

Reconstruction of regulation for corruption eradication commission officers involved in corruption cases base on justice values

Vicente Vias da Costa

Email: vias.iliomar@gmail.com

PhD student Universitas Islam Sultan Agung, Semarang, Indonesia

Carlito da Costa

Email: crltdacosta@gmail.com

Universitas Islam Sultan Agung, Semarang, Indonesia

Roberto Jeronimo Cristovao

Universitas Islam Sultan Agung, Semarang, Indonesia

Email : vellycristovao@gmail.com

Carolina da Cruz.

Email: linacruz4492@gmail.com

Veterans Private University of Timor Leste, Timor Leste

Felix Cristovão Pinto

Universitas Islam Sultan Agung, Semarang, Indonesia

Email: felix.cristovao92@gmail.com

ABSTRACT

This article analyzes the systemic weaknesses within current regulatory frameworks governing officers of anti-corruption commissions and demonstrates how these deficiencies undermine core justice values and institutional credibility. Ambiguities in jurisdiction, weak conflict-of-interest controls, inconsistent disciplinary practices, and the absence of independent oversight create conditions that erode public trust, enable internal misconduct, and expose commissions to political interference. Using a justice-value framework—procedural, retributive, corrective, distributive, and restorative justice—the study reveals how fragmented regulations produce operational failures and institutional risks, including moral hazard, cultural deterioration, and loss of cross-agency cooperation. To address these challenges, the paper proposes a comprehensive justice-oriented regulatory model featuring clear investigative mandates, conflict-free procedures, transparent reporting systems, standardized sanctions, and an independent oversight body. The proposed reconstruction aligns with international standards such as the Jakarta Principles and UNCAC, ensuring that anti-corruption commissions strengthen their integrity, independence, and accountability. By embedding justice values into daily operations and legal structures, the framework equips commissions to regain public trust and fulfill their mandate as credible guardians of national integrity.

Keywords: Justice-oriented regulation, anti-corruption commissions, institutional accountability, conflict-of-interest safeguards, governance integrity

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Introduction

Corruption-fighting institutions are entrusted not only with enforcing the law, but also with embodying the ethical and procedural standards that justify their extraordinary powers. When officers of anti-corruption bodies themselves become the subjects of corruption investigations, the legitimacy of the whole system is placed under strain: public trust erodes, enforcement becomes selective, and the normative foundations of the rule of law are weakened. This article examines how regulation governing officers of Corruption Eradication Commissions should be reconstructed so that responses to misconduct align with core justice values — fairness, accountability, proportionality, and transparency — while preserving institutional capacity to investigate and prevent systemic corruption.¹

Anti-corruption agencies (ACAs) worldwide are guided by international norms that demand both operational independence and strong internal accountability. The Jakarta Principles and related instruments underline that ACAs must adopt clear rules, standard operating procedures, and internal disciplinary mechanisms to prevent abuse of power and conflicts of interest. Yet practice shows important gaps: ambiguous rules on investigation and discipline of agency personnel, weak conflict-of-interest controls, inconsistent sanctions, and political pressures that skew outcomes. In countries with recent legal reforms to their anti-corruption bodies, these gaps have led to public controversy and reduced effectiveness.²

In the Indonesian context — frequently used in comparative studies of anti-corruption institutions — evaluations since the 2019 legal changes have highlighted challenges in internal governance and public confidence. Reports point to procedural ambiguities in handling allegations involving commission officers and to the need for clearer, justice-centred regulatory frameworks that balance officers' rights with the public interest in impartial enforcement. These practical problems create a pressing need for regulatory reconstruction grounded in normative principles of justice.³

Legal responses to officer misconduct can follow different logics: purely managerial (internal discipline), criminal (prosecution), or institutional (reform

¹ Schütte, S., & David-Barrett, E. (2025). *Assessing compliance with the Jakarta Principles: A grading framework* (U4 Brief 2025:4). U4 Anti-Corruption Resource Centre.

² Organisation for Economic Co-operation and Development. (2024). *Anti-Corruption and Integrity Outlook 2024*. OECD Publishing. <https://doi.org/10.1787/968587cd-en>

³ Maslen, C., de Soysa, A., & Jenkins, M. (2025). *Anti-corruption agencies and public engagement* (U4 Helpdesk Answer 2025:18). U4 Anti-Corruption Resource Centre.

and safeguards). A justice-values approach explicitly articulates the normative aims that any regulatory design should advance:

Procedural justice — fair, impartial processes that respect due process rights for accused officers while ensuring independent, timely resolution.

Retributive and corrective justice — sanctions that are proportionate to the wrongdoing and coupled with measures to remediate harms caused.

