

## Comparison of Corruption Eradication Institutions in Various Countries (Indonesia, Hong Kong, Japan, Australia, New Zealand)

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### Abstrak

*This study discusses the Corruption Eradication Commission (KPK) since 2019 there has been a significant change, because the second amendment to the KPK Law has been ratified through Law Number 19 of 2019, Indonesia's ranking index is at 115, amputated authority and declining performance. The study conducted a comparative approach between the Indonesian KPK and the corruption eradication institutions of Hong Kong, Japan, Australia and New Zealand. It was found that Asian and Australian countries have less authority, but are ranked high (3 to 14) in eradicating corruption compared to Indonesia which is ranked 115. The results of the study show that there has been a change in the position of the KPK institution in terms of state administration which is no longer an Auxiliary body but a state organ, full authority but requires permission from the supervisory board, accountability and full control by the government (executive).*

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## 1. INTRODUCTION

Indonesia as a State of Law or *Rechtsstaat* (Constitution of 1945, 1945) requires a legal order as the supreme commander in realizing prosperity while protecting society from all actions that deviate according to Indonesian law. Corruption is an act in the category of extraordinary criminal acts (Sarman, 2018). Corruption is traditionally associated with a number of different concepts, Aristotle, for example, refers to corruption as any deviation of the moral and political order from a state of ideal purity (Dobel, 1978). Like Aristotle, many Republican theorists classified corruption as a condition, rather than a series of actions. For example, throughout his work, Machiavelli views corruption as a condition that arises when ordinary citizens turn to elites for security and advancement, rather than relying on their own public institutions. (Dinsha, 2018).

In Indonesia itself, acts of corruption are regulated in Law number 20 of 2001 concerning amendments to Law number 31 of 1999 concerning the Eradication of Corruption Crimes, Every person who unlawfully commits an act of enriching, benefiting himself or another person or a corporation, abusing the authority, opportunities or facilities available to him

because of his position or position which could harm state finances or the state economy. (Law number 20 of 2001, 2001). The implementation of this law is carried out by the Corruption Eradication Commission (KPK). (Law number 30 of 2002 concerning the Corruption Eradication Commission, 2002).

Since its founding in 2002 to 2019, the Corruption Eradication Committee (KPK) has contributed a lot to saving state finances and eradicating corruption. Call it the Century case, the e-KTP case, the DPR Building case, the BLBI case and many more. ([www.fahum.umsu.ac.id](http://www.fahum.umsu.ac.id), 2023) In the midst of its many achievements, the KPK is currently being hit by many internal problems, starting from changes to the law that amputate its authority and position to a hot case involving the chairman of the KPK himself, namely Firli Bahuri. ([www.newsdetik.com](http://www.newsdetik.com), 2024).

Not without reason, the KPK has experienced significant changes since 2019, because the second amendment to the KPK Law has been ratified through Law Number 19 of 2019. (Law number 19 of 2019 concerning the second amendment to the KPK, 2019) The largest level of decline occurred in the dimension Independence has decreased by 55% (from 83% in 2019 to 28% in 2023), then the Enforcement dimension has decreased by 22% (from 83% in 2019 to 61% in 2023), and the Cooperation dimension Between Institutions experienced a decrease of 25% (from 83% in 2019 to 58% in 2023). The other three dimensions are Human Resources and Budget; Accountability and Integrity; and prevention also experienced a decline. (Transparency International, 2023)

Seeing this worrying condition, the Corruption Eradication Commission actually needs to observe and see how other similar anti-corruption agencies in various countries are doing. This can certainly be a guide and reference for the Corruption Eradication Committee in carrying out its duties and functions and making policies in the future. (Rahmiati, 2019). Looking at previous research, the comparison of Indonesian anti-corruption institutions with countries around Asia is only around Singapore, Malaysia, Singapore. So the author provides something new as a novel discovery that is different from previous authors. The author conducted a comparative study of Indonesia's anti-corruption institutions with several other Asian countries and surrounding areas, including Hong Kong, Japan, Australia, New Zealand. The selection of these countries took into account the perception index on corruption taken in March 2024 in countries around Indonesia or ASIA and Australia. Hong Kong is ranked 14th with a score of 75, Japan is ranked 16th with a score of 73, Australia is ranked 14th with a score of 75, New Zealand is ranked 3rd with a score of 85, compared with Indonesia which is ranked 115th with a score of 34. (transparency.org, 2024)

