

Combating Money Politics: Analysis of Electoral Law Enforcement Systems in South Korea, Singapore, and Indonesia

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Abstract

This article examines the comparative legal frameworks governing money politics as an electoral crime in South Korea, Singapore, and Indonesia. Through systematic comparative analysis, this study evaluates the regulatory structures, enforcement mechanisms, and institutional arrangements that define each country's approach to combating electoral corruption. South Korea's Public Official Election Act and anti-corruption amendments, including the Kim Young-ran Act, establish stringent legal boundaries with severe sanctions for electoral bribery and vote buying, supported by coordinated institutional enforcement involving police, prosecutors, and anti-corruption commissions. Singapore's Parliamentary Elections Act, reinforced by the Prevention of Corruption Act, demonstrates operational effectiveness through centralized anti-corruption agency, transparent investigation procedures, and clearly articulated criminal sanctions. In contrast, Indonesia's electoral law enforcement remains fragmented across multiple institutions with limited deterrent capacity, reflecting predominantly formalistic and procedural approaches without comprehensive political and administrative accountability mechanisms. The fundamental differences lie not only in punishment structures but also in legal philosophy: South Korea conceptualizes money politics as a crime against popular sovereignty, Singapore integrates it within general anti-corruption framework as violation of public integrity, while Indonesia maintains narrow procedural interpretation. This study identifies critical gaps in Indonesian electoral governance and proposes reform strategies including strengthening constitutional independence of electoral bodies, adopting technology-based campaign finance monitoring, implementing multi-level sanctions, formalizing inter-agency coordination protocols, and developing anti-corruption legal culture through political education.

Keywords: *Electoral; Politics; Crime; South Korea; Indonesia; Singapore*

Introduction

Money politics represents one of the most persistent threats to democratic integrity in electoral systems worldwide. The practice of vote buying, electoral bribery, and illicit campaign financing undermines the foundational principle of democratic representation by substituting financial inducement for genuine political choice. As electoral democracies continue to evolve across Asia, the challenge of combating money politics has emerged as a critical determinant of democratic quality and governmental legitimacy.¹ This article undertakes a rigorous comparative legal analysis of three distinct regulatory regimes governing money politics in South Korea, Singapore, and Indonesia. These jurisdictions represent divergent approaches to electoral governance and anti-corruption enforcement, offering valuable insights into the relationship between legal frameworks, institutional capacity, and democratic outcomes. South Korea and Singapore have achieved notable success in establishing firm enforcement regimes through sophisticated institutional structures and demonstrated commitment to addressing electoral corruption.² Indonesia, despite recent reforms, continues to grapple with systemic challenges in electoral law enforcement. The comparative methodology employed in this study enables a nuanced understanding of the strengths and limitations of transnational regulatory frameworks.³ By examining the substantive legal provisions, institutional arrangements, and enforcement mechanisms of South Korea and Singapore, this analysis identifies best practices, potential pitfalls, and reform strategies that could enhance regulatory capacity within Indonesia's electoral governance framework. The study focuses particularly on enforcement mechanisms that may address current gaps in Indonesian electoral law, including the criminalization of money politics, coordination among law enforcement agencies, and the integration of technological monitoring systems. The significance of this comparative analysis extends beyond academic inquiry to practical policy implications. As Indonesia prepares for successive electoral cycles, understanding the institutional and legal innovations pioneered by regional neighbors provides valuable guidance for strengthening democratic accountability and reducing the corrosive influence of money politics on electoral outcomes.

Problem Statement

Despite constitutional guarantees of free and fair elections, Indonesia continues to experience persistent problems with money politics across national, provincial, and local electoral contests. The practice of vote buying has become normalized within Indonesia's electoral culture, with candidates and their supporters routinely distributing cash, goods, or other material benefits to voters in exchange for electoral support. This phenomenon reflects deeper systemic weaknesses in Indonesia's electoral law enforcement regime. The current legal framework governing electoral crimes in Indonesia, primarily embodied in Law No. 7 of 2017 on General Elections, provides only limited and inconsistently applied sanctions for money politics. The regulatory structure is fragmented across multiple

¹ Yeh, Jiunn-rong, and Wen-Chen Chang. "Changing Dynamics of Constitutional Progress and Regression in Asia: Interplay of Electoral, Civic, and Judicial Constitutionalism". *Const. Stud.* 11 (2025): 53. https://heinonline.org/hol/cgi-bin/get_pdf.cgi?handle=hein.journals/constudi11§ion=8.

