



The Role of Financial Service Providers in the Concept of Cyber Child Sexual Violence Protection

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Abstract. *In this era of technology development can have negative and positive impacts on society. Technology has become a common tool in the learning process, making education more accessible, efficient, and effective. On the other hand can have negative impacts, such as the emergence of various forms of cyber child sexual violence. Start from the cyber child trafficking, cyber child pornography, and other cyber child sexual violence. Protection against various forms of cyber child sexual violence must of course involve all participant, not only family, law enforcement officials and society, but financial service providers must also take part in protecting cyber child sexual violence. Based on this, this article will discuss the role of financial service providers in the conception of cyber child abuse protection. The research method used in this article is normative juridical with statue approach and conceptualization approach.*

Keywords: *Concept; Financial service providers; Cyber child sexual*

1. Introduction

The Society 5.0 era is a condition where there is a close and integrated relationship between humans and technology. Rapid technological advances affect various aspects of human life. Currently, humans live side by side with technology and even tend to really need various technological advancement facilities to make their lives easier. Progress in technological development, whether in the form of technology in the form of various electronic equipment, hardware on computers, various kinds of software, various kinds of applications, and various other technologies. People nowadays are used to using it gadget in the shape of smartphone which is supported by various applications, both social media applications or applications to make daily activities easier, such as several applications as follows: WhatsApp, Instagram, Tiktok, Facebook, Twitter, Shopee, Tokopedia, Gojek, Grab, Maxim, and various other applications.

Applications related to finance are now also a necessity to facilitate various transactions where the influence of technological advances makes transactions possible cash less not conventionally as we have known so far. The banking world is also increasingly required to follow technology by creating applications internet banking with various application names such as: BriMo (BRI Bank), Livin (Bank Mandiri), My BCA (Bank BCA), Internet Banking BNI (Bank BNI), and other similar applications. Apart from financial applications from banks, there are also several other financial applications, such as: Dana, Flip, Shopeepay, Ovo, Gopay, and other similar applications. Some of these financial services applications have been registered with the Financial Services Authority (OJK) and some have not been registered. Era Society 5.0

Technological advances of course have various impacts on life which can be positive or negative impacts. Several things have a positive impact from the rapid development of technology, namely: being able to shorten the process of sharing information; work becomes easier, more effective and efficient; the learning system can be done online; facilitate communication that is hampered by distance (such as when someone

is separated from another person at the same time, facilitating communication from one place to another); socialization of government policies can be communicated to the public more quickly in society; makes it easier for someone in one country to learn about various types of culture in other parts of the world [1]. The positive impact of technological developments also has an impact on increasing online business growth, e-commerce and platform Online trading has helped improve the business sector and created new economic opportunities, especially for small and medium businesses [2].

One of the negative impacts of technological developments is the emergence of digital-based crime by utilizing technology or better known as *cybercrime* (cyber crime). Terminology *cybercrime* by Barda Nawawi Arief is interpreted by the term *mayantra* criminal act. The term *mayantra* crime by Barda Nawawi Arief is intended because the term is synonymous with criminal acts in cyberspace (*cyber space*) or also commonly known as *cybercrime* [3].

Cybercrime or cybercrime or cybercrime is a general term to describe actions carried out by a person or group of people who are experts in the computer/informatics field to the detriment of another person or group of people, actions which can be classified as actions that include *cybercrime* namely: do *denial of service attack (DoS Attack)*; *hacking*; write and spread viruses/*trojan*; *cyberterrorism*; *information warfare* (information war); *cyberstalking* and *online harassment*; *fraud* and identity theft/*phishing* (including *carding* and *spoofing*) [4]. Technological advances have also resulted in sexual violence being carried out online *online* which tends to occur on social media, sexual violence on social media can take the form of: harassment *online (Cyber Harassment)*; approach to deceive (*Cyber Grooming*); Hacking (*Hacking*); invasion of privacy (*Infringement of Privacy*); threat of distribution of private photos or videos (*malicious distribution*); revenge porn; impersonation; defamation; online recruitment (*online recruitment*). A part from this there are also *love scamming* which is a form of sexual violence that exists as a result of the development of social media.

Technological developments are currently being enjoyed by various groups of society, including today's children *familiar* with the use of good gadgets, smartphones and other advanced devices. According to Article 1 Paragraph 1 of Law Number 23 of 2002 concerning Child Protection, what is meant by a child is someone who is not yet eighteen years old, including children who are still in the womb. Based on the Civil Code in Article 330, it states that immature people are those who have not reached the age of twenty-one years and have not previously been married, whereas based on the Criminal Code for Children in Article 45 it is stated that children are who are not yet sixteen years old. According to R.A Kosnan, children are young people at a young age in their soul and life journey because they are easily influenced by the circumstances around them, with these conditions children need to be cared for [5]. Children are one of the groups who are vulnerable to experiencing sexual violence because they are still weak and immature.