## 2. RESEARCH METHOD

This research uses a type of normative legal research. Normative legal research is a scientific research procedure to find scientific truth from a normative perspective. (Johny Ibrahim, 2006) Normative legal research functions to provide juridical arguments when there is a vacuum, ambiguity and conflict of norms. (I Made Pasek Diantha, 2016)

This research approach uses a statutory approach and a comparative approach. The statue approach examines all laws and regulations that are relevant to the problem being addressed, using a legislative and regulatory approach. (Mukti Fajar, 2010) comparative approach (comparative approach) This comparative approach is carried out by comparing the legal system of one country with the legal system of another country, or between the constitution of

one country and the constitutions of other countries to obtain similarities and differences between these laws. (Peter Mahmud Marzuki, 2005)

The data in this research was obtained by collecting primary secondary data. The types and sources of legal materials in this research consist of secondary, primary and tertiary legal materials. Based on its binding strength, legal materials for obtaining data are divided into 3 (three), namely:

- b. Primary legal materials are laws that are binding in terms of basic norms, basic regulations and statutory regulations. In this research, the primary legal material is the Constitution of Indonesia and several Asian and Australian countries, several laws that regulate anti-corruption institutions in various countries.
- c. Secondary legal materials are legal materials that provide explanations of primary legal materials in the form of books, research results and/or scientific works, results of seminars or other scientific meetings, opinions of legal experts that are closely related to the research object.
- d. Tertiary legal materials are legal materials that are supporting in nature to provide instructions and explanations for primary and secondary legal materials, such as legal journals, scientific journals, general dictionaries and legal dictionaries, newspapers, the internet and papers related to research objects. .

Data analysis activities in this research were carried out by taking an inventory of laws and regulations related to the problem that was the object of study. Jaako Husa (Elgar Encyclopedias of Comparative Law, 2006) differentiates between "macro-comparative law" and "micro comparative law". Macro legal comparison, focuses more on large/broad problems or themes such as systematic problems, classification and classification of legal systems. Comparative micro law, relating to legal rules, cases and institutions of a specific/actual nature. (Barda Nawawi Arief, 2014) Referring to Jaako Husa's opinion, the legal comparison in this writing is a micro legal comparison, namely a comparison between legal institutions. The collected data will be identified and then analyzed comparatively so that conclusions can be drawn based on the similarities and differences between the anti-corruption institutional systems of various countries.

### **3. RESEARCH RESULTS AND DISCUSSION**

#### **3.1. Research result**

##### **Hong Kong**

Initially, Hong Kong experienced an acute cancer of corruption. In 1948, an anti-corruption agency was formed called the Anti-Corruption Office, which was part of the Hong Kong police. In May 1971 this agency was given stronger authority, namely investigation. Many people believe that the anti-corruption body in the Hong Kong Police is no longer able to eradicate corruption. The situation came to a head in June 1973 when a police officer with the rank of Chief Superintendent named Peter Fitzroy Godber committed corruption and managed to escape to England. Based on the results of the team's investigation led by judge Sir Alastair regarding Godber's escape, the Governor of Hong Kong announced that he would transfer responsibility from the police to an independent body. (Moh. Yamin, 1989)

Then in 1974, Hong Kong formed ICAC (Independent Commission Against Corruption). This institution was formed based on the law concerning the Independent

Commission Against Corruption Ordinance (Cap 204). Then other acts that are classified as criminal acts of corruption are regulated in The Prevention of Bribery Ordinance (POBO) (Cap 201). ([www.ICAC.org.hk](http://www.ICAC.org.hk), 2024). Three powers are given to ICAC, namely investigating allegations of corruption, preventing corruption by improving systems and procedures in the public sector, and providing education to the public regarding corruption and gathering support from the public in efforts to prevent corruption. Apart from the public sector, ICAC also has the authority to investigate allegations of corruption in the private sector. However, ICAC cannot impose legal sanctions on suspects, because this is the authority of the judicial body. ICAC's task is to provide sufficient evidence that corruption has occurred to allow the suspect to be prosecuted. The current ICAC Commissioner is WOO Ying-ming, he served as Commissioner of Correctional Services from 2018 to March 2022 before retiring from the Civil Service. Woo was appointed as Commissioner of the Independent Anti-Corruption Commission from July 2022-2027. He is directly responsible to the head of the Hong Kong Executive, not the President. Please note that Hong Kong adheres to a "one country, two systems" system of government.

