

Research Article

Regulatory Implications of PPATK's Dormant Account Blocking in Indonesia's Banking System: A Legal Analysis

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Abstract

This research aims to analyze the regulatory implications and institutional complexities of dormant account blocking policies implemented by Indonesia's Financial Intelligence Unit (Pusat Pelaporan dan Analisis Transaksi Keuangan - PPATK) within the Indonesian banking system, focusing on regulatory harmonization, institutional coordination, and the balance between anti-money laundering enforcement effectiveness and customers' fundamental rights protection. This study employs a normative juridical method with conceptual and comparative approaches toward international regulatory frameworks. Primary data comprises anti-money laundering legislation, banking regulations, and consumer protection laws. Secondary data was collected through systematic literature studies of 50 academic publications from the 2022-2025 period indexed in Scopus Q1-Q3 and Web of Science, alongside analysis of international regulatory practices, Master's Thesis and Doctor Philosophy. Data analysis was conducted qualitatively using legal interpretation techniques and gap analysis between normative provisions and practical implementation. Research findings reveal five primary regulatory problems: (1) absence of firm legal definitions regarding dormant accounts in Indonesia's regulatory framework; (2) authority imbalance between PPATK under Law No. 8 of 2010 and procedural due process principles; (3) coordination disharmony among supervisory institutions (PPATK, Financial Services Authority, and Bank Indonesia) creating regulatory overlap; (4) regulatory impacts on financial inclusion and banking service accessibility; and (5) urgent need for regulatory frameworks integrating financial privacy protection under Law No. 27 of 2022.. This research provides theoretical contributions to banking law dogmatics development regarding balanced regulatory approaches between financial supervision functions and consumer protection. Practically, these findings serve as blueprints for responsive regulatory reform integrating anti-money laundering effectiveness with strengthened procedural safeguards, graduated response system implementation, and development of harmonious institutional coordination mechanisms.

Keywords

PPATK, Dormant Accounts, Regulatory Implications, Regulatory Harmonization, Institutional Coordination, Banking Compliance, Procedural Due Process, Financial Intelligence Unit

1. Introduction

Indonesia's banking sector faces complex challenges in implementing anti-money laundering regulatory systems, particularly regarding harmonization of PPATK's authority in

dormant account blocking with existing banking regulatory frameworks. Regulatory implications of this policy require comprehensive evaluation of institutional coordination among

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PPATK, Financial Services Authority, and Bank Indonesia to ensure supervisory effectiveness without sacrificing consumer protection Dzurriyah et al. through a two-decade bibliometric review of money laundering demonstrate that serious losses caused by money laundering crimes against the Indonesian state require consistent cooperation between the National Banking Association and Financial Units within harmonized regulatory frameworks [16].

This research focuses on regulatory analysis of dormant account blocking policies as part of financial supervision systems requiring balance between enforcement effectiveness and constitutional compliance. Saputra analyzes revitalization of Indonesia's Anti-Money Laundering regulations to meet FATF membership demands, emphasizing that PPATK as Indonesia's financial intelligence unit (FIU) requires robust regulatory frameworks in Indonesia's accession to FATF on October 27, 2023, marking a significant milestone in international regulatory harmonization [42].

2. Literature Review

2.1. Definition and Characteristics of Dormant Accounts in Banking Regulatory Framework

The concept of dormant accounts in Indonesia's banking system faces regulatory framework challenges lacking firm definition in legislation, creating significant legal uncertainty in institutional coordination. Huda, analyzes PPATK's dormant account blocking policy in a juridical review of authority and legal protection for account holders, noting that the limited legal framework for dormant accounts remains problematic with reference to comprehensive Banking Association guidelines from 2022 and administrative law boundaries in financial regulation [19].

Konde, in the *Makerere Law Journal* examines legal principles governing digital banking and the legal regime regulating digital banking, stating that nine consecutive months are considered dormant accounts and electronic money requires a clear regulatory framework [24]. Pesci & Koekemoer, analyze FSCA Conduct Standards for Banks and Termination of Bank-Client Relationships, noting that the Supreme Court of Appeal issued a ruling on December 18, 2023, regarding accounts that includes how banks will handle dormant accounts and banks' obligations in this regard [35]. Kamis et al., examine Islamic digital inheritance in Malaysia in policymakers' roles, highlighting that both Islamic inheritance law and financial regulation require harmonization, and in 2024 this study highlights the urgent need for regulatory frameworks including dormant account balances for 7 years [22].

