Evaluation of Corruption Prevention Programs
Case Study on the Corruption Prevention Network Program (JAGA)

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ABSTRACT

Keywords: corruption prevention; fraud risk management; anti-fraud strategy.

Efforts to prevent corruption in the form of improving the quality of public service transparency are one of the most crucial things to be done in Indonesia. (KPK, 2023). This is carried out through the Corruption Prevention Network (Jaga) program by the KPK which aims to encourage transparency in public services and public participation in corruption prevention. Unfortunately, the program has not run well based on the assessment of respondents in the Jaga user survey because it has not reached all areas prone to corruption and the complaint resolution rate is low. This study aims to evaluate the Jaga program and assess the suitability of the Jaga program with the Fraud Risk Management (FRM) framework. This study concludes that in general, the Jaga program is in line with the FRM framework but needs to be improved in terms of documentation of the Jaga concept, the implementation of comprehensive and periodic corruption risk assessments, the development of specific preventive controls based on the intervening public service sector, the improvement of the mechanism for handling complaints of indications of corruption, and the implementation of periodic monitoring of FRM implementation.

Introduction

Corruption that occurs in a country has a bad impact because it causes large state losses and will indirectly result in a decrease in the level of public welfare (Buana, 2018). Therefore, efforts to handle corruption are needed strategically, comprehensively, effectively, and efficiently (Suryantoro, 2019). In Indonesia, the government conducts and initiates various efforts to improve the system to prevent corruption such as bureaucratic reform, integrity zones, Monitoring Corruption for Prevention (MCP), and various other programs (Pertiwi & Setyawan, 2020).

As a medium to measure the success of corruption prevention efforts in Indonesia, the KPK developed the Integrity Assessment Survey (SPI). SPI is carried out in all ministries/agencies, provincial governments, and district/city governments in Indonesia

by involving respondents from internal government employees, service users, and experts/experts (Laoli, 2018). The survey results are in the form of numbers on a scale of 1 to 100 which means that the higher the SPI value, the better the system that has been developed by government agencies to detect corruption risks and handle corruption when it occurs in government agencies. In 2023, Indonesia's SPI score is at 70.97 or in the vulnerable category of corruption. When compared to the previous year, this value has always decreased for the last 3 (three) years considering that in 2021 the SPI value was at a score of 72.94 then decreased to 71.9 in 2022 (Sinaga, 2017).

Specifically, the results of the 2023 SPI show that all agencies in Indonesia have a high risk of corruption because the quality of transparency in public services is still considered very poor by respondents and needs immediate attention and handling (Susim & Darujati, 2021). (KPK, 2023). One of the efforts made to encourage transparency in public services is the Corruption Prevention Network (Jaga) program initiated by the KPK. The Jaga program encourages government agencies to manage and transparent public service information so that it is easily accessible to the public that it can prevent corruption in the public service sector (Muhibah & Setiawan, 2022). Furthermore, based on the transparency carried out, the public can submit complaints related to inconsistencies and non-compliance in the implementation of public services to be followed up by relevant agencies (Linda & Winoto, 2024).

Currently, the public service sector that is the intervention area of the Jaga program consists of 6 (six) sectors, namely 6 (six) sectors, namely education, health facilities, villages, ports, licensing, and handling COVID-19. (KPK, 2023). The public service sector intervention in the Jaga program is based on the consideration of the high risk of corruption in the sector. (KPK, 2016). However, the 2022 Jaga user survey stated that Jaga has not reached all public service sectors that have a high risk of corruption. (KPK, 2022). Based on the survey, only 23.3% of respondents stated that currently, the sector in Jaga has covered all sectors that are prone to corruption. Meanwhile, the remaining 76.7% stated that there are still other sectors that are prone to corruption but have not been covered by the Jaga program (Hambali, 2020).

In terms of handling complaints, based on the 2020 KPK Annual Report, the complaint settlement rate in the Jaga program is still low, which is only 31.02% of the total 1,979 complaints received. The low level of resolution is partly due to the lack of commitment of agency leaders to resolve complaints received and the unavailability of personnel at agencies to follow up on complaints received. (KPK, 2020). This condition indicates that the Jaga program as an effort to prevent corruption has not been well understood so it has not received good commitment from all parties involved.