The ICAC organization consists of three divisions (Functional Departments), namely:

1. *Operation Prevention Department*

This division has the main investigative authority. The investigative authority covers the public, banking and private sectors. In fact, based on Section 10 of the ICAC ordinance, the head of the operations division can investigate the bank accounts and deposits of corruption suspects. This division is also given the authority to carry out detentions.

2. *Corruption Prevention Department*

This department is the smallest department in ICAC. The authority of this department is to examine the performance and procedures of government departments and public bodies, identify system weaknesses that allow corruption to arise and provide recommendations for improvements to better work methods to reduce the potential for corruption. Prevention includes providing recommendations for good business implementation to reduce recommendations for good business implementation to reduce disruption and risk. These recommendations can be given to both the public sector and the private business sector.

3. *Community Relations Department*

This department consists of two divisions that have direct relations with information through mass media and public education. This department has responsibility for public education about the dangers of corruption. The responsibility for carrying out public education is carried out on an ongoing basis. Every year employees from this department hold meetings to provide education about the dangers of corruption to business sector actors, school principals, teachers, educational staff and students.

## **Japan**

Corruption is not something foreign to Japan, corruption in Japan is evident from the post-war economic boom, which was built on a close alliance known as the "iron triangle" between Japanese businesspeople, Liberal Democratic Party ("LDP") politicians and elite bureaucrats. Some of the most famous scandals include the Lockheed case (1976) which led to the conviction of former Prime Minister Kakuei Tanaka (and was responsible for the creation of the United States Foreign Corrupt Practices Act), the Recruitment case (1989), which brought down the government of Prime Minister Noburu Takeshita, the Zenecon (General contractor) case (1993-1994) which resulted in several prefectural Governors along with dozens of others

being punished, and one Governor committing suicide, and the Bank of Japan/Ministry of Finance case (1997-1998) which led to arrests, resignations and suicides from several high-level financial officials.

The rise in incidents of bribery by Japanese companies at home and abroad has led dozens of Japanese lawyers and from various top firms to form a Japanese Anti-Bribery Committee (The Anti-Bribery Committee Japan / ABCJ). The Anti-Bribery Committee of Japan (ABCJ) is an independent expert group, formed by Japanese lawyers and researchers on a volunteer basis that has drafted and supervised the "Foreign Bribery Prevention Guidelines", published by the Japan Federation of Bar Associations (JFBA) in July 2016. ([www.antibriberyjapan.org](http://www.antibriberyjapan.org), 2024) ABCJ in carrying out its duties uses the Foreign Bribery Prevention Guide (*Guidance on Prevention of Foreign Bribery*) issued by the Japan Federation of Bar Associations, this guide provides practical guidance and contemporary best practices for Japanese companies and legal advisors who frequently provide them with legal advice regarding the implementation of measures. anti-bribery measures. (Japan Federation of Bar Associations, 2024).

ABCJ's main task in eradicating corruption is to empower companies and society to eradicate potential corruption, explain knowledge about corruption and bribery comprehensively, and encourage collective action between stakeholders. The membership composition of the Anti Bribery Committee Japan consists of 16 (sixteen) Japanese lawyers (attorneys) and 3 (three) Japanese researchers and experts (researchers & experts). Currently ABCJ is chaired by experienced Tokyo Lawyer Daisuke Takahashi.

The ABCJ is an independent expert group, meaning it has no direct accountability to any particular government authority such as the president or prime minister. Instead, it operates independently, consisting of Japanese lawyers and researchers focused on strengthening anti-bribery measures through guidance, tools, and collaborative efforts with various stakeholders. This means that ABCJ is accountable to its members and stakeholders within the framework of its independent operations and collaborative efforts with relevant organizations, not to any government or executive authority.

### **Australia**

Australia, specifically in New South Wales is a major global and Asia-Pacific cultural center. Home to a diverse population of 7.7 million people, NSW is Australia's oldest, largest and most cosmopolitan state. It is also an economic powerhouse, with an economy larger than Hong Kong, Malaysia and Singapore. As well as its cultural and economic strength, NSW's global status is underpinned by its international transport links, with more than 1000 flights operating per week. ([www.nsw.gov.au](http://www.nsw.gov.au), 2024) In the late 1980s the public became concerned about integrity in the NSW public sector due to exposure to acts of corruption among government Ministers, in the judiciary and at senior levels of the Police. ([www.icac.nsw.gov.au](http://www.icac.nsw.gov.au)., 2024)

So in July 1988, the Independent Commission Against Corruption Regulation 1988 was passed after a tough parliamentary debate. The Independent Commission Against Corruption (ICAC) was established in March 1989 as an independent organization monitored by a parliamentary committee. The head of government (Premier) told Parliament that the measure of ICAC's success was increasing integrity and restoring public confidence in public administration. The task of the ICAC is to investigate, expose and minimize corruption within and affecting the government of New South Wales. Responsibility for managing corruption risks lies with each organization. ICAC directs its attention to serious and systemic corrupt

behavior and takes into account the responsibilities and roles of public officials and other authorities in preventing corrupt behavior.