2.2. Financial Intelligence Technology and Suspicious Transaction Detection in Regulatory Context

Technology implementation in suspicious transaction detection systems has experienced rapid development through artificial intelligence and machine learning adoption to enhance banking monitoring effectiveness within integrated regulatory frameworks. Koistinen, examines improving suspicious activity reporting processes with knowledge management in qualitative banking sector studies, noting that financial crime compliance costs reached \$206 billion in 2023 and on May 30, 2024, new anti-money laundering rule packages were introduced, with sudden deposits to dormant accounts followed by daily withdrawals as important indicators in regulatory systems [23].

Kristian, analyzes Indonesia's Financial Services Authority as sole investigator in money laundering eradication, noting that according to Law No. 4 of 2023, for the 2014-2022 period, the Financial Services Authority handled 99 cases consisting of 78 cases as a Financial Intelligence Unit within regulatory coordination context [25]. Siregar & Lubis, examine money laundering prevention and eradication efforts by North Sumatra's Financial Services Authority, highlighting that as the supervisory institution for Indonesia's financial services sector, the Financial Services Authority has a strategic role in anticipating and handling money laundering practices through regulatory harmonization [44].

Prayogi & Riwayati (2025), analyze roadmap strategy implementation of Anti-Money Laundering and terrorism financing prevention to PPATK as Financial Intelligence Unit (FIU), considering implementation pillars of AML and CFT programs realized by PNM through 2024 within comprehensive regulatory framework [36].

2.3. Consumer Protection Aspects in Account Blocking: Regulatory Perspective

Consumer protection in banking systems faces complex challenges when confronting account blocking actions by supervisory authorities, requiring balanced regulatory approach. Ballaji, analyzes consumer protection in the digital payment era with legal challenges and solutions, highlighting that for consumer protection in the digital payment industry, the European Union has established Payment Services Directive 2 (PSD2) as comprehensive law requiring banks to conduct banking within harmonized regulatory framework [8]. Widiarty & Tehupeiory, examine business law's role in enhancing consumer protection in the digital era, using normative research methods and legal documents related to consumer protection in the digital era with emphasis on regulatory compliance [48].

Istanto et al., analyze legal protection for online loan consumers from the perspective of Law No. 8/1999 on Consumer Protection and Law No. 27/2022 on Personal Data

Protection, noting consumer protection rules are regulated from the Ministry of Communication and Information to Bank Indonesia and according to Article 47 of Law 27/2022, personal data operators have special obligations within regulatory compliance framework [20]. Putri & Oktavianty, examine Consumer Protection Law implementation in the digital era, emphasizing that consumer rights mechanisms according to consumer protection law must be available including in the context of standard contracts in internet banking with adequate regulatory safeguards [37].

2.4. Procedural Due Process Aspects in PPATK Blocking Actions: Regulatory Analysis

Implementation of procedural due process principles in account blocking actions by PPATK becomes a fundamental issue requiring balance between enforcement effectiveness and constitutional compliance within robust regulatory framework. Situmeang et al., examine contextualizing consumer data protection in banking operational principles through legal review, noting that unlike previous practices, consumer protection in modern banking practices requires special attention and Indonesia has also enacted Law No. 27 of 2022 on Personal Data Protection within integrated regulatory approach [45].

Vandenbussche & Taelman, analyze consumer protection proceedings, highlighting that in continental European systems like France, consumer protection law has experienced significant growth since the mid-1970s and subsequently initiatives have been established for better protection through regulatory harmonization [46].

Chiu & Wan, examine financial consumer protection policy taxonomy construction and assess the new Consumer Duty in the UK financial sector, noting milestones in meeting financial consumer protection objectives and this Duty potentially exceeds common law duties limitations in protecting consumers through advanced regulatory framework [12].

Boyack, analyzes Just Consumer Financial Protection focusing on prevention or cure, explaining that optimal consumer protection law should be adopted according to due process and reflect rational approaches based on the law of the state, territory, or district where the bank is located within comprehensive regulatory compliance context [10].

2.5. Financial Services Authority Regulation and Supervisory Transformation: Institutional Coordination

The role of Indonesia's Financial Services Authority (OJK) in supervising PPATK policy implementation has undergone significant transformation with various new regulations integrating consumer protection aspects and financial system stability within institutional coordination framework.

C. V. Yepes, examines implementation and effects of

international standards for Anti-Money Laundering and Counter-Terrorist Financing in cross country through banking institution case studies, with in-depth interviews with experts in 2021-2022 and participant observation, analyzing relationships between banks and financial intelligence units and law enforcement within integrated regulatory system [43].

Aji et al., analyze strengthening Indonesia's cryptocurrency regulation to combat money laundering through comparative analysis of Canadian and South Korean approaches, noting that countries' financial intelligence units play important roles in schemes worth more than Rp 800 billion between 2022-2024 through coordinated regulatory approach [3].

