

The Comparative of Regulations About Online Gambling Between Indonesia, Malaysia, Singapore, And United Kingdom

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Abstract

Technology that is developing rapidly affects human life, one of which is in gambling. Gambling that was originally done conventionally then turned into gambling that can be done online. Online gambling is gambling using the internet. Some countries such as Singapore and the UK have strictly regulated and legalized online gambling, but there are still countries that have not explicitly regulated such as Indonesia and Malaysia. This study will discuss the scope of online gambling regulation in Indonesia, Malaysia, Singapore, and the UK, as well as how to apply effective laws that can be applied in Indonesia, after a comparative arrangement has been made. By using normative research methods and Systematic Literature Review then based on the theory of comparison, convergence, and legal effectiveness.

From this study it was found that online gambling in Indonesia and Malaysia is considered a prohibited activity, because it is against the law as well as religious and decency norms that grow and develop in society. Malaysia itself already has regulations to prohibit gambling, although online gambling has not been explicitly regulated. Singapore regulates gambling so that people are not harmed or exploited by remote gambling. Then the UK regulates online gambling by reducing the number of types of gambling and minimizing the influence of organized crime arising from gambling. Indonesia can apply gambling rules as did Malaysia, Singapore, and the UK, of course, with due regard to the effectiveness of the law so that this law is ideally applied in Indonesia while still paying attention to aspects of effective law formation.

Keyword

Gambling, online gambling, legal effectiveness

1. Introduction

Nowadays, technology is increasingly developing, especially when the internet is present during society. With the internet anyone, anywhere, and anytime can exchange information and interact through cyberspace. In cyberspace, the process of interacting with people in life has changed, because this cyberspace is a new space, cyberspace, a space without boundaries, not a real space with clear boundaries. The cyber world is not just about making life easy, it is about making a different or better life or making a new life (Lessig 2006).

This technological development has a huge impact on life, one of which is the gambling industry. Ease of access is one of the factors that make online gambling increasingly popular. In addition, online gambling is in great demand by players because it is considered safer when playing (Dwiwahyuni and Agus 2021). The online gambling industry is increasing with the outbreak of the Covid-19 pandemic, this increase occurs because many conventional gambling places such as casinos, bingo, horse racing, lottery, betting, poker, and several other types of gambling are innovating

in order to continue to run and conduct gambling (Hodgins and Rhys 2021). This increase in online gambling games can be seen from the increase in total gross gambling win globally before, during, and estimated after the pandemic through a survey conducted by H2 Gambling Capital. (Figure 1)



Figure 1. Increase in Online Gambling Gross Win Before, During and Forecast After the Covid-19 Pandemic

In fact, in 2018 online gambling experienced a revenue growth rate of around 10.8% from 2016 revenues of \$45.86 Billion, and it is estimated that by 2024 global online gambling revenues will double to \$96.89 Billion (Dufour et.al 2020). Likewise, the increase in online gambling in Indonesia, this can be seen based on the Online Gambling Content Handling Data for 2018 to 2021 obtained from the Ministry of Communication and Information of the Republic of Indonesia (Kominfo). (Table 1)

Tabel 1. Data on Online Gambling Content Handling from 2018 to 2021 in Indonesia

Tahun	Situs	File Sharing	Telegram	Google/ Youtube	Twitter	Facebook/ Instagram	Total
2018	84484	0	0	0	0	0	84484
2019	78280	26	0	0	0	0	78306
2020	80305	0	0	0	0	0	80305
2021	204807	92	1	15	0	2	204917
Total	447876	118	1	15	0	2	448012
Grand Total							

Source: Ministry of Communication and Information

Indonesia does prohibit all acts of gambling, both conventionally and online, be it sites and/or content that contains gambling content. This can be seen from the existence of regulations prohibiting gambling such as in the Criminal Code (KUHP), Government Regulations (PP), Laws (UU) relating to gambling, as well as religious norms and norms of decency that grow in the community. Online gambling itself is regulated in the Electronic Information and Transaction Law (ITE Law) but does not explicitly regulate it.

