

## Content analysis of legal protection regulations for money laundering victims in Indonesia

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### Abstract

The offense of money laundering is included within the context of corruption. Money laundering persists in evolving via many techniques, often facilitated by advancements in information technology. Consequently, a notable number of persons use these technological advancements to engage in illicit activities, including the washing of illicitly obtained funds. This research aims to analyze the development of regulations regarding the laundering crime and legal protection for victims. This research uses regulatory and statutory documents as the main data. Documents collected include laws and government regulations regarding money laundering crimes and legal protection for victims. This research uses Nvivo 12 Plus software to code documents for presentation to produce numbers in the form of images. This research found that the development of regulations relating to the crime of money laundering continues to develop so that it is no longer possible for there to be a legal vacuum. Furthermore, Indonesia has not only created legal instruments to deal with perpetrators of corruption but also provides legal protection for victims of money laundering crimes. This research only discusses the aspect of statutory documents. Future research needs a more in-depth analysis by comparing regulations and cases of money laundering crimes.

*Keywords: Regulation, Money Laundering, Content Analysis*

### 1. Introduction

The crime of money laundering, as stipulated in Law Number 8 of 2010, pertaining to the prevention and eradication of money laundering, has a broader scope than mere criminality. This legislation encompasses a range of legislative measures and accompanying systems, including the Financial Transaction Reports and Analysis Center (PPATK). The Center for Financial Transaction Reports and Analysis (CFTRA) has the potential to be used for the purpose of tracing the movement of illicit funds, also known as "following the money." This includes tracking the assets of crime victims that have been moved by the offenders. The exclusive focus on prosecuting offenders without concurrently ensuring the restitution of assets to victims who have incurred financial losses undermines the effectiveness of efforts aimed at eliminating the crime of money laundering. The objective of justice, particularly for victims of criminal actions, may be compromised if law enforcement agencies prioritize asset tracking in order to locate and perhaps return funds to the victims. Who are the individuals or groups who have experienced economic disadvantage? To date, money laundering has been seen to use two distinct ways, namely contemporary and old approaches. While it is often acknowledged that money laundering methods vary, the contemporary money laundering process typically has three distinct stages: placement, layering, and integration (Garnasih, 2017).

Money laundering is a criminal act that exhibits the dual nature of comprising a subsequent offense, specifically the crime of money laundering, and a primary offense or underlying crime. In certain jurisdictions, the latter is defined as an illicit activity, commonly referred to as a predicate crime, which generates proceeds that are subsequently subjected to a laundering process (Wattimena, 2020). Multiple scholarly investigations have been conducted on the subject of money laundering offenses, as shown by the study conducted by Sulaksono and Novianto (2019). These studies have revealed that individuals who fall

victim to money laundering crimes are required to pursue compensation in order to get reparation from the wrongdoer. In cases involving corruption, victims may potentially secure compensation by means of asset confiscation executed by law enforcement authorities. This study proposes the revision of legislation pertaining to the prevention and eradication of money laundering offenses, since it is now burdened with financial obligations associated with replacement funds. According to a study conducted by Irwan (2021), it was discovered that the funds obtained via the process of money laundering may be repatriated by a legally binding court ruling, which entails either the confiscation of assets for the state or the restitution of funds to the affected party. According to a study conducted by Gulo et al. (2023), it has been shown that the provision of legal safeguards for those affected by money laundering offenses may be achieved by means of seeking compensation under the witness and victim protection legislation. This study examines several facets of research, specifically focusing on the content analysis of regulations aimed at safeguarding victims of money laundering crimes, with a particular emphasis on corruption-related instances. Multiple phases were undertaken in the preparation of this study. Initially, we conducted a thorough investigation to locate regulatory papers pertaining to the offense of money laundering, as well as regulatory documents aimed at safeguarding the rights and well-being of victims and witnesses. In the subsequent phase, a content analysis was performed on the gathered rules using Nvivo 12 Plus software. The Nvivo 12 Plus program employs an automated coding mechanism to analyze the contents of pre-existing documents. This process involves generating data visualizations that highlight the terms that occur with the highest frequency. The purpose of filtering these terms is to exclude unnecessary data in this study, such as auxiliary words and conjunctions. Following the acquisition of the data, the analysis of this study was conducted from a legal standpoint.

