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INTERNAL FRAUD COMMITTED BY EMPLOYEES IN INSURANCE SECTOR

SCIENTIFIC PAPER

Abstract

The aim of this paper is to show the factors influencing fraud committed by insurance employees, especially those identified as leaders, because a good knowledge of the personality traits of potential perpetrators and their motives can help identify fraud and be put to good use by everyone working on fraud detection.

The subject of this paper is a specific type of crime known in professional literature as white-collar crime. An employee who commits such a crime alone or in collusion with others may cause enormous damage to a company, ruin its reputation, and cause the loss of millions through embezzlement, provided that the fraud is detected, which rarely happens in practice. Furthermore, this paper will show basic theoretical assumptions which enable better knowledge and understanding of certain types of fraud perpetrated by employees in insurance companies.

The overview of white-collar crime faced by most insurance companies provides a particular insight into scientific researches that have dealt with this issue to date and creates conditions for the prevention of this type of fraud in the insurance industry.

Keywords: *frauds, insurance, leadership, white collars.*

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1. Introduction

Although fraud is one of the oldest crimes, not much progress has been made to date in its detection. This is not an easy task even with huge technological advances and the existence of state-of-the-art fraud detection software, primarily because fraudsters continually evolve and change tactics.

In its broadest terms, fraud means obtaining something of value or avoiding an obligation by means of deception (Duffield G, Grabosky P, 2001, 1). It encompasses various forms of behavior, ranging from misrepresentation or concealing facts, making false statements, opinions and reports, through false assessments, false documentation, and complicated, meticulously planned corporate frauds that sometimes involve state officials. In the time of sophisticated information systems, the number and scope of committed frauds are increasing, whereas some new types of fraudulent activities have also emerged.

Insurance frauds committed by those employed in high positions can be a link in the chain of organized crime, and the resulting damage can be huge and impact not only the existence and operations of insurers but also society in general. In dollar value, insurance fraud is the second largest criminal act in America, exceeded only by income tax evasion (Dean, 2004, 67). Despite the aforesaid, at the very opposite end of the moral compass are the views of the public whose exponents claim: (a) that insurance fraud is „a victimless crime“; (b) that the risk of being caught is low and the punishment, if any, is low; and (c) that no social stigma is associated with this crime. All this, however, is a misconception, because insurance companies pass on the costs of fraudulent claims to future customers in the form of higher premiums (Dean, 2004, 68).

Fraud has never been such a serious threat to the global financial system as it is at present due to the increasing number of factors that determine the occurrence of fraud, such as the globalization of financial flows and markets, Internet usage, conscious corporate bankruptcies, and many others (Mackevičius, Giriūnas, 2013, 150).

The reasons for a deeper analysis of frauds committed by insurance employees are numerous, which is why they require more attention, especially if had in mind that the detected white-collar crimes to date have only been the tip of the iceberg. When added a possible connection with other, accompanying criminal acts such as bribery, abuse of office, forgery of documents, money laundering, etc., it becomes even clearer that this issue needs to become more topical.

Taking all of the above into account, there is an interesting note in the conclusion of the article published by Todd J. D. et al. (1999, 123): *A ten-year search of five of the major academic and professional risk and insurance journals yielded not one article relating to internal frauds perpetrated by employees against insurers.*

This paper expands the scope of theoretical and empirical research on this issue in insurance companies in the context of determining the connection between

leadership, organizational culture, and fraud perpetrated by employees, which eventually can significantly contribute to a better understanding of this phenomenon.