The phenomenon of online gambling is not only felt in Indonesia, but in various countries. Therefore, each country has its own regulations in addressing online gambling in its country, such as in Malaysia which has online gambling regulations that are almost the same as Indonesia. Malaysia prohibits conventional and/or online gambling, this is because Malaysia is a country that applies Sharia law. Although Indonesia and Malaysia prohibit gambling, there are countries that allow online gambling, such as Singapore and the UK. These two countries have a similar history where gambling was initially prohibited and then regulations were formed that explicitly regulated the rules and limits of

gambling, so that gambling became legal. The UK allows online gambling, and even created a special commission to regulate gambling, namely The Gambling Commission.

In Indonesia, the phenomenon of online gambling continues to increase every year, this is certainly not in line with the ideals of the state to eliminate gambling in Indonesia. With the comparison of regulations between Indonesia, Malaysia, Singapore, and the UK, it is hoped that it can provide an overview of the formulation of the problem to be discussed, namely related to what is the scope of online gambling arrangements in Indonesia, Malaysia, Singapore and the UK and what the ideal Online Gambling arrangements in Indonesia are based on the countries that have been compared. So based on the background and formulation of the problem, the researcher is interested in conducting research with the title "Comparative Study of Online Gambling Regulations in Indonesia, Malaysia, Singapore and the United Kingdom".

2. Literature Review

2.1 Comparative Law Theory, Legal Convergence and Legal Effectiveness

Rudolf B. Schlesinger argues that comparative law is a method of investigation to gain deeper knowledge about certain legal materials, comparative law is not a set of legal rules and principles, nor is it a branch of law, but rather a technique for addressing foreign legal elements of a legal problem (Fitrah 2021). Comparative law is usually used to see the regulatory models of the compared regulations either on a large scale or on a small scale according to predetermined variables. The principle in comparison is that apple-to-apple comparisons must be built (Shidarta 2016).

Technological advances have led to convergence in cyber activities that have impacted lives. Cyber activities can no longer be limited by the territory of a country and access can easily be done from anywhere, therefore losses can occur both to internet actors and other people who have never been in contact. Legal and economic experts argue that the implications of globalization will force the legal order to converge so as to achieve economic efficiency (Budhijanto 2011). Therefore legal convergence is necessary to prevent cybercrimes from occurring. This is because the related regulatory arrangements of a legal order will make one legal system alone unable to provide an optimal solution to the problems that arise. Markesinis argues that similarities in approaching different legal cultures will play a role in future legal integration.

The law-making process must be relevant to the field or problem to be regulated, if the legislation is to become effective law. Legal effectiveness is an activity that shows a general problem formulation strategy, namely a comparison of legal reality with effective law. The theory of legal effectiveness according to Soerjono Soekanto is that whether a law is effective or not is determined by 5 (five) factors, namely (Soekanto 2008):

- a. The legal factors themselves, namely the law
- b. Law enforcement factors, namely the parties who form and apply the law
- c. Facility factors that support law enforcement
- d. Community factors, namely the environment where the law applies or is applied
- e. Cultural factors, namely as a result of work, creation and taste based on karsa.

In addition to these five factors, legal effectiveness means examining legal rules that must meet the requirements, namely juridical, sociological and philosophical validity. The process of forming laws must be relevant to the field or problem to be regulated, if the legislation is to become effective law.

2.2 Definition, History, and Types of Online Gambling

Robert Carson & James Butcher in the book *Abnorma Psychology and Modern Life*, define gambling as placing a bet on a certain game or event in the hope of obtaining a large result or profit. Meanwhile, the definition of online gambling according to Gambling ACT 2005 defines online gambling or can be referred to as remote gambling is gambling in which people participate by using remote communication using the internet, telephone, television, radio, or any other type of electronic or technology used to facilitate communication. Roesmanto explained that the factors that influence gambling are Social & Economic factors, especially for people with low social and economic status, gambling is often considered as a means to improve living standards, besides that the social conditions of the community that accept gambling behavior have a big role in the growth of gambling in the community (Anhar and Muhammad 2019).