## **2. Literatur review**

### **Legal protection for victims of money laundering crimes**

The criminal justice system is a crime control system consisting of police institutions, prosecutors, courts and prisons for convicts (Reksodiputro, 1997). It was also stated that the criminal justice system is a system for dealing with crime (Atmasasmita, 1996). In the criminal justice mechanism, the victim's position often does not get a fair place. They cannot even directly take an active role in the criminal justice system because their interests have been handed over to the state through the Public Prosecutor, where the victim's position is at least only as evidence for witness testimony. The position of victims of criminal acts is very important to study in a science, namely victimology.

Victimology is an academic discipline that focuses on the examination of victims, encompassing the dynamics between victims and perpetrators, as well as the interplay between victims and the criminal justice system, specifically the police, the court, and the various stakeholders involved. Additionally, victimology explores the interactions between victims and other social groups and institutions, such as the media, business circles, and social movements (KARMEN, 2017). The term "victimology" originates from the Latin words "victima," denoting victim, and "logos," referring to knowledge. Victimology, as a field of study, encompasses the examination of individuals who have experienced victimization, including the exploration of the factors contributing to victimization and the subsequent repercussions. This discipline addresses victimhood as a pervasive social phenomenon with significant implications for human society. In addition, victimology encompasses the examination of the governmental responsibility to ensure the safeguarding of those who have experienced victimization due to criminal offenses. However, victimology also examines the involvement of victims in the commission of criminal crimes, particularly in cases of sexual assault. The involvement of the victim in issue pertains to the acts and behaviors shown by the victim, which are crucial in establishing a significant connection leading to the occurrence of a criminal conduct (Arief, 2006).

In the realm of criminal law, victims are often seen in a manner that suggests the only means of safeguarding their interests is by ensuring that the offender faces appropriate punishment. Nevertheless, in order to conduct a full analysis of the issue of crime, it is essential to acknowledge the significance of victims in the perpetration of criminal activities. Suppose one directs their focus towards the pursuit of material truth as the primary objective in the investigation of a crime. In this scenario, the role of the victim becomes a strategic significance, as it largely influences the determination of whether or not the perpetrator of the crime may be appropriately penalized in accordance with the severity of their actions. The existing legal system, known as the Indonesian Criminal Procedure Code (KUHAP), has a diminished emphasis on prioritizing the welfare and concerns of victims within the context of the criminal-victim interaction. The

absence of compensation for victims and witnesses in the legal process is compounded by the financial burden they face due to missed employment and the need for funds to attend court proceedings. Furthermore, there is a lack of assurance on safety measures to safeguard them from potential harassment by the offender and their associates. In contemporary legal practice, the inclusion of crime victims within the legal framework has historically been lacking. However, the emergence of victimology study has led to a growing recognition of their significance (Mustofa, 2013).

Within the realm of criminal law, there has been a longstanding emphasis on the offender as the central focus, despite the fact that the primary party experiencing the most significant detriment resulting from a criminal act is the victim. This emphasis has persisted throughout the evolution of criminal law. In this particular scenario, there exists a limited number of rules or regulations pertaining to the regulating and safeguarding of victims (Reksodiputro, 1997). While the state assumes control over the rights of the victim, it is the State victim who is represented by the state as the person whose interests have been directly affected. According to Dunga (2009), the primary function of the state is to execute the legal procedures, rendering the existence of several rights safeguarding individuals in the judicial process unnecessary.

It is not an exaggeration that the opinion has developed that victims are an important asset in punishing criminals. In some crime cases, the victim is also an important witness to convict the perpetrator. Unfortunately, in the framework of examining a case where the victim is a witness for the disclosure of a crime, he is only positioned as an instrument to help law enforcement officials punish the perpetrator and never continues with what the state and law enforcement officials can do for the victim, resulting in suffering. (losses) suffered by the victim can be restored to the condition before the crime happened to him (Arief, 2006).