ICAC is divided into four main divisions namely Investigation, Corruption Prevention, Corporate Services, Legal, and also separate Assessment and Communications and Media sections. Currently ICAC is chaired by Hon John Hatzistergos AM as Chief Commissioner for five years from 7 August 2022 to 2027. The responsibility for ICAC's duties is carried out to the New South Wales Parliament. The body reports to parliamentary committees and has significant independence from the executive branch, including the prime minister or other ministerial offices. ICAC operations are overseen by the ICAC Inspector, who is responsible for ensuring that ICAC acts within its legal mandate and handling complaints regarding ICAC's conduct.

### **New Zealand**

New Zealand is a country that is famous for its natural and legal beauty, but it turns out that this country has experienced difficult times. In 1987, when the stock market crashed, an economic recession occurred in New Zealand or what is usually called New Zealand, which revealed fraud on an unprecedented scale in the country that produces cow's milk. At that time, there was a perception that New Zealand was unable to handle the investigation and prosecution of complex financial crimes, therefore in 1990 the Serious Fraud Office (SFO) was created. The SFO is the agency tasked with investigating and prosecuting some of New Zealand's most significant and complex financial crimes.

SFO Act sets out the framework for the SFO to conduct investigations, including search powers which can be found in sections 5, 9 and 10. The SFO does not fall within the provisions of the Search and Surveillance Act 2012. (The serious Fraud Office Act 1990, 2024). The SFO's job is Investigation, carrying out investigations into serious allegations of fraud and corruption. Prosecution, filing charges and prosecuting cases in court, Prevention, working with other agencies and the community to prevent fraud and corruption through education and policy recommendations. Currently the SFO is chaired by a woman, namely Karen Chang as Director and Chief Executive, she has served since 2022. The SFO itself is subject to the supervision of a parliamentary committee and must be accountable to Parliament.

### **Indonesia**

The Corruption Eradication Commission (KPK) was formed during Indonesia's reform era. This institution was formed as part of the corruption eradication agenda, which is one of the most important agendas in improving governance in Indonesia. (Mahmuddin, 2004). Before the formation of the Corruption Eradication Commission as it is today, Indonesia had been making efforts to eradicate corruption for a long time. During the Dutch East Indies, in 1915 a codification of the Criminal Code was formed which was stated in "Wetboek van Strafrecht voor Nederlandsch-Indie" which has been in effect for all residents of Indonesia since 1918 and many more until now, most recently the Corruption Eradication Commission. (Abdoel Djamali, 2006).

It is said that the Corruption Eradication Commission is Indonesia's best institution in eradicating corruption from the Dutch East Indies era until now. However, in terms of the KPK's journey from 2002 to 2024, the KPK's performance is suspected to have decreased. The KPK was initially formed based on law Number 30 of 2002 concerning the Corruption Eradication Commission, but in 2019 the government officially ratified Law Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the

Corruption Eradication Commission. There have been many protests and criticism from the public regarding this controversial change to the KPK Law.

The Corruption Eradication Commission (KPK) is led by the Corruption Eradication Commission (KPK) leadership consisting of five people, one chairman who is also a member and four deputy chairmen who are also members. The five KPK leaders are state officials, coming from elements of government and elements of society. The KPK leadership holds office for four years and can be re-elected for only one term. In making decisions, the KPK leadership is a collegial collective. The Corruption Eradication Commission (KPK) is a state institution within the executive power group which in carrying out its duties and authority is independent and free from the influence of any other power. This institution was not formed to take over the task of eradicating corruption from previous institutions. The explanation of the law mentions the role of the Corruption Eradication Committee as a trigger mechanism, which means encouraging or acting as a stimulus so that efforts to eradicate corruption by previously existing institutions become more effective and efficient.