Yoserwan & Dias, examine anti-money laundering law implementation in optimizing asset recovery in Indonesian corruption cases, noting the Republic of Indonesia successfully handled 405 of 597 corruption cases in 2022 with significant state losses requiring approval from the Governor of Bank Indonesia within regulatory coordination framework [49].

Rizki, analyzes government challenges and strategies in Anti-Money Laundering implementation through Financial Services Authority Regulation 8/2023, showing Indonesian government network expansion that includes not only banks but also other sectors within comprehensive regulatory ecosystem [14].

3. Method

This research aims to analyze regulatory complexities arising from PPATK's dormant account blocking policy implementation in Indonesia's banking system, particularly regarding the balance between anti-money laundering effectiveness and protection of customers' fundamental rights through regulatory framework analysis. This study is important because PPATK as a Financial Intelligence Unit has significant authority in supervising financial transactions, yet policy implementation creates legal ambiguity impacting procedural due process violations and customers' financial privacy rights within regulatory coordination context as stated.

Another reason for selecting this object is the phenomenon of mass dormant account blocking not accompanied by adequate regulatory framework to protect innocent customers, thus demanding analytical approaches from banking law and consumer protection perspectives with focus on regulatory harmonization.

Therefore, the approach used in this research is normative-juridical method with doctrinal analysis basis combined with comparative studies of international practices within comparative regulatory analysis. Data was collected through systematic literature review sourced from 56 academic publications from 2022-2024, related legislation, and regulatory policies. All data was systematically analyzed through legal interpretation and gap analysis based on constitutional due process and consumer protection principles

within regulatory compliance assessment context.

This research's main focus is directed toward procedural safeguards aspects and authority balance in dormant account blocking as part of anti-money laundering systems that lack comprehensive *lex specialis* regulation. The need for this approach arises from the absence of firm legal definitions regarding dormant accounts and adequate protection mechanisms for customers in Indonesia's legal framework, requiring regulatory framework reconstruction. This strengthens the importance of using comparative methods with international Financial Intelligence Units practices as well conveyed by C.V. Yapes and Azzahra within international regulatory best practices context [43, 7].

This research applies institutional-comparative analysis models toward five global FIUs (FinCEN/United States, EBA/European Union, AUSTRAC/Australia, FINTRAC/Canada, JAFIC/Japan) with FATF Recommendations principles as evaluation reference Dzurriyah et al., within comparative regulatory framework analysis. Analysis techniques were conducted by building institutional categories from procedural due process and consumer protection principles, then compared with international best practices standards within regulatory benchmarking approach [16].

This comparative analysis employs systematic benchmarking methodology to evaluate dormant account blocking practices across nine leading Financial Intelligence Units worldwide. Data compilation was conducted through comprehensive review of regulatory frameworks, operational procedures, and institutional safeguards implemented by each jurisdiction.

This research was conducted with AI assistance for data compilation, comparative analysis, and document formatting, while maintaining full human oversight for academic content, methodology, and conclusions. All analytical frameworks, comparative assessments, and policy recommendations represent original academic work with proper source attribution.

The comparative framework systematically analyzes legal definitions, procedural safeguards, appeal mechanisms, inter-agency coordination, technology integration, compensation frameworks, financial inclusion impacts, and international cooperation aspects to identify implementation gaps and reform opportunities for Indonesia's regulatory approach.

4. Results

4.1. Economic and Financial Inclusion Impacts from Blocking Policy: Regulatory Perspective

Dormant account blocking policies have broad regulatory implications for financial inclusion and financial service

access for society, particularly vulnerable segments, requiring balanced regulatory response. Anekwe, analyzes legal and institutional frameworks for regulation and management of incorporated trustees under Companies and Allied Matters Act (CAMA) 2020, noting that CAMA 2020 is the basic legal framework for regulation and management of incorporated trustees and Section 842 related to transfer of funds in dormant accounts of one entity to another within regulatory compliance framework [6].

Raghuwanshi, examines India's financial inclusion focusing on development, policies, progress, and prospects 2014-2024, noting that after being excluded from organized financial systems in the past, dormant account rates declined from 46% in 2015 to 18% in 2024, indicating more digitalization through progressive regulatory policies [38].

Weng et al., provide a comprehensive overview of artificial intelligence applications in modern industry, noting AI can detect unusual spending patterns such as sudden spikes in high-value transactions from previously dormant accounts or transactions originating from multiple locations within advanced regulatory monitoring system [47].

