

COMPARISON OF THE DEATH PENALTY FOR PERPETRATORS OF CORRUPTION IN INDONESIA, MALAYSIA AND SINGAPORE

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Abstract

Corruption is a serious, organized crime that has caused serious problems and threats. The purpose of this study to analyze the regulation of corruption in Indonesia, Malaysia and Singapore, find out and analyze the comparison of the death penalty for corruption in Indonesia, Malaysia and Singapore and compare the efforts to prevent corruption in Indonesia, Malaysia and Singapore. The normative juridical research method is an approach based on the main legal material examining theories, concepts, legal principles, and regulations related to this research. This research included normative juridical research. In normative juridical research, law is conceptualized as a norm, method, principle, dogma. This type research uses a statute approach, which is analyze all laws and regulations relating legal issues that are discussed the research. In Indonesia, corruption more common in the central government from 2004 to 2021 there are many as 402 cases which are data by region, Malaysia scored 48 points out of 100 in the Corruption Perceptions Index 2021 reported by Transparency International, while Singapore the CPIB in 2018 managed to handle 80% of the cases are the majority from the private sector that 112 people were indicted the Court for criminal acts of corruption.

Keywords: Comparison; Corruption Crimes; Death Penalty

INTRODUCTION

Corruption is an extraordinary crime (extraordinary crime) because corrupt activities cause negative consequences, not only causing harm to state finances but also causing harm to public finances (Alfiyah, 2021). Then extraordinary countermeasures are needed (extraordinary enforcement) along with extraordinary measures (extraordinary measures). Because corruption is an extraordinary crime, so that maximum punishment must be carried out as determined in official policies in accordance with Law Number 31 of 1999 (Sukmareni et al., 2021). The theoretical basis also contains the theory of punishment, namely discussing punishment is discussing the authority of judges and therefore judges in determining punishments must have sensitive feelings, in the sense that they must be able to judge properly and objectively in accordance with the feelings of community justice. Although there is no obligation for judges to have absolute theory in sentencing, it is natural for a serious crime to be given an appropriate sentence and regarding the length of the sentence it is left to the judge to consider it himself. The theory of punishment consists of several that can be used as a basis or reason by a country in imposing a criminal. The theories of punishment are:

a. Absolute / Retributive Theory

This theory explains that a punishment occurs because someone has committed a crime.

b. Relative/Utilitarian Theory

Relative theory based on or depending on the purpose of punishment, namely for the protection of society or the prevention of crime.

c. Combined Theory

In this theory covers the basic relationships of absolute theory and relative theory, combined into one. The legal basis of this theory lies in the crime itself, namely retaliation or torture.

In this study there are several records of examinations in corruption. It can be seen from the KPK website that there are 50 cases of budget abuse from 2004 to 2021. Corruption is more common in the central government from 2004 to 2021, there are as many as 402 cases, which are data by region. Therefore, it is necessary to improve governance that can be done by identifying corruption-prone points starting with the level of submission, determination, implementation, and reporting through regulations that manage or discoveries in the field (Zakariya, 2015). Meanwhile, Singapore is the only country that ranks in the top 10 as the country with the lowest category of corruption which has been maintained since 1995 according to Political and Economic Risk Consultancy (PERC)'s 2018 and Transparency International.

CPIB in 2018 managed to handle 80% of cases, the majority of which were from the private sector, so that 112 people were indicted in court for corruption. Singapore's legal basis, namely The Statutes of the Republic of Singapore Prevention of Corruption Act (Chapter 241) regulates the provisions of punishment for perpetrators of corruption. Point 5 Part III Offences and Penalties contains that any person alone or with anyone who commits corruption or receives gratification will be subject to a fine of not more than \$100,000 or imprisonment for a term not exceeding 5 years or both (Hasan, 2020). Malaysia scored 48 points out of 100 on the 2021 Corruption Perceptions Index reported by Transparency International. In Indonesia, there are provisions for gratification which are regulated in Article 12B which states that gratification is a gift in a broad sense including the provision of money, goods, commissions, rebates (discounts), interest-free loans, travel tickets, lodging facilities, tourist trips, free medical treatment and other facilities. other.

