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Examining the Practice of Voluntary Disclosure Programs for Individual Taxpayers

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Abstract: This study aims to explain taxpayers' perceptions of the Voluntary Disclosure Program (VDP) and its implementation practices. A qualitative approach with a critical paradigm was employed to explore the VDP phenomenon, which continues to generate debate, particularly from the taxpayers' perspective. Data were collected through observation, interviews, and documentation involving 12 informants, consisting of eight taxpayers, two tax consultants, and two tax officers. Data analysis followed an interactive model comprising data collection, data reduction, data display, and conclusion drawing. The findings indicate several factors that discourage taxpayers from participating in the VDP, including a lack of trust in the tax system, concerns about tax rates, the perception that there are no undisclosed tax obligations, as well as psychological factors and fear. Insufficient information regarding the benefits and procedures of the VDP also contributes to non-participation. Interestingly, taxpayers who participated in the VDP did not fully support the program; many joined merely to demonstrate formal compliance with regulations, despite having no genuine intention or moral willingness to participate. These findings highlight the importance of strengthening trust, enhancing understanding, and improving the socialization of the VDP to encourage conscious and genuinely voluntary taxpayer participation.

Keywords: voluntary disclosure, taxpayers, perceptions and practices.

INTRODUCTION

Tax is a mandatory contribution paid by citizens to the state as a form of participation in national development and the strengthening of the State Budget. Taxpayers who have met both objective and subjective requirements have the rights and obligations to be registered and to report their tax obligations in a timely manner (Mappadang & Sinaga, 2022). Taxes play a multidimensional role, not only as a source of state revenue but also as an instrument to promote economic stability, equity, and sustainable development (Adilla et al., 2025). Therefore, the Directorate General of Taxes is entrusted with the responsibility of managing

tax revenues to achieve revenue targets, support a sound state budget, and enhance the government's fiscal capacity in addressing various economic challenges.

In this context, the government continues to pursue efforts to improve taxpayer compliance through socialization, administrative reforms, and the implementation of strategic policies. One of the most recent initiatives is the Voluntary Disclosure Program (VDP), introduced through Law Number 7 of 2021 on the Harmonization of Tax Regulations. The VDP is a continuation of the 2016 Tax Amnesty program and aims to encourage taxpayers to voluntarily disclose previously unreported assets and tax obligations by offering lower final income tax rates and exemption from criminal sanctions. This program is designed to broaden the tax base, enhance taxpayer compliance, and promote optimal state revenue.

However, empirical phenomena indicate the presence of both support and opposition toward the VDP. Many taxpayers are reluctant to participate due to various factors, including a lack of trust in the government, perceptions of unfairness toward compliant taxpayers, concerns about tax rates, financial constraints, and insufficient information regarding the benefits and procedures of the program (Prihastuti et al., 2022). A statement from a taxpayer, "Pak Made," illustrates that the VDP is not always effective for all parties, particularly for those whose financial conditions do not allow them to settle tax obligations in a lump sum. This view reflects a real-world phenomenon in which tax policies sometimes fail to enhance compliance due to perceived injustice and government inconsistency in the implementation of previous programs, including the 2016 Tax Amnesty.

Empirical data further indicate that the 2016 Tax Amnesty did not fully succeed in improving tax compliance, as evidenced by fluctuations in the tax ratio following the program. The tax ratio declined from 9% in 2016 to 6.9% in 2020, then increased to 10.38% in 2022, before slightly decreasing to 10.21% in 2023 (Geni & Liana, 2023). These conditions suggest that tax amnesty programs do not necessarily align with long-term improvements in tax compliance. This phenomenon raises critical questions regarding the effectiveness of the 2022 VDP in achieving similar objectives, namely strengthening taxpayer compliance and increasing state revenue.

