UNCOVERING ACCOUNT FREEZING POLICIES: A BIBLIOMETRIC ANALYSIS OF DIGITAL TRANSACTION SECURITY AND FINANCIAL CRIME PREVENTION

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Abstract

The increasing use of digital financial services has raised concerns about transaction security and consumer protection, particularly in light of measures such as account freezes implemented by financial regulators, including the Financial Transaction Reports and Analysis Center (PPATK) in Indonesia. This study aims to analyze the impact of account freezes on digital transaction security and consumer rights, with a focus on the regulatory challenges and cross-border implications associated with such measures. A systematic review of the literature on fraud prevention, money laundering prevention, and consumer protection in digital finance was conducted. The findings indicate that while account freezes significantly reduce financial crime and improve transaction security, they also pose challenges, particularly for consumers whose accounts are unfairly frozen. Transparency, consumer literacy, and precise complaint mechanisms are crucial in mitigating these impacts. Furthermore, cross-border challenges in digital finance regulation complicate efforts to implement effective money laundering prevention measures globally, as data privacy laws and cryptocurrency regulations vary significantly across countries. This study contributes to understanding the balance between consumer security and accessibility in digital finance, highlighting the need for a coordinated regulatory framework. This study encourages further research into new technologies and global regulatory collaboration to address the challenges posed by account freezing in digital financial systems.

Keywords: Account Freezing, Digital Transaction Security, Consumer Protection, Money Laundering

1. Introduction

Digital transactions refer to the exchange of goods or services electronically through devices such as mobile phones and computers. With the convenience they offer, digital transactions enable people to buy and sell goods or services online, eliminating the need for face-to-face meetings and the use of cash, which in turn increases efficiency in various transactions (Aris Sarjito & Sundring Pantja Djati, 2025; Gurgur & Kahveci, 2025; Shaikh & Anwar, 2023). However, while digital transactions offer convenience, their use also presents several challenges, particularly related to the potential for misuse of bank accounts. To conduct digital transactions, people need a bank account as the primary means of connecting to the digital payment system. In reality, although using a bank account greatly simplifies transactions, there have been instances of potential account misuse for illegal activities, such as illicit transactions, online gambling, money laundering, and terrorist financing (Astinayanti Astinayanti et al., 2024; Grover et al., 2019; Zhang et al., 2025). This raises concerns regarding the security and integrity of the digital financial system. In Indonesia, having a bank account is a primary requirement for accessing digital

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transaction systems. According to data from the Financial Transaction Reports and Analysis Center (PPATK), since the policy of freezing inactive accounts was implemented in May 2025, more than 122 million accounts have been frozen through August 2025. Approximately, since 2020, 110.000 accounts were suspected of being linked to illegal activities such as corruption, online fraud, money laundering, and drug abuse. These figures demonstrate that account misuse in the digital financial system is a crucial issue requiring further investigation. To address this issue, legal regulations are necessary to monitor and prevent the misuse of digital transactions, while also protecting the country's financial system from potential illicit risks. Indonesia has various regulations that serve as the legal basis for monitoring and regulating digital transactions. Some of these regulations include Law Number 9 of 2013 concerning the Prevention and Eradication of Criminal Acts of Terrorist Financing and Law Number 8 of 2010 concerning the Prevention and Eradication of Criminal Acts of Money Laundering, which aim to monitor and combat crimes that could harm the state through illegal transactions.

Furthermore, to support the prevention of crime in the financial sector, Indonesia also issued Presidential Regulation Number 10 of 2022, which regulates the Organization and Work Procedures of the Financial Transaction Reports and Analysis Center (PPATK). This regulation provides a clear legal framework for PPATK as an independent institution responsible for preventing and eradicating money laundering and terrorist financing. This Presidential Regulation gives PPATK the legal authority to monitor financial transactions and take preventive action, including freezing accounts used for illegal transactions.