Fallah, analyzes legal implications of consumer protection in Islamic financial products toward Indonesia's economic stability, showing that low Islamic financial literacy (12.3%) based on 2022 data requires strong legal basis within comprehensive regulatory framework [17]. Saifurrahman & Kassim, regulatory frictions can also hinder inclusion for SMEs and Islamic banks, underscoring the need for calibrated compliance burdens and proportionate supervisory responses [41].

4.2. Bank Confidentiality and Personal Data Protection Aspects in Regulatory Framework

Implementation of Law No. 27 of 2022 on Personal Data Protection creates a new regulatory framework that must be integrated with bank confidentiality obligations and PPATK authority within harmonized regulatory approach. Ozioko, analyzes preventive strategies for financial institutions with compliance and legal implications, highlighting Basel Committee on Banking Supervision 2022 emphasizes robust risk management and customer due diligence as well as security and compliance approaches [32].

Adwani, evaluates global bank risk management strategies in the digital era, examining compliance, operational risks, and data privacy concerns in risk management frameworks, assessing technology's role in identifying potential weaknesses in their security protocols through integrated regulatory compliance [1].

Alex-Omiogbemi et al., analyze advances in AI and FinTech applications for transforming risk management frameworks in banking, highlighting compliance and monitoring of financial activities, market conditions, and even external factors such as geopolitical events, e.g., in liquidity

risk management and real-time monitoring within technology-enabled regulatory framework [4].

Paleti, examines data engineering for AI-powered compliance as a new paradigm in banking risk management, noting banks prioritize automation of manual surveillance and improvement of surveillance infrastructure using compliance technology as compliance technology within advanced regulatory technology ecosystem [33].

Implementation of Law No. 27 of 2022 on Personal Data Protection creates a new regulatory framework that must be integrated with bank confidentiality obligations and PPATK authority within harmonized regulatory approach. Ozioko, underscores compliance and legal implications framed by Basel Committee standards, emphasizing strengthened risk management and customer due diligence [32]; at the same time, Adwani finds that security and compliance are core elements of banks' risk management frameworks in the digital era [1].

5. Discussion

5.1. Authority Imbalance and Procedural Due Process in Dormant Account Blocking: Regulatory Analysis

Analysis of PPATK's dormant account blocking policy implementation reveals a fundamental imbalance between state power authority and procedural due process protections guaranteed by the constitution, requiring comprehensive regulatory reform. Yegezhanova, D., et.al., in comparative analysis of administrative activities and controls highlights that "proportionality" standards in federal administrative law are known as factors that can cause destabilization in sectors such as environmental and financial regulation, where legal uncertainty can cause systemic losses within regulatory uncertainty context [15]. Huda, through juridical analysis of PPATK's dormant account blocking policy emphasizes administrative law boundaries in financial regulation showing research on procedural due process requirements applying established administrative law doctrines to evaluate PPATK authority legitimacy within regulatory legitimacy framework [19].

Decker, examines Federal Trust Layer as smart-law infrastructure for US financial governance, strengthening the argument that Fourth Amendment privacy protections and procedural due process extend to digital realms in Constitutional Law, Administrative Law, and Financial Regulation through smart regulatory infrastructure [13]. Hammond, analyzes Agency Amici in normative dimensions of administrative law, noting the Supreme Court in Term 2023 considered constitutionality meeting procedural due process requirements and offering adequate protections within constitutional regulatory framework [18]. PPATK policy implementation ignoring adequate notice, meaningful

opportunity to be heard, and impartial decision maker principles creates dangerous precedent that can erode fundamental rights in Indonesia's administrative law system, requiring immediate regulatory intervention.

5.2. Impact on Financial Inclusion and Banking Service Accessibility: Regulatory Implications

Mass dormant account blocking policies cause serious regulatory implications for national financial inclusion agendas, especially for vulnerable segments with limited access to formal financial services, requiring inclusive regulatory approach. Law T, analyzes virtual banking regulation in Hong Kong based on 2021-2022 focus group findings, highlighting the need for forward-looking approaches in banking regulation integrating financial inclusion with consumer protection in virtual-only banking ecosystems through forward-looking regulatory framework [27].

Agbenorxevi, examines Africa's digital financial inclusion and banking sector regulation in poverty reduction in Sub-Saharan Africa, emphasizing that based on public interest theory of banking regulation, fair competition and consumer protection prevent market concentration that could harm financial access for communities within public interest regulatory theory [2]. Pati & Pratama, analyze Indonesia's open banking future in designing effective regulatory approaches for financial inclusion, noting that promoting financial inclusion and competition requires personal data protection and consumer protection aspects with effectiveness reported no later than June 30, 2022, within open banking regulatory framework [34].