Fitzgerald posits that Salmond's theory of legal protection asserts that the purpose of law is to harmonize and synchronize diverse societal interests. This is because, in the exchange of interests, safeguarding specific interests necessitates the restriction of conflicting interests (Satjipto, 2000). The concept of legal interest pertains to the realm of human rights and interests, whereby the law assumes the utmost power in determining the human interests that need regulation and safeguarding (Satjipto, 2000). The examination of legal protection necessitates consideration of many levels. Legal protection is derived from a legal provision and encompasses all the legal regulations established by a society. These regulations serve as an agreement within the society to govern the behavioral interactions among its members and between individuals and the government, which is regarded as the representative entity safeguarding the interests of the society. In the event that an individual suffers a monetary or material detriment as a result of criminal activity, it might be considered a type of financial loss for the victim. In this scenario, a legal safeguard for the victim is the restitution of the victim's lost rights, often in the form of monetary compensation or the return of commodities. The term "assets" as used by the author refers to these restituted resources. Asset recovery, often known as recovery, refers to the process of reclaiming assets that have been lost, stolen, or otherwise compromised. The process of asset recovery plays a significant role in the attainment of legal goals, particularly in the pursuit of justice. This is particularly crucial for victims of crime who now lack a defined place within the framework of the criminal justice system. The inability of crime victims to recover their losses via criminal justice systems may engender a sense of injustice, underscoring the need for the recognition of this issue within the criminal justice system of Indonesia.

### **3. Method**

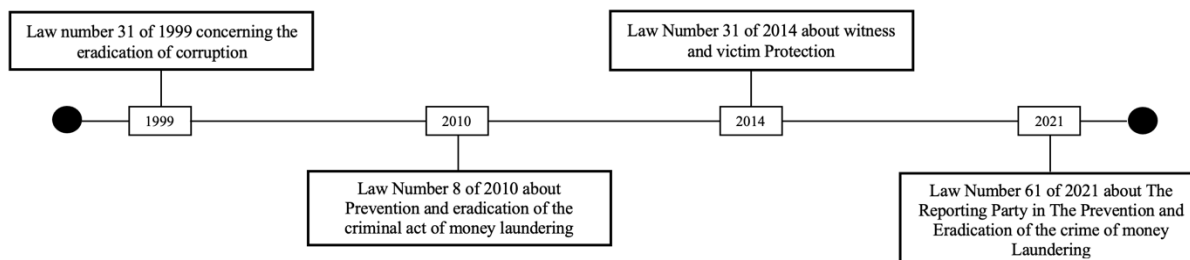
This research uses a qualitative analysis approach as a basis for looking at the natural state of an empirical phenomenon, as well as to gain an in-depth understanding of a phenomenon to be observed (Liamputtong, 2020)(Rahman, 2020). This research uses secondary data sourced from Indonesian regulatory documents. Regulatory documents relating to money laundering crimes and legal protection for money laundering victims. This research also uses content analysis methods, analyzing the contents of legal documents to interpret them into scientific analysis (Harwood & Garry, 2003). In analyzing the contents of legal documents, Nvivo 12 Plus software is assisted in producing comprehensive findings (Woods et al., 2016). Technically, the data was analyzed using the Nvivo 12 Plus software tool using the Chart Hierarchy feature to answer research questions systematically (O'Neill et al., 2018). This research went through several stages, firstly collecting all regulatory documents regarding the crime of money laundering and protection of victims of money laundering crimes. Second, the document is imported into the Nvivo software file for

systematic coding. Third, export coding data to Nvivo 12 Plus visual features such as hierarchy charts. Fourth, visual data analysis in the form of qualitative discussion in the discussion section.

#### 4. Result and discussion

##### Development of regulations regarding money laundering crimes in Indonesia

The term Money Laundering in Indonesia is translated as money laundering and has been categorized as a crime, whether committed by individuals or by legal entities or corporations. In Black's Law Dictionary by Henry Campbell Black (1990), money laundering is defined as follows (Nasution, 2013).



The initial regulations relating to money laundering crimes in Indonesia were in 1999. That year, law number 31 of 1999 was issued concerning eradicating criminal acts of corruption. This law issued the lex specialist derogate legi generale, namely the law relating to the Lex Specialist and the Criminal Code as the lex generale. Simultaneously, Indonesia also ratified the 2003 United Nations Convention Against Corruption, namely the United Nations anti-corruption convention. To maximize the eradication of corruption, a state institution (KPK), a corruption eradication commission, was formed to eradicate criminal acts of corruption.

