

COMPARISON OF LAW IN INDONESIA AND SINGAPORE CONCERNING THE ERADICATION OF CRIMINAL ACTS OF CORRUPTION

Genoveva Puspitasari Larasati

ABSTRACT

The purpose of writing this article is to explain the comparison of corruption eradication in Indonesia and Singapore in terms of existing legal regulations, and the institutions of corruption eradication institutions in each of these countries. It is a fact that corruption has existed since time immemorial. But what makes the difference is how the legal system by governments in different countries is. In this case, the comparison of corruption eradication between Indonesia and Singapore has various differences. The writing of this article uses secondary legal materials, namely books, journals, articles, and other written works originating from both print and internet media which have a correlation with normative research on the comparison of corruption eradication between the Indonesian government and Singapore. The regulations for eradicating corruption in Singapore differentiate more on the sorting of perpetrators from criminal acts of corruption, while in Indonesia they differentiate more on the offenses that occur. In Singapore, the function of eradicating corruption was implemented which was originally under the police institution to become an independent body with a lean and flexible institutional structure. In Indonesia, there is no unitary institution that has the right to deal with corruption. The eradication of corruption in Indonesia is carried out by 3 state institutions, namely the Attorney General's Office, the Police, and the Corruption Eradication Commission (KPK). Eradication of corruption in one country will not run optimally if it is not supported by the political will of the government to eradicate corruption, the unity of state institutions to eradicate corruption, and the enforcement of existing corruption eradication regulations.

Keywords: Corruption, Comparison, Corruption Eradication.

INTRODUCTION

In Indonesia, corruption is a very serious concern. State officials who are supposed to hold the people's mandate to carry out the life of the state as well as people who serve and dedicate themselves to the state, actually commit criminal acts that rob the people of the rights that should be the rights of the people and are used for personal interests. This can be seen from several cases handled by the KPK from year to year, especially in recent years with the revelation of several fairly large corruption cases, including the Hambalang case, the SIM Simulator case, the Jiwasraya Insurance case, and the Covid-19 Bansos case.

Looking back, corruption in this country has been started since the royal era, namely with the will of the king which was evident in the withdrawal of tribute at the will of the king which then continued into the Dutch colonial period, more precisely when the government was held by the VOC. During the VOC period, which began with various sweet promises for the welfare of the indigenous people and gradually led to slavery called slavery. Similar to the royal era, corruption during the VOC period seemed more contrasted with the plundering of natural resources that should have been for the natives, the imposition of arbitrary taxes, the confiscation of the property of the natives, the money that should have been used for the VOC treasury was enjoyed by VOC officials. itself for personal interests, and so on, these are the seeds of modern corruption in this country. The past, before the Reformation, was a time when the constitution became a tool to perpetuate power, not as a control of power (Denny Indrayana, 2011: 52). Press freedom at that time seemed to be limited by a big wall called authoritarian power, so that power was expanding without any control in the form of transparency. In addition, there is also room for ABRI to dominate in the government, especially in the socio-political field, or better known as the ABRI Dual Function. Thus, the widest possible space was opened which became a gap for the political elite at that time to exploit the state, thus giving birth to a corrupt state system. Corruption at that time could be said to be very organized and systematic, this can be seen by the absence of corruption cases that have emerged, which is different from now by being reported openly even at that time there were no regulations governing acts of corruption. Corruption at that time was very neat and seemed to be covered by the existence of sustainable development and on a large scale, providing welfare for the community.

Today, corruption with various modus operandi has attacked massively in the life of the nation and state in Indonesia, and it is feared that it could endanger the stability, security of the state and its people. In addition, it also spreads to various aspects, both economic, cultural and social aspects. In this era of Pancasila democracy adopted by the Indonesian people, especially with the existence of a fair and transparent election (honest, fair, direct, general, free, secret), it is hoped that it will become a party of the people who elect wise and moral state officials, not the other way around which becomes a party for power seekers alone.

Judging from Transparency International's data on the Corruption Perception Index (Corruption Perception Index) in 2020, Indonesia ranks 102 with a GPA (Corruption Perception Index) of 37, while Singapore ranks 3 with a GPA of 85 along with Norway. Singapore is a very effective and efficient role model with a very lean institutional structure but it has a very large effect in eradicating corruption.

Based on the background of the problem above, the author raises the title "Comparative Law in Indonesia and Singapore on the Eradication of Corruption Crimes". In the event that further studies are carried out on how the law on handling corruption in other countries compares with the law on handling corruption in Indonesia so far.

METHOD

In solving the problem formulation raised. The research method used is classified as normative or doctrinal legal research. The normative legal research method uses a method of researching existing library materials. In collecting research data, by using secondary legal materials in the form of books, journals, articles, and other written works, which come from both print and internet media that have a correlation with this research. Because this research is a normative research, the data collection technique used is the study of documents or library materials and the analysis techniques of legal materials used are deduction techniques (from general to specific) and interpretation (interpretation) in analyzing existing legal materials.

