



ANALISIS PERBANDINGAN SANKSI PIDANA TINDAK PIDANA KORUPSI DI INDONESIA, MALAYSIA, DAN SINGAPURA

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Received: June 2026

Revised : August 2026

Accepted: July 2026

Available online : September 2026

How to Cite: Karim, M., & Khatima, U. *Comparative Analysis of Criminal Sanctions for Corruption Offenses in Indonesia, Malaysia, and Singapore*. *Lentera Demokrasi: Jurnal Ilmu Sosial, Politik, Hukum, Ekonomi Dan Pemerintahan*, 2(3), 119–128. <https://doi.org/10.61166/ld.v2i3.49>

ABSTRACT

Corruption is one of the serious problems that hinders development, social justice, political stability, and public trust in state institutions. Previous studies have shown that law enforcement against corruption in Indonesia continues to face various challenges, including political influence on sentencing, disproportionality between sanctions and state losses, weak coordination among law enforcement institutions, and limited institutional independence. Comparative studies have also indicated that the independence of anti-corruption institutions, judicial credibility, governance quality, and public participation are important factors in improving the effectiveness of corruption eradication. Based on these issues, this study aims to analyze and compare criminal sanctions for corruption offenses in Indonesia, Malaysia, and Singapore and to identify factors

influencing law enforcement effectiveness and the deterrent effect of criminal sanctions. This study employs a qualitative method with a comparative legal approach. Data were obtained through a systematic literature review of scientific journals, books, legislation, government reports, and publications from international organizations, complemented by semi-structured interviews with legal experts and practitioners. The data were analyzed thematically and comparatively based on legal frameworks, types of sanctions, sentencing patterns, institutional arrangements, law enforcement processes, and socio-political factors. Data validity was strengthened through source triangulation. The findings reveal differences in the effectiveness of anti-corruption law enforcement among the three countries. Indonesia has a relatively comprehensive legal framework; however, its implementation continues to face challenges, including political intervention, weak institutional independence, sentencing inconsistencies, limited resources, low asset recovery, and limited public participation. In contrast, Singapore demonstrates stronger law enforcement effectiveness through the independence of the Corrupt Practices Investigation Bureau (CPIB), relatively efficient judicial processes, consistent application of sanctions, and stronger reporting and whistleblower protection mechanisms. Malaysia has made progress in anti-corruption governance but continues to face challenges related to institutional independence and political influence. The findings indicate that the effectiveness of criminal sanctions is determined not only by the severity of punishment but also by the independence of law enforcement institutions, judicial integrity, sentencing consistency, asset recovery, social norms, and public participation. Therefore, strengthening institutional independence, reforming the judiciary, promoting anti-corruption education, improving asset recovery mechanisms, and enhancing international cooperation are necessary to strengthen the effectiveness of corruption eradication in Indonesia.

KEY WORDS: *corruption, criminal sanctions, comparative law, law enforcement, institutional independence, anti-corruption policy.*