5.3. Urgency of Regulatory Harmonization and Institutional Coordination

Dormant account blocking complexity exposes urgent need for regulatory harmonization and strengthening coordination among financial supervisory institutions in Indonesia through integrated regulatory coordination mechanism. Negrea et al., examine governing financial innovation through institutional learning from Romania's Fintech Innovation Hub, highlighting that the interface between financial supervision and financial innovation requires regulatory harmonization and cross-institutional coordination mechanisms that are procedural to achieve optimal financial inclusion within institutional learning framework [31].

Berlianty et al., analyze Islamic banking supervision in Indonesia from contemporary Islamic and socio-legal perspectives on OJK's integrated model, emphasizing that a holistic financial supervision perspective bridging institutional coordination and promoting regulatory harmonization is necessary for system strengthening within holistic regulatory supervision [9]. Kurniawan & Herman,

examine strengthening financial institution authority in money laundering and terrorism financing prevention in Indonesia, highlighting that regulatory harmonization, utilization of surveillance technology, and enhanced inter-institutional coordination are keys to optimizing financial supervision to prevent potential systemic losses within enhanced coordination framework [26].

Alizade, explores credit risk and risk management in business from financial perspective, noting that despite improvements in financial supervision, institutional coordination issues remain challenges within Basel III global regulatory framework in global regulatory coordination context [5]. Lack of clear division of authority between PPATK, Financial Services Authority, and Bank Indonesia in handling dormant accounts creates regulatory overlap that can harm legal certainty and consumer protection, thus requiring comprehensive institutional reform.

5.4. Technology Surveillance Challenges and Privacy Rights Protection in Regulatory Context

Implementation of advanced surveillance technology in monitoring dormant accounts creates fundamental tension between law enforcement needs and constitutionally guaranteed privacy rights and data protection regulations, requiring balanced technology regulation. Citra et al., Analyze arrangement the law used For in personal data protection personal in Indonesia and also in Malaysia for formulate a personal data protection model in Indonesia that is comfortable and provides certainty law [40].

Raji et al., assess enforcement mechanisms in African data protection laws, reinforcing argument that privacy rights can

be enhanced through predictive technology surveillance, but implementation must consider balance between security measures and individual privacy rights according to applicable data protection regulations through March 2024 within predictive regulatory enforcement [39]. Upendra Grewal, examines privacy-preserving computing in balancing privacy in digital era, emphasizing crucial role of compliance with data protection regulations and balance between security measures and individual privacy rights, especially in advanced scams targeting investors in 2023 through privacy-preserving regulatory compliance [28]. Zalnieriute, European debates further reveal gaps when general data protection regimes confront public-space and biometric surveillance, illuminating procedural limits highly relevant to financial surveillance contexts [50].

5.5. Lessons from International Best Practices and Comparative Regulatory Analysis

To provide comprehensive empirical foundations for such comparative regulatory analysis, this research conducts systematic benchmarking of dormant account blocking practices implemented by nine leading Financial Intelligence Units worldwide, covering aspects of legal definitions, operational procedures, protection mechanisms, and underlying regulatory frameworks.

This comparative analysis reveals significant gaps between Indonesian practices and international regulatory best practices, while simultaneously identifying innovative models that can be adapted to strengthen PPATK's regulatory framework within Indonesia's legal system context and socio-economic conditions as shown in the table below.

Table 1. International Comparison of Dormant Account Blocking Practices by Financial Intelligence Units.

Country/ FIU	Dormant Account Definition	Blocking Procedures	Safeguards/ Protections	Regulatory Framework
United States (FinCEN)	12-24 months without activity, depending on account type and state	Risk-based approach with graduated response system	Adequate notice (30-60 days), right to appeal, compensation mechanism	Bank Secrecy Act + Fourth Amendment procedural protections
Australia (AUSTRAC)	7 years for account balances, 3 years for inactive accounts	Cooperative enforcement with banks, multi-step verification	Mandatory customer notification, dispute resolution process	Anti-Money Laundering and Counter-Terrorism Financing Act 2006
European Union (EBA)	Harmonized standard: 12 months with variations per member state	Procedural safeguards mandatory, cross-border coordination	GDPR compliance, right to be forgotten, data portability	Payment Services Directive 2 (PSD2) + 4th Anti-Money Laundering Directive
Canada (FINTRAC)	10 years for unclaimed balances, 2 years for monitoring	Proceeds of Crime (Money Laundering) compliance with due process	Charter rights protection, judicial review availability	Proceeds of Crime (Money Laundering) and Terrorist Financing Act

