



ACCOUNTABILITY PRACTICES OF SPECIAL HAJJ AGENCIES: A STUDY USING STEWART'S LADDER

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Abstract: This study examines the accountability practices of Special Hajj Organizers (PIHK) in Yogyakarta Province using Stewart's (1984) accountability ladder, which includes five levels: honesty and legality, process, performance, program, and policy accountability. A qualitative approach was used, with data collected through interviews and documents related to PIHK accountability. The study involved five key informants consisting of PIHK leaders, finance staff, and pilgrims from PT Citra Wisata Dunia and PT Al Anshor Madinah Barokah. The findings show strong accountability practices at the levels of honesty and legality, process, performance, and program accountability. However, policy accountability appears weak due to the lack of triangulable sources and data. This study is the first to investigate accountability in the special Hajj services managed by travel agencies. Previous studies have focused on accountability in religious organizations, overlooking accountability in religious rituals that require economic information, such as the Hajj pilgrimage.

Keywords: Accountability, Pilgrimage, Religious Organizations.

Abstrak: Penelitian ini mengkaji praktik akuntabilitas Penyelenggara Ibadah Haji Khusus (PIHK) di Provinsi Yogyakarta dengan menggunakan tangga akuntabilitas Stewart (1984), yang terdiri atas lima tingkat: akuntabilitas legalitas dan kejujuran, akuntabilitas proses, akuntabilitas kinerja, akuntabilitas program, dan akuntabilitas kebijakan. Penelitian ini menggunakan pendekatan kualitatif dengan teknik pengumpulan data melalui wawancara dan dokumen terkait praktik akuntabilitas PIHK. Informan terdiri dari lima orang, meliputi pimpinan PIHK, bagian keuangan, serta jemaah yang telah melaksanakan haji khusus dari PT Citra Wisata Dunia dan PT Al Anshor Madinah Barokah. Hasil penelitian menunjukkan bahwa praktik akuntabilitas pada tingkat legalitas dan kejujuran, proses, kinerja, dan program ditemukan kuat. Namun, akuntabilitas kebijakan masih lemah karena tidak dapat diatribusikan berdasarkan sumber dan data yang tersedia. Penelitian ini merupakan studi pertama yang menyoroti akuntabilitas dalam layanan haji khusus yang dikelola oleh biro perjalanan. Studi sebelumnya lebih banyak meneliti akuntabilitas pada organisasi keagamaan, sehingga luput melihat akuntabilitas pada ritual keagamaan yang membutuhkan informasi ekonomi, seperti ibadah haji.

Kata Kunci: Akuntabilitas, Ibadah Haji, Organisasi Keagamaan.

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Introduction

The theme of accountability has become a very important issue, especially accountability in religious organizations.¹ Studies discussing accountability in religious organizations have been conducted in various contexts, such as Hindu and Buddhist religious organizations², Christian- and Islamic-based faith charities³, and Islamic religious organizations.⁴ One crucial aspect emphasized in the accountability of religious organizations is trust or trustworthiness.⁵

A new theme emerges from these three bodies of literature. This theme arises because discussions of accountability in religious organizations remain general and therefore fail to recognize accountability within religious rituals that require economic information. One religious ritual that requires accountability in economic information is the Hajj pilgrimage.⁶ Therefore, it is timely to conduct a study focusing on accountability in the religious ritual of Hajj.

In Indonesia, the law divides Hajj into two types: regular Hajj and special Hajj. The difference lies in the organizer. The regular Hajj is organized by the government, represented by the Minister of Religious Affairs through permanent working units structured at regional levels, at the central level, and in Saudi Arabia. Meanwhile, the special Hajj is organized by private travel agencies licensed by the Minister of Religious Affairs, known as Special Hajj Organizers (PIHK). Requirements for obtaining such a license include that the owners and managers must be Indonesian citizens of the Islamic faith, be accredited as Umrah Travel Organizers (PPIU), possess technical capability, personnel competence, and financial capacity proven with a bank guarantee, and demonstrate commitment to improving the quality of special Hajj services.

The special Hajj involves distinct arrangements in management, financing, and service provision, where Private Hajj Travel Organizers (PIHKs) are granted managerial and financial autonomy but are required to comply with established service standards covering registration, guidance, transportation, accommodation, healthcare, pilgrim protection, and administrative documentation. The financing of the special Hajj is regulated through a minimum fee set by the Decree of the Director General of Hajj and Umrah Operations, which in 2019 amounted to USD 8,000, allowing PIHKs to charge higher fees for services exceeding minimum standards, provided that service quality corresponds to the amount paid as stipulated in Minister of Religious Affairs Regulation No. 22 of 2011. However, in practice,

¹ Kelum Jayasinghe and Teerooven Soobaroyen, "Religious Spirit and Peoples' Perceptions of Accountability in Hindu and Buddhist Religious Organizations," *Accounting, Auditing & Accountability Journal* 22, no. 7 (2009): 997–1028, <https://doi.org/10.1108/09513570910987358>.

² Jayasinghe and Soobaroyen, "Religious Spirit and Peoples' Perceptions of Accountability in Hindu and Buddhist Religious Organizations."