One of the main policies implemented by the Financial Transaction Reports and Analysis Center (PPATK) is the freezing of dormant accounts. According to Law No. 8 of 2010 concerning the Prevention and Eradication of Money Laundering, these accounts have been inactive for a long period of time, usually more than three months Then, based on Law Number 9 of 2013 concerning the Prevention and Eradication of Criminal Acts of Terrorist Financing, the PPATK also gives authority to block accounts suspected of being connected to terrorist activities. This freezing aims to prevent the misuse of inactive accounts, which are often used for financial crimes such as money laundering, terrorism financing, and online gambling. This policy took effect in May 2025, aiming to safeguard the integrity of the national financial system and prevent losses resulting from illicit activities that harm the state and society. However, despite this policy's positive objectives, there have been criticisms and complaints from various parties regarding its impact on consumers and the banking system. Account freezing by the PPATK often makes it difficult for legitimate consumers to access their funds, especially when they urgently need funds. Furthermore, the process of reactivating blocked accounts can take up to 20 business days, which is considered burdensome for customers who need quick access to their funds, especially in uncertain economic times.

One of the main criticisms of this policy is that, while its primary goal is to protect the financial system and prevent the misuse of accounts for illegal activities, the slow process of unblocking accounts disadvantages many parties not involved in illegal activities (Wijaya et al., 2025). Many people are unable to withdraw funds from their blocked accounts and must wait a long time for the reactivation process to be completed. Based on the findings, this policy is unpopular and considered detrimental to many, prompting demands that the Financial

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Transaction Reports and Analysis Center (PPATK) immediately reopen blocked accounts. Some also worry that the lengthy procedure could erode customer trust in the formal banking system, even encouraging them to switch to the less controlled informal financial system (Gisymar et al., 2025; Intan Nor Aini et al., 2025).

The PPATK itself asserts that this policy does not directly harm customers, as funds in frozen accounts remain secure and customers can request verification and reactivate their accounts. However, many feel disadvantaged by this policy because they cannot access their funds during the lengthy verification process. Addressing the problem of account misuse for illegal activities is crucial, but a fairer policy that does not harm the public is urgently needed.

Account freezing policies can be analyzed through public policy and public administration theories, such as Collaborative Governance Theory, one of the most prominent approaches in contemporary public administration. This theory emphasizes the importance of collaboration between government institutions, the private sector, and civil society in formulating and implementing policies. In the context of the PPATK's account freezing policy, this theory is relevant because it emphasizes the importance of involving various actors, including customers and banks, in the decision-making and verification process (Ansell & Gash, 2008). Based on this theory, account-freezing policies should involve active communication among the PPATK, banking institutions, and the public. This will encourage the creation of policies that are not only effective in eradicating financial crime but also fair and transparent to users of financial services. Previous research also highlighted similar issues. Manning et al., (2021) examined the effectiveness of the account-freezing policy and found that, while effective in reducing illegal transactions, it had negative social impacts on vulnerable groups. Lopez Leonardi, (2025) explained the need for collaboration to share information and support organizational improvements to address money laundering. Korpela, (2025) explained that one problem in money laundering is a lack of public trust. Therefore, it is important to build public trust.

This study aims to examine the policies implemented by the Financial Transaction Reports and Analysis Center (PPATK) regarding account blocking and their impact on consumers and the banking system. Furthermore, Presidential Regulation Number 10 of 2022 concerning the Organization and Work Procedures of the Financial Transaction Reports and Analysis Center (PPATK) also grants the PPATK the authority to monitor financial transactions and issue recommendations for blocking bank accounts. This research will also compare similar policies implemented in other countries, such as Malaysia, Singapore, and the United States, which face similar challenges related to account misuse for money laundering and terrorism financing. Based on similar research in these three countries, relevant similarities were identified. Yusoff et al., (2024) concluded that the account blocking policy is effective in reducing money laundering activities in Malaysia, but has not adequately addressed the consumer protection aspect. Tan, (2018) explained that Singapore has made efforts to address money laundering issues, including blocking suspicious accounts. However, these efforts have been deemed ineffective and require improvement. Cedrick Agorbia-Atta, (2024) emphasizes that by leveraging advanced technologies such as Artificial Intelligence (AI) and Machine Learning (ML), financial institutions can improve real-time fraud detection and reduce money laundering risks, and mitigate account blocking errors.

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This research is different because it not only analyzes policies in Indonesia in depth, but also compares them systematically with similar policies in other countries like Malaysia, Singapore, and the United States of America through a Systematic Literature Review (SLR) approach. The author will examine various articles discussing related policies and compare them with policy implementation in other countries. By using the SLR method, this study is expected to yield more appropriate policy recommendations to address account misuse without harming the public.. (Brown, 2017).