Based on the results of a survey conducted by Nielsen on Indonesian consumer behavior, of the average 189 minutes per day of using a smartphone, 94% was spent on *chat*, via device *chat* These children easily become victims of sexting, namely interactions via text or images or videos that have a sexual nature without other people knowing. More and more sexual crimes *online* in children is increasing with various types of crimes such as prostitution *online*, online child pornography, child kidnapping, child sexual abuse. Social networks like *facebook* and *twitter* have now become a mode of sex trafficking *online*. No longer just with the lure of giving money, the method has now changed to use technology, the virtual world is now a thin *entry point* to expand *trafficking* [6].

Based on Information System data *Online Protection of Women and Children* (Symphony PPA) recorded that between January and November 2023 there were 15,120 cases of violence against children with 12,158 female victims and 4,691 male victims, where cases of sexual violence were in first place with the highest number of victims from 2019 to 2023 [7]. According to data released by the Information System *Online Protection*

of Women and Children (Symphony PPA), from January to February 2024 the number of cases of violence against children has reached 1,993 [8]. The National Commission for Child Protection (Komnas PA) stated that there were 3,547 complaints of cases of violence against children received throughout 2023, which experienced an increase of 30%. The most dominant case was sexual violence with a total of 1,915 complaints so far this year [9]. The Ministry of Women's Empowerment and Child Protection (PPPA) reported that there were 16,854 children who were victims of violence in 2023, the most common type of violence was sexual violence reaching 8,838 incidents, 195 children were victims of the crime of trafficking in persons (TPPO) in Indonesia, exploitation There were 226 incidents recorded against children [10].

Technological advances have led to the emergence of child sexual violence *online* It is also supported by the existence of facilities to carry out digital transactions. In several cases of sexual violence which have an economic mode, the use of financial transaction facilities is used *online* It also makes the crime easier to carry out. In 2022, the Financial Transaction Reports and Analysis Center (PPATK) revealed findings of TPPO and child pornography with a value of up to Rp. 114 Billion [11]. PPATK is an institution that has a strategic position because it has a special function in managing data and information, as well as analyzing or examining financial transaction reports that have indications of criminal acts of theft of money or other criminal acts. Apart from PPATK which has authority relating to financial transactions, there is also the Financial Services Authority (OJK) which has the function of carrying out an integrated regulatory and supervisory system for all activities in the financial services sector. OJK has the task of carrying out regulation and supervision of financial services activities in the banking sector. capital markets sector and IKNB sector.

Based on the duties of PPATK to prevent and eradicate criminal acts of money laundering, manage data and information obtained by PPATK, supervise the compliance of Reporting Parties and analyze or examine Financial Transaction reports and information that indicate criminal acts of money laundering and/or other criminal acts, as well as the authority of the OJK relating to supervision of financial services institutions, the role of the OJK can be one way to tackle child sexual violence globally. *online* especially in types of child violence *online* which have economic goals. Sexual violence which has an economic aim of course carries out financial transactions in its implementation, based on these transactions, especially those with suspicious amounts, it is hoped that the existence of the OJK will be able to be one way to reduce child sexual violence globally. *online* through early indications by suspecting transactions that are considered suspicious.

Based on several things explained above, the author is interested in discussing the role and function of financial service providers within the positive legal framework in Indonesia and the role of financial service providers in the concept of protecting sexual violence that occurs against children as a whole *online*.

2. Methodology

The research method used in this research is a normative juridical research method. The normative juridical research method is library legal research which is carried out by examining library materials or mere secondary data [12]. Normative juridical research is law conceptualized as what is written in statutory regulations (*law in books*) or law is conceptualized as a norm which is a benchmark for human behavior that is considered appropriate [13]. This research examines various regulations relating to financial services and protection from online sexual violence against children. The approach used in this research is the statutory approach (*statue approach*) and conceptual approaches (*conceptual approach*).

3. Findings and Discussions

3.1 The Role and Function of Financial Service Providers in the Positive Legal Framework in Indonesia

A financial service provider according to Article 1 Paragraph 5 of Law Number 25 of 2003 concerning Amendments to Law Number 15 of 2002 concerning the Crime of Money Laundering is any person who provides services in the financial sector or other services related to finance, including but not limited to banks, financial institutions, securities companies, mutual fund managers, custodians, trustees, deposit and settlement institutions, foreign exchange traders, pension funds, insurance companies, and post offices.

Based on the Regulation of the Financial Services Authority of the Republic of Indonesia concerning Amendments to the Regulation of the Financial Services Authority Number 12/POJK.01/2017 concerning the Implementation of Anti-Money Laundering Programs and Prevention of Terrorism Financing in the Financial Services Sector Article 1 Paragraph 2, Financial Services Providers, hereinafter abbreviated to PJK, are providers financial services in the banking sector, financial service providers in the Capital Markets sector, and financial service providers in the non-bank financial industry sector.