Numerous previous studies have examined the impact of tax amnesty programs and the Voluntary Disclosure Program (VDP) on tax compliance. Finrely and Ardiansyah (2022) found that sanction reductions under the VDP do not always have a significant effect on voluntary taxpayer compliance; however, their study primarily employed a juridical normative approach using secondary data. In contrast, a study by Mawarni et al. (2024) in Lhokseumawe City demonstrated that voluntary participation in the VDP was able to improve individual taxpayer compliance, as reflected in an increase in the number of taxpayers making tax payments. Similar findings were reported by Mahmud et al. (2023), who emphasized the importance of implementing the VDP in a sustainable manner with schemes that support program effectiveness. Dewantara et al. (2022) further argue that the imposition of retributive sanctions can effectively trigger increased voluntary tax compliance, suggesting that a combination of incentives and sanctions is crucial in shaping compliant taxpayer behavior.

Previous studies on tax amnesty programs have also demonstrated a positive effect on tax compliance (Fitriyani et al., 2021; Maharani et al., 2021; Abdurrosid et al., 2021). However, findings from Turkey by Bozdoğan and Şimşek (2018) reveal that tax amnesty programs may generate losses for the state if they are not accompanied by effective strategies and a robust tax system. This highlights the need for governments to establish transparent and credible legal and tax administration systems in order to enhance taxpayers' trust and sense of security. Purnamasari et al. (2018) emphasize that taxpayers' trust in the government is a critical factor influencing their decisions to fulfill tax obligations. When tax systems and governance are well implemented, taxpayers are more confident that the taxes they pay are allocated for public interests without misuse.

Based on this background, the research problems are formulated as follows: (1) how do taxpayers perceive the Voluntary Disclosure Program (VDP)? and (2) how is the Voluntary Disclosure Program (VDP) implemented in practice? By addressing these two issues, this study is expected to provide a deeper understanding of the VDP phenomenon, while also offering insights for improving voluntary disclosure policies so that they become more effective and equitable for all taxpayers.

The novelty of this study lies in its focus on taxpayers' perceptions and practices regarding the VDP as regulated under the Harmonization of Tax Regulations, an area that remains underexplored empirically. Previous studies have predominantly emphasized the quantitative impact of tax amnesty or the VDP on tax compliance, whereas this study qualitatively explores taxpayers' psychological, behavioral, and decision-making factors through the Theory of Planned Behavior framework. Using this approach, the study examines taxpayers' attitudes, subjective norms, and perceived behavioral control in determining participation in the VDP, while also identifying practical constraints encountered in the field.

The urgency of this research stems from the government's need to evaluate the effectiveness of the VDP, identify barriers to taxpayer participation, and formulate more appropriate policy strategies. The findings are expected to provide practical contributions for policymakers in improving the implementation of voluntary disclosure programs and tax policies in general, while also strengthening voluntary and sustainable tax compliance.

METHOD

This study employs a descriptive qualitative approach with a critical perspective, aiming to explore and examine the phenomenon of the Voluntary Disclosure Program (VDP), which continues to generate both support and opposition among taxpayers. The qualitative descriptive approach was selected because it enables the researcher to present a systematic, factual, and accurate depiction of taxpayers' perceptions and practices in either participating in or rejecting the VDP, while also identifying the factors influencing their decisions (Sugiyono, 2018).

The research subjects consist of 12 informants, comprising eight taxpayers, two tax consultants, and two tax officers. The selection of informants was based on their direct involvement in fulfilling tax obligations, ensuring that the data obtained reflect relevant and in-depth conditions. Tax consultants and tax officers provide professional perspectives as well as the government's viewpoint regarding the implementation of the VDP. The diversity of informants' backgrounds is expected to generate comprehensive insights into the perceptions and practices of the VDP in the field.

The research procedure includes a preparatory stage involving problem identification, formulation of the research title and proposal, selection of research subjects, and preparation of research instruments. Data collection was then conducted through in-depth interviews, non-participant observation, and documentation of tax-related archives. The collected data were analyzed qualitatively using an interactive model (Miles et al., 2014), which includes data reduction, data display, conclusion drawing and verification, and final conclusions. Interview guidelines and documentation protocols were employed to ensure systematic and in-depth data collection. Through this process, the study provides a comprehensive understanding of taxpayers' perceptions of the VDP, its implementation practices, and the factors influencing taxpayer participation in this government program (Arikunto, 2017).