² Chng, Kenny. "Falsehoods, Foreign Interference, and Compelled Speech in Singapore". *Asian Journal of Comparative Law* 18, no. 2 (2023): 235-252. <https://www.cambridge.org/core/journals/asian-journal-of-comparative-law/article/falsehoods-foreign-interference-and-compelled-speech-in-singapore/55D1F297B03B6E2545D557EB4EBD6E9B>.

³ Lukito, Ratno. "Compare But Not to Compare: Kajian Perbandingan Hukum di Indonesia". *Undang: Jurnal Hukum* 5, no. 2 (2022): 257-291. <https://www.ujh.unja.ac.id/index.php/home/article/view/727>.

institutions including the General Elections Commission (KPU), the Election Supervisory Agency (Bawaslu), and the Integrated Law Enforcement Center (Gakkumdu), resulting in overlapping jurisdictions, procedural inconsistencies, and enforcement gaps. Money politics is narrowly defined in Indonesian law as the direct distribution of money or goods to voters, failing to address the broader spectrum of illegal campaign financing, corporate involvement, and intermediary networks that facilitate electoral corruption.⁴

Furthermore, Indonesia's predominantly formalistic and procedural approach to electoral law enforcement lacks the substantive political and administrative accountability mechanisms that characterize more effective anti-corruption regimes. Sanctions remain limited to imprisonment and fines, without automatic disqualification provisions or mandate revocation procedures that would create meaningful deterrence. The absence of coordinated institutional enforcement and real-time monitoring systems allows money politics to persist as a cyclical feature of Indonesian electoral competition. In contrast, South Korea⁵ and Singapore⁶ have developed comprehensive legal frameworks that conceptualize money politics not merely as procedural electoral violations but as fundamental threats to democratic sovereignty and public integrity. These jurisdictions demonstrate that effective anti-corruption enforcement requires integration of criminal sanctions, political finance transparency, and cultivation of ethical governance norms. This study therefore addresses the following research questions: What are the key structural and philosophical differences among the electoral law enforcement systems of South Korea, Singapore, and Indonesia? What specific institutional mechanisms and legal innovations account for the comparative effectiveness of South Korean and Singaporean anti-corruption regimes? How can Indonesia adapt these international best practices within its specific sociopolitical context to enhance electoral integrity and reduce money politics?

Methods

This study employs comparative legal methodology⁷ to analyze the regulation of money politics across three jurisdictions: South Korea, Singapore, and Indonesia. Comparative legal methodology is a research approach designed to identify similarities and differences among legal systems with respect to regulatory substance, institutional structure, and enforcement mechanisms.⁸ The comparative analysis proceeds through several systematic stages, beginning with formulation of research objectives and scope, followed by selection of relevant jurisdictions based on criteria including electoral system similarity and comparable challenges in addressing money politics practices. The selection of South Korea and Singapore as comparative models is justified by their demonstrated success in establishing firm enforcement regimes, sophisticated institutional structures,

⁴ Rahmatullah, R., et al. "Preventing Money Politics in Indonesia's Regional Elections". *Legality: Jurnal Ilmiah Hukum* 33, no. 1 (2025): 110-131. <https://ejournal.umm.ac.id/index.php/legality/article/view/37429>.

⁵ Satriawan, Iwan, Seokmin Lee, Septi Nur Wijayanti, and Beni Hidayat. "An Evaluation of the Selection Mechanism of Constitutional Judges in Indonesia and South Korea". *PADJADJARAN Jurnal Ilmu Hukum (Journal of Law)* 10, no. 1 (2023): 122-147. <https://jurnal.unpad.ac.id/pjih/article/view/45076>.

⁶ Tan, Netina. "Manipulating Electoral Laws in Singapore". *Electoral Studies* 32, no. 4 (2013): 632-643. <https://www.sciencedirect.com/science/article/pii/S0261379413001145>.