Domestically and abroad free of charge carried out using electronic means or without electronic means. Therefore, gratification is money or gifts to civil servants outside the predetermined salary or it can be said as gratification, namely services provided to civil servants or state administrators. There are two parties who play an active role in the crime of gratification, namely the giver and the recipient of gratification. The giver of gratuities is regulated in Article 5 and the recipient is regulated in Article 12B. However, with the provisions of Article 12C, namely when the recipient of the gratification reports the gratification to the KPK within 30 days at the latest, the legal provisions of Article 12B paragraph (1) do not apply. This, if viewed carefully, will cause injustice to the recipient and the giver of gratification (Mauliddar, 2017).

While corruption gratification in Singapore (Prevention of Corruption Act / PCA), is an attempt to request, receive, or agree to request, give, promise, or offer gratification as an inducement or gift to people for doing or not doing something, with an intention corrupt. Community participation is regulated in section 28, in terms of the treatment of those who report corruption cases either by telephone or in writing. Based on section 28 PART VI MISCELLANEOUS, Prevention of Corruption Act (Chapter 241), the legal protection for those who report may include the confidentiality of witnesses, names, addresses, places of residence, family, and other legal protections. However, if in the future it is found out that the report provided is wrong, then the PCA provides that the person will

be fined \$10,000 (ten thousand Singapore Dollars) and/or a maximum prison sentence of 1 year, depending on the severity of the alleged case.

RESEARCH METHOD

This research is included in *normative juridical research*. In normative juridical research, law is conceptualized as norms, rules, principles, or dogmas. This type of research uses a *statute approach*, which is to analyze all laws and regulations relating to legal issues that are discussed in the study. The structure of the legislation becomes the basis for research and studying the knowledge contained therein and the background of the birth of the law. The data collection technique used library research on secondary legal materials. Data analysis uses prescriptive analysis by formulating problems based on existing situations and conditions. Not only looking at know-about activities but also know-how activities (Mahmud Marzuki, 2017) . Drawing conclusions using the deductive method, starting from the standard to the specific, from assumptions and estimates to facts or events.

RESULTS AND DISCUSSION

1. Regulation of Corruption Crimes in Indonesia, Malaysia and Singapore

A criminal act is an act of doing or not doing something which is declared by the legislation as a prohibited act and is threatened with punishment. Criminal acts are against the law or contrary to the law. In every country there are several regulations regulated in the case of Corruption Crimes which contain applicable articles and rules. The following is a comparison table for the regulation of corruption in Indonesia, Malaysia and Singapore.

Table 1: Regulation of Corruption Crimes in Indonesia, Malaysia and Singapore

Comparison	Indonesia	Malaysia	Singapore
Constitution	<p>Comparison of the offense/deed, this can be seen from Law No. 31 of 1999 jo. UU no. 20 of 2001 concerning the Crime of Corruption, besides that there is also a Criminal Code which regulates crimes in general and Law No. 8 of 2010 concerning Money Laundering.</p> <p>Article 2 paragraph (1) stipulates that "Everyone who unlawfully commits an act of enriching himself or another person or a corporation that can harm state finances or the state economy, shall be punished with life imprisonment or imprisonment for a minimum of 4 (four) years and a maximum of 20 (twenty) years and a fine of at least Rp. 200,000,000.00 (two hundred million rupiah)</p>	<p>Comparison on the Deed of Suruhjaya Prevention of Rasuah No. 694 of 2009. Articles governing corruption are also detailed in Malaysian law under Deed 694 - Deed of Suruhanjaya Prevention of Rasuah Malaysia - SPRM 2009 sekyen 16, 17, 20, 21, 22,23</p>	<p>Comparison on the sorting of perpetrators from criminal acts of corruption, this can be seen from the regulations in Singapore, namely the existence of:</p> <p>Prevention of corruption act regarding bribery committed by the private sector and the Singapore Criminal Code regarding corruption committed by civil servants.</p>

	and a maximum of Rp. 1,000,000,000.00 (one billion rupiah)." In the event that the criminal act of corruption as referred to in paragraph (1) is committed under certain circumstances, the death penalty may be imposed .		
Institution	In Indonesia, there are 3 institutions that are authorized to handle corruption cases, namely the Prosecutor's Office, the Police and the KPK, so that there is overlap in terms of authority to deal with corruption.	In Malaysia there is 1 institution authorized to deal with corruption, namely SPRM (Suruhanjaya Rasuah Malaysia Prevention)	In Singapore there is only 1 institution authorized to deal with corruption, namely CPIB