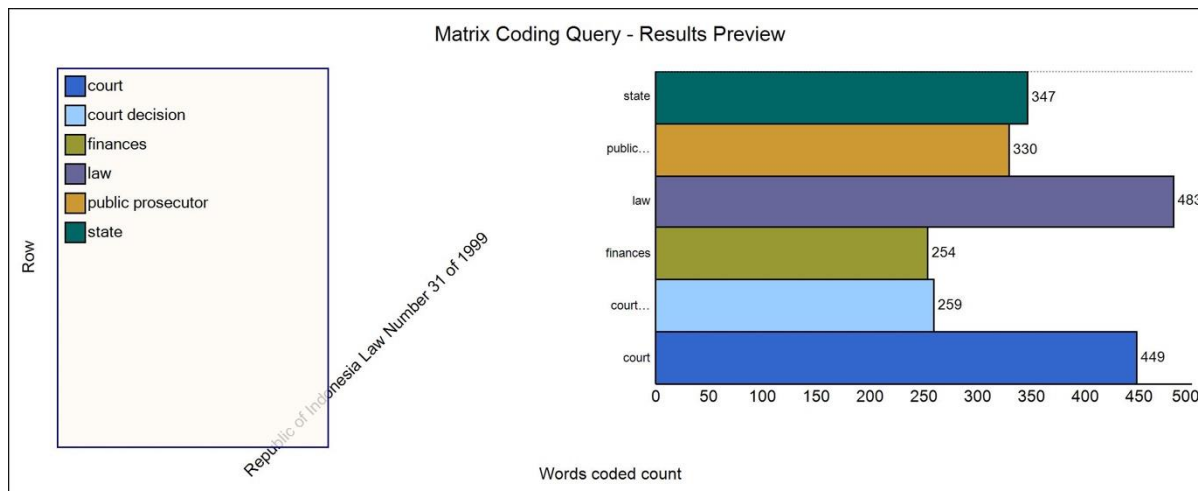
Subsequently, the Republic of Indonesia enacted Law Number 8 of 2010, which pertains to the prevention and eradication of the offense of money laundering. To far, the primary emphasis of legislators in addressing the issue of money laundering has been centered on prevention and enforcement, mostly within a criminal law framework. Namely, the punishment or punishment imposed is based on the theory of retributive punishment or retribution alone (Halim, 2013). Punishment for money laundering is regulated in Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering (UU TPPU). These crimes, which still involve long-term imprisonment, can disrupt macroeconomic stability and tend to result in double penalties, namely, accompanying imprisonment with a fine. However, imprisonment will still be preferred because, based on Article 8 of the TPPU Law, fines can be replaced with imprisonment if the convict's assets are insufficient to pay the fine.

In 2014, the government enacted legislation known as Law Number 31 of 2014, which pertains to the protection of victims. Victims who experience harm due to illegal activities are legally obligated to get compensation, which may include restitution as a form of redress. Restitution is given to victims to reduce the victim's suffering due to criminal acts committed by the perpetrator. This matter of restitution has also been regulated in Law Number 31 of 2014 concerning the Protection of Witnesses and Victims. In 2021, the government continued to issue government regulation no. 61 of 2021. This PP regulates reporting parties in preventing and eradicating criminal acts of money laundering, which includes financial service providers and providers of other goods and services. Meanwhile, Article 8 regulates the obligations of the reporting party to the PPATK regarding transactions carried out by the profession for the benefit of or for and on behalf of Service Users who are known to be reasonably suspected of using Assets that are suspected to originate from the proceeds of criminal acts.