³ Sofia Yasmin et al., "Communicated Accountability by Faith-Based Charity Organisations," *Journal of Business Ethics* 122, no. 1 (2014): 103–23, <https://doi.org/10.1007/s10551-013-1759-2>.

⁴ Hasan Basri et al., "Accounting and Accountability in Religious Organizations: An Islamic Contemporary Scholars' Perspective," *Gadjah Mada International Journal of Business* 18, no. 2 (2016): 207–30, <https://doi.org/10.22146/gamajb.12574>.

⁵ Mark Bovens, "Analysing and Assessing Accountability: A Conceptual Framework," *European Law Journal* 13, no. 4 (2007): 447–68, <https://doi.org/10.1111/j.1468-0386.2007.00378.x>.

⁶ Mervyn K. Lewis, "Islam and Accounting," *Accounting Forum* 25, no. 2 (2001): 103–27, <https://doi.org/10.1111/1467-6303.00058>.

violations have occurred, as reflected in cases such as Pentha Travel Wisata in 2017⁷ where pilgrims who had fully paid failed to depart and the owner was later convicted, and Travelindo in 2019⁸ where delayed visa issuance due to unpaid mandatory obligations nearly prevented 62 pilgrims from traveling, repeating similar problems previously identified in 2015.

Such cases represent actions that can damage public trust and organizational accountability.⁹ According to Bovens¹⁰, accountability is a relationship between an actor and a forum. The actor has an obligation to explain and justify their actions, while the forum has the authority to assess these actions. Thus, the actor may face consequences based on the activities carried out.

Furthermore, Basri¹¹ describes the relationship of formal accountability in Islam, emphasizing that accountability goes beyond fulfilling legal requirements and extends to fulfilling one's relationship with God. In addition, the concept of accountability in Islamic perspectives according to Hudaib and Haniffa¹² is directed not only toward human superiors and users of accounting information, but ultimately toward Allah. Therefore, actors must strive to provide excellent service and recognize their work as a form of worship (devotion to Allah) and righteous deeds, which are key to achieving al-Falah (success in this world and the hereafter).

Similarly, Lewis¹³ states that accountability in Islam is understood as responsibility to God through the free availability of information. The disclosure of truthful and relevant information is essential in various aspects of Islamic life. Haniffa and Hudaib¹⁴ further emphasize that the information provided must assist Muslim users in making economic and religious decisions and help organizations fulfill their accountability to Allah and society. Therefore, PIHKs, as actors, have the obligation to disclose truthful and relevant information to the government and to pilgrims in particular.

Previous literature discussing accountability in religious organizations includes the study by Basri¹⁵, which examines accountability from the perspective of contemporary Muslim students. Another study by Yasmin et al.¹⁶ explores accountability in faith-based charitable organizations, specifically Christian and Islamic organizations, and employs Stewart's ladder of accountability for analysis.

⁷ Tempo, "Dituduh Gelapkan Dana Haji Rp39 M, Agen Travel Digeledah Polisi," 2019, <https://video/tempo.co/read/9004/dituduh-gelapkan-dana-haji-rp-39-m-agen-travel-digeledah-polisi>.

⁸ Republika, "Komisi VIII Desak Pengusutan Kasus Haji Khusus Travellindo," 2019, <https://www.republika.co.id/berita/pv1mwl320/komisi-viii-desak-pengusutan-kasus-haji-khusus-travellindo>.

⁹ Yasmin et al., "Communicated Accountability by Faith-Based Charity Organisations."

¹⁰ Bovens, "Analysing and Assessing Accountability: A Conceptual Framework."

¹¹ Basri et al., "Accounting and Accountability in Religious Organizations: An Islamic Contemporary Scholars' Perspective."

¹² Yasmin et al., "Communicated Accountability by Faith-Based Charity Organisations."

¹³ Lewis, "Islam and Accounting."

¹⁴ Yasmin et al., "Communicated Accountability by Faith-Based Charity Organisations."

¹⁵ Basri et al., "Accounting and Accountability in Religious Organizations: An Islamic Contemporary Scholars' Perspective."

¹⁶ Yasmin et al., "Communicated Accountability by Faith-Based Charity Organisations."

Meanwhile, literature discussing Hajj accountability has been limited to the cost of regular Hajj operations organized by the government.¹⁷ Based on this background, the researcher is interested in conducting a study focusing on accountability among special Hajj organizers operated by private travel bureaus, in this case PIHK.

Theoretical Approach

Hajj is the fifth pillar of Islam for every able Muslim to perform a series of prescribed rituals at the Kaaba, the holy sites, and in specific places, times, and conditions.¹⁸ In the Indonesian context, the Hajj pilgrimage is organized by the government and licensed travel agencies authorized by the Minister, referred to as PIHK.¹⁹ In carrying out their duties, both government and private organizers must adhere to the principle of accountability.²⁰ However, the regulation does not explicitly define the meaning of accountability.

According to Sinclair²¹, accountability carries particular meanings and can be defined from various perspectives. From an Islamic perspective, the concept of Tawhid is strongly emphasized.²² This concept implies that every individual is responsible for their actions before Allah. Additionally, accountability in Islam means that a person must fulfill all duties and obligations arising from the responsibilities entrusted to them²³. Based on this explanation, accountability consists of two elements: accountability as Allah's khalifah (vicegerent) and accountability in fulfilling contracts made among humans. Aligned with this dualistic concept, Bovens²⁴ also divides accountability into two elements: the actor and the forum. These two elements are further illustrated by Yasmin et al. and Haniffa²⁵ by adapting Stewart's (1984) accountability framework (see Figure 1).