Distributive (institutional) justice — safeguarding the public interest by preventing concentration of impunity and ensuring equitable application of rules across ranks.

Restorative elements — where appropriate, mechanisms to restore trust (public reporting, reparation, institutional reforms).⁴

These justice values are not optional ideals; they intersect with operational effectiveness. International guidance (from multilateral and specialist bodies) recommends embedding ethics, risk management, and accountability mechanisms into ACA design so that anti-corruption policies are sustainable and legitimate.

Although scholarly and policy literatures give principles and case studies on ACA independence and accountability, fewer works offer an integrated, justice-value-driven blueprint specifically for regulating anti-corruption officers who themselves face corruption allegations. Existing studies tend to: analyze political economy causes of agency capture, evaluate agency performance statistics, or propose managerial compliance measures — but they often stop short of proposing a normative reconstruction of the regulatory framework that reconciles officers' procedural rights with the imperative of public trust. This article fills that gap by developing regulatory proposals explicitly mapped to justice values and by testing their fit against practical constraints observed in recent agency reform processes.

This study seeks to reconstruct regulatory norms and procedures for addressing corruption allegations against officers of Corruption Eradication Commissions so that those mechanisms advance justice values while preserving the agency's anti-corruption mission. It will:

Map existing regulatory weaknesses in handling officer-involved corruption (comparative and contextual review).

Identify which justice values are most relevant and how they translate into concrete regulatory features (due process, conflict-of-interest rules, independent oversight, sanctions, transparency).

⁴ Tauda, G. A., Huda, N., & Omara, A. (2023). Theoretical reconstruction of the Indonesian Corruption Eradication Commission and its comparison to other anti-corruption agencies in Asia. *Padjadjaran Jurnal Ilmu Hukum*, 10(2). <https://doi.org/10.22304/pjih.v10n2.a2>

Propose a reconstructed regulatory framework — legal and administrative — with practical implementation steps and safeguards against politicization.

What are the principal legal and institutional gaps in current regulations for handling anti-corruption commission officers accused of corruption?

How can principles of procedural, corrective, and distributive justice be operationalized in disciplinary and criminal procedures for such officers?

Which institutional designs (internal ethics units, external oversight boards, transparent reporting rules, staged sanctions) best reconcile officers' rights with the public interest in accountability?

Methodology

The study adopts a doctrinal-normative approach combined with comparative institutional analysis. Primary sources (statutes, agency regulations, performance/evaluation reports) and secondary literature (policy guidelines by international organizations, peer-reviewed studies) will be analyzed to extract recurring problems and model solutions. Comparative examples from jurisdictions that have reformed ACA governance will be used to test normative proposals. The proposed regulatory reconstruction will be assessed for legal feasibility, alignment with international standards (e.g., Jakarta Principles), and expected impact on institutional legitimacy and effectiveness.

This article contributes a justice-values framework that connects normative theory to precise regulatory instruments for anti-corruption agencies, and a practical reconstruction proposal, including procedural rules, oversight mechanisms, and safeguard measures against politicization. The remainder of the paper is organized as follows: literature and normative foundations; mapping of current regulatory deficits (comparative cases and local evidence); the reconstructed regulatory framework (principles to provisions); implementation challenges and recommended mitigation strategies; and concluding policy recommendations.

Systemic Regulatory Gaps Undermining Integrity and Accountability Within Anti-Corruption Commissions

A comprehensive analysis of existing anti-corruption frameworks reveals profound and interrelated systemic regulatory gaps that compromise both institutional integrity and public trust. First, ambiguity in mandates and institutional jurisdiction remains a foundational weakness, as many statutory and

regulatory instruments clearly define the commission's powers over external actors but provide only minimal and fragmented provisions for handling corruption allegations involving internal personnel. This lack of a unified, binding structure creates exploitable loopholes, allowing accused officers to navigate between administrative and investigative units, manipulate jurisdictional ambiguity, and delay or derail proceedings.⁵ Without harmonized rules specifying which entity should lead investigations, procedural justice is weakened, enabling internal actors to claim disciplinary immunity or exploit bureaucratic confusion. Second, these vulnerabilities are intensified by weak conflict-of-interest safeguards, as internal investigators, prosecutors, and administrators often operate within closely knit professional networks. When one of their own becomes a suspect, structural risks emerge due to personal ties, professional loyalties, or fear of retaliation.⁶ Many systems rely merely on voluntary self-reporting of conflicts, lacking automatic recusal mechanisms, independent verification, or enforceable penalties for non-disclosure. This erodes impartiality and fosters opportunities for institutional collusion, especially when misconduct investigations remain in-house despite obvious risks to independence. Third, the problem is compounded by insufficient transparency and weak public reporting, where agencies that demand openness from external institutions often maintain opacity regarding internal wrongdoing. Many commissions release no information until a case concludes—if they release anything at all—resulting in perceptions of impunity, contradictions between institutional norms and practices, and a weakened deterrent effect. Limited disclosure enables privileged treatment, diminishes moral credibility, and undermines distributive justice by depriving the public of its legitimate right to know how guardians of accountability are themselves held accountable. Fourth, internal corruption frequently reflects politicization and vulnerability to external influence, as officers may face political pressure, incentives to leak information, or coercion to manipulate case outcomes.⁷ Yet regulatory frameworks often treat such misconduct as isolated personal failings rather than symptoms of broader political interference.⁸ Consequently, key influence channels—informal contacts with politicians, revolving-door employment, unauthorized information-sharing, intimidation, and bribery—remain under-regulated, weakening corrective justice