⁷ Mohd Zahir, Mohd Zamre, T. N. A. T. Zainudin, R. Rajamanickam, and Z. A. Rahman. "Arahan Do Not Resuscitate (DNR) dalam Sektor Kesihatan dari Perspektif Undang-Undang (Do Not Resuscitate (DNR) Order in Health Sector from the Legal Perspective)." *Akademika* 89 (2019a): 143-54. <http://journalarticle.ukm.my/19445/1/33447-106449-1-PB.pdf> ; Mohd Zahir, Mohd Zamre, T. N. A. T. Zainudin, H. Yaakob, R. Rajamanickam, H. Harunarashid, A. A. Mohd Shariff, Z. Abd Rahman, and M. Hatta. "Hak Pesakit bagi Melaksanakan Arahan Awal Perubatan: Suatu Gambaran Umum (The Patient's Right to Implement Advance Medical Directive: An Overview)." *Sains Malaysiana* 48 (2019b): 353-359. <http://journalarticle.ukm.my/13087/>

⁸ Lukito, Ratno. "Compare But Not to Compare: Kajian Perbandingan Hukum di Indonesia". *Undang: Jurnal Hukum* 5, no. 2 (2022): 257-291. <https://www.ujh.unja.ac.id/index.php/home/article/view/727>.

and measurable reduction in electoral corruption. Both jurisdictions share certain structural characteristics with Indonesia including parliamentary or presidential systems, periodic competitive elections, and regional proximity within the Asia-Pacific context. However, they diverge significantly in their regulatory philosophies and institutional configurations, providing diverse models for potential adaptation. Primary legal materials were collected from official sources including enacted legislation, administrative regulations, and published judicial decisions. Data Collection is mandatory.⁹ For South Korea, analysis focused on the Public Official Election Act and the Kim Young-ran Act (Improper Solicitation and Graft Act), along with implementing regulations and relevant case law. For Singapore, examination centered on the Parliamentary Elections Act, Prevention of Corruption Act, and Political Donations Act, supplemented by guidance documents from the Corrupt Practices Investigation Bureau (CPIB) and Elections Department. For Indonesia, materials included Law No. 7 of 2017 on General Elections, regulations from KPU and Bawaslu, and selected judicial decisions addressing electoral crimes.

Secondary sources including peer-reviewed journal articles, academic books, government reports, and policy documents were collected to provide contextual understanding of each jurisdiction's sociopolitical environment and enforcement practices. Functional analysis was conducted by comparing regulatory aspects that serve similar purposes across jurisdictions, including criminal provisions defining money politics, campaign finance oversight mechanisms, institutional arrangements for enforcement, and sanctioning regimes. The comparative findings are interpreted with careful attention to social, political, and cultural contexts that shape legal implementation in each country. This contextual sensitivity is essential for generating practical recommendations that account for Indonesia's specific institutional capacities, political culture, and democratic development trajectory. The analysis emphasizes substantive regulation of money politics in each jurisdiction while identifying transferable principles and cautionary lessons for Indonesian electoral law reform.¹⁰

Comparative Legal Frameworks and Institutional Arrangements

1. South Korea's Public Official Election Act and Enforcement Architecture

Fighting corruption is a national and international concern for government and enforcement officials. As a result, several regional and international treaties provide frameworks for combating bribery, most of which have been integrated into national law and policies.¹¹ South Korea's approach to combating money politics is grounded in the Public Official Election Act (POEA), which establishes comprehensive legal boundaries and severe sanctions for electoral bribery, vote buying, and gifts to public officials.¹² The POEA conceptualizes money politics as a crime against popular sovereignty rather than merely an administrative violation, positioning electoral corruption as a direct assault on the democratic will of the people. This philosophical foundation informs the entire

⁹ Na'aim, M. S. M., Mohd Zahir, M. Z., Rajamanickam, R., Dahlan, N. K., & Hashim, H. (2025). Analysing ministerial reasons for banning books under the Printing Presses and Publications Act 1984. *Malaysian Journal of Syariah and Law*, 13(2), 401–412. <https://mjsl.usim.edu.my/index.php/jurnalmjssl/article/view/1166>

¹⁰ Ab Rahman, N. H., Mohd Zahir, M. Z., & Althabhwani, N. M. (2023). Repercussions of COVID-19 lockdown on implementation of children's rights to education. *Children*, 10(3), 474. <https://doi.org/10.3390/children10030474>. <https://pmc.ncbi.nlm.nih.gov/articles/PMC10047681/>

¹¹ Hasani Mohd Ali, Muhamad Helmi MD Said, and Siti Zakiah Binti Che Man. "Corporate Culture as Means of Proving Mens Rea in Corporate Criminal Liability Under Malaysian Anti-Corruption Law." *Jurnal Undang-undang dan Masyarakat* 33 (2023): 119–132. <https://ejournals.ukm.my/juum/article/view/67769/14719>

¹² Jin, Youngjae. "South Korea in 2024: Political Uncertainty, Economic Challenges, and Cultural Ascendancy". *Asian Survey* 65, no. 2 (2025): 214-227. <https://online.ucpress.edu/as/article/65/2/214/209664>.

