PUSAT PELAPORAN DAN ANALISIS TRANSAKSI KEUANGAN

SECTORAL RISK ASSESSMENT
Advokat

"Risk Assesment On Lawyer Profession"

**SECTORAL RISK ASSESSMENT
ON MONEY LAUNDERING AND TERRORISM FINANCING**

ADVOCATE PROFESSION

**PUSAT PELAPORAN DAN ANALISIS TRANSAKSI KEUANGAN
NOVEMBER 2019**

OPENING SPEECH OF HEAD OF PPATK

Assalamu'alaikum Warahmatullahi Wabarakatuh.

We give thanks to Allah SWT because of His grace and guidance, PPATK was able to complete the document of the "Sectoral Risk Assessment" for the advocate profession Against Money Laundering in 2019".

PPATK has a very strong commitment to preventing and eradicating money laundering in Indonesia. Various steps in order to strengthen this commitment have been carried out, including through the implementation of compliance monitoring of the reporting party. As the Supervisory and Regulatory Agency (LPP) of the advocate profession, PPATK needs to conduct a risk assessment of the advocate profession against money laundering. This effort aims to ensure that compliance with the profession can be carried out effectively and efficiently.

I appreciate of this SRA document because it is very important in preventing and eradicating the crime of money laundering. With the formulation of an effective and efficient monitoring strategy based on this risk-based approach, it is hoped that it will protect Indonesia from the risk of money laundering offenses whose typology is growing and developing more complex.

Finally, I would like to express my gratitude and appreciation to the PPATK SRA Drafting Team for contributing to the publication of this SRA document. May our deeds be blessed by Allah SWT. Amen Ya Rabbal 'Alamin.*Wassalamu'alaikum Warahmatullahi Wabarakatuh.*

Jakarta,   2019

Head Of PPATK
Kiagus Ahmad Badaruddin

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INTRODUCTION

A. Background

Recommendation No. 1 FATF of 2012 requires each country to identify, analyze and evaluate the risk of money laundering and terrorism financing crimes against that country, take action and decide on the authority that will coordinate risk assessment activities and the utilization of resources aimed at ensuring that the risks has been effectively mitigated.

In line with that, the development of the anti-money laundering regime and the prevention of the financing of terrorism is progressing. This has been proven by the existence of a National Risk Assessment (hereinafter referred to as NRA) which was issued by Indonesia in 2015 and was updated in June 2019. NRA is a risk assessment from Indonesia for the occurrence of Money Laundering and Terrorism Financing Crimes. In the process of making the NRA, it has involved all relevant stakeholders consisting of ministries/agencies that are members of the ML Committee, law enforcement agencies in Indonesia, as well as supervisory and regulatory agencies (LPP) of the Financial Services Industry and Reporting Parties (Financial Services Industry, Goods Providers/ Services in Indonesia and the Profession).

The NRA is a structured and comprehensive evaluation and ongoing recording of Indonesia's risks to money laundering, which includes elements of threats, vulnerabilities, and impacts that will be caused. After the various risks have been identified, analyzed and evaluated, then through the Sectoral Risk Assessment (SRA) it is expected to be able to conduct an assessment of each sector of the reporting party.

Referring to the Government Regulation of the Republic of Indonesia No. 43 of 2015 concerning 43 of 2015 concerning the Reporting Party on the Prevention and Eradication of the Crime of Money Laundering in Article 3 states that advocates as reporting parties are the embodiment of Article 17 paragraph (2) of Law no. 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering. Referring to article 31 paragraph 2 of Law No. 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering, states that if there is no supervisory and regulatory agencies (LPP) that has carried out compliance monitoring and reporting obligations for the reporting party, the compliance monitoring of the reporting obligations is carried out by PPATK. Thus, PPATK is an supervisory and regulatory agencies (LPP) for the advocate profession which currently does not have a regulator. A risk assessment must be carried out to assess the threats, vulnerabilities and impacts of the advocate profession on money laundering offenses.

Furthermore, based on the results of the SRA, each risk can be mitigated so that the impact on each of these risks can be minimized if the risk occurs.

B. Purpose

As one of the action plans in the National Strategy related to the NRA follow-up, it is mandatory for the Supervisory and Regulatory Agency (LPP) to compile a sectoral risk assessment document for money laundering (Sectoral Risk Assessment). The objective is to assess the risk of the vulnerabilities being used by the Reporting Party as a means of money laundering and/or terrorism financing crimes. Therefore, PPATK as LPP of the advocate profession prepares a risk assessment document for the advocate profession sector (SRA). The objectives of the SRA Report for the advocate profession sector include:

a. Identify and analyze various sources of threats, vulnerabilities and impacts of money laundering that have been carried out and have the potential to be carried out by ML perpetrators through the advocate profession sector;

b. Analyzing the level of risk of the advocate profession based on service users, region, country, legal services and types of legal service products that have the potential to be used by money laundering offences; and

c. Provide guidelines related to the relevant money laundering offenses risk as well as information in preparing the Individual Risk Assessment in the advocate profession.

C. Output

Through a comprehensive SRA report, it is expected to produce outputs that help in the following matters:

a. Knowing the level of threat, level of vulnerability, and the level of impact of the advocate profession sector on the threat of money laundering offences.

b. This risk mapping can assist in the allocation of resources (such as: human resources, funding sources, information technology) effectively and efficiently, especially in the compliance aspect. Furthermore, the evaluation of the risk mapping of the advocate profession is expected to be able to protect the profession from the risk of money laundering offences.

c. Knowing the trend of service users, regions, countries, legal services and types of legal service products that have the potential to be utilized by money laundering offenses through the advocate profession sector. By knowing these trends, preventive and repressive measures can be taken to reduce the threat of money laundering offenses in the advocate profession sector.

d. Through this SRA Report, it can also be seen whether the current supervision method applied by PPATK is good enough. Mapping of the Reporting Party

regarding this risk can assist in the basis for allocating resources (such as: human resources, funding sources, information technology) that is effective and efficient in the implementation of the AML/CFT regime, especially in the compliance aspect.