RESULTS AND DISCUSSION

Efforts to realize good tax governance in Indonesia have been supported by Law No. 7 of 2021 on the Harmonization of Tax Regulations, which introduced a new policy in the form of the Voluntary Disclosure Program (VDP). This program is designed as an instrument for taxpayers to disclose assets or tax obligations that were previously unreported, by offering

lower tax rates than the normal rates and granting relief from sanctions that would otherwise apply. The VDP emerged as a continuation of previous tax amnesty experiences, aiming not only to increase state revenue in the short term but also to foster long-term tax awareness and compliance (Minister of Finance of the Republic of Indonesia, 2021).

In practice, the implementation of the VDP has generated diverse perceptions among taxpayers. For some taxpayers, the program provides administrative convenience and reduces tax burdens compared to previous regulations. These positive perceptions generally arise because the VDP offers an opportunity to voluntarily rectify tax reporting, minimize the risk of sanctions, and provide easier access for taxpayers who previously had limited understanding of tax procedures. This is reflected in the experiences of several taxpayers who felt that the program directly assisted them.

For instance, Pak Gede stated that the VDP was particularly helpful for business owners who are unable to focus on tax administration:

“...this tax amnesty is very helpful for business owners like me who cannot focus on administrative matters, as it offers rates that are more efficient than the general tax rates.”

In line with this view, Bu Livi highlighted that the VDP provides administrative convenience, particularly in addressing taxpayers’ previous lack of understanding regarding annual tax return reporting and asset ownership disclosure.

“...it is very helpful, especially in overcoming past misunderstandings related to annual tax reporting and asset ownership disclosures.”

Pak Ketut further emphasized the pro-people orientation of the VDP policy, which he perceived as being designed to target middle- to upper-income taxpayers.

“...I believe it is pro-lower-income groups, because the VDP targets taxpayers with middle to upper incomes.”

Meanwhile, Pak Putu added that although the VDP tax rates are relatively alleviating, they remain higher than those applied under the 2016 Tax Amnesty. This indicates that some taxpayers view the program as practical, yet still carefully consider the amount of tax payable. On the other hand, skeptical perceptions also emerged. Several taxpayers perceived the VDP as less equitable and potentially encouraging future tax avoidance. Ibu Sinta expressed her concerns as follows:

“...I view tax amnesty programs such as the tax amnesty and the VDP with skepticism because they may give the impression that past tax avoidance can be forgiven without adequate consequences.”

Pak Tono added that the program has a dual nature: while some taxpayers feel advantaged, others continue to report income mainly to reduce audit risk.

“...this program is like a double-edged sword; on one side, some taxpayers may assume the government will continue to forgive their past mistakes, but on the other side, taxpayers still report their income to minimize the risk of audits.”

In contrast to the previous views, Pak Made highlighted the lack of inclusivity of the VDP, particularly for lower-income taxpayers. He emphasized the importance of implementing the program more equitably and providing adequate access and assistance so that all taxpayers, regardless of income level, can benefit from the policy.

“...it is important to ensure that this program is implemented fairly and provides adequate access for all taxpayers.”

Taxpayers’ views regarding the impact of the VDP on tax compliance reveal considerable variation. Some perceive that the VDP is capable of increasing tax awareness and compliance. This is reflected in Ibu Livi’s statement, who asserted that through the VDP, taxpayers become more aware of the importance of reporting income and paying income tax in accordance with the actual tax liability.

“...taxpayers will become aware of the importance of reporting income and paying the income tax that is actually due.”

Conversely, Ibu Sinta emphasized that improving tax compliance cannot rely solely on policies such as the VDP, but must be accompanied by the development of trust in the tax system. According to her, sustainable compliance can only be achieved when greater transparency exists in the government’s management of tax revenues.

“...sustainable compliance requires trust in the system and greater transparency in tax management.”

The findings of this study indicate that the implementation of the VDP in practice continues to face significant challenges. Although the online-based reporting system facilitates taxpayers in disclosing assets and tax obligations, many middle- and lower-income taxpayers remain reluctant to participate in the program. The identified reasons include a lack of trust in the tax system, concerns regarding applicable tax rates, psychological factors, fear of audits, and insufficient information about the VDP (Mawarni et al., 2024; Suhendar & Setyorini, 2023).