##### Eradicating criminal acts of corruption

The prevalence of corruption offenses in Indonesia remains a significant concern as a substantial number of agencies and institutions continue to engage in corrupt activities (Rohrohmana, 2017). Corruption offenses are not limited to Indonesia, but rather are prevalent on a global scale. As articulated in the fourth preamble of the United Nations Convention Against Corruption (2003), it is posited that corruption has transcended its localized nature and has become a transnational phenomenon with far-reaching impacts on society and the economy. Consequently, there is a growing recognition of the need for international collaboration in order to collectively prevent and control corruption. According to Widyastuti (2015), the concept of essentiality is of

utmost importance. There is a consensus across nations that corruption is a criminal act that may be classified as a "exceptional" offense. The term "extraordinary" is used to describe this phenomenon because to its systematic nature, involvement of intellectual players, inclusion of stakeholders in a specific region, such as law enforcement authorities, and its wide-ranging and detrimental effects (Djanggih et al., 2017). The aforementioned attribute presents a considerable challenge in the endeavor to eliminate corruption when just relying on conventional law enforcement personnel, particularly in cases where corruption has been deeply rooted and permeated all facets and strata of society (Pohan, 2018). Hence, it is imperative to use a complete, integrated, and holistic approach in operationalizing the elimination of corruption (Waluyo, 2014).



Source; Results Processed by Nvivo 12 Plus software

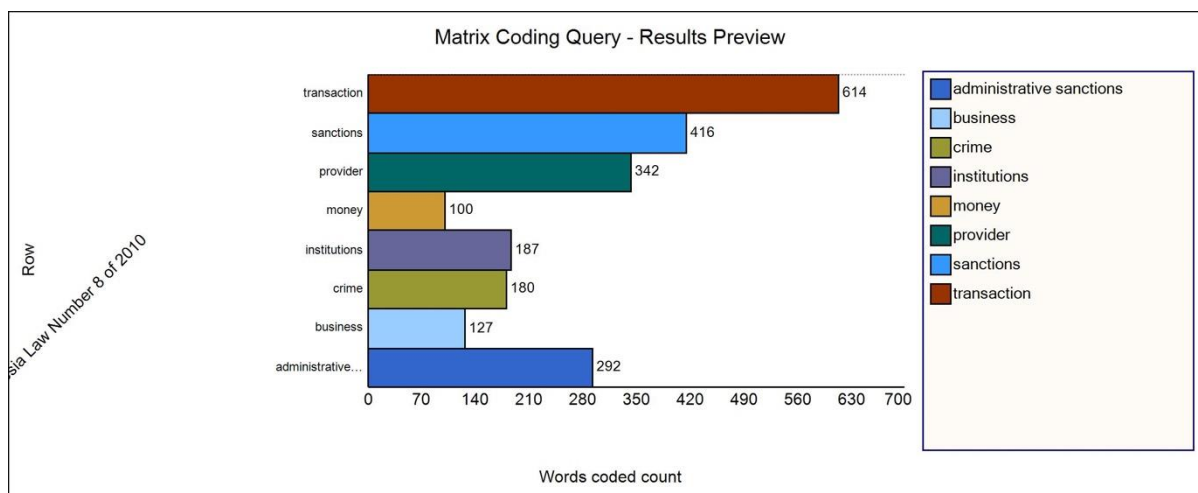
The development of corruption cases in Indonesia is also followed by developments in the laws that regulate it, starting from the Criminal Code to the Corruption Eradication Law Number 31 of 1999 as amended by Number 20 of 2001. The offense in Article 3 (abuse of authority, opportunity or means), that The perpetrator of a criminal act according to Article 3 of Law Number 31 of 1999 is every person, namely individuals and corporations who abuse the authority, opportunities or facilities available to them because of their position or position, as is referred to as an office offense or crime against office.

Law 31 of 1999 has the six most significant words in the regulation. The words that appear most often in the law above are "regulation, court, state, public prosecutor, finance." a number of these words correlate with each other to regulate the course of the law enforcement process in the field of money laundering (corruption), the word regulation is interpreted as a reference for the Indonesian government in enforcing the crime of money laundering, the word court is interpreted as a judicial institution that has an important role in deciding cases of money laundering crimes. The state is interpreted as a unitary Republic of Indonesia with government affairs entities, including law enforcement issues. The word prosecutor is interpreted as a state institution that operates in the field of prosecuting individuals who commit money laundering crimes. Finance is the final content of this law because it correlates with the supervision of state finances from criminal acts of money laundering (corruption).