¹⁷ Nidjam, "Achmad 'Akuntabilitas Informasi Biaya Penyelenggaraan Haji,'" *Jurnal Ilmu Administrasi: Media Pengembangan Ilmu Dan Praktek Administrasi* 14, no. (1) (2017), <https://doi.org/10.31113/jia.v14i1.6>; Burhanudin, "Management System of Hajj Pilgrimage Funds from the Perspective of Positive Law in Indonesia," *Jurnal IUS* 2, no. 4 (2014): 123–41; Muhammad Ali Mubarak and Ulya Fuhaidah, "Manajemen Pengelolaan Dana Haji Republik Indonesia: (Studi Kolaborasi Antar Lembaga BPKH, Kemenag Dan Mitra Keuangan Dalam Pengelolaan Dana Haji)," *ILTIZAM Journal of Shariah Economics Research* 2, no. 2 (2018): 67–88, <https://doi.org/10.30631/iltizam.v2i2.165>; Endang Jumali, "Management of Hajj Funds in Indonesia," *Journal of Legal, Ethical and Regulatory Issues* 21, no. 3 (2018): 1–9.

¹⁸ "Undang-Undang Nomor 8 Tahun 2019 Tentang Penyelenggaraan Ibadah Haji Dan Umrah," 2019.

¹⁹ Republic of Indonesia, "Peraturan Menteri Agama Nomor 23 Tahun 2016 Tentang Penyelenggaraan Ibadah Haji Khusus," 2016.

²⁰ "Undang-Undang Nomor 8 Tahun 2019 Tentang Penyelenggaraan Ibadah Haji Dan Umrah."

²¹ Amanda Sinclair, "The Chameleon of Accountability: Forms and Discourses," *Accounting, Organizations and Society* 20, nos. 2–3 (1995): 219–37, [https://doi.org/10.1016/0361-3682\(93\)E0003-Y](https://doi.org/10.1016/0361-3682(93)E0003-Y).

²² Hairul Suhaimi Nahar and Hisham Yaacob, "Accountability in the Sacred Context: The Case of Management, Accounting and Reporting of a Malaysian Cash Awqaf Institution," *Journal of Islamic Accounting and Business Research* 2, no. 2 (2011): 87–113, <https://doi.org/10.1108/17590811111170520>.

²³ Abdul Rahim Abdul-Rahman and Andrew Goddard, "An Interpretive Inquiry of Accounting Practices in Religious Organisations," *Financial Accountability and Management* 14, no. 3 (August 1, 1998): 183–201, <https://doi.org/10.1111/1468-0408.00060>.

²⁴ Bovens, "Analysing and Assessing Accountability: A Conceptual Framework."b

²⁵ Yasmin et al., "Communicated Accountability by Faith-Based Charity Organisations."