Financial Services Provider (PJK) is defined as a service provider in the financial sector in Indonesia. The activities of Financial Service Providers (PJK) are regulated by applicable laws stipulated by the government. Financial Service Providers (PJK), including but not limited to banks, finance companies, insurance companies, financial institution pension funds, securities companies, investment managers/mutual fund managers, custodians, trustees, postal providers as current account service providers, foreign exchange traders, organizer of means of payment using cards, organizer e-money and/or e-wallet, cooperatives that carry out savings and loan activities, procurement, companies engaged in commodity futures trading, organizers of money transfer business activities, or deposit and settlement institutions, or Financial Services Providers (PJK) provide services in circulating funds from parties who have excess funds to the party in need [14].

Based on the definition of Financial Services Provider (PJK) above, the role, authority and function of each Financial Services Provider (PJK) will have differences because it is based on the type and form of each Financial Services Provider (PJK). Although there will be differences, one of the roles and functions of Financial Services Providers (PJK) is the activity of collecting funds, the way in which the funds collected will be managed will be different. Financial Service Providers (PJK) currently commonly used by the public are banks and organizers of e-money and/or e-wallet, it can be seen that almost all people use various products from banks and have various applications for e-money and/or e-wallet on his cell phone. Financial transactions are currently also dominated by these two Financial Service Providers (PJK), based on May 2024 data there are 106 Commercial Banks with 2,140 Commercial Bank Offices and 1,368 Rural Banks with 6,007 Rural Bank Offices [15].

Based on data from the Deposit Insurance Corporation (LPS), there were 506.56 million commercial bank customer savings accounts throughout Indonesia in January 2023, this figure increased by 14% on an annual basis [16]. Based on data from Bank Indonesia (BI), electronic money in circulation has reached 772.57 million units in November 2022, this number has increased by 34.28% from the position at the end of 2021 [17]. Apart from the use of e-money the last few years of use e-wallet also often used, some e-wallet popular i.e. Gopay, OVO, Days, ShopeePay, and LinkAja. According to reports E-Wallet Industry Outlook 2023, of the 1,300 urban residents surveyed, 74% of them had already used a digital wallet, use Gopay of 71% being the most, use e-wallet mostly used for online shopping, namely 79%, there are also those who use it to top up credit 78%, transfer money as much as 78%, and pay household bills as much as 45% [18].

According to some of the data above, it can be seen that in recent times the circulation of money, both physical and digital, has mostly been carried out by Financial Service Provider (PJK) products, namely banks with all types of products and services and

service providers. e-money and/or e-wallet with various products from each service provider. Many financial transactions are currently carried out through Financial Services Provider (PJK) products, with varying amounts and for various purposes you can use products from these Financial Services Providers (PJK). So far, what is commonly used as a forum for carrying out financial transactions are banks with their various products. All transactions at the bank are under the supervision of authorized institutions, while digital transactions are also under supervision, but considering the large number of applications in digital form, some are under supervision. supervision, there are also those who are not under supervision. Supervision of Financial Services Providers (PJK) in Indonesia is carried out by independent institutions, namely the Financial Services Authority and the Financial Transaction Reports and Analysis Center (PPATK).

The Financial Services Authority, hereinafter referred to as OJK, is an independent institution and free from interference from other parties which has the functions, duties and authority of regulation, supervision, inspection and investigation as intended in Law Number 21 of 2011 concerning the Financial Services Authority [19]. Article 4 of Law Number 21 of 2011 concerning OJK states that OJK was formed with the aim of ensuring that all activities in the financial services sector are carried out in an orderly, fair, transparent, accountable manner and are able to create a financial system that grows sustainably and stably, and is able to protect the interests of consumers and consumers. public.

The formation of the OJK is expected to support the interests of the financial services sector as a whole, thereby increasing economic competitiveness. Apart from that, OJK must be able to safeguard national interests. These include, among other things, human resources, management, control and ownership in the financial services sector while still considering the positive aspects of globalization. OJK was formed and based on the principles of good governance, which include independence and accountability. accountability, transparency and fairness (fairness). OJK functions to organize an integrated regulatory and supervisory system for all activities in the financial services sector [20].

Meanwhile, based on article 6 of Law Number 21 of 2011 concerning the Financial Services Authority, the main task of the OJK is to regulate and supervise: [21]

- a. Financial services activities in the Banking sector;
- b. Financial services activities in the Capital Market sector;
- c. Financial services activities in the Insurance, Pension Fund, Institution sectors. Financing, and Other Financial Services Institutions.

