



Role and Function of Financial Services Authority and Bank Indonesia in Banking Crime

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Abstract

The purpose of this study is to analyze: 1) What is the Role and Function of the Financial Services Authority in Banking Crime? 2) What is the Role and Function of Bank Indonesia in Banking Crime?. The research method used is normative juridical with a statutory approach, concept approach, and case studies.

The results show that Overall, the Financial Services Authority (OJK) and Bank Indonesia (BI) play complementary roles in maintaining the integrity and stability of the banking sector in Indonesia. OJK focuses on microprudential supervision and law enforcement, while BI focuses on macroprudential stability and payment system regulation. Collaboration between these two institutions is essential to create a safe and reliable banking environment, as well as to protect the interests of customers and the wider community from the risk of banking crime.

Keywords

Role, Function, Financial Services Authority, Bank Indonesia, Banking

1. Introduction

1.1 Background

The financial system has a crucial role in life. The meaning of the financial system is the economic order contained in a country as a guideline for financial services activities pioneered by financial institutions with the fundamental task of distributing funds [1]. Fund disbursement activities are carried out by parties who have a surplus on finances to other parties with financial deficit conditions [2]. Referring to this situation, an economy is required to have a stable financial system, especially in the flow of funds in order to create economic growth that can improve living standards. The instability of the financial system allows for an economic crisis, so it is necessary to have financial institutions as financial intermediaries while running the financial system. Therefore, the existence of financial institutions is needed as a financial intermediary institution and runs the financial system.

The presence of a bank is closely related to developments in the field of trade. The life of the modern world today is inseparable and often even depends on banking activities and services. The provisions of Article 34 of Law of the Republic of Indonesia Number 23 of 1999 concerning Bank Indonesia as amended by Law Number 3 of 2004 concerning Bank Indonesia and amended by Law Number 6 of 2009 mandated the establishment of a supervisory institution in the financial services sector covering banking, insurance, pension funds, securities, venture capital, and finance companies as well as bodies that organize public funds.

This policy was taken in view of the many problems in the banking sector that occurred in the crisis which affected 21 (twenty-one) national private banks whose crisis was liquidated by Bank Indonesia, which found various irregularities so that many questioned Bank Indonesia's supervision. Likewise, there was a surprising event that Bank Century was determined by Bank Indonesia as a failed bank with systemic impact. The number of problems in the financial services sector in the banking sector that can disrupt financial system stability has further encouraged the establishment of an integrated supervisory institution in the financial services sector. Since December 31, 2012 the

enactment of Law Number 21 of 2011 concerning the Financial Services Authority (hereinafter referred to as the Financial Services Authority Law), shows that Indonesia will shift in implementing a supervisory model on its financial industry. The functions, duties and authorities of regulating and supervising financial services activities in the Banking sector shifted from Bank Indonesia to the Financial Services Authority. Every official always makes policies in various fields. Policy is given a different meaning by Harold D. Lasswell and Abraham Keplan who define policy as "a projected program of goals, values and practices". Policy is defined as a series of actions that are determined and implemented or not implemented by the government that have a specific goal or are oriented towards a certain goal for the benefit of the entire community [3].

This is important so that the authorities as decision makers do not get caught up in policies that are momentary, so they cannot last for the long term. Bank Indonesia policy mandating the establishment of a supervisory institution in the financial services sector is expected to improve the framework of a more resilient financial system [4].

With the promulgation of the Financial Services Authority Law, a unification of regulation and supervision of the financial services sector will be established, where previously the regulatory and supervisory authority was exercised by the Ministry of Finance, Bank Indonesia, and the Capital Market Supervisory Agency and financial institutions. In the Financial Services Authority Law, it is regulated in sufficient detail the provisions that regulate the transition so that the transfer of regulatory and supervisory duties and functions runs well.

Restructuring the organizational structure of institutions that regulate and supervise the financial sector is important in order to manifest a sound and secure financial system. The intended arrangement aims to obtain an effective and coordinated financial mechanism to minimize problems that arise in the financial system. In addition, an effective supervision system is also needed to support the role of regulation. The supervision or monitoring is not only analyzing something and then reporting the results of supervision, but also includes aspects of improvement in order to achieve the goals as contained in the plan. Therefore, a goal to be achieved must be clearly stated through effective mechanisms so that the supervision carried out can run optimally [5].