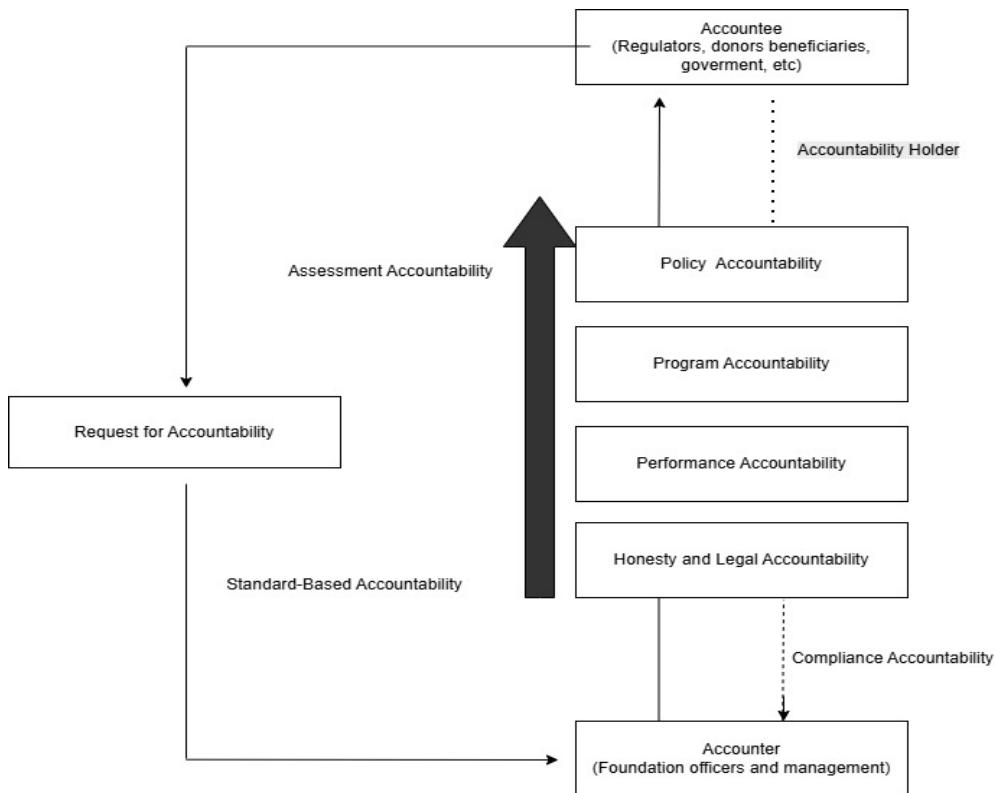


Figure 1 Stewart's Ladder of Accountability

Stewart's (1984) accountability framework conceptualizes accountability as a five-rung ladder that progresses from rule-based accountability toward more judgment-based and strategic accountability, requiring management to provide increasingly comprehensive information to accountees. The first rung, accountability for honesty and legality, ensures that PIHKs manage funds lawfully and transparently through reliable reporting, while the remaining rungs—process, performance, program, and policy accountability—reflect PIHK compliance with Law No. 8 of 2019 and Minister of Religious Affairs Regulation No. 22 of 2011. Process accountability emphasizes adherence to prescribed procedures and Minimum Service Standards, including organizational structure and management disclosure; performance accountability evaluates outcomes against established standards and relates to the disclosure of organizational goals and missions; program accountability assesses the achievement of objectives through disclosure of activities, results, and financial performance; and policy accountability focuses on responsibility for strategic policies and sustainability through disclosure of future plans and planned activities.

Research Methods

To examine the topic of accountability among Special Hajj Organizers (PIHK), the researcher will employ a case study approach using purposive requirements. The author applies three criteria. First, the author selects PIHKs listed in the registry published by the Directorate of Hajj and Umrah Administration of the Ministry of Religious Affairs of the Republic of Indonesia. Second, the selected PIHKs must have their headquarters located in

Yogyakarta Province, the Regional Office of the Ministry of Religious Affairs of the Special Region of Yogyakarta announced that at least 25 Umrah and Special Hajj travel bureaus operating in the region did not possess the required licenses. These travel bureaus were operating without having either a central or branch office license in Yogyakarta. Third, the researcher selects two PIHKs headquartered in Yogyakarta, PT Citra Wisata Dunia (CWD), with license number PHU/HK.3049/IX/2009, and PT Al Anshor Madinah Barokah (AMB), with license number PHU/HK.3267/IX/2013, based on their long-standing accreditation periods. The accreditation date for PT Citra Wisata Dunia is 6 April 2017, and for PT Al Anshor Madinah Barokah is 6 May 2016.

Table 1 presents the list of Umrah Travel Organizers in the Special Region of Yogyakarta published by the Directorate of Umrah and Special Hajj Development, Ministry of Religious Affairs of the Republic of Indonesia. This study uses document analysis techniques, namely obtaining and analyzing documents related to the accountability practices of special Hajj organizers. The documents obtained include a brochure, the Hajj Registration Letter (SPPH), proof of initial BPIH deposit, proof of final payment deposit for special Hajj pilgrims, printed copies of hotel accommodation package invoices in Mecca and Medina, and an accreditation certificate issued by the National Accreditation Committee (KAN). The documents obtained in this study are presented in Table 2 for PT CWD and in Table 3 for PT AMB.

Table 1 List of Umrah Travel Organizers in the Special Region of Yogyakarta

No	Name PPIU	Blacklist Status	Accreditation	Date Accreditation	Branch
1	PT. Buana Sentosa Utama	No	C	17/10/2020	-
2	PT. Mutiara Kabah Wisata	No	-	-	-
3	PT. Freshnel Kreasindo Perkasa	No	-	-	-
4	PT. Alfajr Baladi Indonesia	No	-	-	1
5	PT. Surya Citra Madani	No	-	-	-
6	PT. Laraiba Madania Wisata	No	-	-	-
7	PT. Nabawi Mulia Utama	No	-	-	-
8	PT. Rozi Global Madani	No	-	-	-
9	PT. Cahaya Imani Haji Umrah	No	B	06/08/2019	1
10	PT. Zhafirah Mitra Madina	No	A	28/12/2018	-
11	PT. At Tiquu	No	A	29/12/2018	3
12	PT. Permata Umat	No	A	28/12/2018	-
13	PT. Total Nusa Indonesia	No	A	07/04/2017	1
14	PT. Nuansa Ceria Pesona	No	B	06/04/2017	
	PT. Baitul Izzah One	No			
15	Nahdliyah Tolchah Mansoer		B	13/04/2018	1
16	PT. Nur Ramadhan Wisata	No	B	13/04/2018	3
17	PT. Citra Wisata Dunia	No	A	06/04/2017	-
18	PT. Ceria Patria Wisata	No	B	13/04/2018	-
19	PT. Al Anshor Madinah Barokah	No	B	02/05/2016	1

This study employs purposive sampling through open interviews with five participants, comprising two informants from PT CWD and three from PT AMB, selected based on specific characteristics relevant to accountability practices in Special Hajj Organizers (PIHK). The interview guidelines are designed to explore accountability across five dimensions: legal and honesty accountability related to regulatory compliance and accountability reporting; process accountability concerning the existence and implementation of standard operating procedures for managing Hajj funds; performance accountability focusing on routine evaluation mechanisms; program accountability addressing the disclosure of activities, achievements, and financial reviews; and policy accountability examining the formulation of organizational policies for long-term sustainability. To ensure research rigor, qualitative validity is strengthened through triangulation of data sources and methods, as well as member checking by returning findings to participants for verification²⁶, while qualitative reliability is maintained by careful transcript verification and consistent coding procedures to avoid ambiguous definitions.²⁷