In the regulation of criminal acts of corruption in Indonesia, Malaysia and Singapore, it is stated in accordance with the rules that apply in a particular country. In Indonesia, in the Law of the Republic of Indonesia No. 31 of 1999 in conjunction with Law No. 20 of 2001 concerning the Eradication of Criminal Acts of Corruption. In general, the regulation of criminal acts of corruption in Indonesia is regulated in Article 2 paragraph (1) which stipulates that "Anyone who unlawfully commits an act of enriching himself or another person or a corporation that can harm the state's finances or the state's economy, is sentenced to life imprisonment. life or imprisonment for a minimum of 4 (four) years and a maximum of 20 (twenty) years and a minimum fine of Rp. 200,000,000.00 (two hundred million rupiah) and a maximum of Rp. 1,000,000,000.00 (one billion rupiah).)" While paragraph (2) stipulates that "In the event that the criminal act of corruption as referred to in paragraph (1) is committed under certain circumstances, the death penalty may be imposed. Then in the explanation of Article 2 paragraph (2) of Law No. 31 of 1999 states that what is meant by "certain circumstances" in this provision as a burden for perpetrators of criminal acts of corruption if the crime is committed at a time when the country is in a state of danger in accordance with the law. the applicable law, when a national natural disaster occurs, as a repetition of a criminal act of corruption or when the country is in a state of economic and monetary crisis. The categories included in the "certain circumstances" are those crimes committed against funds designated for:

- a. handling dangerous situations,
- b. national disaster,
- c. response to widespread social unrest,
- d. overcoming the economic and monetary crisis (Nawfal, 2021) .

Indonesia also has a special institution to deal with criminal acts of corruption called the Corruption Eradication Commission or the Corruption Eradication Commission, Indonesia has very strong and firm regulations but has never implemented the death penalty for corruptors.

Malaysia

In the Suruhanjaya Deed for the Prevention of Rasuah No. 694 of 2009, criminal acts of corruption in Malaysia can be grouped into several parts, namely:

- a. A group of corruption crimes related to bribery and wages. Article 16,
- b. A group of criminal acts of corruption relating to agents, Article 17,
- c. The group of criminal acts of corruption are the perpetrators of bribery themselves. Article 18,
- d. Corruption criminal groups are involved in withdrawing bribe offers. Article 20,

e. A group of criminal acts of corruption related to the bribery of employees of foreign companies by using their power or position to bribe employees of public companies. Articles 21, 22, and 23,

f. A group of criminal acts of corruption related to the bribery of employees of foreign companies by using their power or position to bribe employees of public companies. Articles 21, 22, and 23. And now, Malaysia's Corruption or Corruption Law has been updated and is specifically regulated under the Suruhanjaya Deed of Rasuah Prevention Number 694 of 2009 and is now often known as SPRM. Several articles governing corruption are also detailed in Malaysian law under Deed 694 - Deed of Suruhanjaya Prevention of Rasuah Malaysia - SPRM 2009 sekyen 16, 17, 20, 21, 22,23. Malaysia also has a special institution called the Rasuah Prevention Agency (BPR).

Singapore

One of the countries that has succeeded in dealing with the problem of corruption well is Singapore. Corruption in Singapore under the Prevention of Corruption Act. Through consistent law enforcement, Singapore has one of the lowest corruption rates in the world. The success factor for Singapore in reducing the number of corruption crimes is through the regulation of criminal sanctions and the courage of judges in interpreting the Prevention of Corruption Act in new cases, such as sexual gratification. In Singapore, which has firmly and boldly taken action to bring this sexual gratification case to court (Ikhwan et al., 2021) . Singapore has an anti-corruption law, namely the Prevention of Corruption Act of Singapore. The law contains material criminal law and formal criminal law. The formulation of offenses is generally taken from the Criminal Code without changing the sanctions to become more severe, as is the case in Indonesia. Then, Singapore also has an institution similar to the KPK called the Corrupt Practices Investigation Bureau (CPIB). Furthermore, CPIB has the following duties:

- a. Receive complaints and investigate corrupt practices in both the public and private sectors,
- b. Conduct investigations into government officials who commit violations and malpractices,
- c. Preventing corruption by reviewing administrative practices and procedures in departments to minimize the possibility of corruption (Muhammad Iqbal, 2021) .