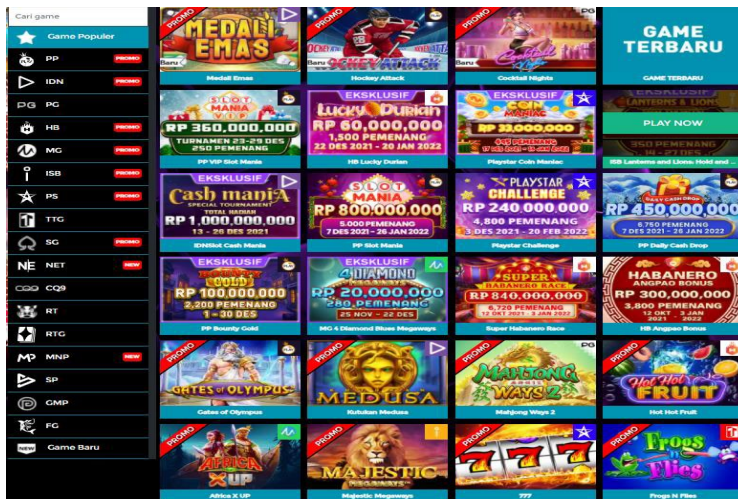


Figure 2. Online Gambling Site

The emergence of online gambling is inseparable from the history of conventional gambling which has existed earlier than online gambling. Since the early 2000s the gambling industry has grown significantly until now. Online gambling has a very wide area coverage, these online gambling players can come from various countries. So that anyone can play online gambling as long as they are connected to the internet. Online gambling adapts the kinds of gambling that are usually carried out conventionally by utilizing electronic media and the internet as access to gambling activities. Popular types of online gambling include poker, slot games, sports gambling, togel, and the latest gambling phenomenon is binary options trading. (Figure 2)

3. Methods

This research will depart from the discussion of conventional gambling and then will more specifically discuss online gambling. Then examine the scope of online gambling regulation and then a comparison of online gambling regulation in Indonesia, Malaysia, Singapore, and the United Kingdom, which will later answer the formulation of the problem. Research is a search effort that has educational value, every research departs from ignorance and ends in doubt, and the next stage departs from doubt and ends in a hypothesis. The research method used in this research is the normative juridical method, namely research whose object of study is legislative documents and library materials. Then to support this normative method, researchers also use the Systematic Literature Review (SLR) method, this method aims to identify, review, evaluate, and interpret all available research with research topics and with relevant research questions.

4. Data Collection

The data collection techniques used in conducting this research are as follows:

1. Normative Juridical Research Methods
Data collection techniques in normative legal research are carried out by literature study and a comparative approach to primary legal materials, and literature study of secondary legal materials, and tertiary legal materials.
2. Systematic Literature Review Research Method
In Systematic Literature Review research, data collection techniques are carried out by identifying research questions, selecting relevant research results, selecting quality research results, obtaining important findings, synthesizing results, and presenting results.
3. Interview
Researchers will ask questions to experts to get information related to the problems to be studied.

5. Results and Discussion

5.1 Overview of Online Gambling Regulation in Indonesia, Malaysia, Singapore, and the UK

Indonesia, Malaysia, Singapore, and the UK have rules governing both conventional and online gambling. Here are some of the regulations used in regulating gambling in Indonesia, Malaysia, Singapore, and the UK. (Table 2)

Table 2. List of Online Gambling Regulations in Indonesia, Malaysia, Singapore, and the UK