Table 2 Document Analysis Data of PT CWD

No	Document	Document Format	Code
1	Registration Letter for Hajj Departure (SPPH) / Special Hajj	Image	P1
2	First Page of Initial BPIH Deposit	Image	P2
3	First Page of Proof of Full Payment of Hajj Organizing Costs for 1441H/2020M	Image	P3
4	National Accreditation Committee (KAN) Certification	Image	L1
5	Recommendation for Service Contract Processing in Saudi Arabia for 1439H/2018M in Indonesian	Printed copy	L2a
6	Recommendation for Service Contract Processing in Saudi Arabia for 1439H/2018M in Arabic	Printed copy	L2b
7	Translation of the Decree of the Director General of Hajj and Umrah Management by Syarif Ibrahim Assegaf	Printed copy	L2c
8	2020M/1441H Special Hajj Package Brochure	Printed copy	K1
9	Hajj Package Report Invoice 1440H	Printed copy	K2a
10	Hajj Package Report Invoice 1441H	Printed copy	K2b
11	Special BPIH Settlement for 1440H/2019M	Printed copy	H1

²⁶ John W. Creswell, *Research Design: Qualitative, Quantitative, and Mixed Methods Approaches*, 4th ed. (SAGE Publications, 2014).

²⁷ Robert K. Yin, *Case Study Research: Design and Methods* (Rajawali Press, 1996).i

Table 3 Document Analysis Data of PT AMB

No	Document	Document Format	Code
1	2020M/1441H Special Hajj Package Brochure	Printed copy	K1
2	Company Profile of PT Al Anshor Madinah Barokah	Digital copy	K

Table 4 Data Informant

No	Code	Position	Gender	Duration
1	A1	Director PT CDW	Male	37:16'
2	A2	Congregation PT CWD	Female	4:55'
3	A3	Director PT AMB	Male	25:33'
4	A4	Finance PT AMB	Male	3:16'
5	A5	Congregation PT AMB	Female	51:12'
				38:17'
				3:02'
				11:28'

Result and Discussion

Accountability of Special Hajj Administrators

1. Accountability Legality and Honesty

Legal and honesty accountability constitute the first step in Stewart's accountability framework. This step ensures that the funds obtained must be used correctly and in an authorized manner, in accordance with applicable laws. Therefore, this step addresses legality and honesty through the regulations used by PIHK and the reliability of the reports prepared.

a. Regulations Used

In carrying out its activities, PIHK must refer to the following regulations: Law Number 8 of 2019 concerning the Organization of Hajj and Umrah, Minister of Religious Affairs Regulation (PMA) Number 22 of 2011 concerning Minimum Service Standards for the Organization of Special Hajj, PMA Number 23 of 2016 concerning PIHK, and other regulations issued by the Directorate General of Hajj and Umrah Affairs. This is supported by the following interview excerpts:

“We all follow the rules, even the older ones have their regulations.” (A1.4)

“We still refer to this PMA itself, Miss.” (A4.26)

In addition, the interview findings are supported by the document *Special BPIH Payment Confirmation for 1440H/2019M*. The findings indicate that PIHK fulfills legal accountability. This is evidenced by the availability of a copy of the Special BPIH Payment Document for 1440H/2019M.

b. Reliable Reports

One form of honesty demonstrated by PIHK in showing that funds are used correctly and in an authorized manner is the preparation of reliable reports. This report includes the PIHK program package, the departure and return schedules of special hajj pilgrims, the list of special hajj pilgrims and PIHK officers, as well as the list of pilgrims who canceled their departure and those who used *mujamalah* visas provided by the Government of the Kingdom of Saudi Arabia. This was conveyed by two PIHK directors in the following interview excerpts:

“The report is just ordinary—how many pilgrims died, were sick, returned home, what happened to them—the deceased, that’s all normal.” (A1.30)

“...everything is reported or included in the report.” (A3.8)

In addition, PIHK also prepares a financial report as a requirement for renewing its operational license. This was stated by the following informants:

“That’s just internal; it’s only for licensing purposes and things like that.” (A1.24)

“Yes, there is. For now, it’s internal.” (A4.20)

Based on the discussion above, in the context of honesty accountability, PT CWD and PT AMB use the funds properly and in an authorized manner.

2. **Process Accountability**

Accountability of process examines the extent to which the procedures that must be followed by PIHK are properly carried out. This relates to the implementation of special hajj services, which must comply with the Minimum Service Standards (SPM) stipulated in PMA Number 22 of 2011.

a. Procedures in Accordance with the Minimum Service Standards (SPM)

The Minimum Service Standards (SPM) for the organization of special hajj services are the minimum benchmarks of service that PIHK is required to provide to special hajj pilgrims. These service standards refer to the regulations stated in PMA Number 22 of 2011.