2. Factors of Organizational Culture Influencing Frauds

Although leadership is as old as civilization itself, since the times of Aristotle until today there have been many different ways and approaches in its definition depending on the angle of observation and factors that the authors preferred, which only indicates the complexity and importance of this phenomenon. For example, Northouse (2008, 11) notes that 20th-century scientists studied leadership through the trait approach, which led to the theories of „great people“ in terms that only particular outstanding individuals possess a particular set of traits. However, this approach was challenged when Stogdill (1984, 35) pointed out *that no consistent set of traits differentiated leaders from non-leaders across a variety of situations*. Again, such an approach led to the perception of leadership as a relationship between people in different social situations or, as Bass (1990, 11) pointed out, leadership as „the focus of group processes“. However, at the end of the last century, thousands of scientific researches on types of leadership were identified (Fleishman et al., 1991, 10), which spawned numerous theories and definitions. Most of them especially emphasized the ethical aspect of leadership, the leader's credibility, and the relationship with associates built on trust. To that extent, we can quote a definition provided by Northouse (2008, 2), where leadership *is a process whereby an individual influences a group of individuals to achieve a common goal*.

Having in mind the above definition, it can be said that *due to the nature of the process of influence, the need to engage followers in accomplishing mutual goals, and the impact leaders have on the organization's values* (Northouse 2008, 243), ethics is central to leadership. This certainly does not mean that followers and other stakeholders should be passive observers. Instead, in the life of the organization, they should also have a positive and active role in defining ethical behavior.

Analyzing the phenomenon of leadership from the aspect of organizational culture, most theorists understand that culture is based on the leader's personality who transfers his own values to the group. In other words, organizational culture is conveyed through the values and leadership styles that leaders practice (Weiss 2006, 35).

The influence of a leader is based on his power, which is very important for understanding the culture of the organization, both from the aspect of concentration and from the aspect of the source of power that he uses.

If the source of power is a deviant and unethical understanding of business and the way of achieving business results, then the corporate culture, and thus the climate in the organization, will be unethically conceived. Using his formal power, a leader can:

- succumb to selfish interests that may harm the organization;
- become a part in money laundering and terrorist financing;
- submit untrue information to institutions (fraudulent financial reporting);
- forge documents;
- give to himself and the chosen (obedient) ones high bonuses;
- neutralize opponents.

Some of the mentioned forms of behavior can be felonies, some offenses, and some abuse of power. The question of whether a certain act constitutes an unethical or unlawful act often remains unanswered because it is detected either untimely or never. The results of a survey carried out among the readers of *Inc.* magazine³ support the assertion that power is important to executives. In two surveys, about 500 CEOs of entrepreneurial companies were interviewed and asked what keeps them motivated. The results were contradictory, but several tendencies stood out. In the main trend that was detected, the leaders involved in the research represented a stereotype of the American system and entrepreneurial values. In both studies, a significant number of respondents shared the view that the driving force is a confident instinct for power and a desire to control other people's lives (Videnović, 2013, 15⁴). Corporate culture, in addition to managers, is influenced by other factors, especially by the type of work that the organization deals with and the way the work is performed, by the professional structure of employees, level of technological development, maturity phase, and company goals, as well as national culture or the culture of the environment. Based on the intensity of the influence of certain mentioned factors, particular attitudes, values, and norms of behavior are formed in the organization.

Yet, whether it is a leader or an organization he leads, the dividing line between creating a climate for professional fraud, that is, fraud committed by employees and management, is a matter of credibility. A person considered reliable and truthful possesses credibility, and according to the definition of Cambridge Dictionary,⁵ credibility is *the fact that someone can be believed or trusted*.

In addition to the leaders' influence on their followers, the literature more often than not refers to the influence on change and argues that all approaches to leadership and change are supported by a set of ethical values that influence leaders' actions and outcomes/consequences of initiatives to change something good or evil. Although we still live in an era in which leaders can have the easy way out despite favoring their own ego and interests against the rights of others, there are growing opinions that a leader should care not only about the organization he

³ *Inc* – business media property founded in 1979 in New York City. It publishes six print issues annually.

⁴ Adžes Isak (2011). *Adžes o menadžmentu*, Hisperia Edu, pp. 69

⁵ <https://dictionary.cambridge.org/dictionary/english/credibility> (Accessed: January, 2021).

heads but also about wider social welfare. This primarily refers to social responsibility, which includes caring for marginalized and vulnerable groups. In his address, Frank Abrams, the Chairman of the Management Board of Standard Oil of Jersey, noted that *business managers are gaining professional status partly because they see in their work the basic responsibilities to the public that other professional men have long recognized as theirs*. In the 1970s, Greenleaf developed this idea as *servant leadership* approach. According to this author, in leadership, *a person emerges as a leader by first serving others* (Northouse 2008, 244).