ABSTRAK

Korupsi merupakan salah satu persoalan serius yang menghambat pembangunan, keadilan sosial, stabilitas politik, dan kepercayaan publik terhadap lembaga negara. Penelitian terdahulu menunjukkan bahwa penegakan hukum tindak pidana korupsi di Indonesia masih menghadapi berbagai persoalan, antara lain pengaruh politik terhadap pemidanaan, ketidakseimbangan antara sanksi dan kerugian negara, lemahnya koordinasi antarlembaga penegak hukum, serta terbatasnya independensi kelembagaan. Studi komparatif juga menunjukkan bahwa independensi lembaga antikorupsi, kredibilitas peradilan, kualitas tata kelola, dan partisipasi masyarakat merupakan faktor penting dalam meningkatkan efektivitas pemberantasan korupsi. Berdasarkan permasalahan tersebut, penelitian ini bertujuan menganalisis dan membandingkan sanksi pidana terhadap tindak pidana korupsi di Indonesia, Malaysia, dan Singapura serta mengidentifikasi faktor-faktor yang memengaruhi efektivitas penegakan hukum dan daya cegah sanksi pidana. Penelitian ini menggunakan metode kualitatif dengan pendekatan hukum komparatif. Data diperoleh melalui kajian literatur sistematis terhadap jurnal ilmiah, buku, peraturan perundang-undangan, laporan pemerintah, dan publikasi organisasi internasional, serta dilengkapi dengan wawancara semiterstruktur dengan ahli dan praktisi hukum. Data dianalisis secara tematik dan dibandingkan berdasarkan kerangka hukum, jenis sanksi, pola pemidanaan, pengaturan kelembagaan, proses penegakan hukum, serta faktor sosial-politik. Keabsahan data diperkuat melalui triangulasi sumber. Hasil penelitian menunjukkan adanya perbedaan efektivitas penegakan hukum antikorupsi di ketiga negara. Indonesia memiliki kerangka hukum yang relatif komprehensif, tetapi pelaksanaannya masih menghadapi persoalan berupa intervensi politik, lemahnya independensi kelembagaan, ketidakkonsistenan pemidanaan, keterbatasan sumber daya, rendahnya pemulihan aset, dan rendahnya partisipasi masyarakat. Sebaliknya, Singapura

menunjukkan efektivitas yang lebih kuat melalui independensi CPIB, peradilan yang relatif efisien, penerapan sanksi yang konsisten, serta mekanisme pelaporan dan perlindungan pelapor yang lebih kuat. Malaysia menunjukkan perkembangan dalam tata kelola antikorupsi, tetapi masih menghadapi persoalan independensi kelembagaan dan pengaruh politik. Temuan penelitian menegaskan bahwa efektivitas sanksi pidana tidak hanya ditentukan oleh beratnya hukuman, tetapi juga oleh independensi lembaga penegak hukum, integritas peradilan, konsistensi pemidanaan, pemulihan aset, norma sosial, dan partisipasi masyarakat. Oleh karena itu, penguatan independensi kelembagaan, reformasi peradilan, pendidikan antikorupsi, peningkatan mekanisme pemulihan aset, dan kerja sama internasional diperlukan untuk memperkuat efektivitas pemberantasan korupsi di Indonesia.

KATA KUNCI: *korupsi, sanksi pidana, hukum komparatif, penegakan hukum, independensi kelembagaan, kebijakan anti korupsi.*

INTRODUCTION

Corruption constitutes one of the most formidable challenges confronting nations worldwide, including Indonesia, as it not only inflicts substantial economic losses but also undermines political stability, social justice, and public trust in governmental institutions. Within the framework of criminal law, corruption is characterized as an offense that causes significant detriment to the state and society by impeding sustainable development and perpetuating structural inequalities. Conceptually, corruption is defined as the abuse of entrusted power for private gain, whether financial or non-financial, encompassing practices such as bribery, fraud, abuse of authority, and nepotism. In Indonesia, the primary legal framework for corruption eradication is established under Law Number 31 of 1999, which has undergone several amendments; however, the effectiveness of law enforcement remains constrained by political interference, judicial bureaucratic complexity, and low levels of public legal awareness (Hidayat et al., 2025; Wibowo, 2026; World Bank, 2023).

Prior studies have consistently highlighted these constraints. Hidayat et al. (2025) document how political economy factors shape corruption sentencing in Indonesia, producing lenient and inconsistent outcomes in high-profile cases. Wibowo (2026) finds evidence of sanction disproportionality relative to state losses, while Firmansyah (2026) emphasizes fragmented coordination among the KPK, police, and attorney general as a source of enforcement inefficiency. Comparative work further shows that institutional independence and judicial credibility are central to deterrence: Transparency International (2026) links Singapore's strong CPI performance to an autonomous CPIB and rigorous courts, and Freedom Malaysia Today (2026) notes that Malaysia's MACC, despite broad powers, faces scrutiny over executive subordination and transparency. Broader governance indicators also associate higher control-of-corruption scores with stronger rule of law and regulatory quality, underscoring the systemic nature of effective anti-corruption regimes (World Bank, 2023; UNODC, 2021).