2. Methods

This study uses the Systematic Literature Review (SLR) method, which aims to comprehensively collect, analyze, and synthesize relevant academic literature (Carrera-Rivera et al., 2022). This article collects, analyzes, and synthesizes the relevant academic literature on account freezing. Articles are taken from the Scopus database (www.scopus.com). Data collection was conducted through publication searches in Scopus using the keywords' digital transaction security' and 'prevention of financial crime', focusing on article titles, abstracts, and keywords from 2014 to 2025. The author's data consists of 3 articles and 23 conference papers. The data excluded are books and book chapters. Data, including the number of publications per year and the number of journals containing articles, were analyzed using Microsoft Excel. Meanwhile, trends in the development of international publications on account freezing were analyzed using VosViewer.

3. Results and Discussion

The growth of digital transaction security and research on financial crime prevention has been significant. The highest growth rate of Scopus-indexed publications in the field of digital transaction security and financial crime prevention occurred in 2025, reaching 13 publications. A more detailed analysis of the growth rate of international publications in the field of digital transaction security and financial crime prevention is presented in the following Table.

Table 1
Publication Each Year in Scopus

Publication Year	Year Number
2014	1
2019	1
2021	1
2022	1
2023	2
2024	7
2025	13

Source: Scopus, 2025

The growth of international publications in the field of digital transaction security and the

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prevention of financial crime, as shown in Table 1, stagnated between 2014 and 2022, followed by an increase in 2023, driven by two publications. This was followed by an increase to 7 publications in 2024. Then, in 2025, a significant increase occurred, with 13 publications. Based on the keywords "digital transaction security and prevention of financial crime" in Scopus, 26 publications were obtained. Of these international publications, they were published in the following journals:

Table 2
Account Freezing Journal in Scopus

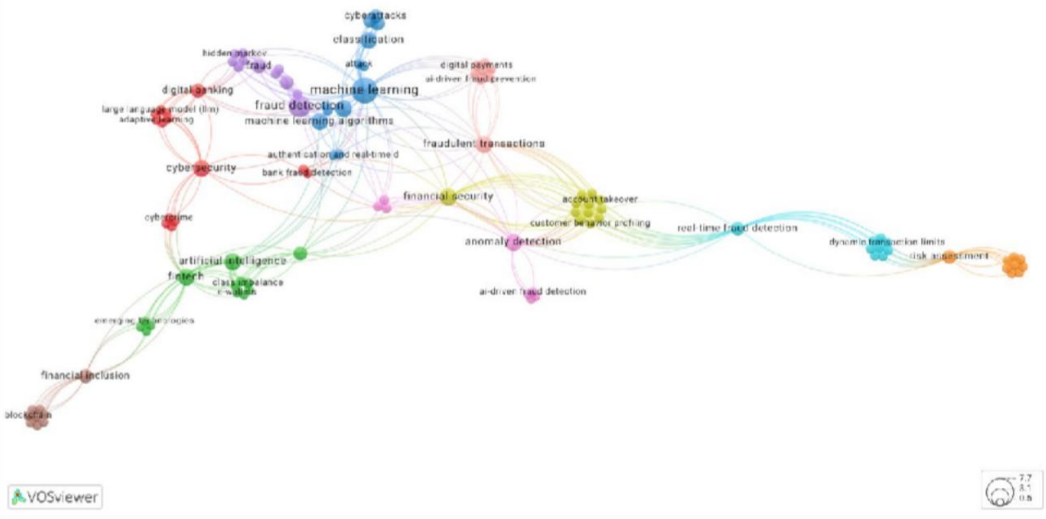
Journal	Number
Institute of Electrical and Electronics Engineers Inc.	21
Elsevier B.V.	1
Academic Conferences Limited info@academic-conferences.org	1
International Federation of Engineering Education Societies (IFEES)	1
Springer Science and Business Media Deutschland GmbH	1
Springer	1

Source: Scopus, 2025

Based on the Table above, it can be seen that the Institute of Electrical and Electronics Engineers Inc. published the most articles, with 21 articles, followed by Elsevier B.V., Academic Conferences Limited (info@academic-conferences.org), the International Federation of Engineering Education Societies (IFEES), Springer Science and Business Media Deutschland GmbH, and Springer (1 article each).