enforcement regime, creating a proactive approach where the National Election Commission (NEC)¹³ and Supreme Prosecutors' Office (SPO) play dominant roles in protecting substantive democracy. The regulatory architecture operates through a three-tiered structure encompassing criminal, political, and administrative dimensions. Criminal sanctions include imprisonment terms and substantial financial penalties, while political sanctions provide for automatic disqualification of candidates found guilty of electoral offenses and annulment of electoral victories. Administrative measures allow for preventive intervention through real-time monitoring and rapid investigation procedures. This multi-layered approach creates comprehensive deterrence by ensuring that perpetrators face not only legal punishment but also permanent removal from political competition.¹⁴

The institutional enforcement mechanism demonstrates sophisticated coordination among the National Election Commission, prosecutors, and police within a unified network. The NEC serves as the central supervisory authority responsible for monitoring campaign activities, investigating suspected violations, and referring cases for prosecution. Prosecutors and police operate under clear protocols for evidence collection, case development, and expedited judicial proceedings. Technological innovation plays a crucial role through a real-time campaign finance monitoring system that creates full transparency and serves as an early warning mechanism for electoral corruption. The Kim Young-ran Act (Improper Solicitation and Graft Act) complements the POEA by establishing strict prohibitions on gifts and hospitality to public officials, including elected representatives. This legislation reinforces the anti-corruption framework by addressing the broader ecosystem of influence and favoritism that can facilitate money politics. The combined effect of POEA and Kim Young-ran Act creates a comprehensive legal regime that addresses both direct electoral bribery and systemic corruption in political-bureaucratic relations.¹⁵

2. Singapore's Integrated Anti-Corruption Model

Singapore presents a centralized and integrated model where electoral corruption is treated as a species of general public corruption.¹⁶ The Parliamentary Elections Act establishes the basic framework for electoral conduct, while the Prevention of Corruption Act (PCA) provides the substantive criminal provisions applicable to electoral bribery and treating.¹⁷ This integration ensures that money politics is prosecuted with the same rigor as administrative corruption, emphasizing that any material benefit intended to manipulate

¹³ National Election Commission of South Korea. "Election Campaign of South Korea, Campaign Expense of South Korea". <https://aerc.anfrel.org/country/south-korea/campaign-finance/> and https://www.nec.go.kr/engvote_2013/main/download.jsp?num=598&tb=ENG_NEWS.

¹⁴ Sanchez, Lorena Gil. "South Korea General Election 2024 Pre-Election Report". Center for Asian Democracy, University of Louisville, April 2024. <https://louisville.edu/asiandemocracy/research/2024SouthKoreaElectionReport.pdf>.

¹⁵ Setiyono, Budi, Muhammad Adnan, and Lusia Astrika. "Combating Corruption During Democratic Transition: The Role of CSOs in South Korea and Indonesia". *Sociology and Anthropology* 5, no. 11 (2017): 968-976. <https://www.hrpub.org/download/20171030/SA6-19610174.pdf>.

¹⁶Ng, Yi Ming, Joel Yew, and Steven Oliver. "Critical Actors in a Dominant-Party Parliament? Representing Marginalised Communities in Singapore". *Parliamentary Affairs* 76, no. 3 (2023): 553-578. <https://academic.oup.com/pa/article-abstract/76/3/553/6617971>.

¹⁷ Tan, Netina. "Manipulating Electoral Laws in Singapore". *Electoral Studies* 32, no. 4 (2013): 632-643. <https://www.sciencedirect.com/science/article/pii/S0261379413001145>.

voter choice constitutes a betrayal of public trust and integrity. The Corrupt Practices Investigation Bureau (CPIB) functions as the core enforcement body, ensuring swift, independent, and depoliticized investigations. CPIB operates with broad investigative powers including the authority to examine bank accounts, compel testimony, and conduct searches without prior judicial warrants in certain circumstances. This institutional autonomy combined with professional expertise creates a formidable deterrent against electoral corruption. The Elections Department, while administratively distinct from CPIB, coordinates closely in monitoring campaign activities and reporting suspected violations.¹⁸