In response, this study aims to analyze and comparatively assess criminal sanctions for corruption offenses in Indonesia vis-à-vis Singapore and Malaysia, jurisdictions recognized for more stringent approaches and independent, broadly empowered anti-corruption agencies. In Indonesia, sanctions comprising imprisonment, fines, and asset restitution are frequently imposed more leniently in practice and often lack sufficient deterrent effect, whereas Singapore imposes comparatively heavier penalties supported by a rigorous judicial system (Transparency International, 2026; MOFO, 2026). The efficacy of sanctions is also critically influenced by public participation: countries with higher levels of public awareness and civic engagement tend to exhibit more robust corruption reporting, thereby strengthening law enforcement outcomes (The Jakarta Post, 2025; UNODC, 2021). Consequently, a holistic approach is required—one

that integrates repressive and preventive sanctions, strengthens institutional capacity, and enhances public participation—to render Indonesia’s anti-corruption efforts more effective and sustainable (PwC Indonesia, 2026; Salsabila, 2025; Khan, 2021).

RESEARCH METHODS

This study adopts a qualitative approach combined with comparative legal analysis to examine criminal sanctions for corruption in Indonesia, Malaysia, and Singapore. Data were gathered through a systematic literature review of academic journals, books, statutes, government reports, and publications by international organizations such as Transparency International and the World Bank, supplemented by semi-structured interviews with legal experts and practitioners (Transparency International, 2024; World Bank, 2023). Thematic analysis was applied to code and categorize data according to key themes—types of sanctions, law enforcement processes, and socio-economic impacts—while a structured comparative framework was used to identify similarities and differences in legal frameworks, institutional arrangements, sentencing patterns, and political influences across the three jurisdictions (Alatas et al., 2022; Khan, 2021).

To enhance credibility, triangulation was employed by cross-verifying documentary evidence, interview transcripts, and secondary sources, and limitations related to restricted access to ongoing case data were mitigated through alternative sources and robust secondary data (Creswell & Poth, 2018). The study aims to generate evidence-based insights into sanction effectiveness, distill best practices in anti-corruption enforcement, and formulate actionable policy recommendations for strengthening Indonesia’s anti-corruption regime (United Nations Office on Drugs and Crime, 2021).

RESULTS AND DISCUSSION

Overview of Research Findings

This research presents a comprehensive comparative analysis of criminal sanctions for corruption offenses in Indonesia, Malaysia, and Singapore. Through a qualitative approach combined with comparative legal analysis, the study identifies critical factors influencing the effectiveness of law enforcement and the deterrent capacity of sanctions imposed on corruption offenders. The findings reveal significant disparities in anti-corruption enforcement effectiveness across the three jurisdictions, attributable to differences in institutional independence, political will, socio-cultural norms, and public participation mechanisms.

Criminal Sanctions for Corruption in Indonesia

Legal Framework and Statutory Provisions

In Indonesia, criminal sanctions for corruption are primarily governed by Law Number 31 of 1999 on the Eradication of Corruption Crimes, as amended by Law Number 20 of 2001. This legal framework establishes corruption as an extraordinary crime, reflecting the severity with which the Indonesian legal system treats such offenses. The statutory provisions prescribe a range of sanctions including imprisonment, fines, and additional penalties such as asset forfeiture and restitution of illegally obtained state funds.

According to the Anti-Corruption Law, imprisonment terms for corruption offenses can range from four to twenty years, depending on the gravity of the offense and the extent of state financial losses incurred. Fines may reach billions of Indonesian rupiah, and convicted offenders are also subject to additional sanctions including the revocation of certain civil rights and confiscation of assets derived from corrupt activities (PwC Indonesia, 2026: 1; Salsabila, 2025: 1086). The legal framework also provides for aggravated sanctions when offenses are committed by public officials or involve substantial state losses.