Publication Development Map Based on Keywords

Findings from the VOSviewer map analysis demonstrate a close relationship between technological developments and account-freezing policies in the context of digital transaction security and financial crime prevention. Key findings from this map highlight the importance of implementing advanced technology to optimize account freezing policies and financial crime prevention systems.



Picture 1. Co-Word Publication Map
Source: Data Analysis, 2025

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First, machine learning and fraud detection play a central role in developing systems that detect fraud in real time. The map indicates that recent research has focused more on real-time fraud detection, enabling the immediate identification of suspicious transactions. This is particularly relevant to account for freezing policies, which aim to prevent potentially harmful transactions before greater losses occur. Using machine learning algorithms, the system can automatically scan and analyze transactions, providing a solid foundation for faster and more efficient account freezes.

Furthermore, the findings reveal a strong correlation between dynamic transaction limits and risk assessment in account freeze policies. This topic emphasizes the importance of dynamically adjusting transaction limits based on a user's transaction behavior. With dynamic transaction limits, the system can set stricter limits for specific transactions based on transaction history and patterns. This suggests that account-freeze policies can be more proactive in preventing financial crime rather than merely reactive after a fraud incident. This approach allows for a more adaptive policy to the risks that arise in digital transactions.

Furthermore, the map highlights the importance of cybersecurity in safeguarding digital transactions. Cybercrimes such as account takeovers can compromise the integrity of user accounts and transactions. Therefore, account freezing policies must take these threats into greater depth. Account freezing, in this case, is based not only on detecting suspicious transactions but also on protecting accounts from cyberattacks that could have devastating consequences for both users and financial service providers. Anomaly detection enables the system to identify unusual activity in transactions, even when traditional models cannot predict it.

Customer behavior profiling is also a key component of these findings. The map focuses on account takeovers and customer behavior profiling. This suggests that account freezing policies can be more personalized based on user behavior analysis. For example, if there is a sudden change in a user's transaction pattern, the system can immediately flag and freeze the transactions to prevent further fraud. This leads to a more responsive, behavior-based system that can more accurately identify risks.

Another interesting finding in this map is the emergence of new trends related to large language models (LLMs) and adaptive learning. These technologies have significant potential to strengthen account-freezing systems by analyzing text and communication patterns on digital platforms. LLMs, for instance, can be utilized to identify suspicious behavior through online communications or interactions. Meanwhile, adaptive learning can ensure that fraud detection systems are always up-to-date with changing transaction patterns and new threats, so that account freezing policies remain relevant and effective in addressing evolving challenges.

Finally, although more peripheral, blockchain and financial inclusion demonstrate that these technologies can support account freezing policies by providing greater transparency and security in transactions. Blockchain can ensure that transactions and user data are better protected, making account freezing policies more trustworthy and reliable.

Overall, these findings underscore the importance of adopting advanced technologies, such as machine learning, fraud detection, cybersecurity, and adaptive learning in account-freezing policies to strengthen digital transaction security systems. By utilizing these technologies, account

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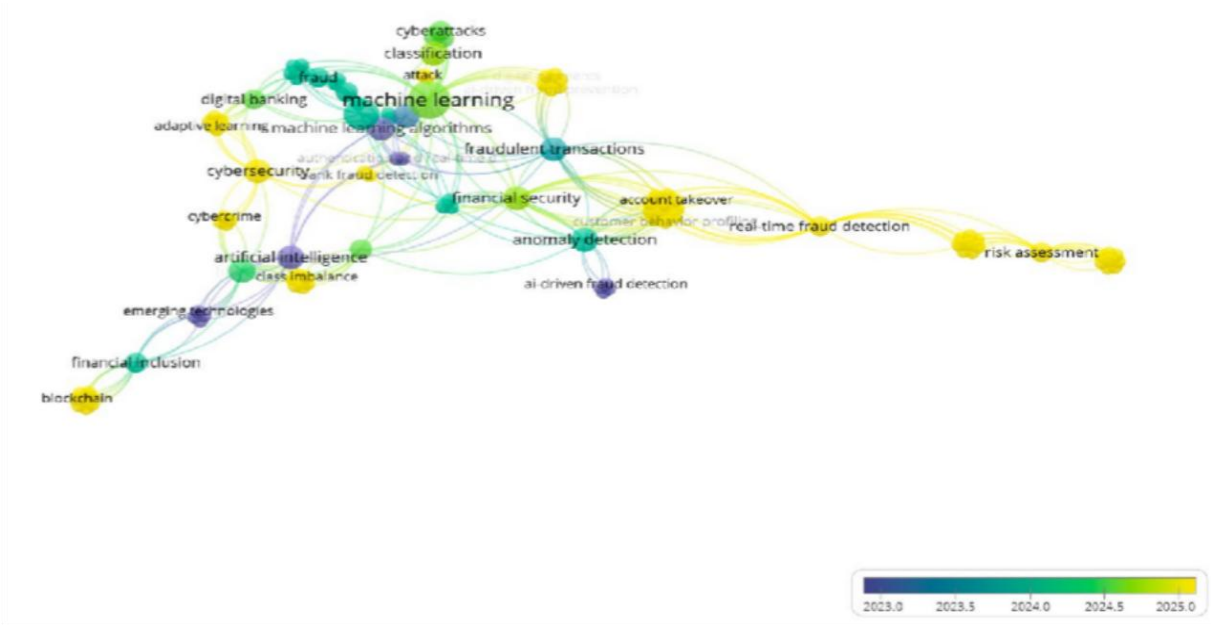
freezing policies will not only become more responsive and proactive but also more adaptable to changing user behavior and emerging threats in the digital financial crime landscape.