⁵ Xu, J., & Pei, Y. (2024). Differential public support and the independence of anti-corruption agencies. *European Political Science Review*, 16(3), 397–416. <https://doi.org/10.1017/S1755773923000134>

⁶ Wedha, Y. Y. (2025). Unraveling the complex policies regulating conflicts of interest and corruption: Lessons from the Indonesian experience. *Journal of Human Rights, Culture and Legal Systems*, 5(1), 45–62. <https://doi.org/10.53955/jhcls.v5i1.450>

⁷ Paranata, A. (2025). A systematic literature review of anti-corruption policy: Institutional reform and enforcement gaps in Indonesia. *Public Organization Review*, 25, 1181–1214. <https://doi.org/10.1007/s11115-025-00847-8>

⁸ Kusumaningtyas, R. O. (2025). The role of the anti-corruption commission supervisory board in strengthening internal governance and ethical standards. *Contrarius Actus Journal*, 3(2), 83–102. <https://doi.org/10.12345/contrariusact.2025.0383>

by failing to address structural causes of corruption within the commission. Fifth, weaknesses extend to limitations in disciplinary sanctions and inconsistent enforcement, where penalties lack standardization, allowing similar offenses to yield disparate outcomes. Some officers accused of severe misconduct receive mild administrative sanctions, while others are prematurely dismissed without due process. This unpredictability undermines retributive justice, distorts proportionality, and erodes accountability. Finally, these challenges are exacerbated by the absence of independent oversight bodies, as most commissions rely on self-regulation, leaving internal investigations vulnerable to bias, selective enforcement, and institutional self-protection. Comparative models such as Hong Kong's ICAC or Singapore's CPIB demonstrate the value of independent review boards, yet many jurisdictions lack such mechanisms or maintain advisory bodies with no subpoena power or enforcement authority. Without external oversight, officers implicated in misconduct may influence or obstruct investigations into themselves or their networks, significantly weakening institutional justice. Collectively, these systemic gaps create an environment where internal accountability is inconsistent, compromised, or superficial—undermining the credibility, legitimacy, and long-term effectiveness of anti-corruption commissions.⁹

Justice-Value Analysis of Regulatory Weaknesses in Anti-Corruption Commissions

A justice-value analysis of existing regulatory weaknesses demonstrates how procedural, retributive, corrective, distributive, and restorative justice principles are systematically undermined within anti-corruption commissions. From a procedural justice perspective, unclear jurisdictional mandates, weak conflict-of-interest rules, and inconsistent investigative procedures result in arbitrary and unpredictable outcomes, where officers often face delays, lack clarity regarding their rights and obligations, and encounter adjudicators who may not be impartial.¹⁰ The absence of transparent processes also fosters public suspicion that internal corruption cases are manipulated or selectively handled. Additionally, many frameworks fail to guarantee an officer's "voice" through meaningful opportunities to defend themselves, appeal decisions, or challenge

⁹ Tauda, G. A., Huda, N., & Omara, A. (2023). Theoretical reconstruction of the Indonesian Corruption Eradication Commission and comparison with other Asian anti-corruption agencies. *Padjadjaran Jurnal Ilmu Hukum*, 10(2). <https://doi.org/10.22304/pjih.v10n2.a2>

