



Integrated IT Regulatory Assessment
Comply more with less efforts

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Background

In recent years, regulators in the banking sector have increasingly tightened their oversight of Information Technology (IT) usage. Regulatory focus is no longer limited to the reliability and security of information systems but has expanded to include more advanced technologies, including the governance of artificial intelligence within Indonesian banking sector. This shift reflects rising regulatory expectations regarding governance, control, and accountability in the use of IT across the banking and financial services industry.

Alongside with this development, the approach to IT regulatory supervision has also evolved. Previously, regulatory obligations focused mainly on routine IT reporting. Today, regulators are now increasingly conducting various periodic maturity assessments, interconnection and competence assessment.

As a result, financial institutions are now required not only to comply administrative compliance requirements but also to demonstrate a consistent and sustainable level of IT control maturity and effectiveness over time. At the same time, the increasing number of IT regulations, assessments, and reviews being conducted in parallel often share overlapping scopes and supervisory objectives. Without an integrated approach, this lead to duplicated efforts, increased operational burden, and disruption to day-to-day business activities.

Accordingly, a more structured and integrated IT regulatory approach is required to leverage the overlaps among regulations and assessments. With the right framework, financial institutions can continue to meet regulatory expectations while achieving more efficient, well-planned compliance efforts that deliver meaningful value to management.



Existing regulations

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Below is a non-exhaustive list of regulations that are currently enforced and have IT-related requirements:

Otoritas Jasa Keuangan (OJK)

- Peraturan Otoritas Jasa Keuangan No. 11/POJK.03/2022 tentang Penyelenggaraan Teknologi Informasi oleh Bank Umum (POJK PTI)
- Surat Edaran Otoritas Jasa Keuangan No. 21 /SEOJK.03/2017 tentang Penerapan Manajemen Risiko Dalam Penggunaan Teknologi Informasi Oleh Bank Umum (SEOJK MRTI)
- Surat Edaran Otoritas Jasa Keuangan No. 29/SEOJK.03/2022 tentang Keamanan dan Ketahanan Siber oleh Bank Umum (SEOJK KKS)
- Surat Edaran Otoritas Jasa Keuangan No. 24/SEOJK.03/2023 Tentang Penilaian Tingkat Maturitas Digital Bank Umum (SEOJK DMAB)
- Peraturan Otoritas Jasa Keuangan No. 21 tahun 2023 tentang Layanan Digital Oleh Bank Umum (POJK LDBU)

Bank Indonesia (BI)

- Peraturan Bank Indonesia No. 22/23/PBI/2020 tentang Sistem Pembayaran (PBI SP) – **New: Peraturan Bank Indonesia No. 10 Tahun 2025 tentang Pengaturan Industri Sistem Pembayaran (PBI PISP) will be enforced on 31 March 2026**
- Peraturan Bank Indonesia No. 23/6/PBI/2021 tentang Penyedia Jasa Pembayaran (PBI PJP)
- Peraturan Bank Indonesia No. 23/7/PBI/2021 tentang Penyelenggara Infrastruktur Sistem Pembayaran (PBI PIP)
- Peraturan Anggota Dewan Gubernur No. 24/7/PADG/2022 tentang Penyelenggaraan Sistem Pembayaran oleh Penyedia Jasa Pembayaran dan Penyelenggara Infrastruktur Sistem Pembayaran – **New: Peraturan Anggota Dewan Gubernur Nomor 32 Tahun 2025 tentang Pengaturan Industri Sistem Pembayaran (PADG PISP) will be enforced on 31 March 2026**
- Peraturan Anggota Dewan Gubernur No. 17 Tahun 2023 tentang Penyelenggaraan BI-FAST Payment (PADG BI-FAST)
- Peraturan Bank Indonesia No. 2 Tahun 2024 Tentang Keamanan Sistem Informasi dan Ketahanan Siber bagi Penyelenggara Sistem Pembayaran, Pelaku Pasar Uang dan Pasar Valuta Asing, serta Pihak Lain yang Diatur dan Diawasi Bank Indonesia (PBI KKS)
- Peraturan Anggota Dewan Gubernur No. 24 Tahun 2024 tentang Keamanan Sistem Informasi dan Ketahanan Siber bagi Penyelenggara Sistem Pembayaran, Pelaku Pasar Uang dan Pasar Valuta Asing, serta Pihak Lain yang Diatur dan Diawasi Bank Indonesia (PADG KKS)

Lembaga Penjaminan Simpanan (LPS)

- Surat Edaran Lembaga Penjamin Simpanan Nomor: SE-1/KE/2023 tentang Pedoman Pemeriksaan atas Kualitas Data dan Keandalan Sistem Pengolahan Data Single Customer View Bagi Audit Internal Bank dan Pihak Independen yang Ditunjuk Bank (SE LPS SCV)