CHAPTER II
GENERAL DESCRIPTION

A. **Definition of Profession**

Profession has various definitions. According to the Big Indonesian Dictionary (KBBI), profession is defined as a field of work based on expertise education (skills, vocational, and so on). The meaning of the profession indicates a job that requires training and mastery of a special knowledge. A profession usually has a professional association, a code of ethics, and a certification and licensing process that is specific to that profession. Examples of professions are in the fields of law, medicine, finance, military, engineering and design.

The term profession has been understood by many people that it is something related to a particular field or type of work (occupation) which is strongly influenced by education and expertise, so that many people work but are not necessarily said to have the appropriate profession. However, the expertise obtained from vocational education alone is not enough to declare a job to be called a profession. But it is necessary to master the systematic theory that underlies the practice of implementation, and mastery of intellectual techniques which are the relationship between theory and application in practice. There are things that need to be considered by professional practitioners.

The term profession has been understood by many people that it is something related to a field that is strongly influenced by education and expertise, so that many people work accordingly. But with the expertise that is obtained from vocational education, it is also not enough to be called a profession.

But it is necessary to master the systematic theory that underlies the practice of implementation, and the relationship between theory and application in practice. We are not only familiar with the term profession for fields of work such as medicine, teachers, military, lawyers, and the like, but extends to include fields such as managers, journalists, painters, singers, artists, secretaries and so on.

In general, there are several characteristics or traits that are always attached to the profession, namely:
  a. The existence of special knowledge;
  b. There are very high moral rules and standards;
  c. Serve the interests of the community;
  d. There is a special license to carry out a profession; and
  e. Professionals are usually members of a profession.

Profession is job, but not all jobs are professions. The profession has its own characteristics that distinguish it from other jobs, including:

  1. Skills based on theoretical knowledge
     Professionals are assumed to have extensive theoretical knowledge and skills that are based on that knowledge and can be applied in practice.

2. Professional Association
   A profession usually has a body organized by its members, which is intended to enhance the status of its members. These professional organizations usually have special requirements to become members.

3. Extensive education
   Prestigious professions usually require a long education in higher education.

4. Competency exam
   before entering a professional organization, there is usually a requirement to pass a test that tests primarily theoretical knowledge.

5. Institutional training
   Apart from examinations, it is also usually required to undergo institutional training where aspiring professionals gain practical experience before becoming a full member of the organization. Improved skills through professional development is also required.

6. License
   The profession establishes registration requirements and a certification process so that only those with a license can be considered trustworthy.

7. Work autonomy
   Professionals tend to control their work and theoretical knowledge in order to avoid outside intervention.

8. Code of ethics
   Professional organizations usually have codes of conduct for their members and disciplinary procedures for those who violate the rules.

9. Independent
   Professional organizations must be able to regulate their own organizations without government intervention. Professionals are governed by those who are more senior, respected practitioners, or those with the highest qualifications.

10. Public service and altruism
    Earning income from professional work can be maintained as long as it is related to public needs, such as doctor services contributing to public health.

11. High status and rewards
    The most successful professions will achieve high status, prestige, and well-deserved rewards for their members. This can be considered as an acknowledgment of the services they provide to the community.

B. Advocate Definition

An advocate is a person whose profession is to be able to provide legal services both inside and outside the court that meets the requirements based on the provisions of the law.

The provisions in Article 5 Paragraph 1 Number 18 of 2013 concerning Advocates give status to advocates as law enforcers who have equal position with other law enforcers in upholding law and justice.

In the judiciary, advocates are also one of the institutions whose role is very important, apart from the role of the police and prosecutors. Advocates are a form of respectable profession so that they are often referred to as officium nobile, namely as service providers who are very noble in law.

The advocate profession is called noble because it is also one of the pillars in upholding the rule of law and human rights and can seek to empower the community in terms of realizing their fundamental rights before the law.

The word advocate, etymologically, comes from the Latin "advocare", which means "to defend, to call to one's aid to vouch or warrant." While in English, "advocate" means "to speak in favor of or depend on argument, to support, indicate, or recommended publicy.". Terminologically, there are also several definitions of advocate defined by legal experts, organizations, regulations and legislation that have existed and have existed since the colonial period until now.

Duties and Responsibilities of Advocates
1. Interview a client and provide them with expert legal advice.
2. Research and be able to prepare cases and present them in court.
3. Write a legal document and prepare a written defense for a civil case.
4. Liaison with other professionals such as lawyers.
5. Specializing in certain legal fields.
6. Represent clients in court, public inquiries, arbitration and courts.
7. Questioning a witness.
8. Negotiating.

Advocate Function

1. As a guardian of the constitution and human rights;
2. Fighting for human rights in an Indonesian legal state;
3. Implement a code of ethics for advocates;
4. Provide legal advice (legal advice);
5. Provide a legal consultation (legal consultation);
6. Provide a legal opinion (legal opinion);
7. Drafting contracts (legal drafting);
8. Provide legal information (legal information);
9. Defending a client's interest (litigation);

10. Representing clients in court (legal representation); and
11. Providing free legal aid to people who are very weak and incapable (legal aid).