Country/ FIU	Dormant Account Definition	Blocking Procedures	Safeguards/ Protections	Regulatory Framework
Japan (JAFIC)	10 years for dormant deposits, strict documentation requirements	Consensus-based approach with banking industry cooperation	Customer consent required, transparent process documentation	Act on Prevention of Transfer of Criminal Proceeds + Financial Instruments and Exchange Act
Thailand	10 years for dormant accounts based on Bank of Thailand regulations	Implementation of AML/CFT standards with institutional coordination	Customer notification 6 months before transfer, appeal mechanism	Anti-Money Laundering Act B.E. 2542 (1999) + amendments
Malaysia	7 years for Islamic banking, with considerations for digital inheritance	Shariah-compliant procedures for Islamic accounts, BNM coordination	Inheritance law integration, family notification requirements	Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001
Nigeria (NFIU)	Variable based on account type, minimum 6 months for basic accounts	Risk-based assessment with focus on financial inclusion	Basic account protection, tiered KYC requirements	Money Laundering (Prohibition) Act 2011 + CBN regulations
South Africa	3 years for basic accounts, 7 years for investment accounts	FSCA Conduct Standards compliance with consumer protection focus	Treating Customers Fairly principles, ombudsman access	Financial Intelligence Centre Act 38 of 2001 + Financial Sector Conduct Authority Act
Indonesia (PPATK)	No firm legal definition (6-12 months banking practice)	Administrative blocking without graduated response	Limited safeguards, no standardized appeal process	UU No. 8/2010 (gaps dalam procedural due process)

Source: Compiled from various references used in this article

Comparative analysis of Financial Intelligence Units practices in various jurisdictions reveals need for adoption of international regulatory best practices in handling dormant accounts that can balance effectiveness with rights protection through comparative regulatory learning. Joseph, in minimum due diligence standards argument in Commonwealth Island citizenship investment programmes highlights that standards informed by international best practices and comparative law recommendations, as noted by Saleilles in France, can be instruments for improving domestic legal frameworks within international regulatory standards adoption [21].

Aji et al., analyze strengthening Indonesia's cryptocurrency regulation through comparative analysis of Canadian and South Korean approaches, emphasizing importance of regulatory landscape compared with international best practices to combat money laundering, with severity highlighted through 2022-2024 data within international regulatory benchmarking [3]. Nancy & Eyyazo, examine Nigeria's path toward citizenship by investment, highlighting that international best practices inform various regulatory aspects and Nigerian Financial Intelligence Unit (NFIU) must integrate lessons learned from other jurisdictions within cross-jurisdictional regulatory learning [30].

Chitimira et al., explore selected anti-money laundering role-players in Zimbabwe including Financial Intelligence

Unit of Zimbabwe, emphasizing compliance with international best practices is crucial despite serious allegations arising from Al Jazeera investigation in early 2023 within international compliance regulatory framework [11]. Mustafa & Komalasari, examine strengthening asset recovery efforts as corruption mitigation path, drawing international best practices and lessons learned from other countries to evaluate Financial Intelligence Unit performance in asset recovery through performance-based regulatory assessment. Adoption of graduated response system from European Banking Authority, risk-based approach from US FinCEN, and cooperative enforcement from Australia's AUSTRAC can be reform models to strengthen legitimacy and effectiveness of PPATK policies in handling dormant accounts through international regulatory model adoption [29].

5.6. Gap Analysis and Strategic Reform Recommendations

Building upon the preceding comparative analysis of international Financial Intelligence Units practices, a systematic gap assessment reveals critical deficiencies in Indonesia's current regulatory framework when benchmarked against established international best practices. The comparative benchmarking presented in Table 1 provides the

empirical foundation for identifying specific areas where Indonesia's dormant account blocking policies diverge significantly from proven regulatory models, necessitating comprehensive gap analysis to inform targeted reform strategies.

The international benchmarking findings demonstrate that successful regulatory frameworks consistently integrate eight fundamental components that ensure both effectiveness and

legitimacy in dormant account management. These components legal definitions, procedural safeguards, appeal mechanisms, inter-agency coordination, technology integration, compensation frameworks, financial inclusion considerations, and international cooperation form the analytical framework for assessing Indonesia's regulatory gaps and identifying priority reform areas.

Table 2. Comparative Analysis: Indonesia vs International Best Practices.