Thus, if leaders are accountable to the organizations that entrusted them with leadership, then there is no doubt that a transparent system of ethics is something that must be instilled. For example, Chapra (1985, 24) points out that human beings constitute the living and indispensable elements of an economic system. They are the main players and, unless they are reformed, nothing can work, neither the *invisible hand* nor the *visible hand*. How important the role of an individual is for understanding this attitude can be seen, for example, in the process of implementing corporate social responsibility in banking, where Hoang (2014, 10) points out that managers' attitudes toward CSR are central to the CSR strategy process of the bank. In view of the aforesaid, *leadership is a process of transformative change where the ethics of individuals are integrated into the mores of a community as means of evolutionary social development* (Barker 2001, 491).

If leadership is what largely determines organizational culture, then trust is the connective tissue of all the factors it comprises. According to the research of one of the most prominent authors on leadership (Bennis 1991, 263–264), there are four key leadership competencies: management of attention, management of meaning, management of trust, and management of self. *Trust is a psychological state comprising the intention to accept vulnerability based upon positive expectations of the intentions or behavior of another* (Rousseau et al., 1998, 395). Thus, by trusting the leader, the followers consciously accept the risk that they may be hurt by the leader's actions, but they believe that this will not happen and that the leader will direct his actions and behavior toward the benefit of the entire organization.

Increased interest in this topic lately shown by scientific and professional circles is not surprising if kept in mind that organizations are particularly sensitive to the diminished trust of employees. If the employee does not feel that the leader and the organization can be trusted, he will find fraud quite a legitimate thing to do. If the leader and/or organization fail to pay taxes to the government fund or misrepresents accounting reports, etc., then the employee's right to copy the behavior of the unethical organization in which he or she works becomes legitimate, and consequently, this leaves far-reaching consequences on the organization's performance. It could be said that the building block of leadership is trust, which should be at the core of the insurance industry. However, although the very concept of insurance implies particular safety, it is always

associated with risk. Risk is also a gambling term, so these two completely different things are often connected. In the case of betting: if we do not gamble, there is no way to be at a loss, so there is no risk. In the case of insurance: the chances of experiencing a loss exist regardless of whether we conclude an insurance contract or not. In other words, the basic difference between insurance and gambling is that gambling creates risk, while insurance enables the transfer of existing risks (Vaughan, Vaughan, 2000, 23).

An additional external risk factor is that the public perception of insurance employees is very unfavorable. The low assessment of their honesty has changed very little from year to year, more precisely, it has been quite consistent over the past 40 years of Gallup's⁶ public opinion poll. In 2019, only 13% of respondents thought that employees in the insurance business were honest and had desirable ethical standards. No comparative research has been conducted in Serbia, but it can be inferred that financial institutions, and thus the insurance business, are not perceived as institutions with high ethical standards. This is contributed by numerous financial scandals, which resonated loudly in the public. According to John Costa, *the business world is full of scandals, starting from trade, banks, insurance, to the managers' false expense* (Videnović 2020, 55).

3. Fraud Triangle

Some employees consider career advancement to be the most relevant indicator of their professional worth. Career success that comes with power, reputation, and financial well-being is a strong driving force that can lead certain employees toward unethical behavior, including deception, denial of important information, misrepresentation of financial statements, etc. New opportunities and technology provide an unusually large range of once unimaginable possibilities for committing fraud, and the only thing that has not changed from time immemorial to date is the damage caused by fraud as a result of obstacles to fraud prevention and detection.