In addition, the practice of the VDP highlights the role of tax consultants in assisting taxpayers in understanding procedures, calculating tax liabilities, and utilizing the program efficiently. However, the final decision remains dependent on taxpayers’ own awareness and willingness, resulting in observable disparities between higher- and lower-income groups. Empirical evidence shows that the majority of VDP participants come from middle- to upper-income segments, while taxpayers with relatively low asset ownership tend to prefer amending their annual tax returns rather than participating in the VDP (Irawan & Ulinnuha, 2022).

Theoretically, the success of the VDP is also closely related to the concept of voluntary tax compliance within the Slippery Slope Framework, which emphasizes the importance of taxpayers’ trust in the government as a prerequisite for voluntary compliance. Without transparency, procedural fairness, and strong trust, tax amnesty programs alone are insufficient to promote long-term compliance (Mahmud & Mooduto, 2023; Dewantara et al., 2022). From a cultural perspective, the VDP can be linked to Hindu teachings on *yadnya*, which emphasize sincere moral obligations for collective welfare, as well as the principle of *Tri Hita Karana*, which stresses cross-subsidization and harmony among community members (Sukendri, 2020). However, the implementation of the VDP, which disproportionately benefits middle- to upper-income taxpayers, suggests that these principles of cross-subsidization have not yet been fully realized.

Thus, the VDP demonstrates a clear duality: on the one hand, it provides administrative convenience, opportunities for amnesty, and the potential to enhance compliance for certain taxpayers; on the other hand, it generates perceptions of injustice, skepticism toward the government, and unequal benefits for middle- to lower-income taxpayers. This study underscores that the success of the VDP does not depend solely on fiscal policy design, but also requires transparency, fairness, and social trust as fundamental foundations for fostering long-term tax compliance (Dewi, 2021; Maulana & Furqon, 2021; Fitriyani et al., 2021; Mamesah & Kristanto, 2021; Madukara, 2020; Arief & Fadhilah, 2021; Bozdoğan & Şimşek, 2018).

CONCLUSION

Based on the research findings and the preceding discussion, several conclusions can be drawn regarding the perceptions and practices of the Voluntary Disclosure Program (VDP). First, there are notable differences in perception between taxpayers who participated in the VDP and those who did not. Taxpayers who participated in the program perceived the VDP as highly beneficial in terms of administrative simplicity and lower tax rates. Moreover, the program was considered capable of increasing taxpayers’ awareness of the importance of

reporting taxes in accordance with their actual financial conditions, thereby encouraging tax compliance. In contrast, taxpayers who did not participate in the VDP perceived the program as creating a sense of injustice toward those who had already complied with their tax obligations. Some respondents viewed the VDP as a potential avenue for tax avoidance, based on the assumption that future tax amnesties may occur, which could ultimately undermine overall tax compliance.

Second, the implementation of the VDP in practice has not been fully effective. Although the government introduced this policy to facilitate tax reporting and provide relief for outstanding tax obligations, the findings indicate that many taxpayers who participated in the program did not fully support it. Some joined the VDP solely out of formal compliance with regulations, despite lacking intrinsic motivation or moral willingness to do so. Several factors were identified as reasons for non-participation in the VDP, including a lack of trust in the tax system, concerns over applicable tax rates, the belief that there were no undisclosed tax obligations, psychological factors and fear, as well as insufficient information or socialization regarding the VDP.

Taxpayers are expected to enhance their compliance by better understanding the role of taxes in promoting public welfare, thereby reducing concerns about potential future audits. Tax authorities, in turn, should ensure legal certainty and protection for compliant taxpayers participating in tax amnesty programs or the VDP, strengthen supervision and guidance for taxpayers and tax consultants, and improve the effectiveness of VDP socialization. Building a trust-based system that emphasizes competence, transparency, reliability, and fairness is essential to fostering taxpayer awareness and long-term voluntary compliance. Finally, future research is encouraged to expand the number of informants to provide richer and more comprehensive insights into the effectiveness and real-world impacts of the VDP.

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