### Prevention and eradication of money laundering crimes

In order to effectively combat and eliminate instances of money laundering, which encompass a range of illicit activities resulting in the acquisition of illegal assets, legislation has been enacted to establish a Financial Transaction Reporting and Analysis Center. The primary objective of this institution is to provide support to law enforcement agencies in their efforts to prevent and eradicate money laundering and associated criminal activities. Another important aspect is the provision of intelligence information via the analysis of reports submitted to the Financial Transaction Reports and Analysis Center (PPATK) in order to effectively fulfill its primary objective. The PPATK is mandated to provide recommendations for financial service providers (PJK) in identifying fraudulent financial transactions conducted by consumers of financial services, among other responsibilities. Hence, it is imperative for the government and other societal entities to allocate significant focus towards addressing the issue of effectively managing the crime of money laundering. Indonesia has shown its commitment to addressing the issue of money laundering with the

implementation of Law Number 8 of 2010, which specifically targets the criminal conduct of money laundering. The enactment of this legislation designates money laundering as a legally punishable act, hence necessitating its prevention and elimination.



Source; Results Processed by Nvivo 12 Plus software

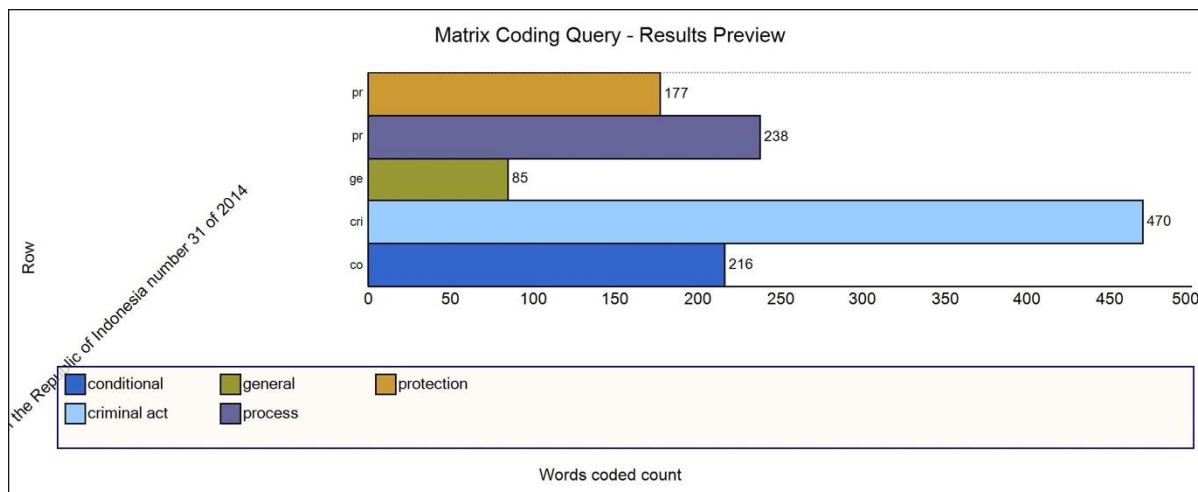
Law no. 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering is a legal regulation in Indonesia which is officially known as "Law of the Republic of Indonesia Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering." This law aims to provide a strong legal basis for the prevention and eradication of money laundering, which is a serious crime that can be used to disguise the origin of illegally obtained funds. This law provides a clear definition of what is considered a money laundering crime, as well as covering actions that can be classified as money laundering. This law requires various parties, including financial institutions, financial service providers, and certain professions (such as notaries and lawyers), to report suspicious financial transactions to authorized institutions. This law provides the legal basis for investigating and investigating criminal acts of money laundering. This includes the authority of law enforcement agencies to investigate and prosecute money laundering cases. This law regulates preventive steps that various entities must take to prevent money laundering. This includes customer identification procedures (Know Your Customer/KYC), establishing a financial reporting unit (PPATK), and employee training. This law recognizes the importance of international cooperation in preventing and eradicating money laundering. This includes the exchange of information and cooperation with other countries in terms of law enforcement. This law determines the penalties imposed on perpetrators of money laundering crimes, including fines and prison sentences. This law gives law enforcement authorities the authority to confiscate and confiscate the proceeds of money laundering crimes. This law protects whistleblowers who report suspected money laundering crimes.