2. Comparison of the death penalty for perpetrators of criminal acts of corruption in Indonesia, Malaysia and Singapore

The death penalty is a sentence or verdict handed down by the court as the heaviest form of punishment imposed on a person due to his actions. There are several countries that impose the death penalty for every criminal act that applies. There are provisions that regulate special rules when imposing a death sentence. The following is a comparison of the death penalty for perpetrators of corruption in 3 (three) countries.

Table 2: Comparison of the death penalty for perpetrators of criminal acts of corruption in Indonesia, Malaysia and Singapore

Comparison	Indonesia	Malaysia	Singapore
S sanction	Criminal sanctions in Indonesia recognize the maximum specific and minimum general punishment system, therefore the Indonesian punishment is heavier, with a maximum fine of IDR 1,000,000. 000, - imprisonment for a maximum of 20 years, life imprisonment and even death penalty. And get to know the cumulative criminal punishment system.	Criminal sanctions in Malaysia in the Malaysian corruption criminal law, since 1997 Malaysia has treated the Anti-Corruption Act which imposes a hanging sentence for perpetrators of corruption. Malaysia implements the hanging penalty for perpetrators of corruption, which is supported by the government with the aim of eliminating harm.	Criminal sanctions in Singapore are in the form of imprisonment for a maximum of 7 years while the maximum fine is \$100,000. In Singapore's criminal system, there is no capital punishment and in Singapore's criminal system, the system is cumulative.

Indonesia

Since independence in 1945, Indonesia has imposed the death penalty as described in various positive laws. The Criminal Code regulates the death penalty for treason, one of which is legislation that includes the death penalty such as Law Number 20 of 2001 concerning Amendments to Law Number 31 of 1999 concerning Eradication of Criminal Acts of Corruption (Lon, 2020) . The death penalty is the most severe punishment of all types of principal crimes contained in Article 10 of the Criminal Code (Rules & Lubis, 2019) . Death penalty decisions can only be imposed on:

- a. serious crimes,
- b. does not conflict with the provisions of the crime of genocide, and
- c. decided by the competent court (Arief, 2019) .

The theory of punishment consists of several that can be used as a basis or reason by a country in imposing a criminal. The theories of punishment are:

- a. Absolute/Retributive theory: This theory explains that a punishment occurs because someone has committed a crime,
- b. Relative/Utilitarian Theory: Relative theory based on or depending on the purpose of punishment, namely for the protection of society or the prevention of crime,
- c. Combined Theory: In this theory covers the basic relationships of absolute theory and relative theory, combined into one. The legal basis of this theory lies in the crime itself, namely retaliation or torture (Sutarto, 2021) .

Malaysia

Meanwhile, Malaysia gives fines to perpetrators of corruption not less than five times the amount or value of bribes contained in the Suruhjaya Prevention of Rasuah Malaysia articles 16 to 23 (deed) 694, criminal sanctions given to corrupt actors depend on the level of corruption committed. In Malaysia's criminal law on corruption, since 1997 Malaysia has adopted the Anti-Corruption Act, which imposes hanging sentences for perpetrators of corruption. Malaysia implements the hanging penalty for perpetrators of corruption, which is supported by the government with the aim of eliminating harm. The purpose of implementing the hanging penalty is so that the perpetrators of corruption are deterrent and become a lesson for all those who have the intention of committing corruption, so he will think twice about doing it (Ami Nur Hasanah, 2020) .