The fraud triangle is a model that provides a better understanding and insight into the factors that cause someone to commit occupational fraud. It consists of three components that together lead to fraud:

1. Pressure - „Trusted persons become trust violators when they conceive of themselves as having a financial problem which is non-shareable, are aware this problem can be secretly resolved by violation of the position of financial trust, and are able to apply to their own conduct in that situation verbalizations which enable them to adjust their conceptions of themselves as trusted persons with their conceptions of themselves as users of the entrusted funds or property“ (Cressey 1950, 743). Cressey explained that the pressure to commit fraud can be equated with a person's intrinsic motives, but stressed

⁶ Gallup is a research and polling organization with headquarters in Washington D.C.. It has more than 40 offices in 27 states.

that the mere presence of financial difficulties does not mean that people will be prone to fraud. He also stressed that the financial problem can be *personal* (e.g., debt, vice, greed, strong revenge against the system, dissatisfaction with salary, need to continue with lifestyle we are accustomed to) or when *management* exerts pressure to achieve their expected target. Cressey noted that fraud would occur in the organization when a perpetrator, lacking the moral strength to resist temptation, was offered the opportunity to commit an offense. In most cases of fraud, the main factor that seems to drive participants to fraud is conflict of interest (Behevani, Mylonas 2014, 32) and presented some other factors and conditions for committing fraud in the form of a fraud triangle. Cressey noted that fraud in the organization occurs when a perpetrator, lacking the moral strength to resist temptation, has the opportunity to commit an offense. In most cases, the main factor that seems to drive participants to commit fraud is conflict of interest (Behevani, Mylonas 2014, 32). Subsequent researchers Biegelman and Bartov (2012), Pfister (2009) and the American Association of Chartered Fraud Examiners (ACFE) grouped and presented some other factors and conditions for committing fraud in the form of a fraud triangle. That triangle consists of possibilities, opportunities, and rationalization. According to these authors, the existence of all three elements creates favorable conditions for fraud. However, over time, in the scientific literature, the elements of the deception triangle began to differ and were differently identified. Bressler and Bressler (2007, 23–36) have suggested improving the fraud triangle and presented it in the form of a square. They identified four elements of the fraud square: incentive, opportunity, capability, and realization. The transformation of the fraud triangle presented in Figure 1 has been variously analyzed and evaluated by scientists (M. Jonas, G. Lukas 2013, 152⁷).

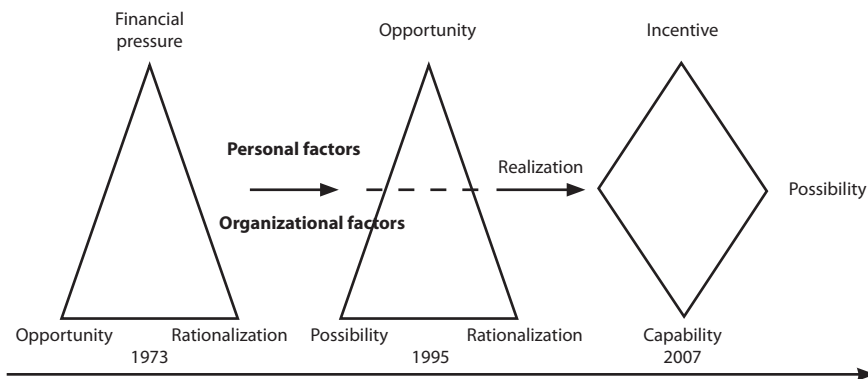


Figure 1: Fraud triangle evolution

⁷ Also see: Albrecht Steve, Williams Timothy, Wernz Gerald, Fraud: Bringing Light to the Dark Side of Business, *Irwin Professional Pub*; Bressler Martin, Bressler, Linda, A model for prevention and detection of criminal activity impacting small business, *The Entrepreneurial Executive*, 2007.