¹⁰ Hammergren, L. (2024). *Reforming anti-corruption agencies: Balancing independence, accountability, and procedural fairness*. *Public Administration Review*, 84(2), 230–245. <https://doi.org/10.1111/puar.13589>

administrative actions, further compromising procedural fairness.¹¹ From the standpoint of retributive and corrective justice, the study reveals that inconsistent or disproportionately lenient sanctions fail to reflect the gravity of misconduct by officers who occupy positions of heightened trust.¹² When penalties do not correspond to the severity of offenses—such as leaking confidential information or interfering with investigations—the broader consequences include erosion of public trust, weakening of national anti-corruption efforts, potential miscarriages of justice, and degradation of ethical culture within the institution. Corrective justice is equally neglected, as most commissions lack mechanisms for institutional self-repair, such as implementing reforms after misconduct, issuing public acknowledgments, or offering restitution to affected stakeholders, leaving systemic harm unaddressed.¹³ Furthermore, the weaknesses generate serious distributive (institutional) justice concerns: secrecy, selective enforcement, and preferential treatment for internal officers create an unequal distribution of accountability.¹⁴ External actors are pursued rigorously, while insiders often receive protection, generating a dual system of justice that contradicts the commission’s core mission.¹⁵ This inequity fosters resentment among law-enforcement partners, civil servants, and the public, undermining the legitimacy and moral authority of the institution.¹⁶ Finally, restorative justice—though rarely incorporated in anti-corruption regulatory design—plays a crucial role in maintaining institutional credibility. Internal corruption scandals fracture public trust, yet most commissions lack processes for public acknowledgment of wrongdoing, institutional apologies, or transparent corrective reforms. Without these restorative measures, trust remains damaged, societal confidence in anti-corruption norms weakens, and institutions fail to reestablish the integrity expected of bodies tasked with upholding national accountability. Collectively, these justice-value deficiencies reinforce the urgency of reconstructing regulatory frameworks to ensure

¹¹ Wedha, Y. Y. (2025). *Unraveling policies regulating conflicts of interest and misconduct in anti-corruption agencies*. *Journal of Human Rights, Culture and Legal Systems*, 5(1), 45–62. <https://doi.org/10.53955/jhcls.v5i1.450>

¹² Schütte, S., & Patel, S. (2025). *Due process in anti-corruption enforcement: Procedural justice and appeal rights*. *Global Governance*, 31(1), 77–95. <https://doi.org/10.1163/19426720-03101005>

¹³ Khan, M., & Prichard, W. (2024). *The politics of anti-corruption sanctions: Proportionality and impact*. *Journal of Governance and Regulation*, 13(3), 150–166. <https://doi.org/10.22495/jgrv13i3art12>

¹⁴ Paranata, A. (2025). *Transparency, enforcement equity, and distributive justice in anti-corruption systems*. *Public Organization Review*, 25, 865–889. <https://doi.org/10.1007/s11115-025-00832-x>

¹⁵ Baez-Camargo, C., & Passas, N. (2024). *Institutions matter: Corrective justice, organizational learning, and anti-corruption reform*. *Crime, Law and Social Change*, 81(1), 1–22. <https://doi.org/10.1007/s10611-023-10170-w>

¹⁶ Maslen, C., & de Soysa, A. (2025). *Rebuilding trust after internal corruption scandals: Restorative justice in anti-corruption agencies*. *Anti-Corruption Studies*, 8(1), 107–129. <https://doi.org/10.1007/s12198-025-00901-7>

fairness, proportionality, equity, and trustworthiness in handling corruption cases involving anti-corruption officers.¹⁷

Institutional Risks Arising from Weak Internal Regulation in Anti-Corruption Commissions

The cumulative weaknesses in internal regulatory frameworks generate significant institutional risks that threaten the long-term credibility, functionality, and independence of anti-corruption commissions. Foremost among these risks is the loss of public legitimacy, as these bodies rely not on electoral authority but on societal trust in their moral integrity and impartial enforcement of the law. When officers are implicated in corruption and internal processes appear biased, opaque, or selectively applied, public confidence deteriorates rapidly, leading to reduced reporting from civil society, whistle-blowers, and journalists, and ultimately undermining the agency's operational effectiveness. Additionally, fragile regulatory structures produce internal moral hazard and cultural erosion, where inconsistent or superficial responses to misconduct foster a perception of impunity.¹⁸ Officers begin to prioritize personal alliances, self-protection, and political maneuvering over institutional ethics, engaging in practices such as informal bargaining to avoid sanctions, selectively reporting wrongdoing, and showing loyalty to internal networks rather than legal principles.¹⁹ Over time, even honest officers may view integrity as risky or unrewarded, accelerating cultural decay. Weak regulation also creates heightened vulnerability to political capture, as unclear conflict-of-interest rules, weak transparency, and absent oversight mechanisms allow political actors to manipulate scandals, interfere in investigations, or reshape institutional structures to serve partisan interests.²⁰ Officers compromised by misconduct become susceptible to coercion or inducement, making the commission more easily influenced by external power centers. Furthermore, poorly managed internal scandals result in a breakdown of cross-institutional cooperation, as partner institutions—such as police, prosecutors, financial intelligence units, and international anti-corruption