However, despite the existence of a relatively comprehensive legal framework, recent developments have raised concerns about the effectiveness of these sanctions. The enactment of

Indonesia's new Criminal Code (KUHP Baru) has introduced significant changes to the penalty structure for corruption offenses. Under the new code, corruption is reclassified from an extraordinary crime to a general criminal offense, and minimum imprisonment thresholds have been reduced. For instance, offenses involving state financial losses now carry a minimum sentence of two years, compared to four years under the previous Anti-Corruption Law regime (PwC Indonesia, 2026: 2). This recalibration has been criticized by anti-corruption advocates as potentially weakening the deterrent effect of criminal sanctions.

Implementation Challenges and Enforcement Gaps

Empirical evidence suggests a substantial gap between statutory provisions and actual sentencing practices in Indonesia. Recent data from Indonesia Corruption Watch (ICW) reveals that corruption convicts received an average prison sentence of only three years and three months in 2024, which falls into the "light" sentence category based on Supreme Court regulations (The Jakarta Post, 2025: 1). This average represents a decline from previous years and is significantly lower than the statutory maximum penalties prescribed by law. Furthermore, only approximately four percent of total estimated state losses incurred from corruption cases were successfully recovered throughout 2024, highlighting severe deficiencies in asset recovery mechanisms (The Jakarta Post, 2025: 1).

The implementation of corruption sanctions in Indonesia is constrained by persistent structural and systemic barriers. Political interference remains pervasive, as implicated officials often exploit their positions to influence proceedings, producing inconsistent sentencing and eroding equality before the law; high-profile cases frequently yield penalties disproportionate to the scale of state losses (Hidayat et al., 2025; Wibowo, 2026). Judicial bureaucratic complexity exacerbates these problems: protracted, fragmented processes delay case resolution, create opportunities for manipulation, and are compounded by weak inter-agency coordination among the Corruption Eradication Commission (KPK), the National Police, and the Attorney General's Office (Firmansyah, 2026; Hidayat et al., 2025).

The KPK's institutional independence has also been contested, particularly after the 2019 legislative amendments that many observers argue diminished its operational autonomy and investigative powers. Further constraints arise from the new Criminal Code, which requires court authorization for wiretapping by all law enforcement agencies-including the KPK-thereby potentially reducing investigative agility and overall effectiveness (PwC Indonesia, 2026).

Comparative Analysis: Singapore and Malaysia

Singapore: A Model of Anti-Corruption Excellence

Singapore is widely regarded as a regional and global leader in anti-corruption enforcement, consistently ranking among the least corrupt countries. In the 2025 Corruption Perceptions Index (CPI), Singapore scored 84 out of 100, placing third globally and first in the Asia-Pacific region (MOFO, 2026; Transparency International, 2026). This performance reflects a robust legal framework, effective enforcement institutions, and a strong societal commitment to integrity.

The centerpiece of Singapore's anti-corruption regime is the Corrupt Practices Investigation Bureau (CPIB), an independent agency with broad investigative powers and direct reporting lines to the Prime Minister's Office. Operating under the Prevention of Corruption Act, the CPIB can impose stringent sanctions-including imprisonment of up to seven years and substantial fines-and is empowered to investigate unexplained wealth, scrutinize financial records, and seize assets (Transparency International, 2026). Singapore's success is further underpinned by a zero-tolerance policy applied impartially across all levels, an independent and efficient judiciary, and sustained public education and ethical enforcement in both public and private sectors (Transparency International, 2026). High public trust and active citizen participation, facilitated by anonymous reporting channels and whistleblower protections, reinforce institutional efforts and help sustain Singapore's reputation as one of the world's least corrupt nations (Transparency International, 2026).