The authority that the OJK has is as follows: [22]

- a. **Specifically related to the Supervision and Regulation of Bank Financial Services Institutions which include:**
 - 1) Licensing for the establishment of a bank, opening of a bank office, articles of association, work plan, ownership, management and human resources, mergers, consolidation and acquisitions of banks, as well as revocation of bank business permits;
 - 2) Bank business activities, including sources of funds, provision of funds, hybrid products, and activities in the service sector;
 - 3) Regulation and supervision regarding bank health which includes: liquidity, profitability, solvency, asset quality, minimum capital adequacy ratio, maximum credit limit, loan to deposit ratio and bank reserves; bank reports related to bank health and performance; debtor information system; credit testing (*credit testing*); and bank accounting standards;
 - 4) Regulation and supervision regarding bank prudential aspects, including: risk management; bank governance; know-your-customer and anti-money laundering principles; and preventing the financing of terrorism and banking crimes; as well as bank checks.

b. Regarding the Regulation of Financial Services Institutions (Banks and Non-Banks) including:

- 1) Establish OJK regulations and decisions;
- 2) Establish regulations regarding supervision in the financial services sector;
- 3) Establish policies regarding the implementation of OJK duties;
- 4) Establish regulations regarding procedures for issuing written orders to Financial Services Institutions and certain parties;
- 5) Establish regulations regarding procedures for appointing statutory managers at financial services institutions;
- 6) Determine the organizational structure and infrastructure, as well as manage, maintain and administer assets and liabilities;
- 7) Establish regulations regarding procedures for imposing sanctions in accordance with the provisions of laws and regulations in the financial services sector.

c. Regarding supervision of financial service institutions (banks and non-banks) includes:

- 1) Establish operational policies for supervision of financial services activities;
- 2) Supervise the implementation of supervisory duties carried out by the Chief Executive;
- 3) Carry out supervision, inspection, investigation, consumer protection and other actions against financial service institutions, perpetrators and/or supporting financial service activities as intended in laws and regulations in the financial services sector;
- 4) Give written orders to financial service institutions and/or certain parties;
- 5) Appoint statutory management;
- 6) Determining the use of statutory managers;
- 7) Establish administrative sanctions against parties who violate laws and regulations in the financial services sector;
- 8) Granting and/or revoking: business permits, individual permits, effective registration statements, registration certificates, approval to carry out business activities, ratification, approval or determination of dissolution and other decisions.

Principles in carrying out its duties and authorities The Financial Services Authority in carrying out its duties is guided by several principles, such as the principles of independence, legal certainty, public interest, openness, professionalism, integrity and accountability [23]. Based on the authority of the OJK to supervise various transactions carried out by the public using Financial Services Providers (OJK), it is possible for the OJK to provide supervision on suspicious transactions carried out by the public using various products provided by Financial Services Providers (PJK). either bank or non-bank. Based on the provisions of Article 1 Paragraph 7 of Law Number 25 of 2003 concerning Amendments to Law Number 15 of 2002 concerning the Crime of Money Laundering, what is meant by suspicious financial transactions are:

- a. Financial transactions that deviate from the profile, characteristics, or transaction pattern habits of the customers involved;
- b. Financial transactions by customers that are reasonably suspected to have been carried out with the aim of avoiding reporting of the transactions in question which are required to be carried out by Financial Services Providers in accordance with the provisions of this Law; or
- c. Financial transactions carried out or canceled using assets that are suspected to originate from the proceeds of criminal acts.

Regarding suspicious transactions, based on the provisions of Article 9 letter c of the OJK Law which reads: "To carry out supervisory duties as intended in Article 6, the OJK has the authority to carry out supervision, inspection, investigation, consumer protection and other actions against Financial Services Institutions, perpetrators and/or supporting

financial services activities as intended in the laws and regulations in the financial services sector". According to Article 1 point 4 of Financial Services Authority Regulation Number 22/POJK.01/2015 concerning Investigation of Criminal Acts in the Financial Services Sector, OJK Investigators are Investigating Officers of the Indonesian National Police and/or Civil Servant Officials who are given special authority as Investigators, who employed at OJK to carry out Criminal Investigations in the Financial Services Sector as intended in Law Number 21 of 2011 concerning OJK.

The authority of the OJK in carrying out this investigation is also confirmed in Article 49 paragraph (1) of the OJK Law: "In addition to the Investigating Officers of the Indonesian National Police, certain Civil Servant Officials whose scope of duties and responsibilities include supervision of the financial services sector within the OJK, are given authority specifically as an investigator as intended in the Criminal Procedure Code." Article 49 paragraph (3) of the OJK Law explains the authority of civil servant investigators (PPNS), namely:

1. Summon, examine, and request information and evidence from anyone suspected of committing, or being a witness to, a criminal act in the financial services sector;
2. Request information from the bank regarding the financial condition of parties suspected of committing or being involved in violations of laws and regulations in the financial services sector;
3. Blocking accounts at banks or other financial institutions of parties suspected of committing or being involved in criminal acts in the financial services sector;
4. Request expert assistance in carrying out the task of investigating criminal acts in the financial services sector.