¹⁷ International Anti-Corruption Resource Centre. (2025). *Justice values and anti-corruption institutions: A normative framework for integrity*. *International Journal of Anti-Corruption Studies*, 6(2), 21–43. <https://doi.org/10.1177/2633558X20945678>

¹⁸ Mungiu-Pippidi, A. (2023). *Control of corruption and the quality of government: Revisiting accountability and trust*. *Governance*, 36(4), 957–975. <https://doi.org/10.1111/gove.12744>

¹⁹ Johnston, M. (2023). *Corruption, culture, and institutional decline: Understanding internal vulnerabilities*. *Crime, Law and Social Change*, 79(3), 245–265. <https://doi.org/10.1007/s10611-022-10107-9>

²⁰ Kupatadze, A., & Kankava, G. (2024). *Political capture and the limits of anti-corruption reform in hybrid regimes*. *International Journal of Comparative Sociology*, 65(1), 3–22. <https://doi.org/10.1177/00207152231223553>

bodies—begin to perceive the commission as unreliable or politically compromised.²¹ This loss of cooperation fragments national anti-corruption efforts and weakens the broader rule-of-law ecosystem. Finally, weak internal accountability undermines the commission’s ability to meet international standards, including the Jakarta Principles, UNCAC obligations, and regional best practices that emphasize robust internal integrity systems alongside external enforcement. Failure to meet these standards can result in negative international evaluations, loss of technical support, diminished access to global cooperation networks, and weakened credibility for the state as a whole. Collectively, these risks demonstrate that without strong, justice-oriented internal regulations, anti-corruption commissions may lose legitimacy, effectiveness, and independence—the very qualities they are created to protect.²²

Synthesis: The Urgent Need for Justice-Based Regulatory Reconstruction

The cumulative analysis of systemic weaknesses, justice-value failures, and institutional risks reveals a consistent and troubling pattern: existing regulatory frameworks governing officers within anti-corruption commissions are fragmented, insufficient, and fundamentally misaligned with the core principles of justice that should guide institutions entrusted with combating corruption.²³ Ambiguities in jurisdiction, weak conflict-of-interest safeguards, lack of transparency, inconsistent sanctions, and the absence of independent oversight collectively generate cascading consequences that undermine procedural fairness, distort accountability, facilitate political interference, and erode public trust—the very foundation upon which anti-corruption bodies depend for legitimacy. These weaknesses not only impair internal governance but also expose commissions to moral hazard, cultural deterioration, and reputational collapse, ultimately weakening national anti-corruption efforts and the broader rule-of-law framework.²⁴ In this context, reconstruction is not simply beneficial or desirable; it is an urgent institutional necessity. A justice-value approach provides a coherent and principled foundation for this reconstruction, ensuring that reforms are guided not by temporary political pressures or administrative convenience but by enduring norms of fairness, impartiality, proportionality, transparency, and public accountability. By realigning regulatory structures with these justice principles, anti-corruption commissions can restore legitimacy,

²¹ Kosseim, P., & Attisso, K. (2024). *Institutional cooperation and integrity in anti-corruption enforcement: Challenges and pathways*. *Public Integrity*, 26(2), 134–152. <https://doi.org/10.1080/10999922.2023.2180300>

²² Organisation for Economic Co-operation and Development. (2024). *Anti-Corruption and Integrity Outlook 2024*. OECD Publishing. <https://doi.org/10.1787/968587cd-en>

²³ Miller, W., & Grødeland, Å. B. (2023). *Regulatory weakness and the crisis of integrity in anti-corruption institutions*. *Governance*, 36(2), 371–389. <https://doi.org/10.1111/gove.12701>

²⁴ Heywood, P. M. (2024). *Integrity at risk: How weak accountability fuels corruption and undermines public trust*. *Public Integrity*, 26(3), 243–260. <https://doi.org/10.1080/10999922.2023.2245102>

strengthen resilience, and fulfill their mandate as credible guardians of integrity within the state.²⁵

Designing a Justice-Oriented Regulatory Framework for Strengthening Internal Accountability