No	Country	Conventional/Online Gambling Regulations	Description
1	Indonesia	<ul style="list-style-type: none"> • Pasal 303 dan 303 bis KUHP • UU No. 7 Tahun 1974 tentang Penertiban Perjudian • PP No. 9 Tahun 1981 tentang Pelaksanaan Penertiban Perjudian • Pasal 27 ayat (2) dan Pasal 45 ayat (2) UU ITE 	<ul style="list-style-type: none"> • There is a link between the article in article 27 paragraph (2) of the UU-ITE and the Criminal Code. • Gambling is an act that violates norms and decency. • The existence of imprisonment for gambling offenders • Distributing and/or transmitting and/or making accessible electronic information and/or electronic documents that have gambling conten
2	Malaysia	<ul style="list-style-type: none"> • Betting Act 1953 • Common Gaming House Act 1953 • Communication and Multimedia Act 1998. 	<ul style="list-style-type: none"> • Regulate gambling-related betting • Prohibit all forms of gambling except for establishments that have a legal license to operate. • Telecommunications and other means of betting transmission between customers and betting houses • Used in regulating gambling activities in cyberspace but does not explicitly regulate them. • Regulates common gaming houses, public gaming and public lotteries. • Used to block online gambling sites and online gambling advertisements • Gambling is an act that violates norms and decency. • Gambling violates Islamic sharia law
3	Singapore	<ul style="list-style-type: none"> • Betting Act 1960 • Common Gaming House Act 1961 • Private Lotteries Act 2011 • Remote Gambling Act 2014 	<ul style="list-style-type: none"> • Encourage and provide security in conducting gambling • Individual lottery control and taxation • Regulates common betting houses, betting in public places, and bookmaking. • Establishment of common betting houses and public lotteries.

			<ul style="list-style-type: none"> • Regulate online gambling with restrictions on online gambling
4	United Kingdom	<ul style="list-style-type: none"> • The Gambling Act 1968 • Gambling Act 2005 • The Gambling (Licensing and Advertising) Act 2014 	<ul style="list-style-type: none"> • Regulates the reduction of the number of types of gambling • Minimize the influence of organized crime arising from gambling • Sets out key concepts and contains definitions, important terms, sets out the powers and duties of the Commission, discusses offenses, discusses child and youth protection, and discusses different types of licenses. • Regulate the licensing and advertising of gambling • Regulates the licensing of companies that advertise or operate gambling in the UK and pay gambling duty. • Regulates the licenses that must be owned by companies engaged in gambling.

Source: processed in 2022

These regulations are made to regulate gambling in the country so that gambling does not harm the community and the country.

a. Indonesia

Gambling in Indonesia has been known since ancient times, especially during the colonial period gambling was increasingly recognized after Chinese and European traders arrived bringing gambling games such as card and dice gambling. For online gambling itself, it is not known exactly when it began to enter Indonesia. But over time online gambling continues to grow in Indonesia.

The regulation of online gambling in Indonesia refers to the Criminal Code and the ITE Law. Gambling is explained in Articles 303 and 303 bis. The definition of gambling in Indonesia can be found in Article 303 paragraph (3) of the Criminal Code, which explains that "permainan judi adalah tiap-tiap permainan, di mana pada umumnya kemungkinan mendapat untung tergantung pada peruntungan belaka, juga karena pemainnya lebih terlatih atau lebih mahir. Di situ termasuk segala peraturan tentang keputusan perlombaan atau permainan lain-lainnya, yang tidak diadakan antara mereka yang turut berlomba atau bermain, demikian juga segala taruhan lainnya." The Criminal Code explains the definition of gambling, but does not explain the definition of online gambling. Article 303 of the Criminal Code provides for any person who offers and provides opportunities for gambling and makes gambling his livelihood. Article 303 bis of the Criminal Code provides for any person who uses the offer and opportunity to conduct gambling as described in Article 303 of the Criminal Code.

Meanwhile, the ITE Law itself does not explain the definition of online gambling. Article 27 paragraph (2) of the ITE Law explains that every person intentionally and without the right to distribute and/or transmit and/or make accessible Electronic Information and/or Electronic Documents that have gambling content. The ITE Law does not explicitly regulate online gambling, the ITE Law only regulates electronic information and/or electronic documents that have gambling content. In the ITE Law, gambling is included in prohibited acts and can be subject to sanctions in the form of criminal sanctions in accordance with the provisions in Article 45 paragraph (2) which explains that "setiap orang yang melanggar ketentuan dalam Pasal 27 ayat (2) dipidana dengan pidana penjara paling lama 6 (enam) tahun dan/atau denda paling banyak Rp1.000.000.000,00 (satu miliar rupiah)."