Based on this, it can be understood that the OJK can request information and/confirmation as well as examine records, books and/or other documents from parties suspected of carrying out or being involved in carrying out suspicious transactions. Discussing suspicious transactions in Indonesia to prevent this, we have anticipated the presence of an independent institution that has roles, functions and authority that generally supervises various transactions carried out by the public using various Financial Service Provider (PJK) products. The Anti-Money Laundering and Terrorism Financing Prevention regime in Indonesia, hereinafter referred to as the APUPPT regime, consists of:

- a. The Financial Transaction Reports and Analysis Center (PPATK) plays the role of Financial *Intelligence Unit (son)* whose task is to prevent and eradicate criminal acts of money laundering and terrorist financing with the authority to receive, analyze all financial-related information and submit it to law enforcement for follow-up.
- b. The Reporting Party is the party who submits financial transaction reports to PPATK which includes Financial Services Providers (PJK), Providers of other Goods and/or Services (PBJ) and Professionals.
- c. The Financial Services Authority acts as a Supervisory and Regulatory Institution which has the authority to supervise, regulate and/or impose sanctions on reporting parties.
- d. The Directorate General of Customs and Excise is obliged to make a report regarding the carriage of cash and/or other payment instruments for further submission to PPATK.
- e. Law Enforcement Agencies consist of investigative agencies, prosecution and execution agencies, as well as judicial institutions. In the APUPPT regime, law enforcement officials have a role in eradicating criminal acts of money laundering and terrorism financing.
- f. The community has a very important role in preventing and eradicating TPPU and TPPT. The role of the community is to provide data and information to the Reporting Party when conducting business relations with the Reporting Party. Apart from that, the public can also play an active role in providing information to the authorized law

enforcement officials or PPATK if they become aware of any actions that indicate money laundering.

- g. The National Committee for the Prevention and Eradication of TPPU consists of several related institutions chaired by the Coordinating Minister for Political, Legal and Security Affairs. *ex-officio*. This committee is tasked with carrying out national coordination in making policies to prevent and eradicate TPPU/TPPT. The Financial Services Authority is one of the institutions that is part of the National Committee for the Prevention and Eradication of TPPU.

Apart from the OJK which has the authority to supervise various suspicious transactions, there are other independent institutions which also have the authority to provide prevention against several suspicious transactions carried out by the public through Financial Service Providers. The Financial Transaction Reports and Analysis Center (PPATK) is a central institution (focal point) which coordinates the implementation of efforts to prevent and eradicate money laundering crimes in Indonesia. Internationally PPATK is a Financial Intelligence Unit (FIU) which has the duty and authority to receive financial transaction reports, carry out analysis of financial transaction reports, and forward the results of the analysis to law enforcement agencies.

The PPATK institution was first known in Indonesia in Law Number 15 of 2002 concerning the Crime of Money Laundering which was promulgated on April 17 2002. On October 13 2003, this Law was amended by Law No. 25 of 2003 concerning Amendments to Law no. 15 of 2002 concerning the Crime of Money Laundering. In order to provide a stronger legal basis for preventing and eradicating money laundering crimes, on October 22 2010 Law no. 8 of 2010 concerning Prevention and Eradication of the Crime of Money Laundering which replaces the previous Law. The existence of Law no. 8 of 2010 strengthens the existence of PPATK as an independent institution free from interference and influence from any power.

In this case, every person is prohibited from carrying out any form of interference with the implementation of PPATK's duties and authority. In addition, PPATK is obliged to reject and/or ignore any interference from any party in the implementation of its duties and authority. PPATK is directly responsible to the President of the Republic of Indonesia. As a form of accountability, PPATK makes and submits reports on the implementation of its duties, functions and authorities periodically every 6 (six) months to the President and the House of Representatives. Efforts to prevent and eradicate money laundering crimes use an approach to pursuing the proceeds of crime (follow the money) in preventing and eradicating criminal acts [24].

Based on the provisions of Article 39 of Law Number 8 of 2010 concerning Prevention and Eradication of the Crime of Money Laundering, PPATK has the task of preventing and eradicating the crime of money laundering. The function of PPATK is regulated in Article 40 of Law Number 8 of 2010 concerning Prevention and Eradication of the Crime of Money Laundering, namely: Prevention and eradication of the crime of money laundering; management of data and information obtained by PPATK; supervision of the reporting party's compliance; and Analysis or examination of financial transaction reports and information that indicate money laundering or other criminal acts such as corruption, bribery, narcotics and others [25].

The following are some of the authorities of PPATK relating to the prevention function. In carrying out the function of preventing and eradicating money laundering, PPATK has the authority to:

- a. Request and obtain data and information from government agencies and/or private institutions that have the authority to manage data and information, including from government agencies and/or private institutions that receive reports from certain professions.
- b. Establish guidelines for identifying suspicious financial transactions.
- c. Coordinate efforts to prevent money laundering crimes with related agencies.