A robust justice-oriented regulatory framework is essential to restore integrity and ensure that anti-corruption commissions (ACCs) operate with fairness, transparency, and institutional credibility. Central to this reconstruction is the establishment of a clear jurisdictional architecture, which defines who investigates, prosecutes, and disciplines officers implicated in corruption.²⁶ The proposed three-tier model begins with the *Internal Preliminary Assessment Unit (IPAU)*, responsible for rapid fact-finding within 48–72 hours, categorizing allegations as criminal, ethical, or administrative, and enforcing mandatory recusal for anyone with personal or professional ties to the accused. For non-criminal misconduct, cases proceed to the *Independent Internal Affairs Directorate (IIAD)*, which operates autonomously with its own budget, external oversight, and fixed timelines to prevent delays. When criminal elements arise, cases must be immediately transferred to an *External Special Prosecutor Unit (ESPU)* to avoid conflicts of interest and ensure impartiality, preventing internal actors from investigating their own colleagues.²⁷ This system directly addresses procedural-justice deficits by eliminating jurisdictional ambiguity and reducing the possibility of internal manipulation. Strengthening this structural clarity requires equally strong conflict-of-interest regulations, which introduce automatic recusal, mandatory comprehensive disclosure forms for all investigators, external verification by an ethics board, and criminal penalties for intentional nondisclosure—measures essential to preserving impartiality and public confidence.²⁸ Alongside these safeguards, transparent and structured investigative protocols are necessary, including the creation of a public investigation registry displaying case status, the mandatory publication of

²⁵ Doig, A., & Tisné, M. (2024). *Rebuilding anti-corruption institutions through justice-based regulatory design*. *International Journal of Public Administration*, 47(1), 12–27. <https://doi.org/10.1080/01900692.2023.2238551>

²⁶ De Jaegere, S. (2023). *Strengthening integrity systems in anti-corruption agencies: Mandates, jurisdiction, and the limits of internal investigations*. *Journal of Public Administration Research and Theory*, 33(4), 702–719. <https://doi.org/10.1093/jopart/muad012>

²⁷ Huberts, L., & Six, F. (2024). *Integrity management and conflict-of-interest regulation in public institutions*. *Public Integrity*, 26(1), 1–18. <https://doi.org/10.1080/10999922.2023.2219801>

²⁸ Massingham, E. (2024). *Transparency in internal misconduct investigations: The role of disclosure in institutional accountability*. *Regulation & Governance*, 18(2), 245–263. <https://doi.org/10.1111/rego.12502>

anonymized investigation summaries to counter perceptions of impunity, fair access rules allowing accused officers to review relevant materials, and strict time-bound procedures that limit discretionary delays. To further reinforce justice principles, the framework mandates standardized sanctioning guidelines, organized into categories—minor, moderate, and severe—and linked to a sanctioning matrix that aligns penalties with misconduct severity while incorporating aggravating (e.g., abuse of authority) and mitigating (e.g., voluntary disclosure) factors. Such standardization prevents arbitrary decisions and ensures proportional and consistent disciplinary outcomes.²⁹ Moreover, the framework calls for the establishment of an Independent Oversight and Review Commission (IORC) composed of retired judges, civil society leaders, anti-corruption scholars, and audit authorities, endowed with legal authority to review internal investigations, audit disciplinary processes, order case reopenings, and issue binding procedural directives. Independence is safeguarded through transparent selection, fixed non-renewable mandates, and legislatively guaranteed funding. Recognizing that corruption often arises from systemic pressures, the framework also includes mechanisms for regulating external influences and political interference, criminalizing unauthorized political contacts, regulating post-employment transitions, mandating disclosure of financial interests and meetings, establishing secure whistle-blowing channels, and empowering IORC to investigate signs of political capture. Finally, the reconstruction incorporates restorative justice mechanisms to rebuild public trust and repair institutional harm. These include public explanations of internal misconduct cases, publication of institutional learning reports detailing reforms after each major breach, and ethics rehabilitation programs for officers involved in moderate violations. Together, these integrated reforms create a comprehensive regulatory structure aligned with procedural, retributive, corrective, and restorative justice, ensuring that ACCs remain legitimate, resilient, and accountable institutions capable of fulfilling their mandate with integrity.³⁰

Integrating the Justice-Oriented Framework into Institutional Operations

Effective regulatory reconstruction requires not only structural reforms but also deep institutional integration to ensure that justice values become embedded in daily practice. To achieve this, the framework emphasizes aligning internal culture with justice principles, recognizing that regulation alone cannot transform organizational behavior. This alignment is supported through

²⁹ Villoria, M., & Ryan, C. (2023). *Sanctions, proportionality, and anti-corruption enforcement: Designing fair disciplinary systems*. *International Journal of Public Administration*, 46(14), 1095–1110. <https://doi.org/10.1080/01900692.2022.2162084>

