to generate added value. The IAF is also required to conform to the expectations of the board and management. Therefore, they audit matters considered to be priorities and important for the success of an organization.

From Table 1, it is clear that the internal audit can take basic steps to provide relevant audit services and high-quality assurance focusing on GRC. From here, the internal audit can provide advice on improving systems or processes that can improve company performance. The final goal is for the internal audit to take on a more prominent role in

driving value within the organisation (Eulerich & Lenz, 2020).

Strategy-related Audit

According to Sawyer and Sawyer (2019), every successful organisation has a clear, transparent, focused and value-adding strategy. In preparing the plan, the organisation will undertake a strategic planning process that applies to the IAF.

IIA Netherlands and KPMG (2015) mentioned two audit types related to strategy: strategic risk audits and strategic process audits. A strategic risk audit focuses on identifying risks that may hinder the organisation’s strategic objectives. While the strategic process audit assesses the strategic management process or even the (content) of the formulated strategy.

Previous Research

IIA Netherlands and KPMG (2015) explored how corporate strategy and strategic risk played a role in the internal audit of companies in the Netherlands. The study used quantitative analysis with the Pearson correlation test. IIA Netherlands and KPMG (2015) acknowledged that their research was only the first step towards open discussion and stimulating further research. Indeed, strategic audit-related research subjects have rarely been discussed over recent decades.

Betti and Sarens (2018) studied how the IAF can align its activities with organisational strategy. Their study used surveys and interviews with Belgian and North American companies. They confirmed that organisational strategy greatly determines internal audit activity but did not detail a precise technique for analysing how the audit's scope can help in fulfilling the organisational strategy.

Eulerich and Lenz (2020) aimed to identify how internal audits can define, measure and communicate their added value. They examined perceptions of the value of internal audit, which is still often described as vague and enigmatic. However, the respondents in their study did not include various other stakeholders.

This research includes the perceptions of auditees and divisions of organisational strategy that previous researchers did not include in an effort to obtain a broader perspective from stakeholders. In addition, none of the extant literature has specifically explained the implementation of audit activities related to strategy, in either Indonesia or South East Asia. This research therefore intends to fill the gaps in the literature pertaining to the coverage of the internal audit as a function capable of aligning with organisational strategy and providing maximum added value.

METHOD

Research Design

The data/information used in this study were obtained based on primary and secondary data. The primary data were derived from questionnaires and interviews. Meanwhile, document observation was used to obtain the secondary data. This study employs a case study approach to evaluate the problems and phenomena of the research object (Ellet, 2018). The object in this instance is BPJS *Kesehatan*, which was selected based on a consideration of its role-model status as the world's largest provider of social health

Table 2. Data Collection Techniques

GRC Partner	Trusted Advisor	Value Driver
Risk-based approach (observation)	Data-driven analytics (questionnaires and interviews)	Strategy-based approach (observation and interview)
GRC audit focus (observation)	Focus on improving efficiency/effectiveness (interview)	Support for strategy projects (interviews)
Efficient monitoring and assessment of other assurance functions (observation)	Comparative study on leading practice (interview)	Data modelling instead of data analysis (questionnaires and interviews)
	The positive image of internal audit (questionnaire)	Always trying to be one step ahead (observation)

Source: Processed Data (2022)

insurance and the only such provider in Indonesia (Ramadhan, 2020).

Table 2 describes the data collection methods used in this study. The observation method yielded several indicators of the scope of the IAF as a GRC partner and value driver. Meanwhile, the questionnaire and interview methods produced several indicators of the scope of the internal audit role as a trusted advisor and value driver.

Data Analysis Method

This study utilised data analysis methods derived from the concept of Miles and Huberman (1994). The gathered data were evaluated continually and interactively at each stage until the task was complete and data saturation was reached. The initial stage of the data analysis consisted of document collection and observation.

An inventory of the activities carried out by internal audit at BPJS Kesehatan during 2021 was determined based on the document observations. These activities were then mapped into 11 indicators of the scope of the internal audit role (Eulerich & Lenz, 2020). Data that were relevant and complete were presented immediately. However, where indicators had not been met, the data/information collection process continued with questionnaire survey activities and interviews.