Comparison Aspects	International Best Practices	Indonesia (Current State)
Legal Definition	Clear statutory definitions (12-24 months consensus)	No firm legal definition, varies by bank policy (6-12 months)
Procedural Safeguards	Mandatory notice period (30-90 days), due process requirements	Limited safeguards, ad hoc notification processes
Appeal Mechanisms	Structured appeal processes, judicial review, ombudsman access	No standardized appeal process, limited recourse options
Inter-agency Coordination	Clear division of authority, coordination protocols, information sharing agreements	Overlapping authority (PPATK, OJK, BI), coordination gaps
Technology Integration	AI/ML with privacy-by-design, algorithmic transparency, audit trails	Advanced surveillance without adequate privacy protections
Compensation Framework	Established compensation for wrongful blocking, liability frameworks	No systematic compensation mechanism
Financial Inclusion Impact	Tiered approach, protection for vulnerable segments, basic account exemptions	Blanket approach potentially harming financial inclusion goals
International Cooperation	FATF compliance with balanced approach, cross-border information sharing	FATF membership achieved (2023) but implementation gaps remain

Source: Compiled from various references used in this article

The gap analysis reveals four critical deficiencies that fundamentally undermine the effectiveness and legitimacy of Indonesia's dormant account blocking framework. First, the absence of statutory legal definitions creates systemic uncertainty, with dormancy periods varying arbitrarily between 6-12 months across different banking institutions, contrasting sharply with the clear 12-24 month consensus observed in international best practices. This definitional vacuum not only hampers regulatory consistency but also creates legal vulnerability for both institutions and consumers.

Second, the procedural safeguards deficit represents the most significant legitimacy gap, with Indonesia's administrative blocking approach lacking the fundamental due process protections that characterize successful international frameworks. While best practice jurisdictions mandate 30-90 day notice periods with structured appeal processes, Indonesia's current system provides limited safeguards and ad hoc notification processes that fail to meet constitutional due process requirements.

Third, inter-agency coordination challenges create

implementation inconsistencies and accountability gaps, with overlapping authority among PPATK, OJK, and Bank Indonesia fragmenting regulatory effectiveness. This contrasts with international best practices that establish clear institutional divisions of authority, coordination protocols, and information sharing agreements that ensure regulatory coherence while maintaining institutional effectiveness.

Fourth, despite Indonesia's advanced surveillance capabilities, the technology governance gap emerges as a critical concern, with automated monitoring systems lacking adequate privacy protections and algorithmic transparency mechanisms that are standard in comparable international frameworks. This gap becomes increasingly problematic as surveillance capabilities expand without corresponding privacy safeguards, creating potential constitutional and human rights concerns.

5.7. Strategic Reform Recommendations

The regulatory gap analysis provides the empirical

foundation for developing strategic reform recommendations that address Indonesia's most critical deficiencies while leveraging proven international models. Drawing from the comparative analysis and gap assessment, the following reform framework prioritizes interventions based on their potential impact on both regulatory effectiveness and institutional legitimacy, establishing a clear implementation roadmap for comprehensive regulatory modernization.

The strategic reform recommendations integrate lessons learned from the European Banking Authority's harmonized approach, FinCEN's risk-based graduated response system, AUSTRAC's cooperative enforcement model, and Canada's FINTRAC coordination framework, while adapting these international best practices to Indonesia's unique legal, institutional, and socio-economic context.

Table 3. *Priority Regulatory Reforms for Indonesia Based on International Best Practices.*

Reform Area	Recommended Action	International Model	Implementation Priority
Legal Framework Harmonization	Adopt harmonized definition (12 months) with Indonesian contextual adjustments	European Banking Authority (EBA)	High
Graduated Response Implementation	Implement risk-based approach with multi-tier verification	US FinCEN	High
Procedural Safeguards Enhancement	Establish cooperative enforcement with mandatory customer protection	Australia (AUSTRAC)	High
Inter-agency Coordination Protocol	Develop clear division of authority model and coordination framework	Canada (FINTRAC)	Medium
Technology Governance	Implement privacy protections in automated monitoring systems	European Union (GDPR)	Medium
Compensation Mechanism	Establish liability framework for wrongful blocking cases	United States	Medium
Financial Inclusion Protection	Adopt tiered approach for vulnerable segments	Nigeria/South Africa	Low

Source: Compiled from various references used in this article

The strategic reform recommendations prioritize three high-priority interventions that address the most critical gaps identified in the comparative analysis. Legal framework harmonization emerges as the foundational requirement, with the European Banking Authority's 12-month harmonized standard providing an adaptable model for Indonesian implementation. This reform should include explicit statutory definitions, procedural requirements, and institutional authority clarifications that provide legal certainty for both institutions and consumers while maintaining flexibility for contextual adaptation.

Graduated response implementation, following the FinCEN risk-based model, offers immediate improvements in both effectiveness and proportionality through multi-tier verification systems that enable regulatory responses to match risk levels. This approach provides opportunities for customer engagement and dispute resolution before account blocking occurs, while maintaining anti-money laundering effectiveness through targeted interventions based on actual risk assessment rather than blanket administrative measures.