Picture 2 Co-Word Publication Map

Source: Data Analysis, 2025

Findings from the VOSviewer map analysis indicate that research related to fraud detection and risk in digital transactions has experienced a significant surge, particularly in 2024 and 2025. This trend suggests that technology-based fraud detection, particularly through machine learning and real-time risk analysis systems, is becoming an increasingly important focus in digital security research. This demonstrates that with technological advancements, fraud detection can now be performed more quickly, efficiently, and automatically, enabling account freeze policies to be more responsive to the threat of fraud and financial crime occurring in the digital world.

This map also demonstrates that machine learning is becoming a central element in research related to digital transaction security. In the context of account-freeze policies, machine learning can be used to detect suspicious transactions in real time. This technology enables the system to recognize unusual transaction patterns with greater accuracy, which aids in timely account freeze decisions. By using techniques such as fraud detection and real-time fraud detection, account freeze policies can identify potential fraud even before a transaction is completed, minimizing potential losses for individuals or financial institutions.

Furthermore, this map underscores the importance of cybersecurity in supporting account-freeze policies. Threats such as account takeovers and cyberattacks are becoming increasingly significant concerns in the world of digital transactions. Transaction security depends not only on identifying fraud that occurs during transactions but also on protecting user accounts from attacks that could steal data or manipulate transactions. Therefore, account freeze policies must be strengthened with technology that not only detects fraud but also protects accounts from potential cyberattacks. The integration of cybersecurity and fraud detection technology is crucial for

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preventing greater losses.

This map also illustrates the increasing use of anomaly detection and customer behavior profiling to detect unusual transaction behavior. These technologies play a crucial role in identifying potential fraud, as systems can detect sudden changes in user transaction patterns. This directly relates to account-freeze policies, which must respond quickly to suspicious transaction patterns. Systems that use these techniques can alert users to unusual activity, enabling account freezes before fraud escalates. This demonstrates that effective account freeze policies require a behavior-based approach that can respond to threats more quickly and effectively.

Furthermore, this map also indicates that new technologies, such as adaptive learning and large language models (LLMs), are emerging in the field of fraud detection research. Adaptive learning enables the system to adjust to changing user behavior over time, making account-freeze policies more responsive to emerging trends and threats that may go undetected by traditional models. Large language models can help detect fraud hidden in text or conversations between users and the platform. This technology opens new opportunities to identify fraud patterns that are more difficult to detect with transaction-based systems alone, improving the reliability of fraud detection and account-freeze systems.

Although less closely related to the map's core, concepts such as financial inclusion and blockchain also emerged from the research and could support account freezing policies. Blockchain, with its ability to provide greater transparency and security, can strengthen fraud-detection and account-freezing systems, ensuring that recorded transactions cannot be manipulated. In this regard, blockchain can play a crucial role in preventing fraud involving transaction data. Furthermore, financial inclusion reminds us that account-freezing policies must balance maintaining financial access for the broader community with ensuring the system is secure against potential fraud.

