

Mainstreaming the Realism Paradigm on Eradication of Corruption Through Analysis of Law (Undang-Undang) No. 19 of 2019 Concerning the Eradication of Criminal Acts of Corruption

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ABSTRACT

Through an analysis of Law No. 19 of 2019 concerning the Eradication of Criminal Acts of Corruption, this paper analyzes the paradigm adopted by the Indonesian government when formulating strategies to combat corruption. Since their inception in 1957, laws and regulations on combating corruption have changed to reflect the evolution of the problem, the causes of corruption's growth in Indonesia, the dynamics of politics and the economy, and other aspects. The formation of Indonesia's Corruption Eradication Commission (KPK) in 2003, which performs a number of tasks, was a turning point in the country's efforts to eradicate corruption. With the publication of Law No. 19 of 2019, which replaces Law No. 30 of 2002 with the eradication of criminal acts of corruption, reform was also continued. This writing aims to analyze and measure the paradigm used by the Indonesian government in making policies to eradicate corruption through the analysis of Law no. 19 of 2019. The author uses the content analysis method in analyzing the law. Analysis was carried out on three indicators; actors, authorities, and governance which represent the three paradigms; realism (state), liberalism (non-state), and constructivism (social construction). Based on the results of the analysis, it can be concluded that; Law No. 19 of 2019 is strongly influenced by the realism paradigm, and although the law is appropriate to replace the previous law, the law still has several weaknesses to be corrected and revised by the government.

Keywords: Corruption, KPK, Paradigm, Corruption Eradication, Law no. 19 of 2019

INTRODUCTION

According to Law Number 31 of 1999, corruption is the illegal enrichment of oneself, another person, or a corporation that has the potential to damage state finances or the state economy. Another definition of corruption is any activity taken by a person with the intent to enrich that person, another individual, or a business. Additionally exploiting the power,

opportunity, or resources he has access to due to his position or one that puts him in a position to jeopardize public finances or the state economy (Law No. 31 of 1999 on the Eradication of Corruption Crimes, 1999).

Corruption can be grouped into 30 types, and of the 30 types of corruption crimes are grouped into 5 groups of corruption and other crimes related to corruption. **First**, One can affect state finances in two ways: by breaking the law and enriching oneself, another person, or a corporation; and by abusing authority for the advantage of oneself, another person, or a business and potentially harming state finances. **Second**, bribery is divided into seven types, namely bribing civil servants; giving gifts to civil servants because of their position; civil servants accepting bribes; civil servants receiving gifts related to their positions; bribing judges; bribe lawyers; and judges and lawyers accepting bribes. **Third**, embezzlement in the office is divided into five types, namely civil servants embezzling money or allowing embezzlement or helping to commit the act; civil servants falsifying books for administrative examination; civil servants tampering with evidence; civil servants allowing others to tamper with evidence; civil servants helping others tamper with evidence. **Fourth**, extortion is divided into two types, namely civil servants who abuse their power to force someone to give something, pay or receive a discount, or do something for themselves; and civil servants who blackmail other civil servants. **Fifth**, fraudulent acts, which are divided into six types, namely contractors/builders who cheat; project supervisors who condone fraud; TNI/Polri partners who cheated; supervisors of TNI/Polri partners who allow fraudulent acts; the recipient of the goods for the purposes of the TNI/Polri allows fraudulent acts; and civil servants usurp state land, thereby harming others. (KebumenKab, 2019).

Corruption can occur in any region or country, whether in poor countries, developing countries, or developed countries. However, based on research conducted by Waluyo (2010) revealed that relatively rich and developed countries have lower levels of corruption than poor countries. Corruption can produce two effects, and both are negative impacts. **First**, developing countries are countries that are actively promoting development, therefore, corruption will certainly hinder the development of developing countries (Hanafi S, 2018). **Second**, according to Karim (in Widiastuti, 2008), corruption can also hinder economic and human development.