The Corruption Eradication Committee's current authority is to take preventive measures, coordinate with authorized agencies, monitor the administration of state government, supervise authorized agencies, investigate, investigate and prosecute criminal acts of corruption, and take action to implement the decisions of judges and court decisions that have received legal force. permanent law. In its current authority, there are regulatory articles that intervene in the KPK's independent authority in carrying out its duties and functions, such as the authority to wiretapping must be carried out in accordance with permission from the supervisor, the regulation of wiretapping is regulated in the article on amendments to the KPK law without prior to the formation of the law on wiretapping, regulation of obligations. issuing SP3 within a certain period of time which is not in accordance with various Constitutional Court Decisions which decided on testing related to SP3 authority by the Corruption Eradication Committee, is not in accordance with the theory of the concept of independent state institutions, both according to experts and international conventions.

The current interim chairman of the Corruption Eradication Commission is Nawawi Pomolango, he is a former judge who became known when he served at the Central Jakarta District Court in 2011-2013 and served as Chairman of the East Jakarta District Court in 2016. Until the end of 2017, Nawawi received a promotion as high judge. at the Denpasar High Court and from 2019-2024 he will be the temporary chairman of the Corruption Eradication Commission, replacing the previous chairman, Firli Bahuri. Please note that Firli Bahuri was replaced because he was caught in a case of alleged blackmail involving a number of ministerial officials, his status is currently a suspect but not detained.

### 3.2. Discussion

Number	State institutions)	Constitutional Position	Authority	Accountability	Ranking
1	ICAC (Hong Kong)	Independent.	Investigation, prevention, anti-corruption education.	Chief Executive.	13
2	ABCJ (Japan)	Independent.	Empower, educate, encourage collective action of companies and society.	Stakeholders (private).	16
3	ICAC (Australia-New South Wales)	Independent.	Investigation, prevention, legal.	Parliamentary committee.	14

4	SFO (New Zealand)	Independent.	Investigation, prosecution, prevention.	Parliament.	3
5	Corruption Eradication Committee (Indonesia)	Independent. Under the executive.	Investigation, investigation, prosecution with permission of the Supervisory Board. (tapping)	President.	115

If you look at the table above, it can be analyzed that the Corruption Eradication State Institutions in various countries have significant differences and outputs. In terms of institutional position constitutionally, ICAC Hong Kong, ABCJ Japan, ICAC Australia, and SFO New Zealand are in the position of Independent or Auxiliary Body. Meanwhile, the Indonesian Corruption Eradication Committee is under the Executive or Auxiliary State Organ group. In terms of authority, Indonesia has the strongest duties compared to other institutions, which on average only revolve around inquiries, inquiries, Japan's ABCJ even has no investigative authority but rather educates on anti-corruption but is ranked 16th in the world compared to Indonesia which is ranked 115th in the world. In terms of accountability, on average the anti-corruption institutions in the various countries above are responsible to parliament and even to the private sector (stakeholders), in contrast to Indonesia's responsibility even under the direct supervision of the President. Lastly, ranking, in terms of the complete authority of the Indonesian Corruption Eradication Committee, the Indonesian Corruption Eradication Committee should be able to eradicate corruption and educate the public and government in enforcing corruption prevention. Indonesia is ranked 115, paradoxically, in fact Japan and New Zealand with the lowest law enforcement authority are actually ranked the highest, namely 16 and 3, as well as Hong Kong at 13 and Australia at 14.

#### 4. CONCLUSION

The complete authority of an anti-corruption agency does not merely make the institution a good or highly ranked anti-corruption agency, in terms of the complete authority of the Indonesian Corruption Eradication Committee, it should be able to eradicate corruption and educate the public and government in enforcing corruption prevention. Indonesia is ranked 115, paradoxically, in fact Japan, New Zealand with the lowest law enforcement authority are actually ranked the highest, namely 16 and 3, as well as Hong Kong at 13 and Australia at 14. It can be seen that the Indonesian State through the Corruption Eradication Committee is not yet serious in eradicating corruption. This is a bad record because it is a cancer that is hampering the progress of the Indonesian state, especially since the dream of a golden Indonesia in 2045 is very far from reality if eradicating corruption is not the government's seriousness.

Writer recommends that the government make KPK regulations even stronger and not intervene by the Executive, Legislative or Judiciary or even any branch of power, the need to enforce the code of ethics in the KPK is also important so that it can set an example to the community and the government below. With maximum strengthening of the Corruption Eradication Committee, it is not impossible for Indonesia to become a golden developed country in 2045.

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