In addition to the Criminal Code and the ITE Law, there are still several related gambling regulations, including Law No. 7 of 1974 concerning Gambling Control. Law No. 7 of 1974 is a law that amends Article 303 and Article 542 paragraphs (1) and (2) of the Criminal Code. This law is also a step taken by the government to eradicate gambling in Indonesia. In this law, it is explained that gambling itself is a crime that violates religious norms and decency, and is contrary to the Pancasila Moral, and is harmful to the livelihood and life of the community, Nation and State. PP No. 9 of 1981 concerning the Implementation of Gambling Control. This PP is an implementing regulation of Law No. 7

of 1974 concerning Gambling Control. This PP explains that all types of gambling are prohibited, whether gambling is held in casinos, in crowded places, or is associated with other reasons. This PP also explains that gambling licenses as stated in the Criminal Code are abolished, so there is no longer the granting of gambling licenses.

b. Malaysia

Malaysia prohibits gambling both conventionally and online, this is because Malaysia is a country that applies Sharia law, then there are several other regulations that discuss gambling such as the Betting Act 1953, Common Gaming House Act 1953 and Communication and Multimedia Act 1998.

The Betting Act 1953 regulates betting gambling. This regulation is considered to be quite strict in prohibiting all forms of gambling except for companies that have a legal license to operate. The BA also addresses telecommunications and other means of transmitting bets between customers and betting houses. The Common Gaming House Act 1953 is often used in regulating gambling activities in cyberspace but does not explicitly regulate it. The CGHA regulates common gaming houses, public gaming, and public lotteries. The Communication and Multimedia Act 1998 does not explicitly regulate gambling in cyberspace, but it is used to block online gambling sites and online gambling advertisements.

c. Singapura

Gambling in Singapore was originally a prohibited activity, especially in the 19th century Singaporeans experienced gambling addiction and caused huge losses (Winslow et.al 2015). As the times developed and many things were considered by the Singapore government, gambling finally became legal. To encourage and provide security in gambling, the Singapore government made regulations to regulate gambling activities, including through Betting Act 1960, this regulation regulates common betting houses, betting in public places, and bookmaking. Common Gaming House Act 1961, this regulation regulates the establishment of common betting houses, and public lotteries. Casino Control Act 2006 regulates casinos and gaming in casinos, and indirectly regulates online gambling. Private Lotteries Act 2011 regulates the control and taxation of individual lotteries. The Remote Gambling Act 2014, in this regulation further regulates online gambling with restrictions on online gambling.

d. Inggris

The UK legalizes gambling and regulates gambling explicitly, even the UK created a special commission to regulate gambling, the Gambling Commission. The UK allows gambling both conventionally and online with restrictions on the types of gambling games that can and cannot be played, as well as regulating related industries in gambling that must first obtain a license in order to operate and be accessed in the UK.

The following are some of the existing regulations in the UK such as The Gaming Act 1968, this regulation deals with reducing the number of types of gambling and minimizing the influence of organized crime arising from gambling. The Gambling Act 2005, this regulation deals with key concepts and contains definitions, important terms, sets out the powers and duties of the Commission, discusses offenses, discusses child and youth protection, and discusses various types of licenses. The UK also has specific regulations governing the licensing and advertising of gambling under The Gambling (Licensing and Advertising) Act 2014, which regulates the licensing of companies that advertise or operate gambling in the UK and pay gambling duty.

5.2 Overview of Effective Law Enforcement in a Country

The legal system is the essence of the law that applies in a particular area. A system is said to be destroyed, if as a result of its exchange with these changes it is unable to maintain its existence, so it must succumb to these changes, but on the contrary if the system is able to overcome these challenges and is able to adapt to the changes that occur, then the system will not lose its existence (Raharjo 2000). A regulation in order not to lose its existence must have legal reform. The function of legal reform, among others, is to update regulations that are no longer in accordance with new needs and developments. The ideal law is a legal order that is not discriminatory and is based on national personality (religious and customary values) and not a personality that hinders communication with the outside world (Harahap 2019).