Indonesia is known as a country that is very prone to corruption cases. This is because, from a historical point of view, the Indonesian government was ruled by the New Order regime for several decades. Now, after the fall of the authoritarian New Order regime, it is clear that the practice of KKN (Corruption, Collusion, Nepotism) has so far been proven to have become

a tradition and culture whose existence is widespread, entrenched, and pervasive in Indonesian society and the bureaucratic system, from the center to the layers of the lowest power (Sulistyo, 2010). From a political point of view, the bureaucracy in Indonesia has mixed characteristics between the feudal bureaucracy inherited from the royal government and the rational bureaucracy introduced to Indonesia by the Dutch colonial government. Max Weber in *Economic and Society: An Outline of Interpretive Sociology* (1978) calls this combination the "Patrimonial Bureaucracy". A leader in a patrimonial type of bureaucracy tends to regard political power as part of private property so that in its use they exercise a lot of discretion (freedom to make their own decisions). The leader's understanding or perception of power will affect his leadership behavior (Weber, 1978). The level of corruption in Indonesia can also be caused by economic factors. Indonesia is a developing country, which is actively implementing development in all fields (Wahjana, 2006).

Indonesia is known as one of the most corrupt countries in the world (Djelantik, 2008). The Corruption Perception Index (CPI) for Indonesia was published by Transparency International Indonesia (TII) in 2019. The highest score for Indonesia's corruption perception index in 2019 was 100, with a score of 40. In order to gauge public sector corruption in 180 nations and territories, the corruption perception index makes use of 13 polls and expert evaluations. The CPI ranking is derived from a scale where 0 represents extreme corruption and 100 represents very cleanliness. When viewed by ranking, Indonesia is in position 85 out of 180 countries. The corruption perception index score has increased by two levels from 2018. In 2018, Indonesia had a score of 38 out of 100 with a ranking of 89 out of 180 countries (Mashabi, 2020). The CPI score for the entire world is 43 points. Of the 180 nations examined by the CPI, as many as 60%, or 120, have scores under 50, including Indonesia. Indonesia is placed fourth among the ASEAN nations, behind Brunei Darussalam, Malaysia, and Singapore. In 2019, Finland came in the second position with a score or score of 86, followed by Denmark and New Zealand at the top level with a score of 87. (KPK RI, 2020).



Figure 1. Corruption in Indonesia in 4 years. Source: (ICW, 2018)

Based on the data above, it can be seen that Indonesia experiences approximately 450-575 corruption cases every year. So it is necessary to make continuous efforts in carrying out anti-corruption measures to prevent state financial losses. Efforts to prevent state financial losses must be carried out together (government, non-governmental organizations, and the community) to increase the effectiveness of the country's economic development and prevent immoral acts in government and social life. These efforts can be carried out by not weakening the 'strength and role' of the KPK in carrying out its duties, utilizing technology, information, human resources, knowledge facilities, and infrastructure.

Therefore, every country has a body that is responsible for eradicating corruption. The institution to eradicate corruption is not only owned by Indonesia (Welianto, 2020). In terms of eradicating corruption, the Indonesian government established the Corruption Eradication Commission (KPK) in 2003 (Priambada, 2014). The KPK performs a number of duties, including coordinating with organizations with the authority to fight corruption, supervising organizations with that authority, conducting investigations, looking into and prosecuting corruption-related crimes, taking action to stop corruption, and monitoring state government implementation (Law No. 30 of 2002 on the Corruption Eradication Commission, 2002). To date, the KPK does not have representatives in any region (Risalah, 2020). So there needs to be extra cooperation between the government and the KPK to eradicate corruption. This is because the potential for corruption will still be large due to the factors that provoke corruption in Indonesia, such as historical, political, and economic factors.

The scope of international relations has its view in looking at the issue of eradicating corruption. The point of view and approach used will affect our view of the issue of eradicating corruption. The realism approach views the issue of eradicating corruption as an important issue in international relations. Realism views the state as the main and most important actor (state-centric) (Dunne and Schmidt, 2001), both domestic and foreign policy making (Abdurrohim, 2022). While the liberalism approach views that international relations actors are not only the state, but also other actors such as multinational companies (MNCs), non-governmental organizations (NGOs), and others (Ruhama, 2016). While the constructivist approach states that the issue of eradicating corruption is not an issue that arises by itself, but rather an issue that comes from the results of social construction. Constructivism has always linked security issues with ideas and norms (Musyaffa, 2022).