- d. Provide recommendations to the government regarding efforts to prevent money laundering crimes.
- e. Representing the government of the Republic of Indonesia in international organizations and forums related to preventing and eradicating money laundering crimes.
- f. Organizing anti-money laundering education and training programs.
- g. Organizing outreach on the prevention and eradication of money laundering crimes.

Authority related to data and information management functions carried out by PPATK in carrying out management functions data and information, PPATK has the authority to organize information systems. Authority related to the supervisory function of the reporting party's compliance, In carrying out its supervisory function regarding reporting party compliance, PPATK has the authority to:

- a. Establish provisions and guidelines for reporting procedures for reporting parties.
- b. Categorizing service users who have the potential to commit money laundering.
- c. Conduct compliance audits or special audits.
- d. Convey information from audit results to the institution authorized to supervise the reporting party.
- e. Provide warnings to reporting parties who violate reporting obligations.
- f. Recommend to the authorized institution to revoke the reporting party's business permit.
- g. Establish provisions for implementing the principle of recognizing service users for reporting parties that do not have supervisory and regulatory institutions.

Authority regarding the function of analysis or examination of reports and information. In carrying out the function of analysis or examination of reports and information, PPATK has the authority to:

- a. Request and receive reports and information from the reporting party.
- b. Request information from related agencies or parties.
- c. Request information from the reporting party based on the development of PPATK analysis.
- d. Request information from reporting parties based on requests from law enforcement agencies or overseas work partners.
- e. Forward information and/or analysis results to requesting agencies, both within and outside the country.
- f. Receive reports and/or information from the public regarding suspected money laundering.
- g. Request information from the reporting party and other parties related to the alleged money laundering.
- h. Recommend to law enforcement agencies regarding the importance of interception or wiretapping of electronic information and/or electronic documents in accordance with statutory provisions.
- i. Requesting financial service providers to temporarily suspend all or part of transactions that are known or suspected to be the result of a criminal act.
- j. Request information on the progress of investigations and investigations carried out by investigators for predicate crimes and money laundering crimes.
- k. Carrying out other administrative activities within the scope of duties and responsibilities in accordance with statutory provisions.
- l. Forward the results of the analysis or examination to the investigator.

Based on the explanation above, the function of PPATK in the Process of Preventing and Eradicating the Crime of Money Laundering is that based on Article 40 letter a and Article 41, PPATK's authority has the function of preventing the crime of Money Laundering, and the implementing regulations of Presidential Decree Number 50 of 2011 concerning Procedures for the Implementation of Central Authority Reporting and Analysis

of Financial Transactions, the PPATK function is not given the authority to carry out investigations into the crime of money laundering. However, PPATK is only given the authority to analyze financial transactions to provide protection against losses experienced by the state or victims of criminal acts, so that PPATK functions to prevent money laundering crimes. So, judging from its function, PPATK is not included in the integrated criminal justice system (Criminal Justice System Integrand) only helps law enforcement officials eradicate money laundering crime [26].

The existence of OJK and PPATK which have the function and authority to provide supervision relating to activities carried out by Financial Services Providers regarding various transactions carried out by the public. Various types of transactions carried out are periodically checked to carry out supervision, one of which is supervision of suspicious transactions. Financial Services Providers in the form of Banks when carrying out transaction activities usually include the purpose of the transaction carried out, for example; transfer of funds, transfer of assets, investment, payment, and so on.

The purpose of this transaction is included so that we can monitor the reasons for the transaction and then see whether it matches the destination account (time, nominal transaction, intensity of carrying out transactions, and several other things), this is to provide supervision of suspicious transactions. Transaction activities carried out via digital media provided by Financial Services Providers are also monitored, considering that currently various things are done online. online so that many transactions are carried out digitally, but it cannot be denied that in Indonesia there are still many things that must be focused on to improve the monitoring system for transactions carried out digitally.

The supervision carried out by OJK and PPATK on Financial Services Providers is expected to be one of the steps to help indicate several criminal acts which are not only money laundering crimes, but also several other criminal acts, bearing in mind that some of the criminal acts committed must be various transactions using various Financial Services Provider products.

Financial Services Providers have an important role in child protection, especially to combat child sexual exploitation that occurs in Indonesia. One of the causes of the rise in child sexual exploitation cases is the compensation paid by people who purchase child sexual exploitation services to child victims. Through regular audits and reviews of the program profiling and transaction monitors, Financial Services Providers can identify and stop financial transactions related to sexual exploitation of children [27]. The criminal act of sexual exploitation of children has used financial institutions to carry out financial transactions.

Financial institutions are deliberately used to disguise the origin of the money. Apart from that, with the increasing development of information and technology, online transactions are also carried out. There is a global and national trend that perpetrators of child sexual crimes use payment methods that utilize non-bank financial institutions, for example money transfer services, transactions via e-wallet, or other financial transactions that are difficult for PPATK to detect [28]. Even though it is said to have been detected by PPATK, this is where OJK takes the role of providing supervision, OJK and PPATK are two institutions that work together to supervise all manual or digital transactions.