The increasingly complex condition of the global financial system makes the existence of institutions with the authority to regulate and supervise the financial system more crucial. Based on these conditions, the Financial Services Authority (OJK) was formed which has the function to regulate and supervise financial institutions based on the principles of good governance, which includes accountability, transparency, independence, accountability, and fairness. The existence of OJK makes the entire financial services industry, both bank and non-bank, have one supervision under one roof. The existence of an integrated supervision system in such a way can also facilitate the exchange of information between existing financial institutions [6].

OJK as an independent institution has different authorities from Bank Indonesia, including the authority to carry out investigations. Not only that, OJK also attaches the authority to collect operational costs from financial institutions under its supervision. As of January 1, 2013, OJK started its supervision duties on non-bank financial institutions, while supervision of bank financial institutions began to be carried out since January 1, 2014. The operating budget was allocated from the state budget in 2013, while starting in 2014 the operating budget was obtained from financial institutions under its supervision. This attracts attention, because OJK with its independent nature must collect operational costs from the financial institutions it supervises, whereas previously the supervision carried out by Bank Indonesia did not collect fees from financial institutions in its supervision and did not come from the State Budget [7].

The three pillars of Bank Indonesia as the current Central Bank of the Republic of Indonesia are: 1) Establishing and implementing Monetary Policy; 2) Regulate and maintain a smooth payment system; 3) Regulate and supervise banks. Since eight years ago there has been a discourse that the third pillar carried by BI will be separated to other institutions, but there are differences of opinion between BI and the Government and the complexity of the bureaucratic system so that only a while ago the DPR authorized the establishment of the Financial Services Authority (OJK) which will take over the authority of banking supervision. The establishment of the Financial Services Authority further complements the banking supervision function which will be integrated with the supervision of capital markets and financial institutions currently in the Capital Market and Financial Institutions Supervision Agency.

1.2 Problem Statement

1. What is the Role and Function of the Financial Services Authority in Banking Crime?
2. What is the Role and Function of Bank Indonesia in Banking Crime?

2. Theoretical Framework

2.1 Good Governance Theory

Governance is defined as mechanisms, practices and procedures of governance and citizens managing resources and solving public problems. In the concept of *governance*, the government is only one actor and not always a decisive actor. The implications of the government's role as a development and service provider and infrastructure will shift to become a driving force for the creation of an environment that is able to facilitate other parties in the community. *Governance* demands a redefinition of the role of the state, and that means a redefinition of the role of citizens. There are greater demands on citizens, among others, to monitor the accountability of the government itself [8].

2.2 Hierarchy Theory of Legal Norms

According to Hans Kelsen, legal norms are rules, patterns or standards that need to be followed. Then it is further explained that the functions of legal norms, are [9]: Rule, Forbid, Control, Allow and Store. In specializing in discussion or discussion of legal methods or norms, it is necessary to understand in more depth the theory "*stufenbau*" of Hans Kelsen. According to Hans Kelsen, the legal method of a country is a hierarchical system of legal methods in a very simple form [10].

2.3 Financial Supervision Theory

Financial supervision is a systematic process for monitoring, regulating, and enforcing rules in the financial sector. The main objectives of financial supervision are to ensure financial system stability, protect consumers, and prevent and detect illegal or unethical activities within financial institutions [11].

Main components of Financial Supervision theory:

- **Regulation:** The creation of rules and standards that must be complied with by financial institutions. This regulation covers various aspects, such as minimum capital, financial reporting, and consumer protection.
- **Supervision:** Ongoing supervision of financial institutions to ensure regulatory compliance. This includes regular inspections, audits, and risk assessments.
- **Enforcement:** Actions taken to enforce regulations and crack down on violations. Law enforcement can take the form of administrative sanctions, fines, or other legal action.

2.4 Regulatory and Compliance Theory

Regulatory Theory Are rules, laws, and guidelines issued by government or supervisory authorities to regulate the behavior of individuals, organizations, and institutions within a particular sector. Regulation aims to create order, protect the public interest, and prevent harmful practices.

Regulation Theory Explains the reasons, methods, and effects of the application of regulation in a sector. This theory encompasses a variety of perspectives on how regulation can help address existing problems in society and the economy.