The three approaches that have been presented above are often used by countries in viewing an issue and making a policy. Therefore, the author intends to conduct a more in-depth analysis of the perspectives and approaches used by Indonesia in viewing the issue of eradicating corruption through Law no. 19 of 2019. There have been several articles that discuss the eradication of corruption in Indonesia through an analysis of the content of the law. Some of these articles are a Comparative Study of Wiretapping in Law Number 30 of 2002 with Law Number 19 of 2019 Amendments to Law Number 30 of 2002 concerning the KPK Regarding Wiretapping Arrangements compiled by Gabriela Yohana Toga Torop, Wiretapping and the existence of the Commission's Supervisory Board Eradication of Corruption Crimes compiled by Agus Suntoro, Authority of Tapping into the Corruption Eradication Commission Based on Law Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 concerning the Corruption Eradication Commission by Sukmareni, Ujuh Juhana, and Muhammad Basri, and the existence of the Supervisory Board of the Corruption Eradication Commission according to Law Number 19 of 2019 concerning the Second Amendment to Law Number 30 of 2002 compiled by Olivia Umar.

The similarity of this writing with the previous writings is that they conduct an analysis of Law no. 19 of 2019. Meanwhile, the difference between this writing and the previous writings is that the author analyzes the law by using content analysis through three indicators (actor, authority, and governance). Then the author views the results of the analysis of the contents of the law using three approaches in international relations, namely realism, liberalism, and constructivism. This paper aims to determine the paradigm used by the Indonesian government in viewing and making policies related to the issue of eradicating corruption.

RESEARCH METHOD

The author uses a quantitative research method, which is carried out by measuring the message sign and its explanation in Law no. 19 of 2019. In this study, the authors use three indicators to perform the analysis, including actors, authorities, and governance. In this study, the authors classify the use of words, sentences, and symbols related to the three indicators into three approaches. The three approaches are realism, liberalism, and constructivism.

The author has compiled three hypotheses to analyze the measurement results. **First**, the regulation in eradicating corruption in Indonesia uses a realism approach. **Second**, the regulation in eradicating corruption in Indonesia uses a liberalism approach. **Third**, the regulation in eradicating corruption in Indonesia uses a constructivist approach.

RESULTS & DISCUSSION

Analysis of Law no. 19 of 2019 concerning the Corruption Eradication Commission

As a step to realize the welfare of the entire Indonesian nation and avoid the negative impact of corruption, it is necessary to have a role from the Indonesian government. In addition, the provisions in the regulation of Law no. 30 of 2002 concerning the Corruption Eradication Commission are no longer in accordance with constitutional life, legal developments, and the needs of the community so the Law needs to be changed (Law No. 19 of 2019 concerning the Eradication of Corruption Crimes, 2019). Thus, on October 17, 2019, the Government of Indonesia through the President of the Republic of Indonesia ratified Law no. 19 of 2019. Then the law was promulgated by the Minister of Law and Human Rights as the basis for the Corruption Eradication Commission (KPK) in carrying out its role and function to eradicate corruption in Indonesia.

According to Law No. 19 of 2019, the eradication of criminal acts of corruption involves a number of activities to prevent and eradicate their occurrence through cooperation, supervision, tracking, investigation, prosecution, and court examination with community involvement in accordance with the law's provisions. The Corruption Eradication Commission is in charge of eradicating corruption in Indonesia (KPK). In practice, the KPK does not yet have representatives in the regions and is only based in the capital.

The author uses three indicators to analyze the viewpoints and approaches used by Indonesia in viewing the issue of eradicating corruption through Law no. 19 of 2019. The three indicators are actors, authorities, and governance. Then, the writer groups the use of words, sentences, and symbols related to the three indicators into three approaches. The three approaches are realism, liberalism, and constructivism. The following are the results of the analysis that has been carried out by the author:

1. Actor Analysis

Table 1. Actor Indicator Measurement Results in Law no. 19 of 2019

Approach	No	Actor	Number of Words
Realism	1	State/Republic of Indonesia (Republik Indonesia)	85
	2	President (Presiden)	18
	3	Government (Pemerintah)	10

	4	Institute (Instansi)	12
	5	Council (Dewan)	39
	6	Court (Pengadilan)	6
	7	Representative (Perwakilan)	8
	8	Official (Pejabat)	4
	TOTAL		182
	PERCENTAGE		70%
Liberalism	9	Agency (Badan/Lembaga)	12
	10	People (Orang/Manusia)	14
	11	Society/Resident (Masyarakat/Rakyat/Warga)	20
	12	Perpetrator (Pelaku)	2
	13	Members (Anggota)	26
	TOTAL		74
	PERCENTAGE		30%
	TOTAL ACTORS		256

Based on the results of the analysis listed in Table 1, it can be explained that Law no. 19 of 2019 places more emphasis on the role of state actors compared to non-state actors. From the results of the analysis, realist actors get a higher percentage of results than liberal actors. The use of realist actors is evidenced by the use of the words state, government, president, and followed by the positions of the words in government, such as councils, officials, and others.