Data analysis was the next step. This was required to identify keywords pertinent to the study problem, and irrelevant data were eliminated. At this stage, the internal audit activities mapped on each coverage indicator were analysed for their relevance to the theoretical concept. In each coverage area (GRC partner, trusted advisor and value

driver), the roles that had been fulfilled and the elements that required improvement were evaluated. The data analysis phase also identified strategy-based internal audit activities based on the theoretical framework of IIA Netherlands and KPMG (2015) to identify strategic process audit activities or strategic risk audits.

The final step in the data analysis stage was to draw temporary conclusions for subsequent verification. If a conclusion was not supported by solid evidence, the data collection stage could be repeated. However, if the findings generated strong evidence and answered the research objectives, the data analysis stage could be ended.

RESULTS AND DISCUSSION

Internal Audit Assignment Activities

The IAF activities at BPJS Kesehatan in 2021 can be broadly divided into audit and non-audit activities, as follows:

1. Routine Audit

As stated in the 2021 Annual Work Programme, the Chief Audit Executive (CAE) of Internal Audit establishes a routine audit plan based on several criteria:

- a. 2021 budget
- b. Number of external audit recommendations
- c. The number of internal audit recommendations escalated to the centre
- d. Main risks and unit risks
- e. Audit records in the previous year.

2. Investigative Audit

An investigative audit is carried out to identify and examine the information and facts to reveal incidents of violation outlined in the report.

3. Assessment of GRC

This activity integrates measurement of the risk management function, implementation of internal control and business processes to describe the maturity level of risk management, internal control effectiveness and business process maturity.

4. Consultancy

This activity provides advice on improving the implementation of the organisation's operational activities by requesting the unit or work unit.

5. Workshop Speaker Request

This provides knowledge and experience related to certain aspects in the implementation of

activities running in the organisation.

6. *Monitoring and Follow-Up on Audit Results of External Supervision*

This activity ensures that the IAF has followed up on the recommendations delivered by external supervision.

7. *External Audit Assistance*

External audit assistance is provided by a public accountant consultant.

8. *Strengthening the Internal Control Function*

These activities include a review of guidelines and follow-up on quality assurance.

9. *Development of Inspection Tools*

This activity is one of the efforts undertaken by the IAF to provide internal audit best practices.

10. *Planning and Evaluation of Work Programmes*

Work programme planning and evaluation activities are carried out twice a year, in July and December.

11. *Competency Improvement*

Competency improvement activities are obligatory for IAF employees to maintain technical quality and the internal audit profession.

Mapping of Internal Audit Activities

Mapping of Internal Audit Activities on the GRC Partner Scope

a. Risk-Based Approach

This indicator has been fulfilled based on the documentary data from the 2021 Annual Work Programme. The internal audit work programme for 2021 was prepared in accordance with a calculation of the risk factors.

b. Focus on Traditional GRC Audits

IAF has carried out the traditional GRC audit. Assurance activities are conducted regularly, on an annual basis, for various field functions located at the Head Office, Regional Offices and Branch Offices.

c. Monitoring and Assessment of Other Assurance Functions

IAF also conducts the investigative audit as a further assurance function.

While the audit's internal activities were found to cover the entire focus of GRC, the result of the GRC assessment stated that IAF had not applied an audit through the compliance function to evaluate the implementation of the substance. IAF thus needs to coordinate and integrate the second line work. Coordination and cooperation are also intended to help realise synergies and avoid duplication of functions (Eulerich, 2021).

Mapping of Internal Audit Activities on the Trusted Advisor Scope

a. Data-Driven Analytics Approach

Based on the results of the questionnaires and research interviews, IAF has applied a data-based analytical approach. However, this continues to be manual and does not use specific software.

b. Focus on Increasing Efficiency/Effectiveness

IAF has made efforts to improve the efficiency/effectiveness of business processes through audit recommendations.

c. Benchmarking with Leading Practice

Efforts to drive leading practice are delivered via an assessment by an external party every 3 (three) years. IAF also undertook benchmarking work in 2021 on *Jasa Raharja* and *BPJS Ketenagakerjaan*.

d. Positive Image of Internal Audit

The positive image of internal audit in this study was derived based on the results of a questionnaire survey with senior leaders as the respondents. The senior leaders agreed that IAF has provided added value through recommendations to their work units' operations/functions/business processes/systems.