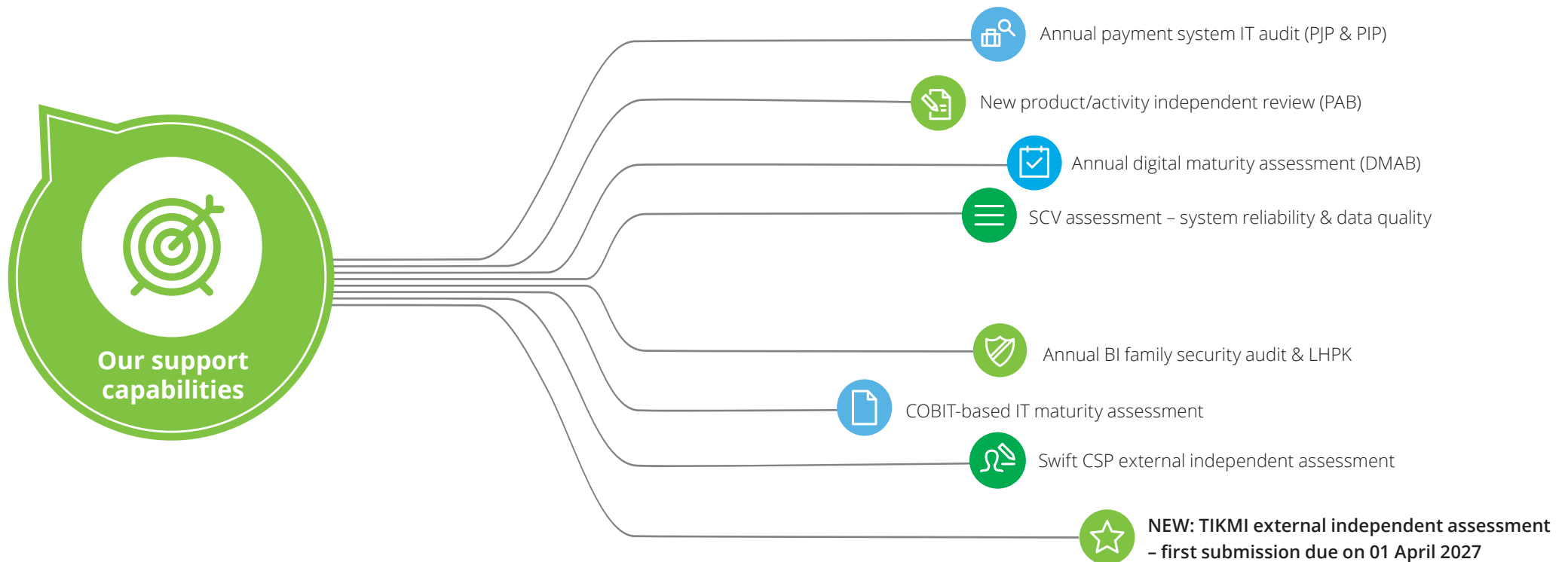
Potential intersection across regulations

The illustration below provides high-level insights on the potential intersection / overlapping scopes which can be performed more efficiently using an integrated approach:

#	Domain	Summary	POJK PTI	SEOJK MRTI	SEOJK DMAB	PBI & PADG PISP	PBI PJP & PIP	PBI & PADG KKS	SEOJK KKS	PADG BI-FAST	POJK LDBU	SE LPS SCV
1	IT Governance	The implementation of IT and digital maturity is addressed in several OJK regulations, with an emphasis on end to end governance within the Bank. In the payment ecosystem, Bank Indonesia also address IT governance aspects for all payment system participants.	✓	✓	✓	✓	✓	-	-	-	-	-
2	Cybersecurity & Resilience	Covered in several Bank Indonesia regulations on information system security and cyber resilience (including implementing provisions) and in OJK regulations for banks regarding cyber resilience processes and testing.	✓	-	✓	-	-	✓	✓	✓	-	-
3	System Security & Reliability	This domain emphasises system protection and security testing, IT operational guidelines, technology/security indicators, and reliable information system capabilities	✓	✓	✓	-	✓	-	-	✓	-	✓
4	IT Risk Management	Addressed in several OJK & BI regulations, this domain covers risk identification, measurement, monitoring, and control.	✓	✓	✓	✓	✓	✓	✓	-	-	-
5	IT Service Providers & Partnerships	The use of third parties including cloud computing and data center/DRC and partnerships for digital services is discussed in several OJK regulations. In payment systems, Bank Indonesia regulates the role of supporting providers.	✓	-	-	✓	✓	✓	-	-	✓	-
6	Data Processing & Protection	This topic appears in several OJK regulations on IT and digital services, including data access management. Bank Indonesia also regulates payment system data security and confidentiality, while LPS requires reporting specific data quality such as the Single Customer View (SCV).	✓	-	✓	✓	✓	✓	-	✓	✓	✓
7	Fraud Management	Regarding fraud management, it is covered by multiple regulations that address securing channels at both the account and transaction levels, as well as preventive measures, anomaly detection, and follow-up actions.	-	-	-	-	✓	✓	-	✓	-	-
8	Business Continuity (BCP/DRP)	Governed by several OJK and BI regulations regarding BIA, BCP, DRP, and periodic testing.	✓	✓	-	✓	-	✓	✓	✓	-	-

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Contact us



Robertus Indrakrishna

Regulatory & Financial Risk Partner

Deloitte Indonesia

rindrakrishna@deloitte.com



David Christian Hidayat

Regulatory & Financial Risk Director

Deloitte Indonesia

dhidayat@deloitte.com



Aldo Surya Putra

Regulatory & Financial Risk Senior Manager

Deloitte Indonesia

alputra@deloitte.com



Ardiansyah Akbar

Regulatory & Financial Risk Manager

Deloitte Indonesia

aakbar@deloitte.com



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