The use of realist actors has a percentage yield of 70%, and liberal actors have a percentage yield of 30%. The activities of state institutions as realist actors are more emphasized on the issue of eradicating corruption which aims to provide welfare for the entire Indonesian nation.

2. Authority Analysis

Table 2. Measurement Results of Authority Indicators in Law no. 19 of 2019

Approach	No	Authority	Number of Words
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Realism	1	Maintenance (Penyelenggaraan)	3
	2	Governance (Pemerintahan)	3
	3	Assignment/Assign (Penetapan/Menetapkan)	12
	4	Supervision (Pengawasan)	1
	5	Instruct (Memerintah)	4
	6	Enforcement (Penegakan)	2
	7	Investigation (Penyelidikan)	12
	8	Prosecution (Penuntutan)	21
	9	Examination (Penyidikan)	25
	10	Revocation (Pencabutan)	1
	11	Eradication (Pemberantasan)	118
		TOTAL	202
		PERCENTAGE	93%
Constructivism	12	Protection (Perlindungan)	2
	13	Service (Pelayanan)	1
	14	Management (Pengelolaan)	2
	15	Handling (Penanganan)	5
	16	Prevention (Pencegahan)	5
			TOTAL
		PERCENTAGE	7%
		TOTAL AUTHORITIES	217

Based on the results of the analysis listed in Table 2, it can be explained that the authority in Law no. 19 of 2019 emphasizes the realism approach with a percentage of 93%. This realism authority is evidenced by the use of the words eradication, investigation, prosecution, investigation, determination, and other actions. While the use of words that represent the constructivist approach only has a percentage of 7%.

UU no. 19 of 2019 provides guarantees to the Corruption Eradication Commission (KPK) for eradication, investigation, prosecution, investigation, and other actions. Actions based on this realist approach aim to provide protection for the Indonesian economy and finances.

3. Governance Analysis

Table 3. Measurement Results of Governance Indicators in Law no. 19 of 2019

Approach	No	Governance	Number of Words
Realism	1	Chapter (Pasal)	152
	2	Paragraph (Ayat)	71
	3	Regulation (Peraturan)	28
	4	Decision (Keputusan)	1
	5	Legislation/Law (Perundang-Undangan/Undang-Undang)	57
	6	Prison (Penjara)	3
	7	Criminal (Pidana)	69
	8	Law (Hukum)	21
	9	Penalty (Sanksi)	1
	10	Authority (Wewenang)	8
TOTAL			411
PERCENTAGE			93%
Liberalism	11	Information (Informasi)	3
	12	Document (Dokumen)	2
	13	Program (Program)	2
TOTAL			7
PERCENTAGE			1,5%
Constructivism	14	Assistance (Bantuan)	3
	15	Principle (Asas)	7
	16	Education (Pendidikan)	8
	17	Structure (Struktur)	2
	18	Pancasila	1
	19	Agreement (Perjanjian)	1
TOTAL			22
PERCENTAGE			5,5%
TOTAL GOVERNANCES			440

Based on the results of the analysis listed in Table 3, it can be explained that governance in Law no. 19 of 2019 places great emphasis on the realist approach compared to the liberal and constructivist approaches. Governance that emphasizes a realist approach is evidenced by the use of the words regulations, legislation, law, criminal, and other governance. Governance in Law no. 19 of 2019 aims to carry out the functions of the KPK, specifically, collaborating with organizations designated to combat corruption, overseeing organizations designated to combat corruption, conducting inquiries into, looking into, and prosecuting instances of criminal

corruption, taking steps to prevent criminal corruption, and keeping an eye on how state governments are being run. By establishing corruption eradication policies that are compliant with laws and regulations, the KPK fulfills its mandate.