1) Registration

Registration for the special hajj is conducted throughout the year, every day, in accordance with the procedures and requirements established by the Minister. The registration is carried out by the pilgrims through PIHK, which is connected to the Siskohat system. This was conveyed by the Director of PT CWD as follows:

“...they must fill out the SPPH, the Hajj Registration Form.” (A1.4)

After pilgrims complete the SPPH, they must also pay the initial deposit in the amount stipulated in the applicable regulations as provided by several informants.

“They just need to finalize the payment, paying the 4,000-dollar down payment.” (A1.4)

"Well, that goes through the system, Ma'am. Yes, the registration is done through the system and we report everything, Ma'am." (A3.203)

"...Then the 4,000 is deposited with BPKH, and after that the quota number is issued." (A4.4)

Based on the interview results, PT CWD and PT AMB explained that the registration fee amount is in accordance with the provisions stated in the regulation.

2) Hajj Travel Documents

Special Hajj travel bureaus (PIHK) are responsible for facilitating the processing of travel documents required for the special Hajj pilgrimage. These documents include passports and visas.

"...we contact for the visa, we inform them how many visas we need, and they issue the visas." (A1.4)

Just like PT CWD, PT AMB also processes its pilgrims' travel documents, which include the passport, visa, and health requirements. This was conveyed by PT AMB's management, as described in the following interview:

"There's the passport, the health documents, and the most important one is the meningitis card." (A3.82)

3) Guidance

This guidance includes Hajj ritual training (manasik), health services, and travel services. Pre-departure Hajj ritual training is given in at least five sessions. This was conducted by PT CWD and confirmed by the pilgrims. According to standards, Hajj manasik training is conducted throughout the Hajj journey, starting before departure and continuing during the pilgrimage in Saudi Arabia. Based on the interview with a PT AMB pilgrim, PT AMB also provides guidance, one of which is the Hajj ritual training (manasik).

4) Health Services

Health services must be provided by PIHK to special Hajj pilgrims from departure until their return to Indonesia. Pilgrims of PT CWD also emphasized that health services were provided both before and during the Hajj pilgrimage. For health services during the pilgrimage, PT CWD assigns medical personnel. Not only PT CWD, PT AMB also provides health facilities both before departure and throughout the Hajj journey. PT AMB regarding health services and the availability of medical personnel during the pilgrimage, the pilgrims felt the same.

5) Transportation

Special Hajj travel bureaus (PIHK) are responsible for providing transportation services to special Hajj pilgrims by ensuring safety, security, and comfort. Transportation services include air transportation to and from Saudi Arabia and ground transportation while in Saudi Arabia.

Air transportation includes flights to Saudi Arabia and return flights to Indonesia, using either direct flights or flights with a maximum of one transit on the same airline. This standard is consistent with the explanations provided by PT CWD management and its pilgrims. PT AMB follows the same standards, uses flights with one transit via Saudia Airlines and confirmed by pilgrims.

According to the minimum standards, land transportation in Saudi Arabia must use *syarikah* (company) buses equipped with air conditioning, with a maximum of 45 pilgrims per bus. The land transportation used by PT CWD follows the minimum standard of 45 pilgrims per bus. PT AMB also uses land transportation by contracting companies in Saudi Arabia.

6) Accommodation

Special Hajj organizers are responsible for providing accommodation services to special Hajj pilgrims. Accommodation must comply with the minimum service standards for special Hajj lodging.

a) Hotels in Makkah

The accommodation standard in Makkah requires hotels to be no more than 500 meters from Masjid al-Haram and have a maximum of four occupants per room. This was stated by the Director of PT CWD and confirmed by the pilgrims. In addition to the interview results, the researcher documented a printed copy of PT CWD's hotel accommodation invoice. The invoice contains information about the hotel in Makkah—Shafwa Royal Orchid—the number of room types, and the total payment for the 1441 Hijri (2020 CE) package. PT AMB uses five-star hotel accommodations in Mecca, which exceeds the established standard requiring a minimum of four-star hotels.

b) Hotel in Medina

Similar to the accommodation standards in Mecca, hotel accommodations in Medina must be located no more than 500 meters from the Prophet's Mosque and house no more than four people per room. This was stated by the Director of PT CWD and confirmed by the pilgrims. In addition to the interview findings above, the researcher documented a printed copy of PT CWD's hotel accommodation package invoice. The invoice contains information about the hotel name in Medina—Anwar Madinah Movenpick—the number of room types, and the total payment for the package for the year 1441 Hijri or 2020 AD. PT AMB also used five-star hotels for its accommodations in Medina, it was Royal Iman.

c) Transit Accommodation

Transit apartment accommodations in Mecca lasted up to five days between the 3rd and 15th of Dzulhijjah. In addition, the PIHK also considered aspects of feasibility, safety, and comfort. This was expressed by the Director of PT CWD and the pilgrims.

The standard states that the selected transit hotel must provide easy transportation access to the Masjid al-Haram. In addition, the standard also states that when determining transit hotels, the PIHK should consider feasibility, safety, and comfort. This was expressed by a PT AMB pilgrim.