Critics of the fraud triangle, Kassem, Higson (2012), Anandarajan, Kleinman (2011), Charles and Christopher (2006), argued that the square cannot help in explaining the reasons for fraud because it ignores factors such as the fraudster's ability and skills. The most common problem about fraud detection is that it is committed by qualified and trained people who have a high opinion of themselves (in terms of being more capable, smarter, and deserving more than others). They meticulously prepare the fraud, study the laws, processes, and procedures, the organizational structure of the company, and pay great attention to the analysis of various factors influencing the potential outcome. In addition, the authors Albrecht et al. (1995) believe that only a person with very high potentials is able to detect the weaknesses of the organization's internal control system and use these weaknesses to commit fraud. As for other characteristics, it is important to emphasize that people susceptible to fraud are very similar to those who never commit them. In most cases, fraudsters are first-time offenders and have a similar lifestyle, education, family background, and hobbies as people who do not commit fraud. Among others, these are some of the reasons why it is quite difficult to recognize a fraudster only by his appearance or some traits (Bahevani and Mylonas, 2014, 32).

2. Perceived opportunity –arises when the fraudster sees a way to use their position of trust to solve the financial problem. Even if a person is motivated, the fraud cannot be committed without the opportunity. Lister (2007, 65) saw opportunity as “the fuel that keeps the fire going” and he believed even if a person has a motive, he or she cannot perpetrate a fraud without being given an opportunity. Some authors believe that the employee's position in the organization contributes to the opportunity to commit fraud e.g.: if the employee realizes that there is a poor division of labor, that there is poor internal control, or that the business is not audited regularly, etc. Also, there is a correlation between the opportunity to commit fraud and the ability to conceal fraud (Arežina, Mizdraković and Knežević 2016, 210). Thus, understanding the opportunity for a criminal act to occur allows the identification of a scheme of criminal acts.

3. Rationalization –a justification of fraudulent behavior by nullifying internal moral objections. Regardless of the type of fraud, most offenders seem to seek to justify or rationalize their activity. In doing so, they will use *vocabularies of adjustment* (Cressey 1986, 199) to manufacture rationale and extenuating circumstances and remove the perception of criminality from the act. Techniques of neutralization will vary with the type of fraud (Benson 1985, 589). For example, frauds against large companies or government departments are often rationalized with the excuse: *They can afford it*. Other examples of rationalization include viewing the victim as culpable in some respect or light-minded and thus, he or she had it coming or provoked the fraudster. Particular frauds are among the easiest for the fraud offender to rationalize because they think that there are no victims, despite the damage done. Such frauds notably relate to money laundering or tax evasion.

4. Senior Executive in the Centre of Fraud Triangle – Profile

The fraud triangle, with various modifications, has withstood the test of time and achieved its purpose of helping researchers to understand why individuals commit fraud. As we have already stated, in addition to that, there is a growing number of frauds perpetrated by high-ranking persons in financial institutions and sometimes they cause global crises, such as the one in 2008, the consequences of which we still feel.

This leads to the conclusion that a common denominator of all motivations for committing fraud is greed and dishonesty (Duffid, Grabosky, 2001, 2). Such an explanation is, however, overly simplistic. There is a whole array of personal traits of employees who may commit fraud under certain circumstances. Senior executives often have a strong ambition to be at the top, to have employees or situations under their control or power. The feeling of superiority over other people transforms it into such a motivating force for committing frauds that it becomes an end in itself. The power over situations is the feeling of satisfaction in more elaborate, long-lasting frauds that require a high level of knowledge and capability. Stotland (1977, 188) calls this motivation *ego challenge*, and it relates to the sense of mastery and excitement in meeting and overcoming challenges. This can bring out a sense of superiority especially because such dominant people are often surrounded by loyal employees who, day by day, help them strengthen that misconception about themselves.

Using her previous experiences, Laura Downing has developed a concept of the “Executive” Fraud Triangle as shown in Figure 2.