Advocate Morale Value

1. Values of Humanity (Humanity)
   In the sense of respect for a human dignity.

2. Values of Justice (Justice)
   In the sense of encouragement to always give people what they are entitled to.

3. Value of Compliance or Fairness (Reasonableness)
   In the sense that efforts to create order and justice in society.

4. Value of Honesty (Honesty)
   In the sense that there is a strong urge to be able to maintain honesty and avoid cheating. Awareness to always respect and also maintain the integrity and honor of the profession.

5. Value of Public Interest Services (To Serve Public Interest)
   In the sense that in the development of the legal profession there has been a spirit of siding with the rights and satisfaction of the community as justice seekers which is a direct consequence of upholding the values of justice, honesty, and also the credibility of the profession.

C. Supervision and guidance of the advocate profession
In carrying out the profession as an advocate according to Article 12 of Law Number 18 of 2013 concerning Advocates, the implementation of supervision is carried out by advocate organizations. The day-to-day supervision is carried out by the Supervisory Commission established by the Advocates Organization. The membership of the Supervisory Commission as referred to in paragraph (1) consists of elements of senior advocates, experts/academics, and the public.

D. Enforcement
According to Article 6 of Law Number 18 of 2013 concerning Advocates, Advocates may be subject to action for the following reasons:

1. ignore or neglect the interests of the client;
2. to act or behave inappropriately towards an opponent or a professional colleague;
3. behaving, behaving, speaking, or issuing statements that show disrespect for the law, statutory regulations, or courts;

4. do things that are contrary to the obligations, honor, or the dignity of the profession; and
5. committing a violation of the laws and regulations and or a disgraceful act.

E. Guidance and Supervision related to the implementation of Anti-Money Laundering and Terrorism Financing (AML/TF)

The guidance and supervision of the advocate profession related to the implementation of Anti-Money Laundering and Terrorism Financing is carried out by the Financial Transaction Reports and Analysis Center (PPATK) based on Article 3 of the Government Regulation of the Republic of Indonesia No. 43 of 2015 concerning 43 of 2015 concerning the Reporting Party on the Prevention and Eradication of the Crime of Money Laundering states that advocates as the Reporting Party are obliged to submit reports to PPATK.

Based on Article 30 of Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering for professions that do not report to the PPATK, the PPATK will be subject to administrative sanctions in the form of:
   a) Warning
   b) Written warning
   c) Public announcement of actions or sanctions
   d) Administrative fines

A. Research Method

The sectoral risk assessment activities for money laundering (Sectoral Risk Assessment) are carried out using methods and frameworks adopted from international best practices. As a theoretical basis for the preparation of the SRA, the IMF's guideline regarding "The Fund Staff's Approach to Conducting National Money Laundering or Financing of Terrorism Risk Assessment" explains that: "risk can be represented as: $R=f[(T),(V)] \times C$, where T represents threat, V represents vulnerability, and C represents consequence". Based on these guidelines, a qualitative and quantitative analysis of various risk factors for money laundering has been carried out to measure the level of threats, vulnerabilities, and impacts by using the following risk assessment formulation:

**Picture 1
Risk Assessment Formulation**

The team has developed a methodology for measuring money laundering risk factors to assess the level of threat, the level of vulnerability, and the level of impact and risk. Referring to FATF Guidance it is stated that:

1. *Threat*

   A threat is defined as a person or group of people, objects or activities that have the potential to cause harm. In the context of money laundering, threats include criminal acts, terrorist groups and their funding. Threat level data in this SRA is processed from the updated Indonesia Risk Assessment of Money Laundering and Terrorism Financing Crimes 2015 (NRA on ML/TF).

2. *Vulnerability*

Vulnerabilities are things that can be used or support threats or can also be referred to as factors that describe the weakness of the anti-money laundering/terrorism financing system in the form of attractive financial products or services for the purpose of money laundering or terrorism financing.

3. *Impact*

Impact is the result or loss arising from the crime of money laundering and/or terrorism financing on institutions, the economy and society, more broadly including losses from criminal acts and terrorism activities themselves.

4. *Risk*

Risk (Risk) is a function of threats, vulnerabilities and impacts. Risk assessment is a result or process based on a methodology agreed by the relevant parties to identify the risk of money laundering offences.

B. Research Stages

The stages in determining the risk of money laundering and terrorism financing in advocate profession sector go through several stages, including the process of identification, analysis and evaluation.

Picture 2
Stages of Risk Assessment

Identification → Analysis → Evaluation

1. Identification Stage

This stage is carried out to identify the risk factors to be analyzed. In this regard, 5 (five) aspects (Point of Concern/PoC) need to be assessed for the level of risk, namely: Service User, Region, Country, Legal Service and Type of Legal Service Product.

In the process of identifying ML risk factors, the SRA Team has collected data/information from both internal PPATK and external PPATK, especially law enforcement officers. The data collection process is carried out both with

primary data in the form of internal and external PPATK databases and secondary data in the form of distributing questionnaires. The scope of data used in the preparation of this SRA is 2018-2019. Some of the data/information collected are as follows:

a. Internal PPATK

   1. Suspicious Financial Transaction Report (LTKM advocate profession);
   2. Analysis Result Report (LHA);
   3. Examination Result Report (LHP); and
   4. Report on the Result of Professional Compliance Supervision.

b. Eksternal PPATK in the form of Court Decisions related to money laundering.

2. Analysis Stage

The analysis stage is a continuation of the risk identification stage using the agreed threat, vulnerability and impact variables. Each risk factor that has been analyzed can be displayed on a scale of 1-9 as follows:

Picture 3
Threat, Vulnerability and Impact Scale Line

1	2	3	4	5	6	7	8	9
LOW			MEDIUM			HIGH		

For each risk-forming factor, the data for each PoC (Point of Concern) aspect is transformed into a scale of 1-9 where the data with the smallest value automatically becomes a scale of 1, while the data with the largest value automatically becomes a scale of 9. With the risk assessment framework, after obtaining the value of threats and vulnerabilities, the two are then added together to obtain the likelihood value and then multiplied by the impact scale to obtain the risk value.