Malaysia: Progress Amid Persistent Challenges

Malaysia occupies an intermediate position between Indonesia and Singapore in anti-corruption performance. In the 2025 Corruption Perceptions Index (CPI), Malaysia scored 52 out of 100, ranking 54th globally and third in ASEAN after Singapore and Brunei, indicating gradual but incomplete progress in governance and integrity (MOFO, 2026; The Star, 2026).

The Malaysian Anti-Corruption Commission (MACC/SPRM) is the principal agency tasked with investigating and prosecuting corruption under the Malaysian Anti-Corruption Commission Act 2009 and related laws, with powers to arrest, search, and seize assets in certain circumstances and penalties that include imprisonment and substantial fines (Freedom Malaysia Today, 2026). However, enforcement faces persistent challenges, notably concerns over the MACC's institutional independence because it reports administratively to the Prime Minister's Department, creating risks of political interference and perceptions of selective enforcement in high-profile cases involving senior officials (Freedom Malaysia Today, 2026). Critics also highlight tensions between investigative assertiveness and procedural fairness, calling for stronger oversight, transparency, and safeguards for suspects' rights, even as Malaysia's improving CPI score suggests measurable, though still limited, gains in anti-corruption governance (Freedom Malaysia Today, 2026; The Star, 2026).

Comparative Effectiveness of Sanctions

Quantitative Indicators of Enforcement Effectiveness

When comparing the effectiveness of anti-corruption sanctions across Indonesia, Malaysia, and Singapore, stark disparities emerge. Singapore's CPI score of 84 significantly outperforms Malaysia's 52 and Indonesia's 34, reflecting fundamental differences in enforcement effectiveness and institutional integrity (Transparency International, 2026: 1; MOFO, 2026: 3). These quantitative indicators correlate strongly with qualitative assessments of judicial independence, political will, and public trust in anti-corruption institutions.

In Indonesia, the average prison sentence of three years and three months for corruption convicts in 2024 stands in sharp contrast to Singapore's consistent application of severe penalties and Malaysia's comparatively stricter sentencing patterns (The Jakarta Post, 2025: 1). The low rate of state asset recovery in Indonesia—only four percent of estimated losses—further underscores enforcement deficiencies, particularly in relation to asset forfeiture and restitution mechanisms (The Jakarta Post, 2025: 1). By comparison, Singapore and Malaysia have demonstrated greater success in recovering illicitly obtained assets through more effective legal frameworks and institutional coordination.

Institutional and Structural Determinants

The comparative analysis reveals that institutional independence constitutes a critical determinant of enforcement effectiveness. Singapore's CPIB benefits from direct reporting to the highest levels of government, operational autonomy, and protection from political interference (Transparency International, 2026: 2). This structural independence enables the agency to pursue corruption cases impartially, regardless of the political status of the individuals involved. In contrast, Indonesia's KPK has experienced progressive erosion of its independence following legislative amendments and institutional reforms, while Malaysia's MACC continues to face scrutiny regarding its administrative subordination to the executive branch (Hidayat et al., 2025: 190; Freedom Malaysia Today, 2026: 2).

Judicial independence represents another crucial factor differentiating the three jurisdictions. Singapore's judiciary is widely recognized for its integrity and efficiency, ensuring that corruption cases are adjudicated fairly and expeditiously (Transparency International, 2026: 3). This fosters public confidence in the legal system and reinforces the deterrent effect of criminal sanctions. In Indonesia, by contrast, perceptions of judicial corruption and political influence over court proceedings undermine public trust and weaken the legitimacy of anti-corruption enforcement (Wibowo, 2026: 1392; Salsabila, 2025: 1090).

Socio-Cultural Dimensions

Socio-cultural factors play a significant role in shaping the effectiveness of anti-corruption sanctions. In Singapore, strong societal norms against corruption, reinforced by comprehensive public education and consistent enforcement, create an environment where corrupt behavior is socially unacceptable and rigorously prosecuted (Transparency International, 2026: 3). Public vigilance and willingness to report corruption complement institutional enforcement efforts, thereby sustaining the country's low corruption levels.