Singapore

Criminal provisions regarding gratification in Singapore are regulated in Article 5 of the Prevention of Corruption Act (Chapter 241), which is as follows: Anyone who will do so alone or in conjunction with other people:

1. corruptly asks for or receives, or agrees to receive for himself, or for another; or,
2. give, promise or offer corruptly to any person whether for the benefit of that person or another person, any gratuity as an inducement or gift for, or otherwise because:
 - a. any person doing or holding back from doing anything in connection with any matter or transaction, actual or proposed; or
 - b. any member, officer or servant of a public body who does or does not do anything in connection with any matter or transaction, actual or proposed, concerning that public body, shall be guilty of an offense and shall be liable to a fine not exceeding \$100,000 or imprisonment for a term not exceeding 5 years or both. Singapore adheres to the Common Law legal system, while Indonesia is heavily influenced by the Civil Law legal system, so the criminal law system between the two countries is different (Ikhwan et al., 2021) .

Singapore has anti-corruption laws that are constantly being developed and adapted to the dynamics of the internal and external environment. The development of anti-corruption laws in Singapore is carried out with several amendments or changes deemed necessary to anticipate problems contextually. Amendments are made not to change the content, but to expand the scope of legislation in the context of effective corruption eradication. The terminology of corruption, for example, in the Singapore law (Prevention of Corruption Act) "The asking, receiving or agreeing to receive, giving, promising or offering of any gratification as an inducement or reward to a person to do or not to do any act, with corrupt intentions". So, corruption is defined as an attempt to request, receive, or agree to request, give, promise or offer gratification as an inducement or gift to people to do or not do something, with corrupt intentions (Siti Nurjanah & Hebrina Antika, 2015) .

3. Comparison of Efforts to Prevent Corruption in Indonesia, Malaysia and Singapore

Every country requires efforts to prevent corruption in order to reduce the level of losses in that country. This can be done with various efforts and regulations that exist in each country. Efforts to eradicate corruption can also be done through the role of the community and

government institutions. The following is a comparison of efforts to prevent corruption in Indonesia, Malaysia and Singapore.

Table 3: Comparison of Corruption Prevention Efforts in Indonesia, Malaysia and Singapore

Comparison	Indonesia	Malaysia	Singapore
Effort	<p>a. Law enforcement agencies, police, prosecutors, and anti-corruption agencies must work together to enforce the Corruption Law.</p> <p>b. the academic community, by providing anti-corruption training and counseling to students and the wider community.</p>	<p>a. SPRM as an anti-corruption agency that stands alone or is outside the government structure that allows SPRM to avoid conflicts that exist within the government environment. In addition, there are 5 bodies that monitor or supervise SPRM to protect the rights of Malaysian citizens, namely:</p> <p>a. Special Committee on Corruption,</p> <p>b. Advisory Council on the Prevention of Corruption,</p> <p>c. Complaints Committee,</p> <p>d. Operation Evaluation Panel</p> <p>e. Corruption Prevention and Consultation Panel.</p>	<p>The CPIB special investigator can exercise his investigative authority only with the permission of the CPIB Director, but the Public Prosecutor may also order the CPIB special investigator to open and block the bank account of a suspect or defendant.</p>

Indonesia

Criminal prosecution in eradicating corruption can be carried out by imposing a maximum penalty on the perpetrators of corruption through court decisions. Criminal sanctions for perpetrators of corruption are regulated in Articles 2 to 13 of the Law on the Eradication of Corruption Crimes. 31 of 1999 in conjunction with Articles 5-12 of Law Number 20 of 2001 amending Law Number 31 of 1999 concerning the Eradication of Criminal Acts of Corruption. Criminal sanctions that can be imposed are life imprisonment and imprisonment. Until the death penalty. Now the judge's decision to punish the corruption allegations. Court decisions must not be low and violate the community's sense of justice. Fair court decisions reflect actual criminal charges. As law enforcement agencies, the police, prosecutors, and anti-corruption agencies must work together to enforce the Corruption Law. This collaboration can involve the wider community, including the academic community, by providing anti-corruption training and counseling to students and the wider community. This means that students must be the pioneers of the nation's successor and have an anti-corruption spirit. If students receive anti-corruption counseling, students are also expected to help universities in providing anti-corruption counseling (Yanto, 2020) . Educational institutions are expected to play a role in providing anti-corruption counseling to all levels of society. Educational institutions have a very strategic position in instilling an anti-corruption mentality. By instilling an anti-corruption mentality from an early age in educational forums at both elementary, middle and high levels, the next generation of the nation in this country is required to have a firm view of various forms of corrupt practices (Zuber, 2018) . The involvement of students in the anti-corruption movement can be broadly divided into three areas. Namely, the family environment, the campus environment, and the local/national level. The home environment is believed to be the first and most important means for students to test whether the anti-corruption internalization process occurs within them. Student participation in the anti-corruption movement on campus is inseparable from the status of students as students who need to participate in the implementation of the campus vision and mission. On the other hand, student participation in anti-corruption movements at the community and local/national levels is related to the status of students as citizens with the same rights and obligations as other communities.