The risk value of each PoC which has a range between 1-9 is then divided into three levels, which are as follows:

Table 1
Risk Level Category

Nilai Skala	Level Risiko
1 ≤ x < 3,67	Rendah (*Low*)
3,67 ≤ x < 6,33	Sedang (*Medium*)
6,33 ≤ x ≤ 9	Tinggi (*High*)

The SRA team has developed a methodology for measuring ML and TF risk factors to measure the level of threat, level of vulnerability, level of impact, and level of risk. The level of threats, vulnerabilities and impacts is obtained through quantitative and qualitative (potential) data. The SRA team uses a hierarchical (tiered) method. In this method, the team has compiled a mathematical formulation of each risk factor which has several variables and sub-variables forming, with the following details:

a. Threat

1) The number of existing LTKM in the advocate profession;
2) The number of LTKM in Financial Service Providers (PJK) related to the advocate profession;
3) Number of court decisions related to the advocate profession; and
4) Potential threats based on the number of Analysis Results or Examination Results (HA/HP)

b. Vulnerability

1) Rules and Regulations;
2) Number of LTKM related to the advocate profession;
3) Supervision Results; and
4) Research Results.

c. Impact

1) The value of assets in the LTKM of the advocate profession;
2) The value of assets in LTKM at PJK related to the advocate profession;
3) Asset value in Court Decisions related to the advocate profession; and
4) Potential impact based on the assessment of the advocate profession.

3. Evaluation

This evaluation stage is a decision/priority-making process in overcoming risks based on an analysis of threats, vulnerabilities, trends and impacts. This stage also contributes to the development of strategies to mitigate the risk of any Point of Concern (PoC) that has the potential to be related to the Crime of Money Laundering and the Financing of Terrorism.

CHAPTER IV
RISK ASSESSMENT RESULTS ADVOCATE PROFESSION

In the advocate profession sector, there are 5 (five) Points of Concern (POC), namely service users, regions, countries, legal services and types of legal service products. The five POCs are assessed based on threat, vulnerability and impact. The results of the risk assessment of the 5 (five) POCs are as follows:

A. Client/Service User

As regulated in Law Number 8 of 2010 concerning the Prevention and Eradication of Money Laundering Money, criminalization of money laundering offenses can be imposed on perpetrators who are individuals or corporations. Based on the results of the risk analysis of the potential for money laundering offenses in Indonesia based on the types of perpetrators in the advocate profession sector, it is known that service users of entrepreneurs/entrepreneurs are more at risk of becoming perpetrators of money laundering offenses, followed by Legislative and Government Officials, political party administrators, TNI/POLRI (including pensioners), and BI/BUMN/BUMD employees (including pensioners). This can be seen in the following image:

Picture 4
Service User Risk in the advocate profession
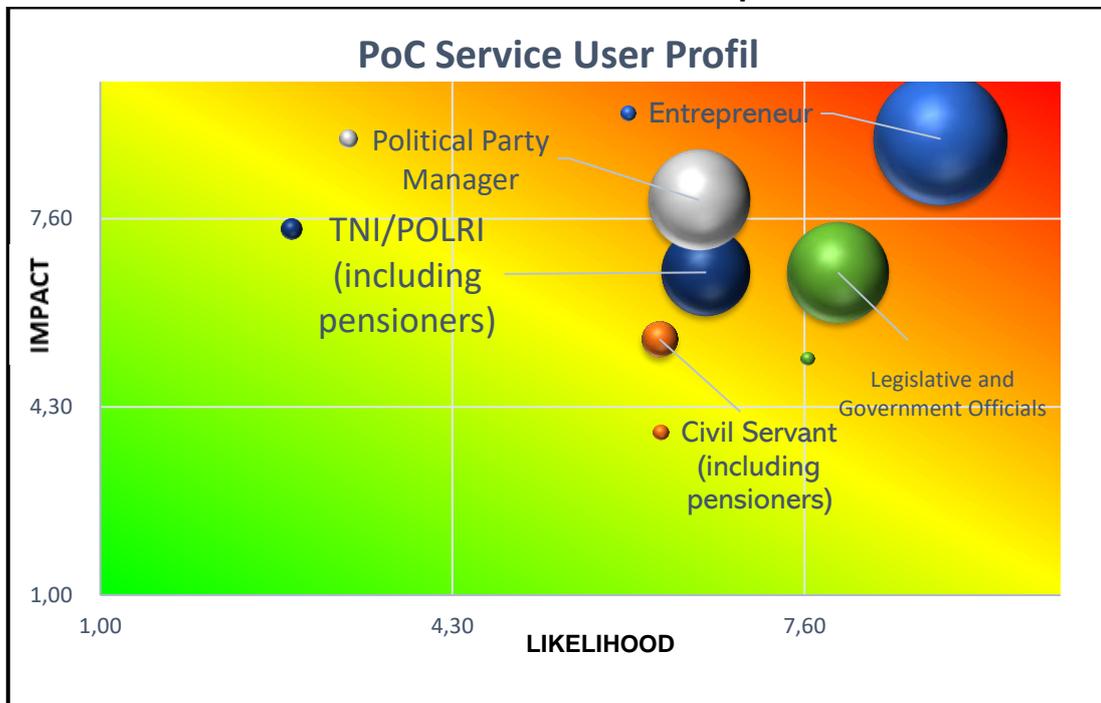
B. Area Geography

In the advocate profession sector, the DKI Jakarta area is more at risk than other provinces in Indonesia, this is due to the centralized vortex of business centers and government centers located in DKI Jakarta.