Singapore's legal framework provides highly detailed classifications of electoral offenses including treating (provision of food, drink, or entertainment for electoral purposes), undue influence (use of force or threats), and direct bribery (monetary payments or valuable considerations). These precise definitional boundaries minimize evidentiary ambiguities and create high degree of legal certainty. The Political Donations Act further reinforces transparency by requiring disclosure of campaign contributions above specified thresholds and prohibiting donations from foreign sources or anonymous contributors. The strong moral governance culture in Singapore enhances the social effect of legal sanctions. Electoral corruption is not merely treated as illegal conduct but as fundamentally incompatible with national values of meritocracy, integrity, and clean government. This moral dimension is reinforced through civic education, leadership example, and public communication emphasizing that political office requires the highest ethical standards. The integration of legal enforcement, institutional capacity, and normative expectations creates a comprehensive anti-corruption ecosystem that extends beyond formal sanctions to shape political behavior and public expectations.¹⁹

3. Indonesia's Fragmented Enforcement Regime

Indonesia's regulatory framework for money politics remains dispersed across multiple laws and institutions, producing overlaps, inconsistencies, and enforcement gaps. The primary legislation, Law No. 7 of 2017 on General Elections, defines money politics narrowly as the direct provision of money or goods to voters without comprehensively addressing illegal campaign financing, corporate involvement, or intermediary networks that facilitate electoral corruption. This limited conceptualization restricts the scope of enforceable conduct and leaves significant regulatory blind spots. Institutional responsibility is divided among the General Elections Commission (KPU), the Election Supervisory Agency (Bawaslu), and the Integrated Law Enforcement Center (Gakkumdu), which coordinates prosecutors, police, and Bawaslu investigators. While this multi-institutional approach theoretically provides comprehensive coverage, in practice it generates jurisdictional ambiguities and coordination failures. KPU focuses primarily on electoral administration and lacks direct enforcement authority. Bawaslu possesses supervisory and investigative powers but depends on prosecutors and police for criminal case development. Gakkumdu serves as a coordinating mechanism but operates only during election periods and lacks permanent institutional capacity.

The sanctions available under Indonesian law include imprisonment and fines but notably lack automatic political disqualification or mandate revocation mechanisms. Many offenders

¹⁸ Tan K. B. Eugene. "Perfecting Singapore's System of Political Governance: Privileging Elites in the Quest for Good Governance". *Research Collection Yong Pung How School Of Law* 12 (2019). https://ink.library.smu.edu.sg/cgi/viewcontent.cgi?article=5589&context=sol_research.

¹⁹ Tongbram, Utkarsh, and Dr. Anna Ganguly. "Electoral System in Singapore". *International Journal for Multidisciplinary Research (IJFMR)* 6, no. 2 (2024): 1-8. <https://www.ijfmr.com/papers/2024/2/16658.pdf>.

perceive imprisonment risks as acceptable political costs, reducing the deterrent effect of criminal sanctions. The application of administrative sanctions, such as candidacy cancellation, depends heavily on divergent interpretations by regional Bawaslu offices, creating procedural inconsistency and unpredictability. This enforcement weakness enables money politics to persist as a cyclical feature of Indonesian electoral competition, with repeat offenders commonly returning to contest subsequent elections. Furthermore, Indonesia's electoral law enforcement remains disconnected from the broader anti-corruption legal framework embodied in Law No. 31 of 1999 on Corruption Eradication.²⁰ This separation prevents the application of more stringent anti-corruption investigative procedures and sanctions to electoral offenses, maintaining a distinction between general corruption and electoral corruption that undermines comprehensive anti-corruption strategies. The lack of integration reflects a narrower conceptualization of money politics as an electoral administration issue rather than a fundamental threat to democratic governance and public integrity.²¹

Table 1: Comparative Legal Frameworks - South Korea and Singapore

Aspect	South Korea	Singapore
Primary Legislation	Public Official Election Act; Kim Young-ran Act	Parliamentary Elections Act; Prevention of Corruption Act
Conceptual Framework	Crime against popular sovereignty	Corruption against public integrity
Lead Enforcement Agency	National Election Commission (NEC)	Corrupt Practices Investigation Bureau (CPIB)
Sanction Structure	Criminal + Political + Administrative (three-tiered)	Criminal + Administrative (integrated with general corruption law)
Disqualification Mechanism	Automatic upon conviction; mandate annulment	Strict enforcement; prohibition from political participation
Monitoring System	Real-time technology-based campaign finance monitoring	Centralized transparency system; mandatory disclosure

*sources: Author's data analysis

²⁰ Calvin, Andreas. "Extraordinary Investigation Power of the Anti-Corruption Agencies in Indonesia and Singapore". *Tumou Tou Law Review* (2024): 15-22. <https://ejournal.unsrat.ac.id/index.php/tumoutou/article/view/52166>.