RESULTS AND DISCUSSION

Comparison of Corruption Handling Methods in Singapore and Indonesia

The criminal act of corruption has existed for a long time with various methods and modus operandi used which have transformed along with the times. As previously explained in the background, corruption is usually likened to a fungus that grows and develops by spreading its spores, and its growth is very rapid and massive. This is reflected in the Corruption Handling Data Tabulation by the KPK for the Year 2004-2021 (as of May 8, 2021):

Table 1. Data Tabulation for Handling Corruption by the KPK for the Year 2004-2021 (as of May 8, 2021)

Penindakan	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	Jumlah
Penyelidikan	23	29	36	70	70	67	54	78	77	81	80	87	96	123	164	142	111	41	1429
Penyidikan	2	19	27	24	47	37	40	39	48	70	56	57	99	121	199	145	91	22	1145
Penuntutan	2	17	23	19	35	32	32	40	36	41	50	62	76	103	151	153	75	34	981
Inkracht	0	5	14	19	23	37	34	34	28	40	40	38	71	84	104	142	92	16	831
Eksekusi	0	4	13	23	24	37	36	34	32	44	48	38	81	83	113	136	108	18	872
Total	27	74	113	155	199	210	196	225	221	276	281	282	423	514	736	718	477	131	5258

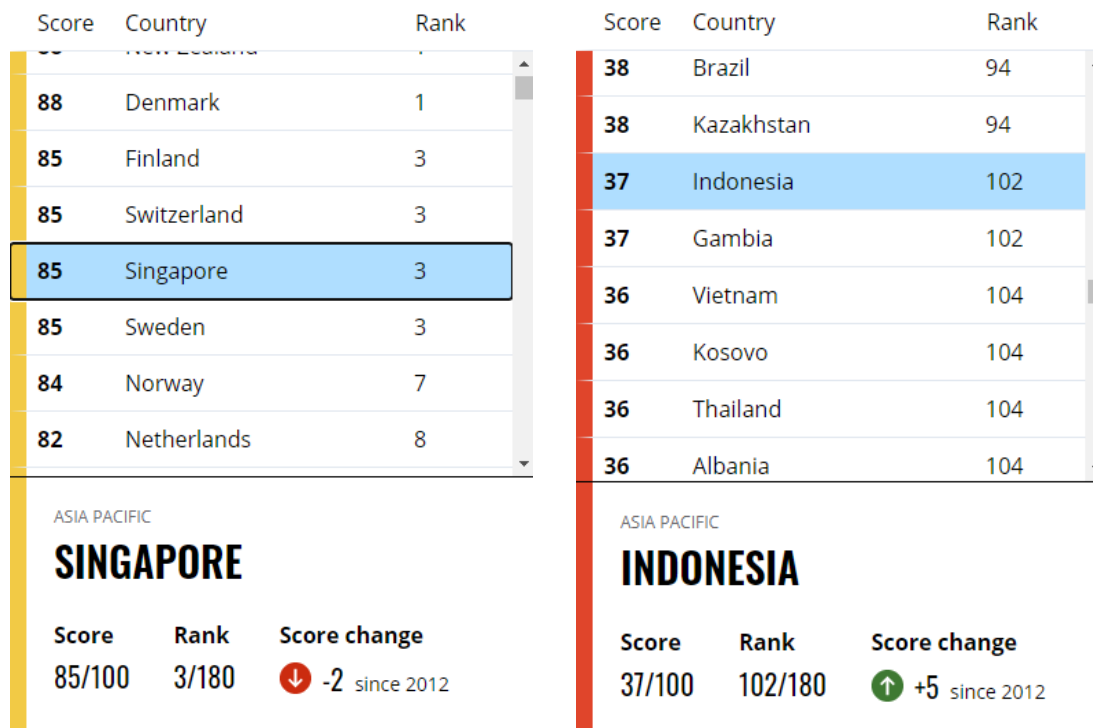
Source : <https://www.kpk.go.id/statistik/penindakan#>

From the data above, it can be seen that during 2004 to May 8, 2021, corruption cases handled by the KPK continued to fluctuate. This reflects that corruption in Indonesia until now has no end been carried out by individuals from the executive, legislative, and judicial institutions themselves, both in the ranks of the central government and regional governments. The government's efforts in dealing with corruption cases are carried out through various policies in the form of laws and regulations from the highest, namely the 1945 Constitution to the Law on the Corruption Eradication Commission. In addition, the government has also established commissions that are directly related to the prevention and eradication of corruption, such as the State Organizing Wealth Inspection Commission (KPKPN) and the Corruption Eradication Commission (KPK). In addition, there are also the Prosecutor's Office and the Indonesian National Police.