Overall, the findings from this map underscore the need for account freezing policies to increasingly rely on advanced technology to ensure fast, accurate, and responsive fraud detection. Technologies such as machine learning, anomaly detection, and AI-driven fraud detection not only enable more effective fraud detection but also support policies that can be more adaptive to threats and changing transaction behavior. By implementing these technologies, account freezing policies can enhance their security.

Account Freezing Policy

A literature review found that bank account blocking occurs worldwide, including in Malaysia, Singapore, and the United States. Each country has a similar goal, both domestically and internationally: preventing the misuse of bank accounts for illicit activities such as money laundering and terrorism. This allows the country to maintain its reputation and maintain national security. This policy has legal force, and there are institutions authorized to block accounts (Ernawati Ernawati et al., 2024; Huang, 2015; Poon, 2021; Yusoff et al., 2024). These results indicate that each country has implemented account blocking policies, and Indonesia has indeed replicated this policy to prevent account misuse. Account blocking policies in each country can

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indeed have positive impacts in terms of security, economics, social, and political aspects. This policy can enhance digital security by addressing the issues of digital fraud and money laundering in Malaysia. In Singapore, the account blocking policy has become a crucial tool, given the country's status as one of the world's leading trade and financial centers. Singapore also faced a US$2.8 billion money laundering case in 2023. The United States has recently implemented an account-blocking policy focused more on internal security, such as blocking the accounts of companies and individuals from Russia and Iran. This account blocking can also increase the value of the dollar in the global market. From this, it can be concluded that the account blocking policy can indeed address criminal issues such as money laundering and terrorism; however, each country has also faced negative impacts from this policy. Malaysia faces the same problem as Indonesia: inaccurate blocking, which harms the wider community and businesses. Singapore faces high compliance costs, as small banks must adapt to the Singaporean government's monitoring and blocking policies, which require them to allocate a larger portion of their budget. The United States has also been criticized for using this account-blocking policy as a weapon to harm developing countries, and many citizens, especially immigrants, have had their accounts blocked. It is also inaccurate (A. Rahman, 2014; Bryan & Collins, 2024; Cihlar, 2009; Fisman et al., 2025; Md Noor et al., 2022; Yu, 2019).

Based on William Dunn, (2018) The account-blocking policy should serve as a reference for compiling the following policy. Based on the results of the literature study, an evaluation of the account blocking policy has been conducted in various countries, including Malaysia, Singapore, and the United States, and the problems associated with this policy have also been previously discussed. Based on the results of the literature review, it can be concluded that Malaysia faces a problem of non-on-target blocking. Singapore, on the other hand, faces the significant burden that small banks must bear, while the United States also faces the problem of blocking that is not on target. Based on William Dunn's theory of policy evaluation, a policy must be evaluated to determine its effectiveness in achieving its objectives, its budget allocation, and its sustainability. Account blocking policies in various countries can reduce illegal transactions, including money laundering and terrorism-related transactions. However, injustices persist across various groups in society, both in the public and private sectors, making the account-blocking policy insufficient to meet the needs of all stakeholders. Furthermore, the account blocking policy was ultimately revoked. Additionally, this policy has not been effective. Based on the literature review, responses have also been identified in each country to address the challenges faced there. Malaysia has implemented a faster appeals procedure, allowing individuals and businesses to appeal quickly if their accounts are blocked. Malaysia has also collaborated with Fintech to develop an Electronic Know Your Customer (e-KYC) system to minimize errors in account blocking (Ghozi, 2022; Zouaghi Adel et al., 2021). Furthermore, Singapore has implemented a collaborative policy with organizations such as Interpol, Europol, and Asian authorities to close loopholes in money laundering. Small banks have also been given trial space without being subject to full costs, and have also developed digital transaction monitoring to be more efficient and targeted. The United States has also developed policies to address various challenges it faces, such as creating a national database to increase transparency into company ownership so that banks do not block accounts simply because of unclear identities. The United States has also encouraged banks to block high-

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risk transactions. The United States has also collaborated, particularly with G7 members, to prevent unilateral account blocking sanctions (Khalifatunnisa et al., 2025; Mohamad Abdul Latif & Abdul-Rahman, 2018; Ngo et al., 2025; Ooi, 2022).