The Association of Certified Public Examiners (ACFE) classifies corruption as a type of fraud in the Fraud Tree concept and states that corruption is the most common and most common category of fraud in all countries in the world with a median loss of $150,000. (ACFE, 2023). Therefore, every organization must develop a system that can identify, assess, and mitigate corruption risks. (Johnson, 2015). The best way to minimize

the losses caused by fraud, including corruption, is to make fraud prevention efforts in the first place. (ACFE, 2023).

As a guideline for organizations in developing fraud handling policies, ACFE and the Committee of Sponsoring Organization of Treadway Commission (COSO) issued guidelines for developing anti-fraud policies entitled Fraud Risk Management (FRM). The guide contains a comprehensive explanation of efforts to develop anti-fraud policies that can be used to prevent and detect fraud in every organization (Sumarno, 2023). FRM is a fraud risk control guideline that can be implemented in all types of organizations, both private and government organizations and is suitable for implementation in all sizes of organizations. (ACFE, 2023). FRM consists of 5 (five) components, namely fraud risk governance, fraud risk assessment, fraud control activities, fraud investigation and corrective action, and fraud monitoring activities.

The lack of reach for all public service sectors that are prone to corruption in the Jaga program as the results of the 2022 Jaga user survey indicate that there are weaknesses in the implementation of the FRM framework in the fraud risk assessment component. Meanwhile, the low complaint resolution rate in the Jaga platform indicates that there are weaknesses in the implementation of the fraud investigation and corrective action components. Therefore, further research is needed to assess the suitability of the Jaga program with the FRM framework and formulate recommendations for the necessary improvements so that the program has a better impact on corruption prevention efforts in Indonesia.

Research Methods

This research uses a case study research strategy with a single case study and a single unit analysis, namely the Jaga program at the Directorate of Gratification and Public Services of the KPK. The purpose of case study research is to get a complete picture of the object being studied, especially in the form of events or activities in an organizational unit, so it is necessary to collect information directly to gain understanding from various perspectives.

This research was conducted using qualitative research methods. Creswell and (Creswell et al., 2018) explained that qualitative research aims to explore and understand the meaning of several individuals or groups of social or humanitarian problems. Qualitative research aims to provide a deep understanding of the conditions and contextual background of individuals and/or organizations that are the object of research, explain individual behaviour and interactions between individuals, evaluate the effectiveness of strategies, and assist in the development of theories and strategies. (Wahyuni, 2015). The qualitative approach in this study aims to gain a deep understanding of the suitability of the Jaga program with the Fraud Risk Management framework.

This study uses primary data obtained directly through an interview process with the KPK as the initiator and implementer of the Jaga program. This study uses unstructured interviews and structured interview methods. Unstructured interviews were

conducted to get an overview of the concept of Jaga from the perspective of anti-fraud management and how the Jaga program is implemented by the KPK. Through this, it is hoped that the main problems related to the Jaga program can be identified as well as the main focus of research related to anti-fraud management. The deepening of the main focus is carried out through the structured interview method so that comprehensive information related to the root causes of problems in the Jaga program is obtained. Structured interviews are carried out using components in Fraud Risk Management issued by COSO and ACFE.

In addition, this study uses secondary data in the form of documents related to the Jaga program obtained from the KPK. Some of the types of documents used in this study are regulations and policies related to the Jaga program, standard operating procedures, activity implementation reports, annual reports, and other relevant documents. The data in the form of data text are then analyzed descriptively to be able to know and understand the research phenomenon so that it can answer the problem formulation in this study.

In carrying out the analysis, this study uses content analysis and descriptive qualitative analysis methods. Data analysis using the content analysis method is carried out by paying attention to the content and contextual meaning of the text data that has been collected. In this study, content analysis was carried out on respondents' answers to research questions to find out the words that were most often spoken by respondents. These words are then analyzed to see their relationship with the Fraud Risk Management component so that an overview of the suitability of the Jaga program with the Fraud Risk Management framework can be obtained. Meanwhile, qualitative descriptive analysis is carried out through grouping and organizing data into relevant categories or themes, as well as a deep understanding of the meaning and relationship between these categories. The results of this analysis are then interpreted to produce findings that provide new understandings or contributions to existing understandings (Creswell et al., 2018).