²¹ Kurniadi, Danang. "Political Corruption in New Democracies: A Comparative Study of Indonesia and South Korea". Presented at the 2012 Arryman Fellows' Symposium, May 18, 2013, Equality Development and Globalization Studies (EDGS) program at Northwestern University (2013). <https://www.edgs.northwestern.edu/documents/working-papers/political-corruption-in-new-democracies.pdf>.

Conceptual Foundations and Sanction Effectiveness

1. Philosophical Dimensions of Money Politics Regulation

The fundamental differences among South Korea, Singapore, and Indonesia extend beyond institutional arrangements to encompass distinct legal philosophies regarding the nature of money politics. South Korea defines money politics as a crime against popular sovereignty, not merely an administrative or electoral violation.²² Under the Public Official Election Act, money politics is categorized as a serious offense against the will of the people because it undermines the legitimacy of election results.²³ This philosophical foundation gives rise to a proactive enforcement approach where legal interventions serve not only as punishment but as mechanisms for restoring democratic legitimacy. This conceptualization positions criminal law as directly linked to constitutional functions, treating the protection of electoral integrity as equivalent to safeguarding the foundational structures of democratic governance. Legal sanctions therefore fulfill both corrective and preventive purposes, ensuring that individuals who corrupt the electoral process are permanently removed from the political sphere. The severity of penalties including imprisonment, substantial fines, and automatic disqualification reflects the gravity accorded to violations of popular sovereignty. This approach elevates money politics from a category of routine electoral misconduct to a fundamental assault on democratic legitimacy.

Singapore integrates electoral corruption into its general anti-corruption legal framework, conceptualizing it as corruption against public integrity.²⁴ Through the Prevention of Corruption Act, any form of offering or promising a reward within an electoral context receives treatment equivalent to bureaucratic or public-sector corruption. Money politics is therefore prosecuted with the same institutional rigor as administrative corruption.²⁵ This legal assimilation gives money politics equal priority with state corruption offenses, emphasizing that any material benefit intended to manipulate voter choice constitutes a betrayal of public trust and integrity. The integration of electoral law, anti-corruption measures, and political funding regulations creates systemic unity that ensures both legal certainty and moral education for society. Singapore's approach not only deters bribery but also reinforces the moral dimension of governance, elevating clean political conduct into a shared cultural value. This strengthens citizens' confidence in electoral fairness and government transparency. Through this system, every act of corruption, whether in the civil service or an election, is punished as an attack on the ethical foundation of the nation. In contrast, Indonesia maintains a narrow and procedural interpretation of money politics, viewing it primarily as a standard electoral offense rather than an extraordinary crime that threatens democratic integrity. The General Election Law No. 7 of 2017 fails to connect money politics to the national anti-corruption legal framework embodied in Law No. 31 of 1999, resulting in enforcement that tends toward administrative rather than substantive approaches. This conceptual limitation leads to

²³ Kurniadi, Danang. "Political Corruption in New Democracies: A Comparative Study of Indonesia and South Korea". Presented at the 2012 Arryman Fellows' Symposium, May 18, 2013, Equality Development and Globalization Studies (EDGS) program at Northwestern University (2013). <https://www.edgs.northwestern.edu/documents/working-papers/political-corruption-in-new-democracies.pdf>.

²⁵ Kurniawan, Muhammad Jefri. "Komparasi Sistem Pendanaan Partai Politik Di Indonesia Dan Singapura". *Jurnal Locus Penelitian dan Pengabdian* 2, no. 12 (2023): 1116-1168. <https://locus.rivierapublishing.id/index.php/jl/article/view/2323>.

weak proportional sanctions and low public moral awareness regarding the dangers of vote buying. Law enforcement authorities, lacking a philosophical foundation that frames money politics as a violation of people's sovereignty, often adopt compromising rather than principled approaches in handling cases.

2. Sanction Structures and Deterrence Capacity

The comparative analysis reveals significant differences in sanction structures that directly correlate with enforcement effectiveness. South Korea's three-tiered sanction system encompasses criminal penalties, political disqualifications, and administrative measures. Criminal sanctions include imprisonment terms ranging from one to ten years depending on offense severity, coupled with substantial financial penalties that may reach millions of Korean won. Political sanctions provide for automatic disqualification upon conviction, with prohibition from seeking elected office for defined periods. Administrative measures enable preventive intervention through campaign finance monitoring and rapid investigation procedures. The automatic nature of political disqualification in South Korea represents a critical deterrent mechanism. Conviction for electoral offenses triggers not only criminal punishment but also permanent removal from political competition, ensuring that individuals who violate electoral laws cannot benefit from their misconduct through continued political participation. Electoral victories secured through illegal means are subject to annulment, eliminating any potential gain from money politics. This comprehensive approach creates powerful disincentives by attacking both the immediate benefits of electoral corruption and the long-term political ambitions of offenders.