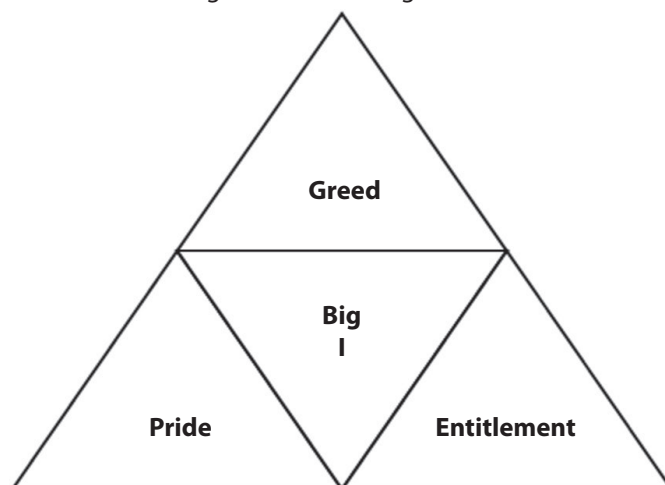


Figure 2 Laura Downing, CFO, Fraud Magazine,⁸ April 2015

⁸ Fraud Magazine is a bi-monthly publication of the Association of Certified Fraud Examiners.

The executive stands at the center as the great "I" and is surrounded by three points:

Greed – Executives want money, position, title, authority, perks, services, etc.

Pride – Executives think they're better, smarter, more skilled, or superior.

They are often very proud of their own achievements and extraordinary capabilities. They focus on how much success they have achieved and how well they are doing the job compared to others, and this can take the form of an excessive need for attention and admiration. In addition, they will not allow any of the employees to question their decisions.

Entitlement: Executives feel "God-given", as though they deserve to have everything they could possibly want -money, position, title, perks, services, etc. They need to be recognized for their excellent results in the expectation that they will be given everything they want. They demand unswerving loyalty, do not accept criticism, and if they are not given credit for their actions, they become disappointed and/or angry. For the crime of fraud, perhaps the most relevant is the belief of managers that they deserve privileges and if their expectations are not met, they will use the benefits that come with their position.

Managers who have these personality traits will very easily take the opportunity to commit fraud. They will usually create it themselves, especially if they meet the criteria often defined in literature by the researchers: „has a grandiose sense of self-importance“; „requires excessive admiration“; „has a sense of entitlement“; „has a lack of empathy“; „tends to be exploitative, manipulative, and arrogant“ (Grijalva, 2014, 2⁹).

Because of their ambition, self-confidence, lack of empathy, and ruthlessness toward others, such individuals often have narcissistic personality traits. Some researchers suggest that narcissism is a key ingredient to leadership success (Kets de Vries, Danny Miller, 1985, 601), and there is a large number of those who argue that leadership roles are often held by narcissists, such as chief executive officers and U.S. presidents (Grijalva 2014, 2¹⁰).

People with such a disorder can be high achievers, but they do not feel remorse and lack a conventional conscience. Due to the lack of a moral compass, they do not rationalize their actions, because no one and nothing is more important than their great "I". The only pressure they feel inside is to get as much as possible.

The prevalence of narcissistic personality disorder in the general population is estimated at 6.2% (Fabijanić, 2014, 55), while this rate is probably much higher in the population of managers. With all this in mind, it can be concluded that the

⁹ Author notes that researchers typically define narcissism by listing several diagnostic criteria for Narcissistic Personality Disorder from the Diagnostic and Statistical Manual of Mental Disorder -IV (DSM-IV; APA, 2000; e.g., pp.717)

¹⁰ Michael Maccoby, "Narcissistic leaders", *Harvard business review*, 2000; Rosenthal Seth, Pittinsky Todd "Narcissistic leadership", *The Leadership Quarterly*, 2006.

presence of narcissistic personality traits increases the risk of fraud, although not every narcissistic person will actually commit it.

5. How to Prevent Fraud

Based on all of the above, we could first start by studying the conditions that increase the risk of fraud. Almost every company has a number of favorable conditions for committing fraud. After examining various researches into the conditions for fraud, Mackevičius and Giriūnas (2013, 156) have created a classification of the most important conditions that increase the risk of fraud. Seven groups of conditions have been identified, i.e. the conditions associated with: 1) honesty, competence, and style of action of the company's managers; 2) the employees of the company; 3) the organizational structure of a company; 4) the financial condition and operating results of the company; 5) the organization of activities and industrial activities of the company; 6) accounting, auditing, and the internal control system; 7) external conditions.