Results and Discussion

The following are the results of the analysis conducted on the suitability of the Jaga program with the Fraud Risk Management framework based on data and information obtained from the in-depth interview process and relevant documents.

Component 1 – Fraud Risk Governance

Fraud Risk Governance encourages organizations to commit to and support the development of anti-fraud policies and communicate these policies to all units and levels of the organization. The analysis of the components of Fraud Risk Governance in the Jaga program is as follows.

Organizational Commitment and Support for the Implementation of Jaga

The implementation of the Jaga program as a form of effort to prevent and detect corruption in the public service sector has received support and commitment from the Corruption Eradication Commission through the stipulation of Corruption Eradication Commission Regulation Number 7 of 2020 concerning the Organization and Work Procedures of the Corruption Eradication Commission. In the regulation, it is stated that

one of the duties of the Directorate of Gratification and Public Services is to detect vulnerability to gratuities and/or bribes in public services, monitor, study, and provide recommendations for improving public services in Indonesia. The form of commitment and organizational support for the implementation of the Jaga program can also be seen in the provision of a budget for the implementation of the Jaga program at the Directorate of Gratification and Public Services. In addition, a form of commitment to the implementation of the Jaga program is also obtained from other agencies involved in the implementation of the Jaga program through the signing of a commitment to follow up on complaints and the appointment of a person in charge of handling complaints received through the Jaga.id platform.

Development of a Comprehensive FRM program

The Jaga program is designed comprehensively to be able to prevent and detect corruption in the public service sector. In terms of preventing corruption in the public service sector, the Jaga program focuses on increasing the transparency of public services both in terms of increasing the disclosure of service data and service information. Meanwhile, in terms of corruption detection, the Jaga program accommodates people who want to convey indications of corruption through the provision of discussion channels or complaints on Jaga. id platforms. The implementation of the Jaga program is not only in the KPK but also involves parties who provide public services to the community. These parties include Ministries/Institutions that have data related to public services such as the Ministry of Finance, the Ministry of Education, Culture, Research, and Technology, the Ministry of Health, and BPJS Kesehatan.

Determination of Roles and Responsibilities in the Implementation of FRM

The Directorate of Gratification and Public Services has established roles and responsibilities in the implementation of the Jaga program through the establishment of the organizational structure of the Directorate of Gratification and Public Services. In the organizational structure, the Directorate of Gratification and Public Services appoints a Task Force responsible for the implementation of the Jaga. In addition, the determination of roles and responsibilities for the implementation of the Jaga program is also carried out through the determination of the Unit in Charge and Observer in the follow-up of complaints of indications of corruption received through the Jaga platform. The Unit in Charge and Observer are appointed based on proposals from each agency responsible for following up on complaints received.

FRM Documentation

The Jaga program as a comprehensive effort to prevent corruption in the public service sector is documented in the Jaga Development Road Map. The document contains the concept, vision, and mission of the Jaga program. However, the document has not been formalized as an official document of the organization. Explanations and documentation related to the formal Jaga program can be found in the KPK's annual report and the annual report of the Jaga program.

FRM Communication to All Stakeholders

Communication of the Jaga program to all stakeholders is carried out through various media and forms of activities, including technical guidance and socialization activities. Technical guidance activities are intended as an effort to explain concepts and technicalities to all parties involved in the Jaga program such as local governments and other agencies. Meanwhile, Jaga's socialization activities are aimed at making the Jaga program known not only by agencies but also by the community.

Komponen 2 – Fraud Risk Assessment

The Fraud Risk Assessment component encourages organizations to comprehensively identify fraud risks and schemes. The results of the identification of fraud risk risk are the basis for the organization to determine appropriate prevention and detection efforts. The implementation of the Fraud Risk Assessment component in the Jaga program is as follows.