This part of the paragraph explains the data above, which shows nine words obtained after coding Law No. 8 of 2010. The nine words are "transactions, sanctions, users, money, institutions, crime, business, administration". The word transaction is interpreted as monitoring all forms of transactions that lead to the crime of money laundering. The word sanctions is a content that confirms the existence of strong sanctions against individuals who commit crimes and money laundering. The word user is interpreted as a person or perpetrator who uses his authority in deviant actions such as money laundering. The word money means that money is a tool that is evidence of the crime of money laundering. The word institution in this law refers to institutions or institutions that are involved in enforcing security in the field of money laundering crimes. The word crime is interpreted as a criminal act of money laundering. The words business and administration are the final words that appear in the content of this law.

### Protection of witnesses and victims of criminal acts

The efficacy of a criminal justice procedure depends upon the effective revelation or acquisition of evidence during the trial proceedings. Witnesses play a crucial role in the criminal justice process. The level of public and law enforcement focus on witnesses within the criminal justice process has been very limited so far. Numerous undisclosed and unresolved cases may be attributed to witnesses' reluctance to provide testimony to law enforcement due to the frequent occurrence of threats from certain entities. The provision of legal

safeguards and ensuring security aims to foster an environment whereby individuals feel empowered to report illegal activities to law enforcement without fear.



Legislation regulating the protection of witnesses and victims, including the Law on the protection of witnesses and victims in the context of law enforcement in Indonesia, is still partial and spread across various laws and regulations, so it only applies to certain crimes, such as (1) Criminal acts corruption; (2) Narcotics/psychotropic crimes; (3), Terrorism crime; (4) Criminal acts that result in witnesses and victims being faced with situations that seriously endanger their lives. The general criteria for who and when it can be said that there is a threat to the lives of witnesses and victims are still unclear, so witness. Victim protection cannot be fully applied to all types of crimes, even though the consequences are the same, in the form of material and non-material losses and not fully protecting witnesses. Furthermore, victims are in a decisive position in the criminal justice process in all types of crimes. The limited rights given to witnesses and victims are still very far compared to the treatment of suspects/defendants, as regulated in the Criminal Procedure Code.

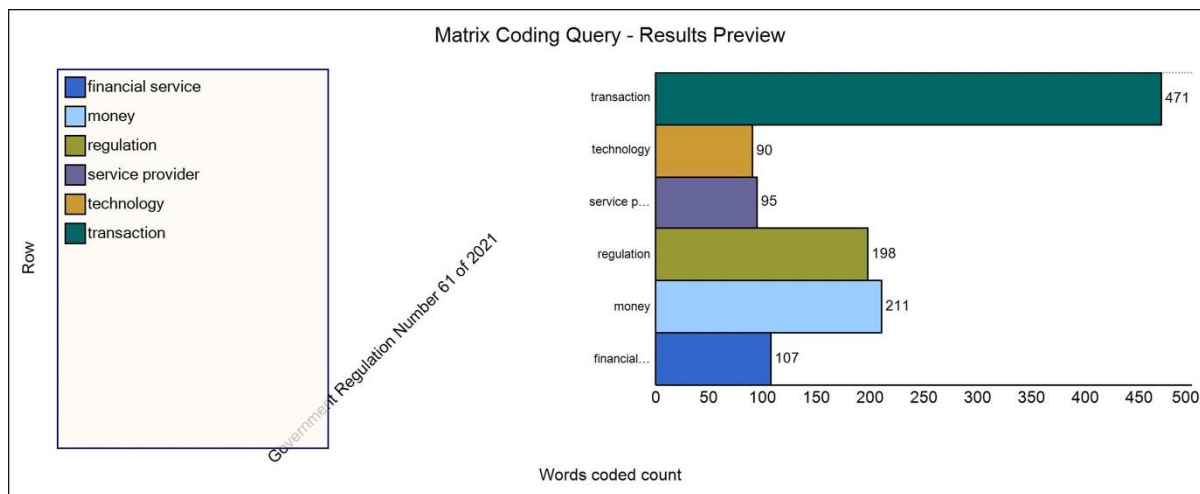
In contrast, the protection for crime victims is inadequate, so there is less guarantee for witnesses and victims in providing information, both in the investigation process and investigation, as well as before the trial is held, including after they give testimony. All of this will cause the public to be reluctant to become witnesses, both in the investigation/investigation process and in the criminal justice process at trials in court. Besides that, the victim's position is replaced by the prosecutor/public prosecutor, causing the victim, including the victim's family, to no longer have control throughout the trial and play a role in determining the end of the criminal justice process. This also happens to other witnesses, even though their presence and testimony are very crucial in the examination process in court, so if they are not involved, it will cause problems.