6. Conclusion

The development of technology is one of the factors that online gambling is present in the midst of people's lives. Especially when the Covid-19 pandemic hit, all activities were limited and carried out online, as well as gambling. During this pandemic, it is estimated that revenue from online gambling globally has increased, even predicted to continue to increase every year until 2025.

Online gambling in Indonesia and Malaysia is considered a prohibited activity, as it goes against the law as well as religious and moral norms that grow and develop in society. However, Malaysia itself has rules to prohibit gambling, although online gambling has not been explicitly regulated. Then, there are countries that allow gambling such as Singapore and the UK. Singapore regulates gambling so that people are not harmed or exploited by remote gambling. Then the UK regulates online gambling by reducing the number of types of gambling, minimizing the influence of organized crime arising from gambling. Indonesia can implement gambling regulations like Malaysia, Singapore, and the UK, of course, still by paying attention to the effectiveness of the law so that this law is ideal for implementation in Indonesia while still paying attention to aspects of effective law formation.

References

- Amirudin., Zainal Asikin. *Pengantar Metode Penelitian Hukum*. Depok: Rajawali Pers.
- Anhar, Al., Muhammad. "The Effect of Islamic Education Understanding Toward Gambling Behavior." *Journal of Research in Islamic Education*. Vol. 1. No. 1.
- Apriansyah, Agus Ari. "Fenomena Judi Poker Online Dikalangan Mahasiswa Universitas Riau Jurusan Sosiologi." *Jom FISIP*. Vol. 5 No. 11.
- Betting Act 1953.
- Betting Act 1960.
- Budhijanto, Danrivanto. "Pembentukan Hukum Yang Antisipatif Terhadap Perkembangan Zaman Dalam Dimensi Konvergensi Teknologi Informasi Dan Komunikasi." *Jurnal Ilmu Hukum*. Vol. 14. No. 2.
- Casino Control Act 2006.
- Common Gaming House Act 1961.
- Common Gaming House Act 1953.
- Communication and Multimedia Act 1998.
- Dhillon, Guru., et al. "Online Gambling in Malaysia: A Legal Analysis." *Pertanika Journal of Social Sciences and Humanities*. Vol. 29. No. 1.
- Direktorat Putusan Mahkamah Agung Republik Indonesia Nomor 338/Pid.B/2020/PN Clp Tahun 2020.
- Djaenab. "Efektifitas dan Berfungsinya Hukum Dalam Masyarakat." *Ash-Shahabah Jurnal Pendidikan dan Studi Islam*. Vol. 4. No. 2.
- Dufour, Magali., et al. "Once Online Poker, Always Online Poker? Poker Modality Over Two Years." *Addictive Behaviors Report*. Vol. 11.
- Dwihayuni, Yayi Putri., Agus Machfudz Fauzi. "The Motive for the Action of Online Gambling as an Additional Livelihood during Social Restrictions Due to the Covid-19 Pandemic." *Jurnal Sosiologi Dialektika*. Vol. 16. No. 2.
- Fitrah, Farrel Alanda. "Perbandingan Hukum Terkait Pembentukan Pasal Penghinaan Terhadap Peradilan, Perzinahan, dan Santet Dalam RKUHP Indonesia." *SIGn Jurnal Hukum*, Vol. 2 No. 2.
- Fleming, Alice. *Something for Nothing: A History of Gambling*. New York: Delacorte Press, 1978.
- Gambling Act 2005.
- Gambling Sites. "Online Gambling Law in Malaysia." (Online). Tersedia di <https://www.gamblingsites.org/laws/malaysia/>.
- H2GC. "H2 Gambling Capital." (Online). Tersedia di WWW: <https://h2gc.com/>.
- Harahap, M.Syhanan. "Konsepsi Hukum Yang Ideal Bagi Negara Kesatuan Republik Indonesia." *Jurnal Ilmiah Hukum Dirgantara*. Vol. 10. No. 1.
- Hodgins, David., Rhys M.G. Stevens. "The impact of COVID-19 on gambling and gambling disorder: emerging data." *Current Opinion*. Vol. 34. No. 4.
- Hoesein, Zainal Arifin. "Pembentukan Hukum Dalam Perspektif Pembaharuan Hukum," *Jurnal RechtsVinding*. Vol. 1. No. 3.
- Kitab Undang-Undang Hukum Pidana Republik Indonesia.
- Lessig, Lawrence. *Code*. Basic Books, 2006.
- Mudjiyanto, Bambang. "Tipe Penelitian Eksploratif Komunikasi." *Jurnal Studi Komunikasi dan Media*. Vol. 22 No. 1. Hlm. 67.
- Neilson, W Bryce. "Gamin History & Law." *Gaming the Stage 2018*.
- NetPlay88. (Online). Tersedia di WWW: <https://34.101.198.206/>.
- Novita, Ria Ayu., et al. "Efektivitas Pelaksanaan Undang-Undang Nomor 2 Tahun 1960 Tentang Perjanjian Bagi Hasil Tanah Pertanian (Tanah Kering) Di Desa Bringin, Kecamatan Bayan, Kabupaten Purworejo." *Diponegoro Law Journal*. Vol. 6. No. 2.
- Peraturan Pemerintah Republik Indonesia Nomor 9 Tahun 1981 tentang Pelaksanaan Penertiban Perjudian