Identification of Corruption Risks in the Public Service Sector

The Jaga program is designed to prevent corruption in the public service sector. Given the breadth of the public service area, the Jaga program sets the focus of the area based on several considerations including consideration of corruption risks in the area. The high risk of corruption is seen from the number of corruption cases in the sector. In addition, the high risk of corruption is also seen from the size of the budget and the pattern of budget management in the sector. The higher the managed budget and the centralized and less supervised budget management, the higher the risk of corruption. Based on these parameters, the KPK identified the public service sector that has a high level of corruption vulnerability and designated it as a sector that is an intervention area for the Jaga program.

Identification of Availability and Effectiveness of Control in Managing Fraud Risk

Identification of existing controls is an important step in the fraud risk assessment process. Information related to the availability of control is the basis for the formulation of appropriate policies to prevent and detect fraud in the organization. In the development of the Jaga, the control identification process that has been developed in each sector is carried out by assessing the quality of transparency of public services in the intervened sector. Transparency of public services is the main control that is identified and assessed because it is the key to preventing corruption in public services.

In addition to identifying the quality of service transparency, the reliability of control in the public service sector that is intervened in the Jaga program is also carried out through an assessment of corruption vulnerability in the sector. The assessment process was carried out in the education and village sectors through an analysis of policies, regulations, and their implementation to see the reliability of controls designed to prevent corruption in the sector. However, the process of assessing corruption vulnerability has not been carried out in the port, licensing, health, and Covid-19 handling sectors.

Assessing and Responding to Residual Fraud Risks

Response to residual risk is an important effort in the framework of FRM considering that this response acts as an antidote to fraud and as a mechanism to find fraud that occurs in an organization. Ideally, the response to residual risk is carried out to

close the gap or difference between the identified risk and the reliability of control in an organization. This is intended so that the residual risk level is successfully lowered to an acceptable risk level or included in the organization's risk appetite.

In the Jaga program, the assessment process for residual risk is carried out after the risk assessment and control process is completed. Based on the residual risk assessment, the Jaga Task Force then formulated the mitigation measures needed to close the gaps in corruption in each sector. Included in the formulation of the mitigation measures is the determination of the person in charge of implementing the mitigation measures.

Reassessment, Documentation, and Reporting on Fraud Risk

The process of reassessing the risk of corruption in the service sector is carried out based on the urgency or needs of the Guard Task Force and the Directorate of Gratification and Public Services. The reassessment process is carried out through the collection of relevant information related to the public service sector from other work units and based on the analysis of public service data that has been available in the Jaga program. This is done in the education and village sectors but has not been implemented in other sectors.

Komponen 3 - Fraud Control Activities

The fraud control activities component requires each organization to define and develop activities to prevent and detect fraud to mitigate the risk of fraud that occurs or is not detected by the organization. In the Jaga, activities to control fraud in the form of corruption are carried out through the following things.

Development of preventive control

Preventive control in the Jaga program is focused on efforts to increase transparency in public services. This is based on the consideration that transparency is a very important aspect of efforts to prevent corruption in the public service sector. Efforts to increase transparency are also carried out to close the gap in corruption based on the identification of corruption risks carried out in the previous stage. In addition to the provision of data, information, and regulations, the development of corruption prevention activities in the Jaga program is also carried out through the provision of recommendations for improving public service systems and mechanisms in the sectors in Jaga. This is done in the village and education sectors through the provision of recommendations for improving public service systems and/or procedures in both sectors based on corruption vulnerability analysis.

Efforts to detect corruption in public services

To detect corruption in public services, the Jaga program facilitates people who find indications of corruption to submit their findings through the Jaga.id platform. The complaints submitted are then verified, analyzed, and followed up by the substance of the complaint and the authority of the agency that handles it.

Komponen 4 - Fraud Investigation and Corrective Action

The Fraud Investigation and Corrective Action component is related to the mechanism for collecting information related to potential corruption and efforts to detect,

investigate, and determine the appropriate follow-up related to indications of corruption. The analysis of the fulfilment of this component is as follows.