Currently in Indonesia there are several law enforcements officers who have the authority to eradicate corruption. The Indonesian National Police, the Indonesian Attorney General's Office, and the Corruption Eradication Commission act as the front line in eradicating corruption. Unlike in the country, currently Singapore only has one anti-corruption agency, namely CPIB (Corrupt Practices Investigation Bureau) as a new organization that is independent and separate from the police agency to investigate all corruption cases. The result is also clear that the eradication and prevention of corruption in the two countries is very effective and efficient. This is what Indonesia should adopt, namely in the jurisdiction of the Republic of Indonesia there should be only one institution that has a full role in handling corruption, in this case the Corruption Eradication Commission (KPK). All authorities in handling corruption crimes are in the hands of the KPK, while the Police and the Prosecutor's Office only serve as assistance tasks if needed by the KPK as the main axis of corruption eradication, this is because corruption is a special crime that must be handled specifically as well. In addition, PPATK, OJK, ICW and PBK can also assist the performance of the KPK in the context of prevention and supervision, especially the flow of funds that are suspected of having irregularities.

In 2020, according to data from Transparency International on the Corruption Perception Index, Indonesia was ranked 102, while Singapore was ranked 3. This can be seen from the table below:

Figure 1. Comparison of Indonesia's Corruption Perception Index (CPI) with Singapore



Source : <https://www.transparency.org/en/cpi/2020/index/idn>

From the data above, we can see that Singapore has a very good GPA which shows the effectiveness of eradicating corruption in the country. This is in contrast to Indonesia, which only ranks 102 with a GPA of 37, which shows that the prevention and handling of corruption in Indonesia is still weak. In terms of efforts to handle corruption, the author focuses on the country of Singapore which is used as a comparison and is a perfect role model and can be applied in Indonesia.

Handling Corruption By CPIB (Corrupt Practices Investigation Bureau) in Singapore

Singapore in 2021, according to data from Transparency International on the Corruption Perception Index, is ranked 3rd with a score of 85. This proves that Singapore is truly an anti-corruption country. The achievements made by Singapore cannot be separated from the role of the government authorities at the time and also the CPIB in thoroughly investigating all activities indicated by corruption.

In Singapore the regulations to regulate criminal acts related to corruption are divided into 2 regulations, namely the Prevention of Corruption Act, the formulation of special offenses among businesses in the form of bribery between the private sector and the private sector, and for civil servants the bribery offense is taken from the Singapore Criminal Code, this is due to the country's background. Singapore is a country of business or trade. In the Prevention of Corruption Act, there are 2 (two) articles, in Article 5 and Article 6 of the Prevention of Corruption Act, namely with a maximum criminal threat of 5 (five) years plus a clause that aggravates the crime to 7 (seven) years.

If corruption or bribery is related to contracts entered into between the private sector and the government or public institutions / agencies, then according to Article 5 and Article 6 of the Prevention of Corruption Act, the criminal penalty is increased to \$100,000 or imprisonment for a maximum of 7 (seven) years and applies cumulatively. Articles 10 to 12 of the Prevention of Corruption Act regulate bribery in the case of tenders for work, services, doing or supplying something, material or goods, which are contracts with the Government or public departments or agencies. Thus, when it comes to bribery related to contracts with the government, the criminal sanctions are increased. So here there is a qualified offense, the elements of which are added because they are related to the government. However, the threat of criminal sanctions in the Prevention of Corruption Act is still much lower than the threat of criminal sanctions regulated in Law of the Republic of Indonesia Number 20 of 2001 concerning Amendments to Law of the Republic of Indonesia Number 31 of 1999 concerning Criminal Acts of Corruption. In addition, Article 32 paragraph (2) of the Prevention of Corruption Act also regulates gratification, if a public official receives the gift of gratuity but does not arrest the giver and takes it to the nearest police station without reasonable reasons, he is threatened with a maximum fine of \$ 5,000 or imprisonment for a maximum of 6 (six) months or both.

The public prosecutor may by order authorize the director of the Singapore CPIB or the Singapore CPIB special investigator to carry out an investigation of any offense under written law, all or any authority relating to an investigation by the police under the Criminal Procedure Code. This authority is not possessed by anti-corruption agencies in other countries, because then the Singapore CPIB can investigate all offenses including those that are not included as corruption offenses, provided that it is by order of the Public Prosecutor (Article 19 Prevention of Corruption Act). The public prosecutor may also give an order to examine the bank's books under Article 20 of the Prevention of Corruption Act. The examination is related to evidence that an

offense has been committed as stated in Article 161 to Article 165 or Article 213 to 215 of the Singapore Criminal Code, including related parties who assist someone in committing an offense related to his position in the government or any department or public agency, that can be found in the bank's books regarding that person, his wife or children or a person trusted by the Public Prosecutor is that person's trust or agent.

In this case the Singapore CPIB special investigator can at any time enter the bank mentioned in the order and examine the books in that bank and can take a copy of any part of the book in the form of bank accounts, stock accounts, purchases accounts, expense accounts, or any account, only, or a safe deposit box at a bank and to disclose or submit all information, whether accounts, documents, or objects that are strongly suspected to be related to the offense.