7) Consumption

Consumption services must be provided in accordance with the minimum service standards for special Hajj. Meals are served with hotel-level standards and through a buffet system. In addition, the menu served must use Indonesian dishes. Meanwhile, during travel or at the airport, meals may be provided in boxed form. This was stated by the Director of PT CWD and confirmed by the pilgrims. The same situation also applied to PT AMB in providing consumption services to its pilgrims. The consumption service standards are reflected by PT AMB management and pilgrims.

8) Protection

Special Hajj pilgrims receive various types of protection, including the protection of Indonesian citizens abroad, legal protection, security protection, and life, accident, and health insurance. The travel bureau is responsible for providing protection to special Hajj pilgrims and special Hajj officers before, during, and after the pilgrimage. One form of protection provided by PT CWD is insurance. This was revealed by the Director of PT CWD and pilgrims. PT AMB also provided protection to its pilgrims through insurance. PT AMB obtained insurance through an intermediary, namely the association under which PT AMB operates. From the explanation above, it can be concluded that both PT CWD and PT AMB have fulfilled the regulatory mandate by providing insurance for their pilgrims.

b. Information on Structure and Management

Process accountability not only looks at the compliance of procedures that must be followed by PIHK, but PIHK must also provide information related to organizational structure and management. Prospective special Hajj pilgrims can view PT CWD's organizational structure and management on the website. PT AMB's management structure data was obtained from the finance department in the form of a digital copy.

3. Performance Accountability

Performance accountability focuses on evaluating performance against required standards and is related to the disclosure of the organization's goals and mission.

a. Performance Evaluation

Performance evaluation is carried out by assessing the implementation of the special Hajj conducted by PIHK in accordance with the required standards. According to the Director of PT CWD, evaluations are conducted internally. This was expressed in the following interview excerpt:

“...but usually, we just evaluate it ourselves, yes like this, what is lacking here, what needs improvement next year.” (A1.12)

Based on Law Number 8 of 2019, the evaluation of special Hajj implementation is conducted both by the association and by the Ministry of Religious Affairs. This is consistent with what was stated by PT AMB's management. PT AMB also conducts internal evaluations within its organization. Pilgrims from PT CWD and PT AMB also participate in evaluations as reflected in the following interview excerpts:

“Maybe adding (more doctors) would be good, so that Hasuna can also improve.”
(A2.60)

“I usually say it directly to the *mutawwif* or the bureau staff.” (A5.90)

b. Disclosure of Goals and Mission

The disclosure of goals and mission is communicated by PIHK to pilgrims who will use their services. The mission of PIHK is to provide guidance, services, and protection so that pilgrims can perform the Hajj in accordance with Islamic teachings. The Director of PT CWD stated that PT CWD's guides ensure that pilgrims stay focused on their worship. The pilgrims from PT CWD also confirmed that their Hajj worship in Saudi Arabia went

smoothly. To achieve its goals, PT AMB emphasizes the religious aspects of Hajj services for its pilgrims. PT AMB pilgrims also confirmed that performing the pilgrimage was easier due to their trust in PT AMB.

4. Program Accountability

Program accountability assesses the extent to which an organization has carried out and achieved its objectives related to the disclosure of activity information, performance, and financial review.

a. Disclosure of Activity Information

Performing the Hajj pilgrimage is an obligation for Muslims who are able. Being "able" in this context means having the capability to perform a series of specific rituals at the designated place and time. The sequence of rituals is crucial for pilgrims to understand so they can prepare properly. Activity information is disclosed by both PT CWD and PT AMB. The details of the activities explained by the informants above are also listed in brochures prepared by both PT CWD and PT AMB.

b. Disclosure of Performance

Disclosure of information regarding the performance of PIHK (Hajj Travel Organizers) is an important consideration for pilgrims to ensure that the chosen travel agency is legal and not involved in legal issues. To verify PIHK legality, pilgrims can check the website simpu.kemenag.go.id, where accreditation status is also available.

PT CWD has received accreditation from KAN. Furthermore, PT CWD has also received a recommendation letter from the Ministry of Religious Affairs, issued by the Director General, for handling service contracts in Saudi Arabia. PT AMB has obtained a license from the Minister and also received a B accreditation. Pilgrims verify PT AMB's legality when registering.

c. Disclosure of Financial Review

The PMA stipulates that one of the requirements for obtaining a license from the Minister is that PIHK must submit a photocopy of the latest one-year financial statements audited by a Public Accounting Firm (KAP), with an Unqualified Opinion (WTP). Financial review disclosures in PT CWD are limited only to internal purposes. This was conveyed by the Director of PT CWD in the following interview:

"Nooo, that is only internal. It's just for licensing purposes and such." (A1.24)

In contrast, the finance department of PT AMB stated that there has not yet been any step taken to obtain an audit opinion. However, PT AMB has already organized its financial records using an Accounting Services Office (KJA).

5. Policy Accountability

Policy accountability refers to ensuring that PIHK is responsible for the policies it establishes to maintain the sustainability of its organization. This includes disclosing plans for future periods as well as the details of activities that have been planned.

a. Disclosure of Plans for Future Periods

Future plans are important to ensure sustainability and can also be used to compare with previous years to determine whether objectives have been met, thus fulfilling the

aspect of policy accountability. The Director of PT CWD explained the company's future plans involve offering Umrah programs. Meanwhile, the President Director of PT AMB considers all aspects when making policies. Not only are the interests of the company considered, but also those of the pilgrims, the association, and the government as regulator, to ensure the continuity of PIHK operations.

b. Details of Planned Activities

Policy accountability can be observed through the alignment of the policies established with the actions taken by PIHK. This is reflected in the details of the planned activities. The Director of PT CWD described the activities carried out to maintain business continuity by nurturing good relationships with its pilgrims. Pilgrims also acknowledge this good relationship.