Furthermore, the areas affected by the risk are West Java, East Java and Central Java. This can be seen in the following image:

Picture 5
Regional Risk in the advocate profession
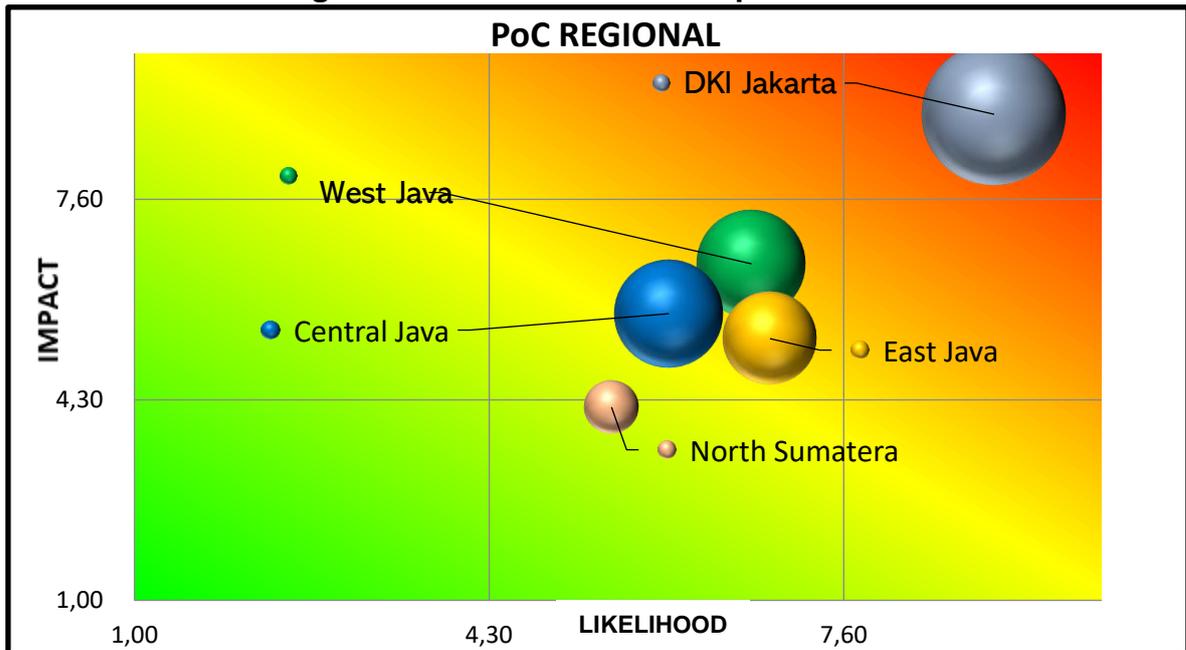
C. Country

From the state's assessment of the advocate profession, it can be seen that Singapore is considered more at risk, which is followed by China and Hong Kong. This can be seen in the following figure:

Picture 6
Country Risk in the advocate profession
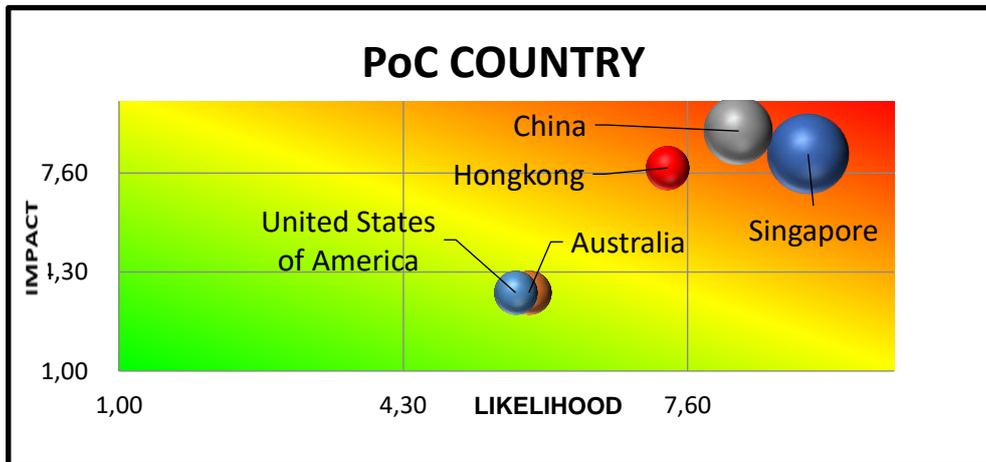
D. Legal Service

From the assessment of legal services in the advocate profession, it is known that non-litigation legal services are services that have a high risk compared to litigation services and Mediation/ADR (Alternative Dispute Resolution) services. This can be seen in the following image:

Picture 7
Legal Services Risk in the advocate profession
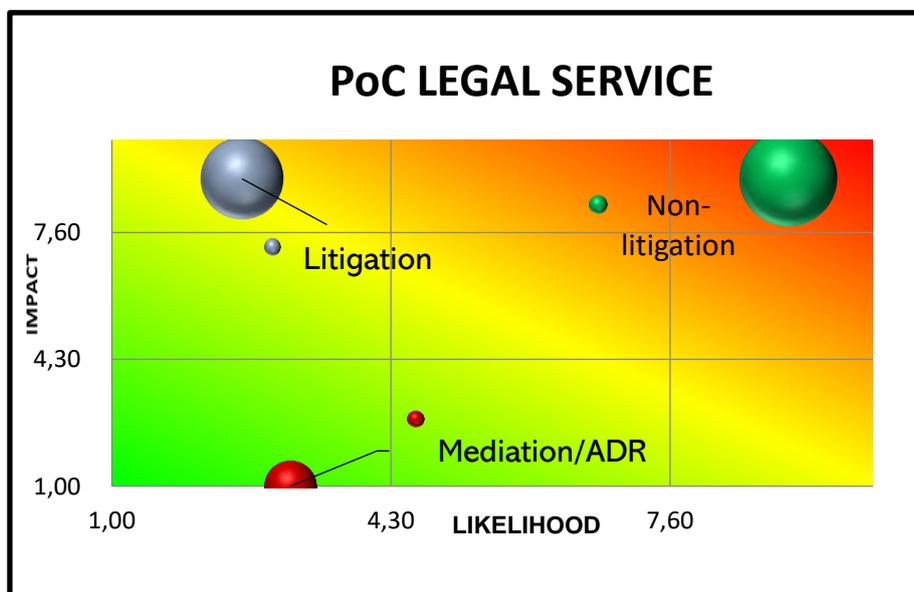
E. Legal Service Product

According to the risk assessment of the advocate profession based on the derivative products of legal services provided, it is known that the purchase and sale of property is a legal service product that has a high risk of money laundering offenses followed by the management of money, securities, and/or other financial service products. Meanwhile, the medium risk is occupied by legal service products managing checking accounts, savings accounts, deposit accounts, and/or securities accounts as well as litigation related to civil or criminal disputes and financing transactions (financing). This can be seen in the following image:

Picture 8
Legal Service Products Risk for the advocate profession
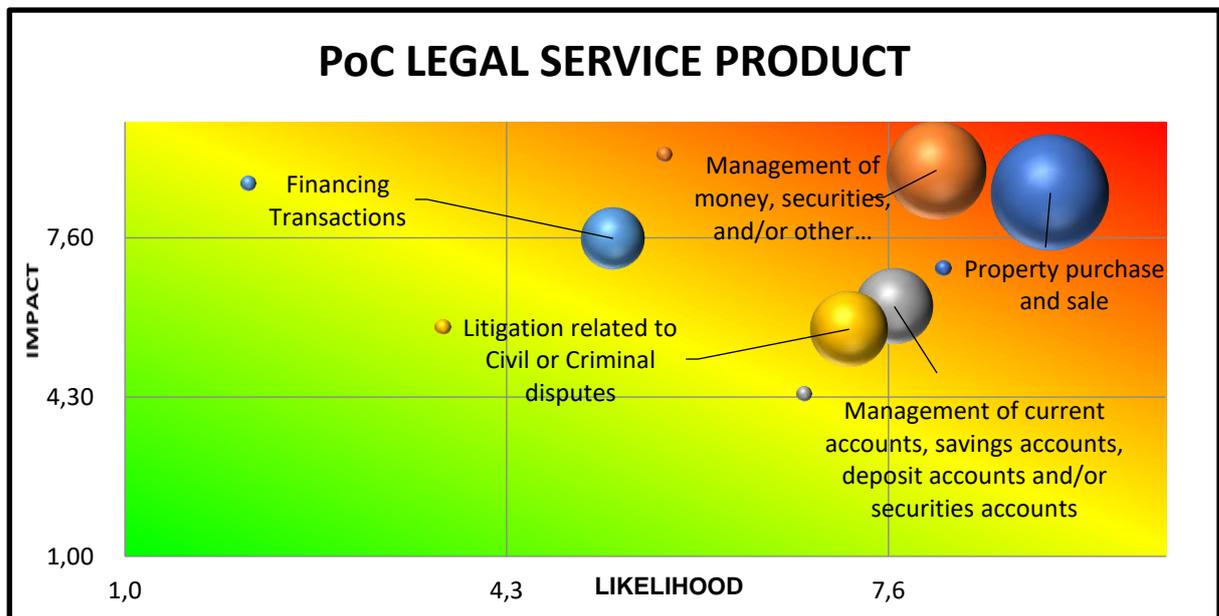
CHAPTER VIII
CONCLUSIONS AND RECOMMENDATIONS

A. Conclusions

Based on the analysis of data in the advocate profession sector on 5 (five) Points of Concern (POC), namely **service users, region, country, legal services and types of legal service products**, it can be concluded that:

a. **Entrepreneurs** are service users with a "**high**" risk level based on the type of perpetrator, followed by **Legislative and Government Officials**, **political party managers**, **TNI/POLRI (including pensioners**) and **BI/BUMN/BUMD employees (including pensioners)** at "**medium**" risk. In addition to the five service users, there are 9 (nine) service user profiles identified as having "medium" risk and 12 (twelve) service user profiles in the "low" category.

b. **DKI Jakarta** is an area with a "**high**" level of risk in the advocate profession sector compared to 34 (thirty four) provinces in Indonesia, while the other regions consist of 3 (three) medium-sized regions namely West Java, Central Java and East Java and 30 (thirty) "low" risk areas.

c. **Singapore and China** are countries with a "**high**" risk level for money laundering, followed by Hong Kong with a "**medium**" risk and Australia and the United States with a "low" risk level.

d. **Non-Litigation Legal Services** are legal services with a "**high**" risk level being used as a money laundering tool, followed by **Litigation** with a "**medium**" risk level and **Mediation/ADR** with a "low" risk level.

e. **The purchase and sale of property and the management of money, securities, and/or other financial service products** are legal service products that carry a "**high**" risk of money laundering offences. Meanwhile, the medium risk is occupied by legal service products for **the management of current accounts, savings accounts, deposit accounts and/or securities accounts as well as litigation related to civil or criminal disputes and financing transactions (financing)**.