Law 31 of 2014 contains the words that appear most often regarding "Art of crime, process, conditional, protection, general". The term crime, as interpreted in this Law, is an action taken to safeguard or protect victims from criminal acts of money laundering. The word process is part of the activities or efforts carried out to provide security protection for victims or witnesses of money laundering crimes from threats of intimidation from any party. The word conditional is interpreted as a rule that regulates adjustments to existing conditions. The word protection is interpreted as protection for victims and witnesses of money laundering crimes. The word general is interpreted as a rule that applies to the general public.

### Reporting Parties in the Prevention and Eradication of Money Laundering Crimes

In order to effectively combat and eliminate instances of money laundering, encompassing a range of illicit activities that generate unlawful assets, a Financial Transaction Reporting and Analysis Center has been established pursuant to this legislation. The primary objective of this center is to provide support to law enforcement agencies in their efforts to prevent and eradicate instances of money laundering and associated criminal activities. Another significant aspect is the provision of intelligence information via the analysis of reports provided to the Financial Transaction Reports and Analysis Center (PPATK) in order to fulfill its primary responsibilities. The PPATK is mandated to provide recommendations for financial service providers (PJK) in order to identify the conduct of financial service users who engage in certain activities.

The crime of money laundering is a serious threat to the integrity of the global financial system and society in general. Efforts to combat money laundering require cooperation from various parties, including financial institutions, financial service providers, and certain professions such as notaries, advocates, and accountants. Regulations relating to reporting parties in preventing and eradicating money laundering crimes are important in mitigating financial risks and preventing misuse of funds obtained illegally. This article will discuss the key role of reporting parties in this effort.



Government Regulation No. 61 of 2021 concerning Reporting Parties in the Prevention and Eradication of Money Laundering Crimes is an Indonesian government regulation that discusses the roles and obligations of parties who are required to report suspicious financial transactions in efforts to prevent and eradicate money laundering crimes. This regulation provides a clear definition of who is considered a reporting party. Usually, reporting parties include financial institutions, financial service providers, and certain professions such as notaries, advocates and accountants. The reporting party must report suspicious financial transactions to the Financial Services Authority (OJK) and the Financial Reporting Unit (PPATK) within the specified time. This regulation details reporting procedures, including the report format, information that must be included in the report, and procedures for sending the report to the OJK and PPATK. Protection issues for whistleblowers. This includes provisions that prohibit disclosing the reporter's identity to the public and prohibit discrimination or retaliation against the reporting party. Government Regulation No. 61 of 2021 is an important instrument in efforts to prevent and eradicate money laundering crimes in Indonesia. This helps create a clear legal framework for parties reporting suspicious transactions and provides a basis for effective cooperation between the financial sector and law enforcement agencies. Thus, this regulation supports efforts to maintain the integrity of the Indonesian financial system and reduce the potential for financial abuse in criminal activities.

### Conclusion

An analysis of the content of regulations relating to money laundering and corruption from 1999 to 2021 found that regulations generally impacted resolving money laundering crimes. In particular, the regulations regarding the crime of money laundering strengthen law enforcement institutions, especially courts, prosecutors and other institutions, in resolving cases. Using regulations regarding the criminal act of money laundering (corruption) can expand the networks involved so that state finances as victims can be minimized. Furthermore, existing regulations make it easier for law enforcers to handle cases to completion. Regulations regarding the protection of victims of money laundering crimes in Indonesia can be said to have fulfilled the legal elements so that they can be applied to the protection of victims. However, it is necessary to strengthen the understanding of victims and law enforcers to understand better the legal content contained to the fullest to avoid failure to understand the values. It is in the regulations. Ultimately, this research only analyzes the content of money laundering criminal regulations and legal protection for victims of money laundering crimes. Future research needs a more in-depth analysis by comparing regulations and cases of money laundering crimes.

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