Several indicators in the trusted advisor scope were successfully met. However, the implementation of data-based analytical indicators is still not optimal. The audit conducted by IAF should ideally have used an automated method using specific software to identify red flags from the scope of business activities that are very large and play a crucial role. Maximising the use of data analytics will ensure the provision of more targeted audit follow-up recommendations to support the achievement of the organisation's main focus.

Mapping of Internal Audit Activities on the Value Driver Scope

a. Strategy-based Approach

This study used the following 2 (two) assessment categories to measure audit activity using a strategy-based approach as presented by IIA Netherlands and KPMG (2015):

1) Strategic Risk Audit: According to IIA Netherlands and KPMG (2015), a strategic risk audit can be performed by developing a work programme based on the main risks that may hinder the achievement of the organisation's objectives. Based on the questionnaires and interviews, IAF has not

accommodated all of the 2021 Main Organisational Risks, especially changes to the Organisation's Main Risks in Semester II of 2021.

2) Strategic Process Audit: IIA Netherlands and KPMG (2015) also stated that strategic process audits can comprise audits based on the content of the strategy itself. IAF did not have any assurance activities through the strategic planning and implementation function.

b. Support for Strategic Projects

In BPJS *Kesehatan*, support for strategic projects can be seen through the internal audit's involvement in providing assurance and consulting assignment activities through the main units (PIC) function of BPJS *Kesehatan*'s strategy. Due to limited resources, however, not all of them were covered by the assurance function performed by IAF.

c. Data Modelling instead of Data Analysis

IAF had still not implemented data modelling in 2021.

d. Always Trying to be One Step Ahead

IAF has fulfilled this element of strategy support through various training programmes and

certifications. The annual plan for increasing auditor capability is prepared by considering the knowledge and skill requirements.

It is possible to conclude that the internal audit assignment has satisfied the trusted advisor scope. However, full implementation has yet to be achieved in the value driver scope. Once the scope of internal audit has progressed to include value driver activities, then all audit activities will be focused on the essential elements that support the success of an organisation's strategy (Eulerich & Lenz, 2020).

BPJS *Kesehatan* should view its shortcomings as an opportunity to develop the IAF in the future. Since various audit scopes have been clearly defined, there is no doubt in terms of determining the good internal audit value indicators that have been added to the organisation. Nevertheless, the role of BPJS *Kesehatan* in the provision of quality health services in Indonesia requires the support of the IAF. In this case, IAF can add value through digitisation and the automation of both audit techniques and assurance functions aligned with the organisation's strategy.

Analysing The Role of Internal Audit in Strategy Implementation

Relationship between IAF, Strategic Planning Function and Risk Management Function in Supporting BPJS Kesehatan Strategy Implementation

The 2020 BPJS *Kesehatan* Governance Guidelines state that the BPJS *Kesehatan* GRC architecture begins with the strategic planning and implementation function (SPIF). The Annual Work Plan & Budget is used as the basis for planning and performance evaluation. SPIF facilitates the Board of Directors in determining the formulation of organisational strategy. After reaching an agreement, the formulation of the strategy is approved by the Supervisory Board. Then, the main risk to each strategy is revealed by the Risk Management Function.

In the 2021 Annual Work Programme, IAF added the main risk to the criteria for preparing the audit programme. However, not all major risks can be accommodated. According to IIA Netherlands and KPMG (2015), an audit that considers the organisation's main risks is one form of strategy-related audit that can provide enormous added value to the organisation. In addition to strategic risk audits, strategic process audits relate to those strategies capable of

providing the most significant added value (IIA Netherlands and KPMG, 2015).

In the context of *BPJS Kesehatan*, it is possible to audit the strategic process using the following scheme:

- a. Strategy formulation process: IAF can perform assurance assignment activities in the SPIF function by testing the validity and assumptions used in the organisation's strategy formulation process.
- b. Strategy implementation process: IAF can include the main focuses of *BPJS Kesehatan* as criteria for the Annual Work Programme and increase consultancy activities in the PIC for the main focuses of *BPJS Kesehatan*.
- c. Strategy evaluation process: IAF ensures that the results of the SPIF strategy evaluation are appropriate and can be used in strategy formulation for the next period.