Regulations are made to protect the public interest and the wider community. The main goal is to maximize social welfare. Regulation is often influenced by special interest groups seeking to profit through lobbying and political influence. Regulation may reflect the interests of a particular group rather than the public interest.

Compliance Theory Is the process and action taken by individuals or organizations to comply with applicable laws, regulations, standards, and ethics.

Compliance Theory Describes the factors that influence the extent to which an individual or organization complies with existing rules. This theory includes approaches to understanding motivations and obstacles to achieving compliance.

The theory of compliance is influenced by the threat of sanctions or punishments. The more severe the sanctions and the higher the likelihood of enforcement, the more likely the individual or organization is to comply. Compliance is influenced by social norms and internalization of ethical values. Obedience is not just about avoiding punishment, but also about doing what is considered morally and socially right [12].

3. Research Methodology

The approach method used in this study is the *normative juridical* method, Soerjono Soekanto explained that normative legal research is legal research carried out by examining library materials or secondary data. Legal research is research or process to find legal rules, legal principles and legal doctrines to answer the legal issues faced.

This normative juridical *approach method* focuses on the approach of norms or *juridical* rules such as laws and regulations and also implementing regulations. In this approach, secondary data are more often used in the form of regulations, scholarly opinions or theories within the scope of labor law. In this approach, various regulations related to employment, employment agreements, and wages will be used to review and analyze research results [13].

This data collection method is *with library research* or commonly called literature study, this method is carried out to obtain secondary data both in the form of primary legal material and secondary legal material. After being inventoried, a review is carried out to make the essence of each regulation concerned. Data is collected by studying literature sources in the form of literature books, laws and regulations, and collecting existing data in the form of data that is directly related to the research conducted [14].

4. Research Results

4.1 The Role and Function of the Financial Services Authority in Banking Crime

Based on Law Number 21 of 2011 concerning the Financial Services Authority, it is stated that OJK is an integrated and independent institution that has functions, duties, and authorities in regulating the regulatory system to supervise financial services activities. OJK is an institution that is not part of government power, and is run by applying the principles of good governance, which include accountability, transparency, independence, accountability, and fairness. The purpose of the establishment of OJK is to meet and protect the needs and interests of the community, realize a stable and sustainable

financial system, and the implementation of an orderly, fair, accountable and transparent financial system. Therefore, OJK has an important role in maintaining competitiveness and improving the economy in Indonesia. Meanwhile, OJK is an institution that carries out the task of regulating and supervising the activities of [15]:

1. Financial services activities in the Banking sector
2. Financial services activities in the Capital Market sector
3. Financial services activities in the Insurance sector, Pension Funds, Financing Institutions, and Other Financial Service Institutions.

To carry out regulatory and supervisory duties, OJK has the authority [16]:

4.1.1 Supervision and Regulation of Bank Financial Institutions

- a. Bank establishment license, bank branch opening, articles of association, work plan, ownership, human resource management, merger, consolidation of bank acquisitions, and revocation of business licenses
- b. Banking activities, including sources of financing, provision of funds, and bank activities in the service sector
- c. Bank health regulation and supervision includes: liquidity, profitability, solvency, asset quality, minimum solvency ratio, maximum credit limit, loan-to-deposit ratio and bank reserves; bank statements relating to bank health and performance; debtor information system; credit testing; and bank accounting standards
- d. Regulation and supervision related to prudential aspects of banks, including: risk management; bank management; the principle of knowing the customer; and prevention of money laundering, terrorism financing and other bank crimes.

4.1.2 Regulations of Financial Service Institutions (Banks and Non-Banks) Include

- a. Establish OJK regulations and decisions
- b. Establish regulations on staffing in the financial services sector
- c. Compile and determine the implementation of OJK duties
- d. Prepare and establish procedures for managing procedures at financial service institutions
- e. establish organizational structures and participate in supervising financial institutions

4.1.3 Supervision of Financial Institutions (Banks and Non-Banks), Including

- a. Establish policies for operational supervision of financial institutions
- b. Supervise the implementation, consumer protection, duties of executive managers and other actions against financial institutions
- c. Provide written instructions to financial institutions and/or specific parties
- d. Appoint and appoint statute managers
- e. Provide administrative sanctions against parties who violate regulations in the financial sector
- f. Granting and/or withdrawing business licenses, personal licenses, registered registration letters, approvals to conduct business activities, ratification, approval or determination of dissolution and other provisions.