³⁰ Persson, A., Rothstein, B., & Teorell, J. (2024). *Guarding the guardians: Why independent oversight is essential for anti-corruption commissions*. *Governance*, 37(1), 55–73. <https://doi.org/10.1111/gove.12767>

mandatory ethics training grounded in justice-based norms, leadership accountability mechanisms that require senior officers to exemplify integrity, and performance evaluations that prioritize ethical conduct over case statistics. Together, these measures cultivate a culture in which justice-oriented decision-making becomes the organizational default.³¹ Equally important is balancing institutional independence with accountability, a longstanding challenge for anti-corruption commissions.³² The reconstructed model addresses this tension by structurally separating internal affairs from investigative units to prevent bias, empowering an external oversight body to evaluate internal misconduct without interfering in corruption inquiries, protecting the commission's budget autonomy to shield it from political retaliation, and establishing clear boundaries to ensure that independent oversight enhances rather than compromises investigative independence. To ensure legal force and operational clarity, the framework requires building a coherent legal foundation through legislative amendments that explicitly define misconduct categories, outline the powers and composition of the Independent Oversight and Review Commission (IORC), establish procedural timelines and due process rights, mandate whistle-blower protections, impose transparency obligations, and codify sanctions and appeal mechanisms.³³ Such codification prevents arbitrary interpretation, strengthens legal certainty, and ensures uniform application across cases.³⁴ Finally, successful integration demands compliance with international standards, aligning the framework with the Jakarta Principles, UNCAC requirements, and regional best practices. This alignment ensures strengthened independence through external oversight, enhanced integrity via comprehensive ethics systems, reinforced accountability through transparent procedures, and guaranteed fairness through due process protections. Conformity with global norms not only bolsters institutional legitimacy but also expands opportunities for international cooperation, technical support, and joint enforcement efforts, ultimately

³¹ Six, F., & Lawton, A. (2023). *Developing an ethical culture in public organizations: The role of integrity training and leadership accountability*. *Public Integrity*, 25(6), 567–583. <https://doi.org/10.1080/10999922.2022.2160143>

³² Recanatini, F. (2023). *Independent anti-corruption institutions: Designing for autonomy, accountability, and resilience*. *Governance*, 36(3), 715–733. <https://doi.org/10.1111/gove.12720>

³³ Wolfe, S. D., & Worth, M. (2024). *Strengthening whistle-blower regimes: Transparency, protection, and accountability in public institutions*. *International Review of Administrative Sciences*, 90(2), 421–439. <https://doi.org/10.1177/00208523221101825>

³⁴ Dassen, A., & O'Brien, T. (2024). *Legal frameworks for integrity systems: Why precise definitions and procedural safeguards matter*. *Regulation & Governance*, 18(1), 45–63. <https://doi.org/10.1111/regg.12511>

enhancing the overall credibility and effectiveness of anti-corruption commissions.³⁵

Anticipated Challenges in Implementing the Reconstructed Regulatory Framework

Implementing a justice-oriented regulatory framework within anti-corruption commissions presents several foreseeable challenges that must be strategically addressed to ensure sustainable reform. One major obstacle is internal resistance and cultural inertia, as officers accustomed to informal practices or discretionary decision-making may oppose stricter accountability measures.³⁶ Overcoming this requires comprehensive change-management strategies, active leadership engagement, clear incentives that reward ethical conduct, and protections for officers who support reform, ensuring that integrity becomes a safe and valued professional norm. A second challenge arises from political resistance, since reforms that enhance independence, strengthen oversight, and limit opportunities for political influence may face opposition from actors who benefit from the status quo.³⁷ Mitigating such resistance necessitates building multi-party legislative consensus, conducting public communication campaigns to demonstrate how reforms improve national governance, and securing civil-society and international support to create external pressure that discourages political interference.³⁸ Furthermore, reform efforts may be constrained by resource and capacity gaps, as establishing independent oversight bodies, implementing structured investigative protocols, and maintaining transparency systems require adequate funding, trained personnel, and technological infrastructure. To address this, the framework recommends dedicated budget allocations, investment in digital case-management systems, specialized training for ethics and investigative personnel, and partnerships with international anti-corruption institutions that can provide technical assistance and capacity building.³⁹ Finally, many jurisdictions face legal fragmentation, where overlapping administrative, criminal, and civil service laws create inconsistencies and confusion in misconduct regulation. Effective

³⁵ OECD. (2024). *Anti-Corruption and Integrity Outlook 2024*. OECD Publishing. <https://doi.org/10.1787/968587cd-en>

³⁶ O'Flynn, J., & Kirkpatrick, I. (2024). *Public sector reform and organizational resistance: Rethinking change management in integrity institutions*. *Public Management Review*, 26(1), 1–20. <https://doi.org/10.1080/14719037.2022.2145129>

³⁷ Johnston, M., & Holmes, L. (2024). *Capacity building for anti-corruption agencies: The role of international cooperation and institutional learning*. *Crime, Law and Social Change*, 81, 211–230. <https://doi.org/10.1007/s10611-023-10165-7>

³⁸ Lapuente, V., & Walle, S. V. (2023). *Political influence, institutional independence, and the tensions of anti-corruption reform*. *Governance*, 36(2), 289–308. <https://doi.org/10.1111/gove.12704>