This classification can help business managers and auditors to identify frauds easier, to determine their causes and location, objectively assess their impact on performance results, and provide specific prevention measures. Internal and external auditors must pay special attention to the analysis of the conditions that increase the risk of fraud. The internal control system in a company is also important: the more it is effective, the lower are the possibilities to make a mistake or to commit fraud. However, as practice shows, if in the past frauds have been more often committed by less skilled and low-competence employees, nowadays a growing number of frauds are committed by intelligent, creative employees in high positions.

According to the ACFE report, in 2012, 51% of employees engaged in fraud had a university education, and even 46% worked in senior executive positions (Mackevičius and Giriūnas, 2013, 160).

Based on a comprehensive review of the literature, Hooks et al. (1994, 117) suggested that codes of conduct have little impact if not implemented. Strong corporate awareness of the wrongfulness of fraud should provide support to audit and internal control, to create greater sensitivity to the fraud-associated risk factors. In addition, it should discourage unethical activities and encourage the reporting of these crimes if they occur. In contrast, organizations that show less fraud-related awareness will provide inadequate support to internal controls. Such an environment may allow or even encourage unethical activities for some, and discourage others from reporting suspicious activities. In a nutshell, positive or strong ethical attitudes modeled by management enhance the awareness of employees, whereas loose attitudes cause reduced employee awareness.

Internal controls dealing with fraud detection should include the reviews of accounting and audit reports, as well as anonymous reports of illegal and unethical conduct. If the strategic goal of the organization is to approach the implementation of these controls in a systematic way if an organization regularly performs reliable internal audits of all organizational units, and if it dismisses the employees caught in the act of fraud, there is a high probability that it will deter potential fraudsters because the risk that they will be discovered will become certain. In addition, it is only logical to assume that managers and employees of insurance companies, due to the nature of their work, have a more developed awareness of fraud in general. The next logical assumption would be that reports of fraud are more likely to originate from employees than from external sources.

6. Conclusion

Analyzing the literature, we concluded that to understand internal fraud, it is necessary to consider countless models of employee behavior and the influencing factors, so that potential perpetrators can be discouraged. Therefore, we will focus on highlighting those to which activities and measures should be systematically directed to reduce the risk of fraud and raise awareness of the overall damage to the company that such behavior may cause.

In today's complex and competitive business environment, the question that arises for insurance companies is how to ethically lead and manage changes.

The risk of encouraging unethical behavior can be reduced where there is employee confidence that the company's goals are in line with their values, and where there is transparency in decision-making and independent external supervision. In addition, the real basis for changes that will reduce the possibility of fraud lies in raising moral standards and clearly defining unacceptable behavior at work.

Nevertheless, the main pillars of ethical behavior in achieving business goals are leaders who bear essential responsibility for the successful functioning of the organization, and their decisions affect all stakeholders (insurance beneficiaries, suppliers, investors, shareholders), and especially employees. It is the duty of the leader to establish clear rules of ethical conduct. The successfully achieved goal of that leadership responsibility should be a community of satisfied individuals whose interests do not conflict values or interests of the organization in which they work. In order to achieve that goal, the leader needs credibility. If this condition is met, then all other activities that can improve the ethical climate in the organization or save it from erosion should follow. This primarily refers to the tightening of penal policy in the field of internal fraud, and to the use and continuous improvement of the overall system for timely detection of abuse and fraud detection. In addition, closer

cooperation and coordination of all authorities is needed, both within and outside the organization (police/prosecutor's office/court), to effectively respond and thus present an obstacle to such undesirable behavior. Putting into perspective a severe punishment can help, but with this type of fraudsters, the fear of publicity is a much stronger inhibitor than possible imprisonment, because they lose what they care about the most and what is their reason for committing fraud, namely: power, status, and pride. This would raise the risk of insurance fraud to a level unacceptable to most high-ranking employees who think they can "outsmart" the system they serve.

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