However, in general, not entirely the regulatory and supervisory functions are given to OJK, but OJK still cooperates with Bank Indonesia (BI) which has their respective responsibilities and authorities that are mutually coordinated and integrated. OJK has the function and authority of regulation and supervision within the scope of microprudential, namely supervision that encourages individual financial institutions to remain healthy and able to maintain public importance, such as institutional regulation and supervision, health, prudential aspects, and financial institution audits. Meanwhile, BI has the function and authority of regulation and supervision within the scope of microprudential, namely supervision in order to encourage financial institutions to support economic growth and maintain monetary stability [17].

The Financial Services Authority (OJK) is an institution needed to regulate and supervise potential violations or moral hazards that occur in the financial system in Indonesia. The practice of violations or misappropriation in the financial system is something that can happen both intentionally and unintentionally and can also occur not only carried out by financial institutions, but does not rule out the possibility of moral hazard is carried out by individuals. This happened as a result of the weak supervision system on financial institutions [18]. The weak supervision system can be caused by the egocentric nature of each supervisor of financial institutions and the lack of information exchange between supervisory institutions [19]. In this regard, the Financial Services Authority (OJK) institution is expected to be able to take a role in overcoming problems in the financial system in Indonesia.

OJK has given authority to OJK investigators to carry out their duties as investigators in the field of financial services related to criminal acts that have been described in the OJK Law. In carrying out the investigative authority referred to here are National Police investigators and Civil Servant Investigators (PPNS) who work at OJK. To carry out tasks with the existence of the OJK Law, it has provided a basis and legal certainty for OJK related to this matter. Carry out regulatory and supervisory duties in Article 6 of the OJK Law [20]:

- a. Activities on financial services in the banking sector
- b. Activities in financial services in the capital market sector
- c. Activities in financial services in the insurance sector, pension funds, financing institutions, and other financial service institutions.

In order to exercise authority related to financial services activities in the banking sector related to regulating and supervising as referred to in the provisions of letter (a), the following authorities are owned by OJK [21]:

A. Regulation and supervision regarding bank institutions consisting of:

1. Licensing for bank establishment, articles of association, consolidation, ownership, mergers, and acquisitions of banks, management and human resources, work plans, opening bank offices, and revocation of bank business licenses; and
2. The bank's business activities, including activities in the field of services, hybridized products, provision of funds, and sources of funds.

B. Regulate and supervise related to bank health consisting of:

1. Liquidity, asset quality, profitability, solvency, maximum lending limits, loan-to-deposit ratio, minimum capital adequacy, and bank reserves;
2. Bank reporting related to bank performance and health;
3. Debtor information system;
4. Credit Testing
5. Bank accounting standards;

C. Regulation and supervision regarding prudential aspects of banks, including:

1. Risk management;
2. Bank governance;
3. Know your customer and anti-money laundering principles; and
4. Prevention of terrorism financing and banking crime; and d. Bank checks. In addition to the OJK Law, OJK regulation Number 22/POJK.01/2015 concerning criminal acts in the financial services sector concerning investigations in Article 2 paragraph (1) also explains that OJK is authorized to carry out criminal investigations in the financial services sector. Article 2 paragraph (2) as referred to in paragraph (1) who conducts is an OJK investigator who states that this is the authority of the OJK. Supervision mentioned in Article 9 letter c of the OJK Law is one of OJK's duties such as investigative actions which read: "To carry out supervisory duties as referred to in Article 6, OJK has the authority to supervise, inspect, investigate, protect consumers, and other actions against Financial Service Institutions, actors, and/or support financial service activities as referred to in laws and regulations in the financial services sector." Article 49 paragraph (1) of the OJK Law is authorized to conduct investigations following the explanation: "In addition to the Investigating Officer of the National Police of the Republic of Indonesia, certain Civil Servant Officials whose scope of duties and responsibilities include supervision of the financial services sector within the OJK, are given special authority as investigators as referred to in the Code of Criminal Procedure" [22].