Singapore's CPIB is referred to as an investigative model. The characteristics of CPIB are unique, namely with its relatively small size which emphasizes the investigative function and the direction of eradication is adjusted to major government policies. The organizational structure of CPIB Singapore, at the top position is held by a Director, Deputy Director, and Assistant Director. There are 3 (three) divisions or sections under it, namely the operation section, the operation support section, and the prevention section. The operations section oversees the special investigation team, Unit I, Unit II, Unit III. Operations assistance is in charge of intelligence and field research as well as technical assistance. The administration section is in charge of finance, records and screening, HR and the Computer Info Systems Unit. The structure of the CPIB, which is arguably very slim but effective, consists of 3 (three) divisions.

The separation of the function of handling corruption in Singapore which was originally under the police institution into an independent body with a lean and flexible institutional structure, yet effective and efficient in anticipating the challenges of the development of increasingly dynamic modes of corruption. Strategy to eradicate corruption in Singapore Singapore's strategy for preventing and repressing corruption focuses on four main issues, namely, Effective Anti-Corruption Agency; Effective Acts (or Laws); Effective Adjudication; and Efficient Administration, all of which are based on the government's strong political will against corruption.

This was done by the government of the People's Action Party (PAP) after it came to power in June 1959 under Prime Minister Lee Kuan Yew. During this government, the CPIB was formed. At this time there is an increasing number of corruption and one way to combat it is to increase the salaries of political leaders and civil servants, as quoted from the Asian Journal of Public Administration (John ST Quah: 93): "Perhaps the most eloquent justification of the PAP government's approach to combatting corruption by reducing the need for corruption by raising the salaries of its political leaders (and civil servants) was provided by Prime Minister Lee Kuan Yew in Parliament on March 22, 1985 when he explained why the salaries of the cabinet ministers had to be increased. He contended that political leaders should be paid the top salaries that they deserved in order to ensure a clean and honest government. If they were underpaid, they would succumb readily to temptation and indulge in corrupt acts."

In 2000 the number of employees registered at CPIB was only 80 people, compared to the number of employees of ICAC Hong Kong which reached about 1200 people in the same year. The emphasis on the investigative function requires that the CPIB must be able to resolve corruption cases that are handled with penalties that can provide a deterrent effect. This can be proven by the CPIB, which in all cases handled has a high level of evidence. Each proven corruption case can result in a fine of up to \$100,000 and imprisonment of up to 5 years. In addition to being fined, the defendant who is found guilty must also return all the money he received from corruption (Corruption Eradication Commission, Directorate of Research and Development Deputy Prevention. 2006: 15). CPIB plays a very important role in preventing corruption by means of preventive measures, namely by reviewing the performance of government departments and public entities that are considered corrupt. CPIB also has the right to examine all records relating to the wealth and assets of the community. It aims to find discrepancies or weaknesses in the administrative system that allow for loopholes in corruption or procedural irregularities (malpractice). In addition, it also provides input in the form of improvements, especially in the standardization of corruption prevention measures for the relevant departments.

CPIB is also active in conducting outreach to the public regarding preventive measures against corruption. In addition to preventive measures, CPIB uses repressive measures, including conducting investigations and investigations into every bank, stock, purchase, expense account, deposit and suing people (individuals or institutions). In such action, the individual or institution is usually required to notify or designate the requested document as evidence that the action is not an indication of corruption. This is very instrumental in minimizing the efforts that lead to corrupt acts. In short, Singapore has been successful in minimizing the problem of corruption because its anti-corruption strategy is characterized by (John S.T. Quah: 95):

- 1) *Commitment by the political leaders, especially Prime Minister Lee Kuan Yew, towards the elimination of corruption both within and outside the public bureaucracy;*
- 2) *Adoption of comprehensive anti-corruption measures designed to reduce both the opportunities and need for corruption; and 3) Creation and maintenance of an incorrupt anti-corruption agency which has honest and competent personnel to investigate corruption cases and to enforce the anti-corruption laws.*

Historically, the anti-corruption activities in Singapore, CPIB is supported by a strong legal framework, gets substantial financial support, the number of experts and law enforcers both in quantity and quality is very good, and most importantly the consistency of continuous government support. .

Singapore is one of the developed countries in Asia whose economy is supported in terms of services and tourism. The history of corruption in Singapore starts from within the government, from officials to lower-level employees who are familiar with corrupt practices with various forms and modus operandi. In cracking down on corrupt practices in Singapore, which are increasingly worrying, the Singapore government has established a corruption eradication agency under the Singapore Police. With the arrest of a Singaporean police officer in a bribe-taking case, this has led to a split between the police and the institution established under the police force to deal with corruption. With the distrust of the corruption eradication institution to the police, the institution was separated from the police institution, and is now the Corrupt Practices Investigation Bureau (CPIB). Under the leadership of Lee Kuan Yew who came to power in 1959, he proclaimed the 'war on corruption'. He emphasized: 'no one, not even top government officials are immune from investigation and punishment for corruption'. 'No one, not even high-ranking state officials, is immune from investigation and punishment from acts of corruption'. Lee Kuan Yew's determination was supported by

the passage of the Prevention of Corruption Act (PCA) which was renewed in 1989 under the name The Corruption (Confiscation of Benefit) Act.