1. Family environment
The lesson that can be learned from this family environment is one's obedience to the rules/orders that apply. Anything that violates a rule/regulation means robbing other people's rights and harming others. Taking other people's rights is the beginning of corruption. Therefore, if students overcome this difficult time, they are expected to overcome various obstacles that lead to corruption when they enter society. At least there is a younger generation who does not want to commit acts of corruption. If there are many universities that take anti-corruption education, there will be quite a lot of young people in Indonesia as an anti-corruption base.
2. Campus Environment
The involvement of students in the anti-corruption movement in the campus environment can be divided into two: the individual students themselves and the student community. In the individual context, students are expected to be able to prevent themselves from corruption or self-corruption. From a community perspective, students are expected to be able to prevent and prevent corruption among students and student organizations on campus. So that students can play a good role in the anti-corruption movement, they must first act in an anti-corruption and non-corrupt manner at various levels. Therefore, students need to have anti-corruption values and understand anti-corruption principles. These two things can be achieved by participating in anti-corruption education outreach activities, campaigns, seminars, and lectures. The values and insights gained need to be implemented in everyday life. In other words, students must be able to prove that they are clean and not corrupt.
3. At Local and National Level
In the national context, student involvement in the anti-corruption movement aims to prevent corruption in society. Skilled students can become leaders in large-scale local and national anti-corruption movements. From organized activities on campus, students can spread anti-corruption behavior to the wider community by starting from the community around campus and moving to a wider area. Anti-corruption activities that are designed and implemented jointly and continuously by students from various universities will be able to awaken public awareness of the bad corruption that occurs in a country (Burhanudin, 2019) .

Malaysia

Meanwhile, Malaysia has SPRM as an anti-corruption institution that stands alone or is outside the government structure which allows SPRM to avoid conflicts that exist within the government environment. In addition, there are 5 bodies that monitor or supervise SPRM to protect the rights of Malaysian citizens, namely:

- a. Special Committee on Corruption,
- b. Advisory Council on the Prevention of Corruption,
- c. Complaints Committee,
- d. Operations Evaluation Panel,
- e. Corruption Prevention and Consultation Panel.

Singapore

The definition of a criminal act of corruption in the corruption legislation in Singapore (Prevention of Corruption Act / PCA), is an attempt to request, receive, or agree to request, give, promise, or offer gratification as an inducement or gift to people for doing or not doing something, with a corrupt intent. Community participation is regulated in section 28, in terms of the treatment of those who report corruption cases either by telephone or in writing. Based on section 28 PART VI MISCELLANEOUS, Prevention of Corruption Act (Chapter 241), the legal protection for those who report may include the confidentiality of witnesses, names, addresses, places of residence, family, and other legal protections. However, if in the future it is discovered that the report provided is wrong, then the PCA provides that the person will be fined \$10,000 (ten thousand Singapore Dollars) and/or a maximum prison sentence of 1 year, depending on the severity of the case alleged. CPIB is given the authority to use all authorities in eradicating corruption. CPIB is also related to the active participation of the community in eradicating corruption (Yosua & Naibaho, 2016) . In Singapore, the CPIB special investigator can exercise his investigative authority only with the permission of the CPIB Director, but the Public Prosecutor may also order the CPIB special investigator to open and block the bank account of a suspect or defendant. Implementing policies to eradicate corruption, Singapore applies the steps outlined by Klitgaard, namely:

- a. changing the reward and punishment system, by giving letters of praise and promotions to outstanding state employees, while in terms of punishment applied, namely the provision of administrative sanctions related to the future and career of an employee,
- b. Information gathering is the second step implemented by Singapore in dealing with its anti-corruption policy by collecting as complete and accurate information as possible about the

amount of wealth owned by a Singaporean citizen. The information collected is then used as material to summon the residents concerned so that they can provide clarification regarding the wealth information.