Evaluation of the Alignment of the Role of Internal Audit with the BPJS Kesehatan Strategy

IIA Netherlands and KPMG (2015), Betti and Sarens (2018), and Eulerich and Lenz (2020) agree that internal audit will add significant value when its activities are aligned with the organisation's strategy.

Furthermore, Eulerich and Lenz (2020) stated that if the IAF's scope falls within the value driver category, then a successful alignment will automatically occur.

IAF's strategy-related audit was not optimal when viewed from the strategic risk audit perspective. This was evident in the 2021 audit work programme, which was not integrated with the agency's main risks for 2021. Based on the interview results, IAF had different perceptions of the risk priorities and risk management function.

Another area requiring improvement was support for strategic projects. A strategic project at BPJS *Kesehatan* can be translated as a work programme derived from BPJS's Main Focus Performance Indicators (ICK) in 2021. As outlined in the theory presented by Jensen and Meckling (1976), the role of internal audit is vital in ensuring an agent acts according to the principal's expectations. In the context of BPJS *Kesehatan*, the principal party in question is DJSN (the National Social Security Council). IAF, as the internal audit party, has a vital role in communicating ICK-related matters that are not on target. Together with SPIF, IAF should convey the actual conditions of the management and provide input on elements that pose a

risk to the achievement of ICK. The reasons for non-achievement must be properly conveyed and accepted by the principal.

The opportunities to conduct consulting assignment activities are both enormous and necessary for work units, particularly those that were yet to achieve their targets by the final quarter of 2021. According to an interview with IAF, there are 2 (two) reasons for this: a lack of resources and a lack of IAF knowledge, competence or skills in this field. Therefore, education and training for IAF should also be an area of improvement.

An internal audit charter is an excellent instrument for identifying all forms of activity, scope, resources or skills required for an internal audit. The role of the internal audit as a GRC partner, trusted advisor and value driver can be clarified in the internal audit charter. Thus, adding value can no longer be described as vague or a grey area.

Unfortunately, BPJS *Kesehatan*'s internal audit charter has not been revised since 2014, despite the dynamism in its business activities. The management organs and various other stakeholders have also undergone significant changes since 2014. The added value of internal auditing may also be affected

by a more up-to-date audit plan, rules, procedures and auditing techniques. These expectations must be covered in audit practice so that all activities and the overall audit process always meet expectations.

The BPJS *Kesehatan* strategy has been well defined to accommodate all existing stakeholders. Therefore, when IAF uses a strategy-related audit, the significant added value will fulfil the aims and objectives of all stakeholders. It could also drive value and change the perception of the IAF from being merely a supervisory function to one that contributes to the areas that matter for BPJS *Kesehatan*.

CONCLUSION, IMPLICATION, AND LIMITATION

This study found that the IAF activities in 2021 were divided into audit and non-audit. These were then further translated into 11 types of audit planning. IAF has provided a quality assurance function as a GRC partner. One indicator was not satisfied in the trusted advisor scope, namely the data-driven analytics approach.

In the value driver scope, a majority of the indicators were not successfully implemented. As such, the IAF audit programme has not been fully integrated with the main

risks of the organisation, with IAF having its own standard for setting the risk priority.

The relationship between the second and third lines is also not functioning well. This was evident in the internal audit report that did not explain the effectiveness of risk management. The relationships between the second and third lines were found to lack synergy, potentially leading to an overlapping and duplication of functions.

This study recommends that IAF conducts audits related to strategy by accommodating all strategic risks, support for strategic projects and implementing more up-to-date audit techniques. The IAF should emphasise the six principles of the three lines model in each of the guidelines produced.

In terms of limitations, this study included neither the Audit Committee nor the CAE in the survey and interview samples due to time and opportunity constraints. This study also considered a one-year work programme, which means it did not accommodate the context of a continuous assignment.

Therefore, further research is expected to interview members of the Audit Committee and the CAE to convey another point of view. Future studies may also seek to employ other

business field objects and a longer research period to provide a broader viewpoint.

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