From PT AMB's perspective, the detailed activities planned to maintain business sustainability include holding regular religious study sessions. PT AMB also supports organizational sustainability through its Umrah program. PT CWD and PT AMB maintain their organizational sustainability by fostering strong relationships with their pilgrims. One way they do this is by organizing regular religious study sessions.

Discussion: The Overall Accountability Of The Hajj Organizers

General description of the special Hajj organizer accountability practices carried out by PT. CWD and PT. AMB is as follows. Accountability, legality and honesty carried out by PT. World Tourism Image and PT. Al Anshor Madinah Barokah. The legality accountability can be seen from simpu.kemenag.go.id which lists the two PIHKs as administrators of officially licensed Umrah trips. Furthermore, honesty accountability is seen from reliable reports. The report is prepared by PIHK to the Minister. Triangulation of interviews and findings of program package brochures at PT. CWD and PT. AMB is an affirmation of the existence of honesty accountability practices.

Process accountability can be seen from the implementation of PT. CWD and PT. AMB in carrying out the special haj pilgrimage in accordance with the Minimum Service Standards contained in PMA number 22 of 2011. PT. CWD and PT. AMB generally fulfill the minimum service standards for Special Hajj pilgrims. Both PIHKs assist prospective pilgrims with the registration process, facilitate the preparation of travel documents such as passports and visas, and provide guidance before and during the pilgrimage. Health services are available prior to departure and during the pilgrimage, including the presence of medical personnel. Transportation services are provided in accordance with regulations, covering air travel with a maximum of one transit and air-conditioned land transportation in Saudi Arabia. Accommodation services meet the required distance standards from the Grand Mosque and the Prophet's Mosque with limited room occupancy, and consumption services are delivered using hotel-standard buffet systems with Indonesian menus. In addition, both PIHKs provide protection for pilgrims through insurance coverage.

The performance accountability of PT. CWD and PT. AMB can be seen from the performance evaluation of the implementation of the pilgrimage. PT. CWD conducts performance evaluation independently, meanwhile, PT AMB conducts evaluation both independently and evaluates the required standards. In terms of disclosing the objectives and mission of the organization, both PT. CWD and PT. AMB discloses and carries out its objectives in accordance with the mandate of the Law, namely, fostering and serving the

congregation so that they can carry out the pilgrimage in accordance with the provisions of the Sharia.

The implementation of program accountability can be seen from the disclosure of information on activities, achievements and financial reviews by PT. CWD and PT. AMB. The disclosure of activities was carried out by both PIHKs through their brochures. Furthermore, disclosure of the achievements of PT. CWD and PT. AMB can be seen on the simpu.kemenag.go.id web. In addition, the disclosure of financial reviews, PT. CWD has received the WTP opinion from KAP. Meanwhile, PT. AMB is still in the stage of tidying up the report using an Accountant Service Office so that it can be reported to KAP.

Finally, the policy accountability carried out by PT. CWD and PT. AMB is seen from the responsibilities of the two Directors in making policies. This policy leads to the sustainability of the organization by maintaining good relations with the congregation. One way is by holding regular recitations. However, this accountability ladder is difficult to deduce. This is related to strategic information that is only known by PIHK internals, so that source triangulation and data triangulation cannot be done.

Conclusion

The purpose of this study is to determine the accountability practices of special hajj organizers. Based on the discussion above, it can be concluded that PT. CWD and PT. AMB carries out accountability based on Stewart's (1984) accountability ladder. The accountability ladder starts from accountability according to regulations, PIHK refers to regulations issued by the government. This can be seen from the results of interviews and findings in the field, namely, the 1440H / 2019M Special BPIH Repayment document at PT. CWD. Furthermore, the accountability of the process of seeing the implementation of the hajj carried out by PT. CWD and PT. AMB which has used the existing regulations.

In terms of performance accountability, PT. CWD conducts evaluation independently and PT. AMB conducts evaluations both independently and evaluates the required regulations. Furthermore, program accountability looks at the disclosures made by PT. CWD and PT. AMB. both PIHKs perform disclosures that include information on activities, achievements and financial reviews. Finally, policy accountability looks at the direction of policies made by PT. CWD and PT. AMB. This policy leads to the sustainability of the organization by maintaining good relations among its congregation. However, there is no source triangulation and data triangulation at this top ladder.

The accountability ladder that has weaknesses is the top accountability ladder, namely policy accountability. On this ladder, the only information obtained is one-way information, namely from the PIHK. As for the information provided by the congregation that, PT. CWD maintains a good relationship with the congregation, it is not disclosed in detail the things that are done by PT. CWD to maintain this good relationship. In addition, management of PT. AMB stated that the policy step was carried out by holding recitation, while the congregation of PT. AMB stated that they have participated in the Umrah program several times because they already feel trust or trust. Furthermore, on this ladder the researchers did not find any other data to do triangulation.

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