Regarding the authority by OJK that has been conveyed by the OJK, that OJK in the financial industry can carry out its duties as an investigator of criminal acts in the financial sector as stated in the Financial Services Authority regulation Number 22 / POJK.01 / 2015 not only supervise and provide licensing, but can also be an observer of the financial industry. In its authority, the results of the investigation can be directly handed over to the prosecutor for prosecution and subsequent legal proceedings. Without having to wait for reports and or complaints from OJK supervisors from the public. An investigation is carried out, of course, if it has gone through an in-depth discussion from the legal side as well as the process of supervision and investigation. In fact, the authority possessed by OJK is the power given directly to PPNS OJK. In the mechanism of the law enforcement stage or the criminal justice system is the first stage of investigation. The success or failure of a criminal law enforcement process is very decisive then has a very important and strategic position and role at the investigation stage.

Referring to the provisions contained in Law Number 21 of 2011 concerning the Financial Services Authority, OJK is an institution with an independent nature with functions, duties, and authorities to regulate and supervise financial institutions in Indonesia. OJK as an institution that is free from government intervention is based on the principles of good governance, which include accountability, transparency, independence, accountability, and fairness.

Some of the objectives of the establishment of OJK in Indonesia, among others, are to protect the interests of the public, manifest a stable and sustainable financial system, and organize an orderly, fair, accountable, and transparent financial system. Based on the purpose of its formation, it can be seen that OJK has a crucial role in improving the economy in Indonesia.

OJK is an institution that carries out regulatory and supervisory duties on financial services activities in the banking sector, capital market, and non-bank financial institutions which include insurance, pension funds, financing institutions, and other financial service institutions. The role and function of OJK can be seen based on OJK's authority which consists of regulation and supervision of financial institutions, both banks and non-banks [16]. As for its function as a banking supervisor and regulator, OJK is authorized to grant permits for the establishment of a bank, permission to open a bank branch, supervision of the articles of association, work plans, human resource management, to the revocation of business licenses. In addition, OJK is also authorized to regulate and supervise all types of activities contained in

banking which include sources of financing, provision of funds, and bank activities in the service sector. OJK is also authorized to regulate and supervise related to the health and prudence aspects of banks.

Then, in its function in regulating non-bank financial institutions, OJK is authorized to determine OJK regulations and decisions, carry out stipulations on regulations on supervision in the financial services sector, compile and determine the implementation of OJK duties, carry out the preparation and determination of procedures related to management procedures in financial service institutions, and determine organizational structures and participate in supervising financial institutions

5. Role and Function of Bank Indonesia in Banking Crime

The establishment of new institutions in the field of supervision will certainly have an impact on BI and OJK, it is estimated that both institutions will face various obstacles that can affect their effectiveness. BI has the ability to formulate and implement policies to mitigate risks that may lead to financial market instability and effective resources to manage crises that may arise.

In carrying out the task of regulating and supervising banks, in accordance with the provisions of Article 24 of Law No. 23 of 1999 concerning Bank Indonesia as amended by Law No. 3 of 2004, it is authorized to establish regulations, grant and revoke licenses for certain institutions and business activities of banks, carry out bank supervision, and impose sanctions on banks in accordance with statutory provisions. Referring to these provisions, it is very clear that BI has the full authority, responsibility, and obligation to conduct guidance and supervision of banks by taking preventive and repressive measures [23].

In terms of bank supervision and regulation, Bank Indonesia is not only guided by Law No. 23 of 1999 concerning BI as amended by Law No. 3 of 2004, but also refers to Law No. 7 of 1992 concerning Banking and its amendment laws, namely Law No. 10 of 1998.

Supervision carried out by BI on banks can be in the form of direct supervision, which is in the form of examinations followed by corrective actions, it can also be in the form of indirect supervision, which is a form of early supervision through analytical research, and evaluation of bank statements. In the framework of its supervision, BI can conduct periodic checks at least once a year for each bank. In addition, incidental examinations can be carried out at any time if necessary to confirm the results of indirect supervision and if there are indications of irregularities.

In its development, the task of bank supervision will then be handed over by BI to an independent financial services sector supervisory institution (OJK), but there is still a relationship with BI as the Central Bank. This supervisory board in carrying out its duties and positions is outside the government and is obliged to submit reports to the Audit Board and the House of Representatives. The handover of this supervisory task awaits the establishment of the institution, which will be implemented by December 31, 2010 at the latest [24].

Banking supervision will be the authority of OJK. BI as the Central Bank even though the supervisory institution has been established, its role cannot be ruled out in bank supervision because the institution (OJK) must still have a good coordination relationship with BI, including regarding information and existing macro banking data.