From these various explanations, each country has responded by proposing ways to make account-blocking policies more effective without harming various parties. Account blocking policies are an integral part of digital transaction security, as they provide a step to stop suspicious activity. Kotarski, (2015) explains the importance of this practice in combating financial cybercrime and protecting digital transactions. The ability to block accounts in real-time is crucial for preventing account misuse, which can facilitate money laundering and terrorism, two threats that often occur during account use. Therefore, account blocking policies are not inherently wrong, as various countries have adopted similar policies in practice (Campbell et al., 2012). However, in Indonesia, the account-blocking policy was formulated in a closed, rushed manner, resulting in various problems during implementation, including the blocking of many inaccurate targets and a lengthy process for recording blocked accounts. Therefore, by conducting a literature review of account-blocking practices across various countries, the author can provide recommendations for adoption. Indonesia can adopt Malaysia's approach to protecting customers and expediting the opening of blocked accounts, adopt technology similar to Singapore's, and utilize a high-risk approach similar to that of the United States.

Indonesia must protect customers and enforce transparency. The Indonesian case demonstrates that disproportionate blocking can be detrimental to both the public and businesses. Therefore, Indonesia should implement a rapid appeals mechanism, for example, through a financial mediation institution under the Financial Services Authority (OJK) or a special court, so that the public can quickly have accounts unblocked. Furthermore, each bank is also required to provide information about the account to be blocked, explain the reasons for the blocking, and give the public time to respond to the decision to block a bank account. Furthermore, Indonesia must also implement technology, as practiced in Singapore. The government can utilize AI to aid in tracking suspicious transactions, thereby reducing the misidentification of account misuse. Third, Indonesia needs to adopt a risk-based approach, similar to that of the United States. Therefore, account blocking should focus more on transactions in high-risk sectors, such as accounts used to perpetrate scams or engage in suspicious cross-border transactions. This would reduce the number of individual account blocks and reduce the number of everyday transactions. Fourth, regulatory reform is also needed. The Anti-Money Laundering Law No. 8 of 2010 (TPPU) needs to be updated to align with the latest Financial Action Task Force (FATF) standards, including those on digital assets.

Furthermore, the definition of "suspicious transactions" should be clarified to provide banks with clear guidelines and prevent overreaction. Personal data protection must also be a priority to prevent abuse of the freezing authority. Fifth, Indonesia can build collaboration both nationally and internationally. Indonesia has various financial institutions. Therefore, each of these institutions, such as Bank Indonesia (BI), the Financial Services Authority (OJK), the Financial Transaction Reports and Analysis Center (PPATK), and the police, can develop an integrated system to monitor suspicious transactions. This way, accounts used for money laundering can be immediately blocked. Indonesia can also develop big data and AI-based anti-money laundering

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software by involving banks and technology companies to detect suspicious transactions. It can also establish a whistleblowing mechanism that allows the public to report suspicious transactions. In addition to developing collaboration at the national level, Indonesia can also develop collaboration on a global scale. By utilizing ASEAN, Indonesia can collaborate with each ASEAN country, for example, by conducting joint training with each ASEAN country on anti-money laundering measures and training on preventing the financing of terrorism. Indonesia can also work together to agree on blocking accounts between ASEAN countries.

4. Conclusion

While account freezing is a crucial tool for enforcing Anti Money Laundering (AML) regulations and preventing terrorism, it faces significant challenges. The effectiveness of account blocking is hindered by inaccurate targeting and the lengthy process of reopening blocked accounts. Therefore, Indonesia should reconsider its mechanism for blocking suspicious accounts and learn from the account blocking policies of other countries, such as Malaysia, Singapore, and the United States. Account blocking policies have been adopted in countries such as Malaysia, Singapore, and the United States, with the shared goal of preventing money laundering and countering the financing of terrorism. Each country adopts a different approach. Malaysia focuses more on protecting customers and expediting the process of unblocking blocked accounts. Singapore adopts technology to enhance efficiency and reduce the risk of account blocking errors. The United States, on the other hand, adopts a high-risk approach. Indonesia can also adopt these approaches. Malaysia, Singapore, and the United States have adopted collaborative approaches to address challenges in implementing account-blocking policies. Therefore, Indonesia can also adopt collaboration on both a national and global scale to overcome the problems encountered during the blocking process, namely, inaccurate blocking and the lengthy process of opening blocked accounts.

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