B. Risk Mitigation

To mitigate the risk of ML and TF offenses in the advocate profession, the Indonesian Financial Transaction Reports and Analysis Center (PPATK) has increased compliance monitoring of the Advocate Profession through regulatory and supervisory aspects by carrying out, among others:

1. Regulations

PPATK has published:

a. The Republic of Indonesia Government Regulation No. 43 of 2015 concerning the Reporting Parties in the Prevention and Eradication of Money Laundering states that the advocate profession as the Reporting Party is obliged to submit a report to the PPATK; and

b. Regulation of the Head of PPATK Number 10 of 2017 concerning the Implementation of the Principle of Recognizing Service Users for Advocates.

2. Supervisions

Through Regulation of the Head of PPATK Number 13 of 2016 concerning Procedures for Implementation of Compliance Audits, Special Audits and Follow-Up Monitoring of Audit Results, PPATK has carried out risk-based supervision with off-site and on-site supervision methods.

3. Implementation of Sanctions

Based on Article 30 of Law Number 8 of 2010 concerning the Prevention and Eradication of the Crime of Money Laundering for professions that do not report to the PPATK, the PPATK will be subject to administrative sanctions in the form of warnings, written warnings, announcements to the public regarding on the actions and/or penalty, and administrative fines.

C. Recommendations

Based on the results of the identification and analysis of the risk assessment of money laundering in the advocate profession sector, several recommendations are made as follows:

1. The advocate profession needs to prepare or update internal policies regarding the application of a risk based approach in the context of implementing the Recognizing Service User Principles by taking into account the Sectoral Risk Assessment Document for the advocate profession sector.

2. In the context of mitigating the risk of money laundering in the advocate profession, PPATK as the Supervisory and Regulatory Agency needs to conduct outreach, among others, in the form of training, discussion, and technical guidance to advocates in these high-risk areas.

3. In addition, PPATK needs to carry out thematic supervision on compliance with the application of the principle of recognizing service users, in particular

compliance with Customer Due Diligence (CDD) and Enhance Due Diligence (EDD) obligations to service users, regions, countries, legal services and types of legal service products that are at high-risk in each of these professions.

ATTACHMENT

A. Attachment table on the profession of advocate

Appendix I. Service User Risk

SERVICE USER		Threat	Vulnera bility	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
1	Entrepreneur	9,00	8,75	17,75	8,88	9,00	79,89	8,89	high
2	Civil Servant (including pensioners)	4,56	7,93	12,48	6,24	5,49	34,25	4,33	medium
3	Housewife	5,54	6,44	11,99	5,99	1,88	11,26	2,03	low
4	Student	3,27	5,12	8,40	4,20	1,68	7,06	1,61	low
5	Private employees	4,95	7,02	11,97	5,99	4,51	27,01	3,60	medium
6	Legislative and Government Officials	6,83	9,00	15,83	7,91	6,66	52,69	6,17	medium
7	TNI/POLRI (including pensioners)	4,36	9,00	13,36	6,68	6,66	44,47	5,35	medium
8	BI/BUMN/BUMD employees (including pensioners)	5,84	7,10	12,94	6,47	5,78	37,41	4,64	medium
9	Professionals and Consultants	7,02	6,28	13,30	6,65	4,51	30,01	3,90	medium
10	Trader	5,15	4,30	9,45	4,72	5,49	25,92	3,49	medium
11	Bank employee	3,86	5,70	9,57	4,78	4,80	22,98	3,20	low
12	Money Changer Employee	2,98	4,38	7,36	3,68	5,88	21,62	3,06	low
13	Lecturer	3,27	1,91	5,18	2,59	1,59	4,11	1,31	low
14	Farmer	1,30	1,00	2,30	1,15	1,68	1,93	1,09	low
15	Limited Liability Corporation (Private)	6,43	3,80	10,24	5,12	5,59	28,59	3,76	medium
16	Central or Regional Government Agency	3,86	5,21	9,07	4,54	5,39	24,45	3,34	medium
17	BUMN/BUMD including its subsidiaries	3,96	6,69	10,65	5,33	4,90	26,11	3,51	medium
18	Foreign Institutions/Le gal Entities	5,84	5,12	10,96	5,48	5,29	29,01	3,80	medium

SERVICE USER		Threat	Vulnerability	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
19	Cooperative Corporation	3,77	4,13	7,90	3,95	2,17	8,57	1,76	low
20	Foundation Corporation	4,26	3,80	8,06	4,03	3,24	13,08	2,21	low
21	CV Corporation, Firma and Maatschap	5,15	2,98	8,13	4,06	3,83	15,56	2,46	low
22	Legal Entity Association Corporation	5,44	3,72	9,17	4,58	2,66	12,18	2,12	low
23	Association Corporations Not Legal Entities	4,95	3,47	8,42	4,21	3,83	16,13	2,51	low
24	Political Party Manager	5,05	8,18	13,22	6,61	7,93	52,41	6,14	medium
25	Act on Power	6,04	5,87	11,90	5,95	5,78	34,40	4,34	medium
26	Others	1,00	1,74	2,74	1,37	1,00	1,37	1,04	low