Private Lotteries Act 1952.

Putusan, Direktori, Mahkamah Agung, and Republik Indonesia.(2020).

Raharjo, Satjipto. *Ilmu Hukum*. Bandung: PT. Citra Aditya Bakti, 2000.

Ramli, Ahmad M. "Dinamika Konvergensi Hukum Telematika Dalam Sistem Hukum Nasional." (*Online*). Tersedia di WWW: https://ditjenpp.kemenkumham.go.id/index.php?option=com_content&view=article&id=668:dinamika-konvergensi-hukum-telematika-dalam-sistem-hukum-nasional&catid=107&Itemid=187.

Remote Gambling Act 2014.

Sagala, Mesias J.P., et al. "Tinjauan Yuridis Terhadap Tindak Pidana Permainan Judi Jackpot (Studi Kasus Putusan Nomor 45/Pid.B/2017/PN.MDN)." *Jurnal Hukum Kaidah*. Vol. 18 No. 3.

Shidarta. "Perbandingan Hukum Sebagai Suatu Metode Penelitian Hukum." (*Online*). Tersedia di WWW: <https://business-law.binus.ac.id/2016/06/10/perbandingan-hukum-sebagai-suatu-metode-penelitian-hukum/>.

Soejono., H. Abdurahman. *Metode Penelitian Hukum*. Jakarta: Rineka Cipta, 2003.

Soekanto, Soerjono. *Faktor-Faktor yang Mempengaruhi Penegakan Hukum*. Jakarta: PT. Raja Grafindo Persada, 2008.

Tan, Bryan., Sally Murphy. "Online Gambling Regulation In Singapore," *Casino Lawyer Spring*.

The 1968 Gaming Act.

The Gambling (Licensing and Advertising) Act 2014 (2014 Act).

The Gambling (Operating Licence and Single-Machine Permit Fees) Regulations 2017 (SI No 303, 2017).

Triandini, E. et.al. "Metode Systematic Literature Review Untuk Identifikasi Platform dan Metode Pengembangan Sistem Informasi di Indonesia." *Indonesian Journal of Information System (IJIS)*. Vol. 1 No. 2.

Undang-Undang Republik Indonesia Nomor 7 Tahun 1974 tentang Penertiban Perjudian.

Undang-Undang Republik Indonesia Nomor 19 Tahun 2016 Tentang Perubahan Atas Undang-Undang Nomor 11 Tahun 2008 Tentang Informasi Dan Transaksi Elektronik Informasi dan Transaksi Elektronik..

Winslow, Munidasa., et al. "Gambling In Singapore: An Overview Of History, Research, Treatment and Policy." *Addiction*. Vol. 110. No. 9.

Biography

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