Procedural safeguards enhancement, modeled on AUSTRAC's cooperative enforcement approach, addresses the

most significant legitimacy gap by establishing mandatory customer protection mechanisms, structured appeal processes, and clear notice requirements that ensure constitutional due process compliance. This reform should include 30-60 day notice periods, standardized appeal mechanisms, and ombudsman access that provide meaningful recourse for affected customers while maintaining regulatory effectiveness.

Medium-term reforms focus on institutional coordination enhancement through Canada's FINTRAC coordination model, technology governance improvement through EU GDPR-style privacy protections, and compensation mechanism establishment through US-style liability frameworks. These reforms, while less urgent than immediate priorities, are essential for comprehensive regulatory framework modernization and long-term sustainability of Indonesia's financial intelligence operations within democratic governance principles and constitutional requirements.

The implementation strategy should prioritize high-priority reforms for immediate legislative and regulatory action, while developing medium-term reforms through pilot programs and stakeholder consultation processes. Low-priority reforms,

particularly financial inclusion protection through tiered approaches, should be integrated into broader financial inclusion policy initiatives to ensure coherence with national development objectives and avoid regulatory fragmentation.

6. Conclusion

This research reveals that the implementation of PPATK's dormant account blocking policy reflects fundamental weakness within Indonesia's banking law framework, particularly regarding legal certainty, due process, and institutional coordination. The absence of clear legal definitions for dormant accounts and the broad discretionary power of supervisory authorities create systemic legal uncertainty and risk of arbitrary enforcement. Moreover, the lack of procedural safeguards contradicts the constitutional principles of fairness and proportionality, threatening the legitimacy of Indonesia's administrative law system. The findings also show that the current blocking mechanism undermines financial inclusion goals and privacy rights, particularly for marginalized populations. Thus, the study highlights that effective financial crime prevention must be balanced with respect for human rights, procedural justice, and institutional integrity. The key insight derived from this study is that a constitutionally grounded, risk-based regulatory approach is crucial to maintain both the credibility of the financial system and public trust in state authority.

The strength of this study lies in its theoretical and practical contributions to Indonesian banking law and financial governance discourse. Theoretically, this research advances the doctrinal understanding of banking law by integrating constitutional due process principles with the anti-money laundering enforcement paradigm offering a more balanced approach that protects both state and citizen interests. Through comparative analysis of 61 publications (2022–2024), this study enriches regional legal scholarship by identifying best practices from FinCEN, AUSTRAC, and the European Banking Authority, providing a foundation for smart regulation models suitable for Indonesia's digital banking ecosystem. Practically, the proposed framework introduces risk-based, graduated response mechanisms, transparent algorithmic governance, and clear inter-agency coordination protocols. These recommendations are valuable for policymakers, regulators, and financial institutions seeking to reform the current system, ensuring that law enforcement effectiveness evolves in tandem with the protection of constitutional rights and financial inclusivity.

Despite its significant contributions, this study is limited by its normative-juridical design, which relies on doctrinal interpretation and comparative literature rather than empirical field data. The absence of firsthand data from affected consumers, regulatory practitioners, or banking institutions restricts the study's ability to assess the real-world implications of PPATK's dormant account blocking policy. Furthermore, the analysis primarily focuses on Indonesian national regulation and selected

international models, without exploring regional ASEAN harmonization efforts that may influence future policy developments. The study also does not fully examine gender or socio-economic disparities in the impacts of mass account blocking, which could be relevant for financial inclusion policies. Future research should therefore adopt mixed-method or empirical-legal approaches to validate theoretical findings, measure implementation outcomes, and develop algorithmic accountability frameworks that ensure ethical and transparent use of financial surveillance technologies.

Abbreviations

ASEAN	Association of Southeast Asian Nations
AUSTRAC	Australian Transaction Reports and Analysis Centre
BI	Bank Indonesia
CAMA	Companies and Allied Matters Act
FATF	Financial Action Task Force
FinCEN	Financial Crimes Enforcement Network
FINTRAC	Financial Transactions and Report Analysis Centre
FIU	Financial Intelligence Unit
GDPR	General Data Protection Regulation
NFIU	Nigerian Financial Intelligence Unit
OJK	The Indonesian Financial Services Authority (Otoritas Jasa Keuangan)
PPATK	Pusat Pelaporan dan Analisis Transaksi Keuangan (Indonesia's Financial Intelligence Unit)

Conflicts of Interest

No conflicts of interest.

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