The follow-up to this law is the establishment of an independent anti-corruption agency in the country, which is named CPIB. With Lee's strong political will, CPIB was given the widest possible authority to use all authorities in eradicating corruption with public support. Although Lee had great power, he could not intervene. This institution is truly a strong, independent, and neutral institution so that it cannot be intervened by any party. In addition to the separation of institutions and strong political will, the key to the success of CPIB in handling corruption crimes is a strong commitment and consistency in handling corruption, both preventive (prevention) and repressive (action) efforts. CPIB was established with great authority in prosecution and prevention. Concrete examples include conducting investigations into bank accounts, auditing ownership assets, and most importantly being able to take all necessary actions to prevent suspects from escaping from the prosecution.

Investment in human resources (HR) is carried out very well by CPIB, so that human resources from CPIB are fulfilled both in number and expertise. The recruitment pattern and career path at CPIB are based on the expertise and performance of each staff. In general, there are three main points that support CPIB in efforts to eradicate corruption, namely strong political will from the government, by providing a strong legal framework and adequate resources in efforts to eradicate corruption, having a good publicity function, especially in publishing the process of prosecuting corruption. , the existence of a policy that emphasizes state officials to declare their assets and sources of income well implemented, taking a comprehensive approach through three strategies: investigation, prevention, and public education.

Handling Corruption in Indonesia

Indonesia is a country with an area of 1,990,250 km² consisting of thousands of islands with a population in 2020 of around 271,349,889 people (https://id.wikipedia.org/wiki/Daftar_negara_menurut_sum_penresident). In its development, Indonesia began to show as a country that is quite calculated in the world economy. This makes Indonesia in the spotlight of various countries in the world as one of the countries that should be taken into account for investment or investment. With this economic development, it also indirectly attracts the attention of power seekers. This also encourages power seekers to tend to be profit oriented or profit oriented for personal interests, so it is not surprising that corruption is rampant in this country. It is so difficult for Indonesia to get up quickly because it still has to deal with many internal problems related to reforms in the political sector and the government system, including the reform of the public bureaucracy, which has been confined to the circle of corruption issues for a long time. The losses caused by corruption are very large. It is not enough just to impose a sentence on corruptors, who are only sentenced to one or two years, and they can even go free (H. Jawade Hafidz Arsyad, 2013: 173).

In general, in the criminal law system in Indonesia, especially in relation to the crime of corruption, there are several main related provisions, including the Criminal Code as a basic criminal provision and Law Number 31 of 1999 jo. Law Number 20 of 2001, Law Number 8 of 2010 concerning Money Laundering, and others. In this case, the *lex specialist derogat legi generale* applies, namely the related law as *lex specialist* and the Criminal Code as *lex generale*. Regulations in Singapore differentiate more on the sorting of perpetrators from criminal acts of corruption, while in Indonesia they differentiate more on the offenses that occur. This can be seen from the regulations in Singapore with the Prevention of Corruption Act, the formulation of special offenses among businesses in the form of bribery between the private sector and the private sector, and for civil servants the bribery offense is taken from the Singapore Criminal Code. Meanwhile, on the other hand, Indonesia has the Criminal Code in general for everyone and Law Number 20 of 2001 for Corruption Crimes and also Law Number 8 of 2010 for Money Laundering offenses.

In the perspective of positive law in Indonesia, the definition of corruption is explained in several articles in Law no. 31 of 1999 and Law no. 20 of 2001, and the law also mentions sanctions for those who violate, including the following:

1. Corruption crime by enriching oneself, another person, or a corporation as referred to in Article 2 paragraph (1), shall be sentenced to life imprisonment or imprisonment for a minimum of 4 (four) years and a maximum of 20 (twenty) years and a minimum fine of Rp. 200,000,000.00 (two hundred million Rupiah) and a maximum of Rp. 1.000.000.000,00 (one billion Rupiah). Even in paragraph (2) of this article the punishment can be increased, namely the death penalty.
2. Corruption by abusing the authority, opportunity, office facilities, or position as referred to in Article 3, shall be punished with life imprisonment or with a minimum imprisonment of 1 (one) year and a maximum of 20 (twenty) years and or a minimum fine of Rp. 50,000,000.00 (fifty million Rupiah) and a maximum of Rp. 1.000.000.000,00 (two hundred and fifty million Rupiah). This formulation was adopted from the former article 210 of the Criminal Code.
3. The Corruption Crime of bribery by giving or promising something as referred to in Article 5, shall be punished with a minimum imprisonment of 1 (one) year and a maximum of 5 (five) years and or a minimum fine of Rp. 50,000,000.00 (fifty million Rupiah) and a maximum of Rp. 250,000,000.00 (two hundred and fifty million Rupiah). This formulation was adopted from the former article 209 of the Criminal Code.