- c. restructuring the patron-client relationship between employees and superiors. Restructuring the relationship between superiors and subordinates is carried out by rotating employees or superiors in a division to other divisions on a regular basis, so that the working relationship that will be created tends to always be renewed with a new and more conducive working relationship, this minimizes the opportunity for corrupt practices.
- d. Reducing and eradicating corrupt practices is to change people's attitudes about corrupt practices. This is done by giving and issuing moral messages to government institutions/agencies, companies, organizations, and the general public regarding appeals against the dangers of corruption. Singapore, as a small country with an economy that is not yet conducive, has initially made concrete efforts to eradicate corruption as a solution to create a developed and established Singapore as it is today.

Singapore's success is largely determined by the seriousness of the government and Singaporean citizens to eradicate corruption through efforts to disclose information about the number of assets that can be widely accessed by the general public, especially CPIB (Sri Lestari & Lecturer of Sociology, 2017)

CONCLUSION

Corruption is a common crime and has a major impact on the country. Indonesia and Malaysia have different types of anti-corruption policies and regulations. The two countries are almost the same in determining corruption crimes and punishments for convicted corruption. Even under normal circumstances, no corruption case was sentenced to death. Taken from the words the death penalty for corruption criminals who are sentenced to death for certain reasons. This is regulated in Article 2 paragraph (2) of Law No. 31 of 1999 in conjunction with Article 1 paragraph 1 of Law No. 20 of 2001. Enforcement and implementation conditions are very difficult. This article explains that perpetrators of criminal acts of corruption can be sentenced to death in "certain circumstances". UU no. 31 of 1999 in conjunction with Law no. 20 of 2001 imprisonment in Indonesia for a minimum of 1 year, a maximum of 20 years, and a minimum fine of Rp. 50,000,000.00, the highest is Rp. 1,000,000,000.00 and Indonesia also applies additional sanctions. The form of revocation of rights and the confiscation of certain goods. Efforts to eradicate corruption can also be carried out by the community and the government. The role of the community can be represented by the academic community, namely the role of students in anti-corruption counseling events.

Under Malaysian law, it is sentenced to up to 20 years in prison under the Rasuah Prevention Act No. 694 of 2009. A person convicted of corruption in Malaysia can be fined at least five times more than bribery or corruption. Since 1997, Malaysia has implemented the Anti-Corruption Act, which imposes a hanging sentence for perpetrators of corruption. Malaysia implements the hanging penalty for perpetrators of corruption, which is supported by the government with the aim of eliminating harm.

Singapore is one of the countries with the lowest corruption rates in the world. Singapore has an anti-corruption law, namely the Prevention of Corruption Act of Singapore. Article 5 of the Prevention of Corruption Act (Chapter 241) regulates the criminal provisions regarding gratification in Singapore, namely that any member, official or servant of a public body who does or does not do anything in connection with any matter or transaction, actual or proposed, relating to such a public body, shall be guilty of an offense and shall be liable to a fine not exceeding \$100,000 or imprisonment for a term not exceeding 5 years or both. In an effort to prevent corruption, public participation is regulated in section 28, in terms of the treatment of those who report corruption cases, either by telephone or in writing. Based on section 28 PART VI MISCELLANEOUS, Prevention of Corruption Act (Chapter 241), the legal protection for those who report may include the confidentiality of witnesses, names, addresses, places of residence, family, and other legal protections. However, if in the future it is discovered that the report provided is wrong, then the PCA provides that the person will be fined \$10,000 (ten thousand Singapore Dollars) and/or a maximum prison sentence of 1 year, depending on the severity of the case alleged.

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