The Corruption Eradication Paradigm as a Challenge for the Corruption Eradication Commission (KPK)

The Preamble of the 1945 Constitution, paragraph IV, lists the national objectives that the Indonesian government is working to achieve. These goals are to protect the entire Indonesian nation as well as its entire homeland, to advance public welfare, to educate the nation's population, to take part in establishing a world order based on independence, perpetual peace, and social justice, and to realize the national principles listed in paragraph II of the Preamble. This is done by paying attention to justice and transparency to protect the rights of all Indonesian people, especially in the financial and economic fields.

National development efforts carried out by the Indonesian government are often disrupted by a lot of corruption. If such conditions continue to occur, then corruption will hinder development (Weda, 2013). Such corruption can be related to state finances/state economy, bribery, embezzlement in office, extortion, fraudulent acts, conflicts of interest in procurement, corruption related to gratuities, and other acts of corruption.

Indonesia is a country that has a lot of corruption cases. Corruption that occurs can result in state economic losses, hinder development, and the mentality of the Indonesian nation is degenerate in the eyes of the international community. Losses caused by corruption can affect all kinds of aspects of life, both in economic, political, and social aspects. Therefore, it is necessary to take action to eradicate corruption by the government to prevent financial losses due to corruption in order to increase the efficiency of development, economy, and people's welfare.

Law no. 19 of 2019 is expected to help Indonesia survive the epidemic of corruption (Mukhlisin, 2020) and prevent losses caused by corruption. In addition, this law also emphasizes the cooperation of the central government, government agencies, companies, and residents. In terms of eradicating and preventing corruption, the Indonesian government established the Corruption Eradication Commission (KPK). The KPK and the corruption eradication paradigm have undergone several transformations since their inception.

According to a number of sources, the Military Authorities Regulation Number PRT/PM/06/1957 marked the official beginning of the legal elimination of corruption, which

began only in 1957. The Military Authority of the Army and Navy, at the time military authorities, created this law, called the Order on the Eradication of Corruption.

Presidential Decree No. 28 of 1967 About the Formation of a Corruption Eradication Team was issued by the government in the early years of the New Order era (the period in which Soeharto was elected as the country's second president). The team's ability to eradicate corruption in practice was subpar, and it might even be stated that it was barely operating. The implementation of Commission IV, one of the 11 commissions in the House Of Representatives (DPR) RI, which is charged with examining bureaucracy issues and making recommendations to address them, was highlighted by protests and demonstrations that began in 1969 and culminated in 1970 as a result of this regulation.

The New Order was arguably the most widely issued regulation because the New Order period was quite long. But unfortunately, not many regulations that are made are effective and make corruption a little less in Indonesia.

The following are some of the regulations issued during the New Order era relating to corruption eradication:

- GBHN 1973 concerning the Development of Authorized and Clean Apparatus in State Management;
- The 1978 GBHN Concerning Policies and Steps for Controlling State Apparatus from Problems with Corruption, Abuse of Authority, Leakage and Wasting of State Wealth and Money, Illegal Fees, and Various Other Forms of Misappropriation that hinder the Implementation of Development;
- Law No. 3 of 1971 concerning the Crime of Corruption;

When the new order regime changed, corruption eradication also changed a lot. The New Order was foundered, and a new government emerged from the reform movement in 1998. During the reign of Abdurrahman Wahid (known as Gus Dur, the fourth president of Indonesia), there was MPR Decree Number XI/MPR/1998 concerning State Management that was Clean and Free of Collusion and Nepotism. Gus Dur's government then formed state agencies to support efforts to eradicate corruption, including the Joint Team for Combating Corruption Crimes, the National Ombudsman Commission, the Commission for Examining the Wealth of State Officials, and several others.

The Corruption Eradication Commission was established by the Megawati administration (the fifth Indonesian president), who took office amid extremely low public confidence in state agencies tasked with combating corruption (KPTPK). The creation of this

organization represents a legal advancement in the nation's sluggish fight against corruption. Later, this evolved into the Corruption Eradication Commission's predecessor (KPK).