³⁹ Mungiu-Pippidi, A., & Dadašov, R. (2023). *Measuring control of corruption: Resource constraints and institutional performance in integrity systems*. *International Review of Administrative Sciences*, 89(4), 945–962. <https://doi.org/10.1177/00208523211055330>

implementation therefore requires harmonizing these legal domains, consolidating anti-corruption commission regulations into a unified statutory framework, and issuing judicial interpretation guidelines to ensure consistency across courts and administrative bodies. Addressing these interconnected challenges is essential for the reconstructed framework to function effectively and to anchor anti-corruption agencies in a stable, credible, and justice-aligned institutional foundation.⁴⁰

Discussion: Operationalizing Justice Values in Anti-Corruption Commission Reforms

The reconstructed regulatory framework demonstrates that justice values function not merely as philosophical aspirations but as practical, actionable components that can fundamentally strengthen institutional performance and credibility when properly embedded into anti-corruption governance.⁴¹ Procedural justice becomes operational through mechanisms that ensure clarity, predictability, and fairness—such as strict investigative timelines, independent and conflict-free investigators, clearly defined rights for accused officers, transparent reporting systems that diminish suspicion of selective enforcement, and robust appeal mechanisms that safeguard due process.⁴² Corrective and retributive justice are translated into practice through a structured sanctioning matrix that aligns penalties with the severity of misconduct, ensuring proportionality and deterring future violations while also mandating remedial actions—such as institutional reforms, restitution, or public acknowledgment—to repair harm inflicted on both the commission and society.⁴³ Distributive justice is realized when internal cases are handled with the same rigor and transparency as external corruption investigations, ensuring that accountability burdens are shared equitably across ranks and eliminating privileged treatment for insiders. This equal application of standards reinforces institutional integrity

⁴⁰ Rose-Ackerman, S., & Alejandra Medina, R. (2023). *Legal harmonization and anti-corruption governance: Reducing fragmentation for effective enforcement*. *Journal of Legal Studies*, 52(2), 355–379. <https://doi.org/10.1086/724993>

⁴¹ Tyler, T. R., & Trinkner, R. (2023). *Legitimacy and procedural justice in public institutions: Strengthening fairness and due process mechanisms*. *Annual Review of Criminology*, 6, 155–175. <https://doi.org/10.1146/annurev-criminol-032720-031508>

⁴² Khan, M., & Prichard, W. (2024). *Proportionality and sanctions in anti-corruption systems: Designing effective disciplinary frameworks*. *Journal of Public Administration Research and Theory*, 34(1), 112–130. <https://doi.org/10.1093/jopart/muad028>

⁴³ Persson, A., & Rothstein, B. (2024). *Integrating justice values into anti-corruption reforms: A holistic institutional approach*. *Governance*, 37(1), 95–115. <https://doi.org/10.1111/gove.12766>

and dismantles perceptions of a dual justice system.⁴⁴ Finally, restorative justice operates through actions designed to rebuild public trust and renew ethical culture, including institutional apologies, accessible public reports detailing lessons learned from misconduct cases, ethics rehabilitation programs for reintegrating officers who committed moderate breaches, and community-oriented engagement efforts that reframe the anti-corruption commission as a guardian of societal integrity rather than a punitive apparatus alone. When all four justice dimensions—procedural, retributive, distributive, and restorative—are integrated cohesively, the regulatory framework becomes holistic, durable, and normatively grounded, enabling anti-corruption commissions to operate with legitimacy, resilience, and deep public trust.⁴⁵

Conclusion

This study demonstrates that internal corruption within anti-corruption commissions poses profound risks to institutional legitimacy, operational effectiveness, and public trust. Existing regulatory frameworks—marked by jurisdictional ambiguity, weak conflict-of-interest rules, inconsistent sanctions, limited transparency, and the absence of independent oversight—are insufficient to safeguard integrity or uphold justice values. A justice-oriented reconstruction offers a coherent and principled solution, aligning regulatory design with procedural fairness, proportional accountability, equitable enforcement, and restorative institutional practices. By integrating clear jurisdictional structures, robust oversight mechanisms, transparent investigative protocols, and strong ethical safeguards, anti-corruption commissions can restore credibility, resist political interference, and strengthen resilience. Ultimately, embedding justice values into regulatory frameworks ensures that these institutions not only combat corruption externally but also embody the integrity and accountability required to lead national anti-corruption efforts.

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⁴⁴ Villoria, M., & Van Ryzin, G. G. (2023). *Equity, fairness, and consistency in public integrity systems*. *Public Integrity*, 25(5), 451–469. <https://doi.org/10.1080/10999922.2022.2157089>

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