Appendix II. Regional Risk

	Regional	Threat	Vulnerability	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
1	Aceh	3,51	2,41	5,92	2,96	1,82	5,39	**1,44**	low
2	Bali	6,96	5,05	12,01	6,00	3,15	18,94	**2,79**	low
3	Bangka Belitung	2,88	2,32	5,20	2,60	1,00	2,60	**1,16**	low
4	Banten	3,98	4,29	8,27	4,14	2,54	10,50	**1,95**	low
5	Bengkulu	1,47	1,47	2,94	1,47	2,13	3,13	**1,21**	low
6	D.I Yogyakarta	4,14	3,26	7,40	3,70	2,64	9,77	**1,88**	low
7	DKI Jakarta	9,00	9,00	18,00	9,00	9,00	81,00	**9,00**	high
8	Gorontalo	2,25	1,56	3,82	1,91	2,85	5,44	**1,44**	low
9	Jambi	1,63	1,75	3,38	1,69	2,54	4,29	**1,33**	low
10	West Java	5,71	7,78	13,48	6,74	6,54	44,08	**5,31**	medium
11	Central Java	5,39	6,55	11,95	5,97	5,72	34,15	**4,32**	medium
12	East Java	6,80	7,02	13,83	6,91	5,31	36,70	**4,57**	medium
13	West Kalimantan	3,35	4,11	7,46	3,73	3,97	14,82	**2,38**	low
14	South Kalimantan	3,51	3,73	7,24	3,62	5,00	18,10	**2,71**	low
15	Central Kalimantan	2,88	3,16	6,05	3,02	4,59	13,88	**2,29**	low
16	East Kalimantan	3,35	3,73	7,08	3,54	5,10	18,07	**2,71**	low
17	North Kalimantan	2,57	3,26	5,83	2,91	3,87	11,28	**2,03**	low
18	Riau Islands	4,76	1,47	6,24	3,12	3,56	11,11	**2,01**	low
19	Lampung	2,10	1,38	3,47	1,74	3,87	6,73	**1,57**	low
20	Maluku	1,00	1,09	2,09	1,05	2,85	2,98	**1,20**	low
21	North Maluku	1,16	1,75	2,91	1,45	2,74	3,99	**1,30**	low
22	West Nusa Tenggara	1,94	2,22	4,16	2,08	3,26	6,78	**1,58**	low
23	East Nusa Tenggara	2,73	1,00	3,73	1,86	3,36	6,26	**1,53**	low
24	Papua	3,98	3,64	7,62	3,81	2,44	9,28	**1,83**	low
25	West Papua	3,04	2,79	5,83	2,91	2,74	7,99	**1,70**	low

	Regional	Threat	Vulnerability	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
26	Riau	3,51	3,07	6,58	3,29	3,26	10,71	1,97	low
27	West Sulawesi	1,94	2,79	4,73	2,36	3,05	7,22	1,62	low
28	South Sulawesi	2,73	2,88	5,61	2,80	2,85	7,98	1,70	low
29	Central Sulawesi	2,88	1,94	4,82	2,41	2,54	6,12	1,51	low
30	Southeast Sulawesi	1,78	3,16	4,95	2,47	2,74	6,79	1,58	low
31	North Sulawesi	1,94	3,26	5,20	2,60	2,64	6,87	1,59	low
32	West Sumatra	2,57	2,51	5,07	2,54	3,15	8,00	1,70	low
33	South Sumatra	3,20	4,29	7,49	3,75	3,56	13,35	2,23	low
34	North Sumatra	5,08	5,80	10,88	5,44	4,18	22,73	3,17	low

Appendix III. Country Risk

	Country	Threat	vulnerability	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
1	Singapore	9,00	9,00	18,00	9,00	8,23	74,08	**8,31**	High
2	Australia	6,81	4,71	11,52	5,76	3,62	20,82	**2,98**	low
3	China	7,97	8,42	16,39	8,19	9,00	73,75	**8,27**	high
4	Hongkong	7,71	7,03	14,74	7,37	7,77	57,25	**6,63**	Medium
5	United States of America	6,03	5,17	11,21	5,60	3,62	20,26	**2,93**	low
6	Others	1,00	1,00	2,00	1,00	1,00	1,00	**1,00**	low

Appendix IV. Legal Services

	Legal Service	Threat	Vulnerability	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
1	Litigation	4,08	1,00	5,08	2,54	9,00	22,85	**3,18**	medium
2	Non-litigation	9,00	9,00	18,00	9,00	9,00	81,00	**9,00**	high
3	Mediation/ADR (Alternatife Dispute Resolution)	1,00	5,22	6,22	3,11	1,00	3,11	**1,21**	low

Appendix V. Legal Service Products

	Legal Servie Product	Thread	Vulnerability	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
1	Buying and selling property	9,00	9,00	18,00	9,00	8,53	76,76	**8,58**	high
2	Management of money, securities, and/or other financial service products	7,29	8,74	16,03	8,02	9,00	72,14	**8,11**	high
3	Management of checking accounts, savings	7,61	7,69	15,30	7,65	6,18	47,26	**5,63**	medium

Legal Servie Product		Thread	Vulnera bility	Trend		Impact	Risk		Level
				Total	Scale		Total	Scale	
	accounts, time deposit accounts, and/or securities accounts								
4	Company operation and management	7,19	4,80	11,99	5,99	5,55	33,27	**4,23**	Medium
5	Establishment , buying and selling of legal entities	7,72	4,80	12,52	6,26	5,55	34,75	**4,37**	medium
6	Litigation related to Civil or Criminal disputes	6,44	8,08	14,52	7,26	5,71	41,43	**5,04**	medium
7	Mediation/AD R (Alternatife Dispute Resolution)	5,48	3,62	9,10	4,55	2,57	11,69	**2,07**	Low
8	Business Entity Licensing Management	7,72	3,75	11,47	5,74	6,18	35,43	**4,44**	medium
9	Financing	5,37	5,07	10,44	5,22	7,59	39,61	**4,86**	medium
10	Others	1,00	1,00	2,00	1,00	1,00	1,00	**1,00**	low