In general, the regulation of corruption in Indonesia basically contains several things, such as individuals or corporations who violate the law and enrich themselves or others, or corporations that can harm the country's finances or economy, are sentenced to life imprisonment, or imprisonment for a minimum of 4 years and a maximum 20 years, and a fine of at least Rp. 200,000,000.00 and a maximum of Rp. 1,000,000,000.00, even in certain circumstances a death penalty may be imposed. Meanwhile, individuals or corporations abuse their authority, opportunities or facilities, they will be sentenced to life imprisonment or imprisonment for a minimum of 1 year and a maximum of 20 years or a minimum fine of Rp. 50,000,000.00 and a maximum of Rp. 1,000,000,000.00. UU no. 20 of 2001 it is stated that bribing a civil servant is corruption, and the perpetrator is threatened with imprisonment for a minimum of 1 year and a maximum of 5 years or a fine of at least Rp. 50,000,000.00 and a maximum of Rp. 250,000,000. Civil servants are also included in corruption. So all forms of bribery are classified as corruption.

Much progress has been made regarding the level of dealing with corruption in Indonesia. First, the development of a more transparent, accountable and participatory democratic system in Indonesia, which is a prerequisite for the realization of good governance. Second, the anti-corruption regulations are getting better, this is proven by the existence of Law Number 31 of 1999

jo. Law Number 20 of 2001. In addition, Indonesia has ratified the United Nations Convention Against Corruption with Law Number 7 of 2006, as well as the establishment of Law Number 8 of 2010 concerning Money Laundering, the KPK Law, the Corruption Court Law, the Law on Public Information Disclosure and others. Third, anti-corruption institutions are more complete and empowered, including the KPK, the PPATK Corruption Court, the Information Commission and others. Fourth, responsible press freedom, namely by reporting on corruption cases and socializing the latent dangers of corruption directly or indirectly. Fifth, there is public participation in a more participatory corruption eradication agenda. This can be seen from the existence of ICW, the UGM Center for Anti-Corruption Studies (Pukat UGM) and other non-governmental organizations (Denny Indrayana, 2011: 147-149).

Efforts to prevent corrupt practices are also carried out within the executive or state administrators, where each agency has an Internal Control Unit (supervisor and control unit within the agency) in the form of an inspectorate. The function of the inspectorate is to supervise and examine the implementation of development activities in their respective agencies, especially the management of state finances. In addition, there is also supervision and inspection of development activities, namely the Supreme Audit Agency (BPK) and the Development Finance Supervisory Agency (BPKP). Externally there are non-governmental organizations such as ICW (Indonesian Corruption Watch), but in practice these institutions only supervise in a limited scope.

In terms of the flow of financial funds, in Indonesia there are institutions in charge of overseeing the flow of funds, especially in the banking world, namely PPATK (Financial Transaction Reports and Analysis Center) and OJK (Financial Services Authority). In fact, there are 3 institutions that are clearly visible in handling corruption cases in Indonesia, namely the Prosecutor's Office, the KPK, and the Indonesian National Police. From the description above, it seems that there is an overlap of authority in handling corruption in one country. In addition, in Indonesia, it is not clear which institution should be the most dominant in handling corruption cases. This is a big question mark, as if in the handling of corruption cases in Indonesia there are clashes and fights. Judging from the existing performance, it is the KPK that dominates the handling of corruption in Indonesia compared to other institutions that have the same task in dealing with corruption. This can be seen in the case of the POLRI fat bank account and also the SIM simulator case handled by the KPK.

In dealing with corruption cases, both in a repressive and preventive way, of course the KPK involves all the systematic components that exist within the KPK. Within the KPK institution, there are seven main organs or components that oversee several other organs, including the KPK Leader, KPK Advisor, Deputy for Prevention, Deputy for Enforcement, Deputy for Information and Data, Deputy for Internal Supervision and Public Complaints, and the Secretariat General. The seven organs are in charge of the other organs.

Similar to the CPIB in Singapore, all organs within the KPK have their respective roles. There are organs in charge of education and community service, research and development, investigation, investigation, prosecution, management of data information, internal control, public complaints, planning and finance, human resources, and so on. Although all organs within the KPK cooperate with each other systematically in dealing with corruption, in fact the repressive efforts carried out by the Deputy for Enforcement and the organs under it are often seen in the media in conducting investigations, investigations and prosecutions of corruptors.