When a public agency with clear responsibilities and authority to remove corruption develops, it is like taking a deep breath after a long journey. Although it was previously claimed that this was off the agenda in accordance with the provisions of Article 43 of Law Number 31 of 1999 as amended by Law Number 20 of 2001, it can now be said that discussion of the KPK bill is a sign of how seriously the Megawati government is taking the fight against corruption. There were various factors behind the delay in the bill's discussion. **First**, changes to the money constitution have implications for changes in the constitutional map. **Second**, there is a heavy legislative tendency in the DPR. Third, the tyrannical tendency of the DPR. One of the reasons for the delay in discussing the KPK bill was due to internal problems that plagued the political system in Indonesia during the reform era.

The vision of eliminating corruption was reflected in the early actions taken by President Susilo Bambang Yudhoyono (the sixth president of Indonesia), who issued Presidential Instruction No. 5 of 2004. He then proceeded with the creation of the National Action Plan for Corruption Eradication (RAN), which was arranged by Bappenas. Between 2004 and 2009, the RAN Corruption Eradication was in effect. The Susilo Bambang Yudhoyono administration benefits from a well-established judicial process, the KPK's existence thanks to Law Number 30 of 2002, the Corruption Court (Tipikor), which is a separate court from the general court, international support (structure), and reciprocally beneficial legal instruments when using the legal system paradigm between national law and international law (Anti-Corruption Clearing House). After several years of the formation of Law Number 30 of 2002, the government made a new law, namely Law Number 19 of 2019 because it was no longer in accordance with constitutional life, legal developments, and the needs of the community so that the Law needed to be changed (Law No. 19 of 2019 concerning Eradication of Criminal Acts of Corruption, 2019).

In its implementation, the KPK has several functions; coordinating with organizations tasked with eradicating corruption, overseeing organizations tasked with eradicating corruption, conducting inquiries, inquiries, and prosecutions of corruption offenses, taking preventative measures against corruption, and overseeing state government implementation (Law No. 30 of 2002 on the Corruption Eradication Commission, 2002). The KPK does not yet have representatives in the regions. In carrying out its functions and duties, the KPK carries out corruption eradication in several stages, namely public complaints, investigations, and

confirmation of investigations from witness information. The law to eradicate corruption in Indonesia is experiencing dynamics and transformation.

The government's efforts to eradicate corruption in Indonesia have been structured and institutionalized quite well. However, in terms of legislation, there are still some weaknesses. **First**, there is no clear regulation regarding confiscated goods, including how much is returned to the state and the mechanism. Therefore, the KPK Law should regulate the maintenance of confiscated goods. **Second**, the KPK needs to focus on recovering state losses. For this reason, the KPK does not need to handle cases that can still be resolved by the police and prosecutors. That firmness must be in the KPK Law (Adiyudha, 2019). **Third**, Law no. 19 of 2019 confirms that the process of eradicating corruption is an obligation and duty of the government. The role of the non-government sector is minimal. So there is a need for a more in-depth explanation of the roles, rights, and obligations of non-governmental institutions, as well as the community in the process of eradicating corruption in Indonesia.

Based on the comparison of the measurement results of three indicators (actor, authority, and governance) using three approaches (realism, liberalism, and constructivism), it shows that the direction of Indonesia's policy in looking at the issue of eradicating corruption through Law no. 19 of 2019 has been dominated by the realism approach.

The realism approach has been reflected in the use of words that are dominated by state actors and government institutions which are carried out through the authorities for eradication, investigation, prosecution, investigation, determination, and other actions. Realistic governance is wrapped through a series of regulations and laws that are adapted to the legislation.

CONCLUSION

Analysis of the direction of policies issued by the Indonesian government regarding the issue of eradicating domestic corruption which has been regulated in Law no. 19 of 2019, shows that the policy direction is dominated by three approaches (realism, liberalism, and constructivism). This realism approach has been reflected in the use of words that are dominated by state actors and government institutions which are carried out through the authorities for eradication, investigation, prosecution, determination, and other actions. Realistic governance is wrapped through a series of regulations and laws that are adapted to the legislation. The regulations on eradicating corruption have undergone a series of reforms from 1957 to 2019. The KPK is a state actor who exercises its authority in a realism approach, such as eradication and investigation. The authority is framed with a realist paradigm through legislation. The

suggestion for the following research could be analyzing the corruption eradication law from neighboring countries that have lower corruption rates, such as Malaysia, Singapore, Thailand, Australia, etc. This could give opportunity for the researcher to understand more about the paradigm comparison regarding the eradication of corruption and also how Indonesia can learn from other countries.

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