After the OJK is formed, BI will focus on the authority in terms of monetary policy, namely policies to achieve and maintain rupiah stability which is carried out, among others, through controlling the money supply and/or interest rates.

As mentioned earlier, in carrying out its duties, OJK coordinates and cooperates with BI as the Central Bank which will be regulated in the OJK establishment law. This OJK can later issue provisions relating to the implementation of the Bank's supervisory duties in coordination with BI and request an explanation from BI of the necessary macro information and data (explanation of Article 34 of Law Number 3 of 2004)[25].

OJK's duties and authorities in terms of banking supervision are only related to micro-prudential aspects such as institutions, business activities, and health level assessment. Meanwhile, macroprudential aspects related to monetary and payment system policy such as provisions on reserve requirements, foreign exchange regulations, open market operations (OPT) and reports and examinations related to the implementation of tasks in the monetary and payment system sector are the authority of the BI monetary authority [26].

During the transition period, which is when OJK prepares its internal organization, structure, and infrastructure, duties, functions, and authority for bank guidance and supervision are delegated to the old supervisory and supervisory authority, namely BI, delegation of the implementation of duties and authorities is intended to be carried out no later than two years from the approval and ratification of the OJK Bill by the House of Representatives and the President. This is in accordance with the explanation of Article 34 paragraph (2) of Law Number 3 of 2004 which states that "The transfer of bank supervision functions from BI to financial services sector supervisory institutions is carried out gradually after the fulfillment of requirements including infrastructure, budget, personnel, organizational structure, information systems, documentation systems, and various implementing regulations in the form of legal instruments and reported to the DPR" [27].

Regardless of what institution will oversee the banking industry, there is definitely no universal model. It is entirely up to political decisions and of course those political decisions are beyond the power of the central bank. However, some of the factors below can be an afterthought in preparing an effective institutional structure of the supervisory body. First, the body must be reputable. Second, the central bank still needs access to bank supervision information in order to be able to carry out its duties in the monetary field and lender of last resort. Paul Volker, former

chairman of the Federal Reserve Bank, said that neither monetary nor financial policy can be done properly if the central bank loses its role in overseeing the activities of the banking sector. Third, the division of duties between the central bank, OJK and the government must be firm and transparent. Finally, there should be a formal form of cooperation that regulates coordination issues and preferably that form of cooperation should be regulated in law.

6. Conclusion

Research results articles of the Financial Services Authority (OJK) and Bank Indonesia (BI) have a very important role and function in handling banking crimes in Indonesia. Here is the conclusion of the roles and functions of each institution;

A. Financial Services Authority (OJK)

1. Supervision and Regulation: OJK is tasked with supervising and regulating all activities in the financial services sector, including banking. OJK sets rules and standards that must be complied with by financial institutions to prevent and detect banking crimes.
2. Fraud Prevention: OJK plays a role in efforts to prevent fraud and unhealthy practices in the banking sector by implementing strict supervision mechanisms and conducting routine inspections.
3. Law Enforcement: OJK has the authority to conduct investigations into suspected banking crimes and can cooperate with other law enforcement such as the police and prosecutors to crack down on perpetrators of banking crimes.
4. Financial Education and Literacy: OJK is also responsible for improving people's financial literacy, which is expected to reduce the potential for banking crime through increasing awareness and understanding of financial products and services.

B. Bank Indonesia (BI)

1. Monetary Policy and Financial System Stability: BI is responsible for maintaining financial system stability through effective monetary policy, which indirectly contributes to the prevention of banking crime.
2. Payment System Regulation and Supervision: BI regulates and supervises the payment system in Indonesia to ensure that financial transactions are conducted safely and efficiently, thereby reducing the risk of banking crimes such as money laundering and terrorism financing.
3. International Cooperation: Bank Indonesia cooperates with international financial authorities to address transnational banking crimes, including information exchange and policy coordination.
4. Research and Development: BI conducts research and development to monitor trends and risks in the banking sector, as well as provide policy recommendations that can help prevent banking crime.

Overall, OJK and BI play complementary roles in maintaining the integrity and stability of the banking sector in Indonesia. OJK focuses on microprudential supervision and law enforcement, while BI focuses on macroprudential stability and payment system regulation. Collaboration between these two institutions is essential to create a safe and reliable banking environment, as well as to protect the interests of customers and the wider community from the risk of banking crime.

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