In Indonesia, by contrast, socio-cultural attitudes toward corruption remain more permissive. Interviews with legal practitioners conducted as part of this research revealed that many citizens view corruption as a normalized practice, particularly when committed by individuals of high social status or those with close ties to power structures (The Jakarta Post, 2025: 2; Firmansyah, 2026: 155). This cultural tolerance creates significant barriers to effective enforcement, as it reduces public willingness to report corruption and weakens social pressure for accountability. Low levels of legal awareness and fear of retaliation further discourage citizens from participating in anti-corruption efforts.

Malaysia occupies an intermediate position, with growing public awareness and increasing demands for accountability, yet persistent challenges related to political interference and institutional credibility (The Star, 2026: 1; Freedom Malaysia Today, 2026: 3). The country's improving CPI score suggests gradual shifts in public perceptions and governance standards, although sustained reforms are necessary to consolidate these gains.

Challenges in Law Enforcement

Political Interference and Institutional Capture

Political interference represents the most significant challenge to effective anti-corruption enforcement in Indonesia. Many senior officials within law enforcement institutions maintain close relationships with political figures, creating conflicts of interest that compromise investigative independence and prosecutorial integrity (Wibowo, 2026: 1395; Hidayat et al., 2025: 192). This phenomenon is particularly evident in high-profile cases involving prominent politicians, where investigative processes are frequently delayed, evidence is compromised, or sentences are disproportionately lenient.

The 2019 amendments to the KPK Law, which placed the commission under greater executive oversight and introduced a supervisory board with authority to approve or reject investigations, have been widely criticized as weakening the institution's independence (Hidayat et al., 2025: 193; PwC Indonesia, 2026: 4). These changes have raised concerns about the potential for political capture of anti-corruption institutions and the erosion of checks and balances essential for effective governance.

In Malaysia, while the MACC possesses relatively strong investigative powers, its administrative subordination to the Prime Minister's Department creates similar vulnerabilities to political influence (Freedom Malaysia Today, 2026: 2). High-profile corruption cases involving senior politicians have occasionally generated public skepticism about the commission's ability to operate independently of political considerations.

Resource Constraints and Capacity Limitations

Resource constraints constitute another significant barrier to effective anti-corruption enforcement in Indonesia. Despite its mandate to investigate, prosecute, and prevent corruption, the KPK faces limitations in terms of personnel, technical capacity, and operational funding (Hidayat et al., 2025: 194; Firmansyah, 2026: 158). These constraints are particularly acute in relation to complex financial investigations requiring specialized expertise in forensic accounting, digital evidence analysis, and cross-border asset tracing.

Malaysia's MACC similarly faces resource challenges, although to a lesser extent than Indonesia. The commission's ability to pursue sophisticated corruption schemes involving transnational financial networks is constrained by limitations in technical capacity and inter-agency coordination (Freedom Malaysia Today, 2026: 3).

The Role of Public Participation

Public Awareness and Reporting Mechanisms

Public participation plays a pivotal role in enhancing the effectiveness of anti-corruption enforcement. In Singapore, the government has established comprehensive mechanisms for public reporting of corruption, including anonymous hotlines, online platforms, and physical reporting centers (Transparency International, 2026: 3). Citizens are actively encouraged to report suspicious activities, and the CPIB provides protection and confidentiality to whistleblowers. This creates a culture of collective responsibility for integrity, wherein public vigilance complements institutional enforcement.

In Indonesia, by contrast, public awareness of legal rights and obligations to report corruption remains low. Many citizens perceive reporting corruption as futile or risky, fearing retaliation or believing that their reports will not result in meaningful action (The Jakarta Post, 2025: 2; Firmansyah, 2026: 160). This perception is reinforced by high-profile cases where corruption reports have been ignored or where whistleblowers have faced harassment and intimidation.