3.2 The Role of Financial Service Providing Institutions in the Concept of Protecting Children's Online Sexual Violence

As is known in the previous explanation, cybercrime is a form of unlawful action carried out using computer technology and occurs in the cyber domain [29]. Currently, online sexual violence, which is part of crime in the cyber world, seems to be a new trend. This sexual violence, just like in other countries, uses internet media, such as social media, to carry out their crimes, starting from exposing photos, chatting, or even more worrying, online activities that are deliberately carried out to sell sex to their victims [30]. Internet media has exposed its users to sexually violent behavior or even use internet media to

persuade or even force their victims to have sexual relations through technological intermediaries, which is commonly referred to as cyber sex [31].

Victims of online sexual violence are not only adults, but also minors who are vulnerable to becoming victims of online sexual violence. Online sexual violence is basically part of online gender-based violence (KBGO). Online Gender-Based Violence (KBGO) is violence committed against someone based on sex or gender, facilitated by digital technology [32]. Therefore, online gender-based violence is considered to be one of the most systematic and widespread human rights violations because the perpetrators aim to gain profits either sexually, financially or both by causing feelings of discomfort and loss to the victim and even trauma to the victim [33].

Online gender-based violence has become increasingly visible in the Covid 19 era, where most activities are carried out digitally. This condition changes people's life patterns with the use of digital media increasing significantly among young people [34]. The 2020 WEF Youth Survey found that 87% of respondents aged between 16-35 years admitted that their use of digital media had increased during the pandemic. And 42% of respondents admitted to using a new digital application that had never been used before [35]. Komnas Perempuan Commissioner, Verryanto Sitohang, said that crimes in cyberspace are often facilitated by technology. The victims are generally women who are often associated with their bodies [36].

Based on data obtained by the National Commission on Violence Against Women, it is stated that there are eight types of sexual violence that are facilitated by the presence of technology, ranging from harassment in cyberspace, hacking, spreading intimate content without consent, to threats of spreading intimate photos and videos [37]. Interpol together with Ecpat and Unicef reported that the number of suspected cases occurred quite high from 2017 to 2019. From 2017 to 2019, allegations of sexual exploitation of children in the online world amounted to 727,494 children in 2017 and increased in 2018 (a total of 1,223,972 children) and decreased in 2019 by a number 840,221.4 This is presumptive because Indonesian law enforcement has difficulty tracking cybercrime. Meanwhile, according to children's reports, this case often occurs in as many as 2% (of 500,000 children). These forms of sexual exploitation include: showing pornographic images, blackmailing sexual images, distribution without the child's permission, sexual acts with gifts [38].

UNICEF explains that sexual violence against children includes gender-based violence [39]. Gender-based violence is violence that harms one gender, especially women [40]. Even though women are also perpetrators of sexual violence against children and teenagers, 90% of the perpetrators are men. Reports show that sexual violence against girls is 2-3 times higher than boys, although in some countries and certain organizations the rate against boys is higher [41].

In fact, digital technology does not cause online sexual violence against children, but rather facilitates even greater online sexual violence against children. Online child sexual violence content is evidence of direct child sexual violence, usually the perpetrator is someone who has a close relationship with the child. The nature of online sexual violence against children requires collaboration between technology and law enforcement between regions [42].

End Child Prostitution and Trafficking (ECPAT) Indonesia mapped the situation of child vulnerability and online sexual exploitation by reviewing online questionnaires for 1,203 respondents aged 6 to 17 years. It was found that children's internet use increased by 67% compared to before COVID-19. UNICEF explains that children who experience sexual violence in general and online sexual violence in particular, do not always realize that these actions constitute sexual violence. The impact of child online sexual violence varies, depending on the severity and duration of the violence, the child's development in

understanding acts of sexual violence, and the way family, friends, and society deal with sexual violence.

Discussing child protection, Indonesia actually has special regulations regarding child protection which are regulated in Law no. 23 of 2002 concerning Child Protection jo. UU no. 35 of 2014 concerning the First Amendment to the Child Protection Law jo. UU no. 17 of 2016 concerning the Second Amendment to the Child Protection Law. Article 4 of Law no. 23 of 2002 regulates that every child has the right to live, grow, develop and participate appropriately in accordance with human dignity, as well as protection from violence and discrimination.

Legal protection is a form of protection for human rights that are harmed by other people and this protection is given to the community so that they can enjoy all the rights granted by law or in other words legal protection is a variety of legal efforts that must be provided by law enforcement officials to provide a sense of security, both mentally and physically from disturbances and various threats in the form of violence in any form to anyone and wherever that person is [43].