Development of whistleblower systems, fraud investigation procedures, and investigation implementation

The Jaga program accommodates people who find indications of corruption in public services to convey the findings through the Jaga.id platform. Furthermore, the indication of corruption will be followed up through the process of verifying the completeness of information first before then forwarding it to the Unit in Charge or the unit responsible for resolving complaints. The unit in Charge is responsible for following up on the complaint by the mechanism that applies in each agency. In addition to being forwarded to the Unit in Charge, the results of verification of complaints submitted by the community can be followed up directly by the Guard Task Force based on certain considerations. However, the complaint handling mechanism has not been established in the business process of the Directorate of Gratification and Public Services even though it has been agreed as a procedure for handling complaints received through the Jaga.id platform.

The Use of Analytical Data in Identifying Weaknesses in Control and Potential Losses Caused by Corruption

The use of analytical data in identifying weaknesses in control and potential losses caused by corruption in public services has been carried out by the Task Force in the education and village sectors. This was done through data analysis in the ABC Program and analysis of the use of village funds in XYZ Regency. The data used as analysis material includes public service data published on the platform Jaga. id combined with other data such as public complaint data.

Communication and Follow-up of Investigation Results

Communication of the results of investigations on indications of corruption in the public service sector submitted through the Jaga.id platform is carried out through the provision of explanations and information on the status of complaint follow-up on the Jaga.id platform. The explanation can be accessed by all users of the Jaga.id platform, including reporters, observers, and other users. This also serves as a control over the follow-up investigation carried out on each complaint received. For investigations carried out directly by the Guard Task Force, communication of the results of the investigation is carried out through the delivery of letters to the investigated units. The letter was prepared based on the Analysis Report signed by the Director of Gratification and Public Services. Furthermore, the Guard Task Force prepared a letter to submit the results of the analysis and recommendations to the relevant agencies.

Evaluation of the Investigation Process

Evaluation of the investigation process carried out in the Jaga program is carried out through the preparation of a recapitulation of complaint status and identification of the cause of the non-resolution of complaints by the Unit in Charge. However, the evaluation process of the implementation of the investigation has not been carried out comprehensively because it has not been carried out on the substance of the investigation

so it has not been possible to conclude the level of effectiveness and efficiency of the investigation carried out by the Task Force.

Komponen 5 - Fraud Risk Management Monitoring Activities

Fraud monitoring activities are related to the efforts made by the organization to ensure that all FRM principles have been implemented effectively by the organization. In addition, organizations must also respond to deficiencies from the application of FRM principles by establishing corrective actions and appropriate responsible units. So far, the monitoring process of the Jaga program as part of the implementation of FRM on the risk of corruption in public services has not been carried out comprehensively to see the suitability of the implementation of the five components of FRM. Monitoring of the Jaga Baru program is limited to the validity of the data provided in the Jaga platform as well as monitoring the total access to the Jaga platform. The Jaga Task Force annually assesses the validity of the data displayed in the Jaga.id platform and updates the data through coordination with the data owner (Walidata).

Conclusion

Based on the results of the research analysis, it can be concluded that in general the Jaga program has been aligned with the FRM framework, but not all FRM components have been fulfilled in the implementation of the Jaga program. This is found in the Fraud Risk Governance component. Despite the support and commitment from the organization, the Jaga program has not been supported with adequate documentation because the concept, strategic plan, and road map of Jaga have not been recorded in a formal document. In the Fraud Risk Assessment component, the process of reassessing corruption risks has not been carried out thoroughly in all public service sectors that are intervened in the Jaga program and has not been carried out periodically.

The Fraud Control Activities component has been fulfilled in the Jaga program because the Jaga program has established a form of preventive and detective control activities to prevent corruption in the public service sector. However, the Jaga program has not yet established a form of preventive control that is specific to each sector because the assessment of corruption risks has not been carried out in all sectors. The Jaga Program has established a means for the public to submit complaints related to indications of corruption through the Jaga.id platform and its follow-up mechanism, but it has not been formalized in the business process of the Directorate of Gratification and Public Services so the Fraud Investigation and Corrective Action component has not been fully fulfilled. In the Fraud Monitoring Activities component, the Jaga program has not established a comprehensive monitoring and evaluation mechanism to determine the components that need to be corrected so that it has a good impact on the prevention of corruption in the public service sector.

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