Civil Society and Media Oversight

Civil society organizations and independent media play crucial roles in monitoring government accountability and exposing corruption. In Singapore, while civil society space is more constrained, the government maintains strong partnerships with community organizations to promote integrity and ethical standards (Transparency International, 2026: 3). In Indonesia, civil society organizations such as Indonesia Corruption Watch have been instrumental in monitoring corruption cases, advocating for reforms, and providing independent analysis of enforcement trends (The Jakarta Post, 2025: 1).

However, civil society actors in Indonesia face significant challenges, including limited funding, legal restrictions, and occasional intimidation. The effectiveness of media oversight is similarly constrained by ownership concentration, political affiliations, and self-censorship (Wibowo, 2026: 1400). Strengthening the capacity and independence of civil society and media institutions is essential for enhancing public accountability and supporting anti-corruption enforcement.

To enhance the effectiveness of anti-corruption sanctions in Indonesia, this study proposes five priority reforms. First, the government should restore and strengthen the Corruption Eradication Commission's (KPK) institutional independence by amending or reversing provisions of the 2019 KPK Law that curtail its autonomy, while ensuring adequate resources and shielding investigators from political interference; analogous reforms should extend to the police and attorney general's office (Firmansyah, 2026; Hidayat et al., 2025; PwC Indonesia, 2026). Second, comprehensive judicial reforms are needed to improve integrity and efficiency, including stronger appointment and oversight mechanisms, expansion of specialized corruption courts, adoption of case-management systems to reduce delays, and enhanced transparency and ethics training for judges and court staff (Salsabila, 2025; Wibowo, 2026).

Third, sustained public education and awareness campaigns should reframe corruption as a threat to public services, development, and social justice, while clarifying reporting channels and whistleblower protections and integrating anti-corruption values into school curricula (Firmansyah, 2026; The Jakarta Post, 2025). Fourth, Indonesia should strengthen asset recovery by adopting non-conviction-based forfeiture, improving inter-agency coordination for tracing and confiscating illicit assets, and investing in specialized training and international cooperation for cross-border recovery (PwC Indonesia, 2026; Salsabila, 2025). Fifth, given the transnational dimension of many corruption schemes, Indonesia should deepen international cooperation through mutual legal assistance, information sharing, and joint investigations, while drawing on best practices from Singapore and Malaysia to inform domestic reforms (Hidayat et al., 2025; MOFO, 2026).

CONCLUSION

This study comparatively analyzes criminal sanctions for corruption offenses in Indonesia, Malaysia, and Singapore. Although Indonesia has a comprehensive legal framework based on Law Number 31 of 1999 and its amendments, law enforcement continues to face challenges arising from political intervention, bureaucratic inefficiency, and low public awareness. Singapore demonstrates strong enforcement outcomes through an independent anti-corruption agency, namely the Corrupt Practices Investigation Bureau (CPIB), strict and consistently applied sanctions, transparent judicial processes, and strong public support. Malaysia, despite having a strong legal framework and the Malaysian Anti-Corruption Commission (MACC), continues to face challenges related to political intervention and limitations in transparency, while Indonesia's Corruption Eradication Commission (KPK) has strengthened law enforcement but continues to encounter problems concerning sentencing consistency, particularly in high-profile cases.

The effectiveness of law enforcement is influenced by institutional independence, the severity and consistency of sanctions, public participation in reporting corruption, and socio-cultural norms toward corruption. Permissive attitudes and weak institutional autonomy in Indonesia reduce the deterrent effect of anti-corruption measures. This study recommends: (1) strengthening the independence and capacity of the KPK and related institutions; (2) increasing public awareness and anti-corruption education; (3) reforming legislation to ensure proportional and consistent sentencing; (4) enhancing international cooperation in addressing transnational corruption cases; and (5) providing adequate resources for anti-corruption institutions. The contribution of this study lies in enriching the discourse on comparative criminal law and public policy while providing practical guidance for stakeholders in Indonesia. Future research should expand comparative analysis beyond Southeast Asia, assess the long-term impacts of institutional and legal reforms, and examine how digital technologies can enhance transparency and accountability.

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