Singapore's sanction structure similarly combines criminal penalties with strict enforcement measures that effectively bar corrupt individuals from political participation. The Prevention of Corruption Act prescribes imprisonment terms of up to five years and substantial fines for electoral bribery. Beyond criminal sanctions, convicted offenders face professional and social consequences that extend to employment restrictions, reputational damage, and social stigmatization.²⁶ The centralized enforcement through CPIB ensures consistent application of penalties across all cases, minimizing opportunities for selective or inconsistent enforcement that could undermine deterrent effects. In Indonesia, sanctions remain limited to imprisonment and fines without accompanying automatic political or administrative measures that would reinforce the moral and social impact of punishment. The absence of automatic disqualification mechanisms weakens deterrent effects, as many offenders perceive imprisonment risks as acceptable political investments. Moreover, the application of administrative sanctions depends heavily on divergent interpretations by regional Bawaslu offices, producing procedural inconsistency that undermines enforcement predictability. This weakness enables money politics to persist as a cyclical feature of Indonesian electoral competition, with repeat offenders commonly returning to political participation after serving relatively modest criminal penalties.

3. Institutional Coordination and Technological Innovation

Effective anti-corruption enforcement requires not only substantive legal provisions but also sophisticated institutional coordination and technological capacity. South Korea demonstrates exemplary inter-agency collaboration through formalized protocols linking the National Election Commission, prosecutors, and police in unified

²⁶ Larasati, Genoveva Puspitasari. "Comparison of Law in Indonesia and Singapore Concerning the Eradication of Criminal Acts of Corruption". *International Journal of Business, Economics and Law* 25, no. 2 (2020): 95-102. https://ijbel.com/wp-content/uploads/2022/02/IJBEL25.ISU-2_04.pdf.

enforcement networks.²⁷ The NEC operates as the central supervisory authority responsible for monitoring campaign activities, investigating suspected violations, and referring cases for prosecution. Prosecutors and police follow clear procedures for evidence collection, case development, and expedited judicial proceedings, minimizing delays that could compromise enforcement effectiveness. Technological innovation plays a crucial role in South Korea's anti-corruption architecture.²⁸ The real-time campaign finance monitoring system creates full transparency by requiring immediate electronic reporting of campaign contributions and expenditures. This system serves as an early warning mechanism for electoral corruption, enabling rapid identification of suspicious financial patterns and facilitating timely intervention before violations escalate. The combination of institutional coordination and technological capacity creates a comprehensive surveillance and enforcement ecosystem that significantly reduces opportunities for undetected money politics.

Singapore's centralized enforcement model through CPIB provides similar benefits of institutional coherence and investigative capacity. CPIB operates with broad investigative powers including authority to examine bank accounts, compel testimony, and conduct searches, enabling thorough investigation of complex financial networks supporting electoral corruption. The Elections Department coordinates closely with CPIB in monitoring campaign activities and reporting suspected violations, ensuring seamless information flow between electoral administration and anti-corruption enforcement. Indonesia's fragmented institutional structure, by contrast, generates coordination challenges that compromise enforcement effectiveness. The division of responsibilities among KPU, Bawaslu, and Gakkumdu creates potential for jurisdictional disputes, information gaps, and procedural delays. The absence of permanent institutional coordination mechanisms beyond temporary election-period arrangements limits the development of specialized expertise and institutional memory. Furthermore, Indonesia lacks comprehensive technological monitoring systems for campaign finance, relying primarily on voluntary disclosure and episodic oversight that provides limited real-time visibility into financial flows supporting electoral activities.

Conclusion

This comparative examination of electoral law enforcement systems in South Korea, Singapore, and Indonesia reveals fundamental differences in regulatory philosophy, institutional capacity, and enforcement effectiveness that shape each country's ability to combat money politics. South Korea and Singapore have achieved notable success in establishing firm enforcement regimes through comprehensive legal frameworks, sophisticated institutional structures, and demonstrated commitment to protecting electoral integrity. These jurisdictions treat money politics not as routine administrative violations but as fundamental threats to democratic legitimacy and public integrity, warranting severe sanctions and proactive enforcement strategies. South Korea's effectiveness originates from the integration of the Public Official Election Act and Political Funds Act, creating a three-tiered legal structure encompassing criminal, political, and administrative dimensions. This system produces institutional deterrence

²⁷ Jin, Youngjae. "South Korea in 2024: Political Uncertainty, Economic Challenges, and Cultural Ascendancy". *Asian Survey* 65, no. 2 (2025): 214-227. <https://online.ucpress.edu/as/article/65/2/214/209664>.