In the context of the journey of the Indonesian nation, the problem of corruption has indeed been rooted and entrenched. Even among the majority of public officials, it is not uncommon to see corruption as something natural. Like opium, corruption has become a prestigious item, which if not done, it will create "stress" the audience. Corruption begins with a process of refraction, eventually becomes a habit and ends in something that state officials are used to doing. Inevitably, many people are so pessimistic and desperate for law enforcement efforts to crush corruption in our country.

Corruption in Indonesia which has existed since ancient times when regions in the archipelago were still familiar with the feudal government system (absolute oligarchy), or government at a time when this country had not yet obtained the status of an Indonesian state, namely when the kingdoms were led by the nobility (King of the Republic of Indonesia), Sultans etc.). During the Kingdom era, the culture of corruption in Indonesia was principally motivated by the existence of interests or motives for power and wealth. The historical literature of Indonesian society, especially during the ancient kingdoms (Mataram, Majapahit, Singosari, Demak, Banten etc.), teaches us that power conflicts were accompanied by motives to enrich themselves in the form of collecting taxes or tributes to the population at that time and also the struggle for power on the pretext of a woman or a king's daughter. See how the Singosari Kingdom, which maintains civil wars, even up to seven generations, is seeking revenge against each other for power. Starting from King Anusapati, King Ranggawuni, to King Mahesa Wongateleng and so on. The same thing happened in the Majapahit Kingdom, which was destroyed by the civil war that we know as the "Paregreg War" which occurred after the death of Maha Patih Gajah Mada. In addition, the culture of corruption in Indonesia can be seen from the "abdi dalem" or the position of messengers in the kingdom. The courtiers in this era of power tend to always be sweet to attract the sympathy of the king or sultan. This is also the forerunner of the birth of opportunists who in the end also have a very large potential for corrupt souls in the life of our nation and state in the future.

During the colonial era, the culture of corruption began to emerge and appeared to the surface which was manifested in the practice of corruption which had begun to enter and spread to the socio-political cultural system of our nation. The culture of corruption has been built by the colonial occupiers (mainly by the Dutch) for 350 years. This culture of corruption developed among local figures who were deliberately used as political puppets by the colonialists, to run certain administrative areas, such as the demang (lurah), tumenggung (district or provincial level), and other officials who incidentally were ordered by the invaders. Netherlands to maintain and supervise certain territorial areas. Those who were appointed and employed by the Dutch to harvest tribute or taxes from the people, were used by the Dutch colonialists to enrich themselves by exploiting the rights and lives of the Indonesian people. In addition, the Dutch colonizers enslaved the natives into forced labor or slaves to enrich them or what was called forced labor. In the Modern Age, the development of corrupt practices in modern times is a continuation of the legacy of the colonial colonizers. One of the legacies left behind is the culture of corruption, collusion and nepotism (KKN). This is reflected in the behavior of government officials, which has even begun in Soekarno's Old Order era, which eventually grew and thrived in Suharto's New Order government until now. Once again, the pattern of leadership that tends to be authoritarian and anti-critic, makes the way for corrupt practices to occur everywhere more open. This continues until the current government.

After the 1998 revolution, along with the times and with the remnants of the ORBA, in 2004 the Corruption Eradication Commission (KPK) was formed precisely in the government of President Megawati. Even though the KPK was formed, the political will at that time did not fully support the KPK as in Singapore. This was due to the lack of regulations regarding corruption at that time and the existence of three institutions dealing with corruption, besides that it was also undeniable that there were other factors, namely the number of officials who had to be audited by the KPK throughout Indonesia.

Comparison of Corruption Eradication between Indonesia and Singapore from Various Facets

From the explanation above, some basic differences in the handling of corruption in the two countries can be drawn, which are shown in the following table:

NO.	COMPARISON	INDONESIA	SINGAPURA
1.	laws and regulations	Distinguishing the offense / action, this can be seen from Law No. 31 of 1999 jo. UU no. 20 of 2001 concerning the Crime of Corruption, besides that there is also a Criminal Code which regulates crimes in general and Law no. 8 of 2010 concerning Money Laundering.	Distinguishing the segregation of perpetrators from criminal acts of corruption, this can be seen from the regulations in Singapore, namely the Prevention of corruption act regarding bribery committed by the private sector and the Singapore Criminal Code regarding corruption committed by civil servants.
2.	Penalty	Criminal sanctions in Indonesia recognize a special maximum punishment system and a minimum general, so the Indonesian punishment is heavier, both a maximum fine of Rp. 1,000,000,000 and a maximum imprisonment of 20 years, life imprisonment and even death. And get to know the cumulative criminal punishment system.	Criminal sanctions in Singapore are in the form of imprisonment for a maximum of 7 years while the maximum fine is \$100,000. In Singapore's criminal system, there is no capital punishment and in Singapore, there is a cumulative system.
3.	Institution	In Indonesia, there are 3 institutions that are authorized to handle corruption cases, namely the Prosecutor's Office, the Police and the KPK, so that there is overlap in terms of authority to deal with corruption.	In Singapore, there is only one institution authorized to deal with corruption, namely the CPIB.
4.	Culture and Politics	Starting from the royal period with the withdrawal of tribute, the colonial period with the VOC government and the work of Rodi and the New Order period with an authoritarian and anti-criticism system of government, so that corruption is increasingly open. In the next government, although the KPK was established, the political will at that time was still weak and there was a lack of support from the government and the community.	The CPIB started with the establishment of the Anti-Corruption Commission (KAK) within the police agency and was later separated due to bribery in the police agency. There was a strong political will from the authorities at that time and was supported by the people and government officials of Singapore.
5.	Number of Employees of KAK (Anti-Corruption Commission)	Indonesia is a large area consisting of islands and regions, so there are many officials in Indonesia because each region requires a different number of officials, so that compared to KPK employees, it is very difficult to audit and thoroughly investigate all officials in the area. Indonesia. Therefore, it is necessary to increase the number of KPK employees even more.	Singapore with a relatively small area, so that Singapore government officials are relatively few, making it easier for CPIB with a relatively small number of CPIB employees to audit and thoroughly investigate officials suspected of being corrupt.
6.	Institutional structure KAK (Anti-Corruption Commission)	The structure of the KPK institution is very numerous and less streamlined and some organs seem less effective and less visible in the community, especially in preventive efforts.	The institutional structure is lean and very effective, this can be seen in the repressive efforts and efforts to prevent corruption in Singapore.

CONCLUSION

In general, corruption in various parts of the world has a different style and character, so the handling is also different. Indonesia as a developing country with all the obstacles in eradicating corruption is considered less effective when compared to other countries. Efforts and methods and mechanisms for eradicating corruption that have been carried out by Indonesia are less effective in preventing and eradicating corruption. In developed countries, corruption seems more sophisticated than in developing countries with a generic and simple pattern of corruption. In Indonesia, the perpetrators of corruption are more accurately said to be corruptors who use political power to enrich themselves which then after being caught, the 'corrupt rats' under various pretexts try to evade charges. In addition, the cases handled by the KPK are dominated by the infrastructure sector, namely the procurement of goods and services. This sector is considered to have a very large budget composition. It is hoped that corruption in this sector can be prevented, one of the efforts is by e-procurement, transparency of the budget cycle from planning to budget disbursement. This is expected to have an impact on saving state finances (asset recovery). In accordance with the considerations of the Anti-Corruption Law, if efforts to recover state financial losses are not carried out, it will hamper national development, as well as the growth and continuity of national development which demands high efficiency (Hari Purwadi, Adriana Grahani Firdausy, Sasmini. 2010. Reimbursement of Regional Financial Losses Due to Acts Corruption Crime. *Journal of Yustisia*, January-April 2010 Edition 79. Surakarta. Faculty of Law UNS).

In terms of culture, Singapore with its political will, public awareness and attitude and culture of professionalism is ingrained. In Indonesia, public awareness and political will from the government is still not maximized so that some Indonesian people consider corruption to be a natural thing and in handling it is still not professional or seems to be half-assed. Meanwhile, in terms of regulations, regulations in Singapore are more different in sorting perpetrators from criminal acts of corruption, while in Indonesia they are more different in the offenses that occur. In terms of institutions, Singapore has only one institution that has full authority in eradicating corruption, namely the CPIB, while Indonesia has three institutions namely the Police, the Prosecutor's Office and the KPK which seem to have equal and equal authority in dealing with corruption, resulting in overlapping authorities.

Judging from the presentation on the prevention and eradication of corruption from Singapore, it can be said that the prevention and handling of corruption in Singapore has been very good and effective. Compared to Indonesia, although we cannot deny that the role of the KPK, which is so dominant in eradicating corruption, has shown good progress so far. However, the comparison between the KPK's increasing efforts with arithmetical progression, and the increasing number of criminal acts of corruption with a geometric progression, then no matter how big the KPK's efforts, it will be difficult to completely eradicate corruption in Indonesia.

As described above, Singapore is a developed country where public awareness and attitude and culture of professionalism are ingrained. In addition, the Singapore government's commitment to eradicating corruption is very large. This is shown by In Singapore, prime minister Lee Kwan Yew in the early days of his reign declared war on corruption with the jargon 'no one, not even top government officials are immune from investigation and punishment for corruption'. 'No one, not even high-ranking state officials, is immune from investigation and punishment from acts of corruption'. If we look at such a huge commitment and such an efficient and effective way implemented by Singapore, it seems that it will be difficult to implement in Indonesia. In dealing with corruption in Indonesia, nowadays, the reverse proof is applied in the case of Bahasyim Assifie and it is quite successful. It is hoped that this mechanism will be adopted and applied to other corruption cases by improving the quality and effectiveness of its implementation.

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Genoveva Puspitasari Larasati
Magister Ilmu Hukum
Universitas Jenderal Soedirman
Email : genovevap14596@gmail.com