Article 28D paragraph 1 of the 1945 Constitution of the Republic of Indonesia states that "everyone has the right to recognition, guarantees, protection and fair legal certainty as well as equal treatment in advance". Law. Article 1 number 3 of the 1945 Constitution states, among other things, that "the Indonesian state is a state of law", a statement that must be respected in all government actions. Accordingly, Article 20 of Law No. 35 of 2014 concerning the responsibilities of family and society regarding the protection of children, "The state, government, regional government, family, community, family and parents/guardians are responsible and obliged to provide protection for children." Apart from that, Article 76 of the Child Protection Law No. 35 of 2014 states "Everyone is prohibited from placing, allowing, carrying out, ordering to carry out, or even participating in the economic and/or sexual exploitation of children." The prohibition on anyone in the online world sexually exploiting children is also confirmed in the Child Protection Law.

Exploitation and mistreatment of children mainly occurs on social media platforms, such as WhatsApp, Facebook and Facebook Messenger. However, up to 56% of children never tell anyone about the incident they experienced. Children who report prefer to tell friends or relatives rather than parents or other adults. In the survey, only one child reported an incident to the police, namely an incident of receiving unwanted sexual content, and another child contacted the service contact number after being lured by money or gifts if they were willing to provide sexual content [44].

Seeing the development of online child sexual violence which is increasingly leading to child sexual exploitation and even refers to child sexual trafficking, progressive and comprehensive steps are needed regarding the involvement of all parties to prevent and deal with this form of online child sexual violence. Starting from government officials, law enforcement officials, the community and other institutions, including the role of financial service providers. Legal protection is not only carried out through repressive measures such as those regulated in the Child Protection Law, the ITE Law, and the Pornography Law. However, preventive efforts are also needed in the concept of child protection in terms of online sexual violence against children, one of which is the role of institutions providing financial services.

Perpetrators of criminal acts of sexual exploitation of children have used financial institutions to carry out financial transactions. Financial institutions are deliberately used to disguise the origin of the money. Apart from that, with the increasing development of information and technology, online transactions are also carried out. There is a global and national trend that perpetrators of child sexual crimes use payment methods that utilize non-bank financial institutions, for example money transfer services, transactions via e-wallet, or other financial transactions that are difficult for PPATK to detect [45].

Thus, the role of financial service provider institutions is needed in the concept of protecting child online sexual violence. According to the author, Indonesia indeed has

various regulations that provide a legal umbrella for crimes involving online sexual exploitation of children, but the author feels that the role of financial service institutions is also needed in the concept of protecting online sexual violence. The regulations contained in the Child Protection Law should be added to a chapter related to the role of financial providers in child sexual exploitation transactions. This is important considering that we are entering an era where financial transactions are carried out completely digitally.

From the barter system to the discovery of 'money' as a means of payment. From *cash and carry* to the emergence of the term *cashless*, and the increasing number of companies and *startups* engaged in financial services or what is better known as *financial technology* (*fintech*). However, anticipation needs to be taken because various forms of crime can occur through financial transactions, such as corruption, bribery and even various forms of sexual exploitation involving children, such as prostitution, pornography, etc. Therefore, in eliminating sexual exploitation, all parties need to be involved, including for example PPATK as a government institution that independently analyzes finances [46].

The financial sector, such as financial service providers, actually has a big role in identifying forms of online sexual crimes against children which are part of online sexual violence against children. First, it needs to be understood that it should be the obligation of the financial sector to detect transactions related to other predicate crimes, which are then packaged in the form between consumers and producers as usual. Compile financial reports data from multiple sources, providing the evidence law enforcement agencies need to launch its investigation, confiscation and confiscation of criminal proceeds, and rescue of victims. Requires all members of the private financial sector, such as banks, MSEs, money transfer platforms, and cryptocurrency exchanges, to file SARs and STRs whenever suspicious financial activity is identified that may be related to sex-based crimes against minors [47].

Second, monitoring financial flows in cases involving online sex-based crimes against minors [48]. Financial flows serve as a key opportunity to identify perpetrators and victims in need of protection. This is important because it can lead to double security much quicker opportunities compared to traditional law enforcement investigations.

Third, data sharing and disclosure to law enforcement [49]. This data is often not available for law enforcement to share, and financial institutions cannot share either data freely with law enforcement due to privacy laws. Privacy and data sharing laws related to national context, which makes disclosure very difficult.

4. Conclusions

Based on previous discussions, the author can conclude that the role of financial service providers in terms of protecting online sexual violence against children, including crimes of online sexual exploitation of children, is very necessary as a form of preventive and repressive legal protection. The supervision carried out by OJK and PPATK on Financial Services Providers is expected to be one of the steps to help indicate several criminal acts which are not only money laundering crimes, but also several other criminal acts, bearing in mind that some of the criminal acts committed must be various transactions using various Financial Services Provider products.

The manifestation of this role needs to be emphasized in the concept of protecting children's online sexual violence by referring to several things, namely early detection of transaction activities that lead to or have the potential to lead to online sexual transactions of children, maximizing monitoring of financial transaction flows, and transparent data disclosure. by collaborating with law enforcement on cases of online sexual transactions of children.

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