²⁸ Minkin, Lewis. "Managing the Changing NEC: Partnership and Shifting Power". In *The Blair Supremacy*. Manchester University Press (2024): 229-265. <https://www.manchesterhive.com/abstract/9781526185938/9781526185938.00016.xml>.

through combining imprisonment with automatic disqualification and electoral annulment. The robust institutional architecture led by the National Election Commission operates in harmony with prosecutors and police within coordinated enforcement networks. Technological innovation through real-time campaign finance monitoring creates full transparency and serves as an early warning mechanism for electoral corruption. The conceptualization of money politics as an offense against popular sovereignty provides philosophical grounding that elevates enforcement beyond technical compliance to protection of democratic foundations.

Singapore presents a centralized and integrated model where the Parliamentary Elections Act, Prevention of Corruption Act, and Political Donations Act form a cohesive legal framework treating political corruption as violation of public integrity. The Corrupt Practices Investigation Bureau functions as the core enforcement body, ensuring swift, independent, and depoliticized investigations. Singapore's detailed legal classifications covering treating, undue influence, and bribery provide high degree of legal certainty while minimizing evidentiary ambiguities. The strong moral governance culture enhances social effects of legal sanctions, creating comprehensive anti-corruption ecosystem extending beyond formal penalties to shape political behavior and public expectations. Indonesia continues to face significant normative and structural limitations in its electoral law enforcement regime. Regulations remain dispersed across multiple laws and institutions, producing overlaps and inconsistencies that compromise enforcement effectiveness. Money politics is narrowly defined as direct provision of money or goods to voters without comprehensively addressing illegal campaign financing, corporate involvement, or intermediary networks. This fragmentation weakens deterrence and undermines legal legitimacy of electoral processes. The absence of automatic political disqualification mechanisms and integration with broader anti-corruption frameworks reflects a predominantly pragmatic rather than principled approach to electoral law enforcement.

The philosophical dimensions distinguishing these systems prove as significant as institutional arrangements. South Korea's conceptualization of money politics as crime against popular sovereignty and Singapore's integration within general anti-corruption framework both stem from moral-constitutional values rejecting financial transactions as legitimate democratic practices. Indonesia's narrow procedural interpretation lacks similar ethical grounding, reducing enforcement motivation and blurring the political message that popular mandates cannot be purchased through material inducements. Five key reform priorities emerge from this comparative analysis for Indonesian electoral governance: First, strengthening constitutional independence of electoral oversight bodies to insulate enforcement from political interference. Second, adopting real-time technology-based campaign finance monitoring to create transparency and enable rapid identification of suspicious patterns. Third, implementing multi-level sanctions combining criminal penalties with automatic political disqualification and administrative accountability measures. Fourth, formalizing inter-agency coordination protocols to ensure seamless collaboration among KPU, Bawaslu, prosecutors, and police throughout electoral cycles. Fifth, developing anti-corruption legal culture through comprehensive political education and ethical governance initiatives that reshape public attitudes toward vote buying.

However, adaptation of South Korean and Singaporean models requires careful attention to Indonesia's specific sociopolitical context. Indonesia's vast territorial extent, significant economic disparities, entrenched patronage networks, and decentralized political structures create implementation challenges distinct from smaller, more economically developed jurisdictions. Blind legal transplants risk ineffectiveness and social resistance if institutional capacities, political will, and cultural norms do not support rigorous enforcement. The most realistic reform pathway involves selective adaptation

drawing from core principles demonstrated by comparative models: legal consistency, institutional independence, comprehensive transparency, and integration of moral governance with rule of law. Ultimately, Indonesia's democratic consolidation depends upon framing electoral integrity as both constitutional imperative and cultural project. Institutional reforms must converge with technological innovation, comprehensive sanctions, and civic education to reshape political behavior and public expectations. Only through such integrated approach can Indonesia establish substantive democracy where electoral representation reflects genuine political choice rather than financial inducement, and where public office represents civic responsibility rather than commercial investment. The comparative models examined in this study provide valuable guidance for this transformative project while respecting Indonesia's unique democratic trajectory and institutional capacities.

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