



National Resilience and the Automatic Administrative Decree: Calibrating Algorithmic Due Process

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Article Info:	Abstract
Keywords: Administrative Decree; Algorithmic due process; <i>Asta Gatra</i> ; National resilience; Throughput legitimacy.	Purpose: This study examines how the absence of procedural protection over algorithmically produced administrative decisions bears on Indonesia's national resilience, treating the political and socio-cultural <i>gatra</i> of <i>Asta Gatra</i> as the dimensions first exposed. Design/methodology/approach: Normative-doctrinal research combining statutory, conceptual, comparative, and policy approaches, with explicit rules for grading safeguards and assigning <i>gatra</i> ; institutional trust is treated as a conceptual mechanism, not a measured variable. Findings: Indonesian law exhibits a fragmentation gap rather than a regulatory vacuum, since protective elements exist across separate regimes without being coupled to one another. Fragmentation becomes harm through opacity, bias, flawed data, and weak contestability, which generate systemic algorithmic administrative error, deplete throughput legitimacy, and erode the institutional trust sustaining the political and socio-cultural <i>gatra</i> . Implications: Existing instruments can carry notice, explanation, human review, and contestation in priority services without new legislation, while the trust pathway awaits empirical testing. Originality/value: The study proposes the Automatic Administrative Decree as a doctrinal category identified by authorship, and a calibrated nine-element standard whose intensity scales with the <i>gatra</i> a decision touches.
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INTRODUCTION

When an automated public service refuses an application and returns only an error code, the refusal is an exercise of public authority that escapes the safeguards administrative law presumes (Alifpiya & Nurrozaka, 2025). Indonesian public administration is moving from a street-level bureaucracy of human discretion towards a system-level bureaucracy in which software architecture disciplines the act of deciding (Bovens & Zouridis, 2002; Gules-Guctas, 2026). Presidential Regulation (Perpres) 95/2018 on the acceleration of digital transformation integrate priority services, among them social assistance, health, and population identity, on an interoperable base (Perpres 82/2023, arts. 2(1) (3)).

Eligibility for the contribution assistance of the national health insurance (PBI JK) shows what this integration can mean. Ministerial Regulation (Permensos) 3/2026 makes the national socio-economic single database (DTSEN) the source of beneficiaries, removes those no longer classified as poor in it, and provides for notice of removal to the health ministry and district social offices without a specific duty to notify the person removed (arts. 4, 11(3), 12, 16-19). About 11 million participants were deactivated (Bisnis.com, 2026), and the Minister of Health acknowledged that the change took effect on 1 February 2026 without prior socialisation (Republika, 2026). The government presented the deactivation as the correction of inclusion errors (Bisnis.com, 2026), and the reports do not establish how far the classification was automated. The episode is therefore treated here not as a proven automated decree but as a data-driven eligibility determination that tests whether existing law can tell who decided.

The risks associated with digital government decisions are closely linked to procedural legitimacy, which is determined not only by service outputs, speed, and reach but also by "throughput", specifically, the quality, transparency, and fairness of the decision-making process (Grimmelikhuisen & Meijer, 2022). Although automation is considered capable of enhancing the consistency of legal application, accelerating procedures, and bolstering trust (Parycek et al., 2023) output efficiency cannot substitute for procedural fairness and transparency; this is because the acceptance of adverse decisions relies more heavily on these latter aspects than on mere speed or consistency, as evidenced in automated adjudication (Flórez Rojas, 2025).

Throughput quality links the legitimacy of administrative procedures with institutional trust as a supporting element of national resilience. National resilience encompasses the *Tri Gatra* (natural aspects) and *Panca Gatra* (ideology, politics, economy, socio-culture, and defence and security) (Simanjuntak et al., 2024). Public participation and the protection of citizens' rights reinforce the balance between security and welfare (Seki & Firdaus, 2024). Development disparities can erode social trust and threaten stability (Karimullah et al., 2025), whereas automated systems have the potential to either weaken or strengthen institutional trust between policymakers and citizens (Parviainen et al., 2025). Therefore, this study positions institutional trust as the link between the legitimacy of administrative procedures and national resilience, particularly regarding the political and socio-cultural dimensions.

Indonesian positive law supplies building blocks, yet each stops short of the decision it should discipline. Law (UU) 25 of 2009) on Public Services sets service standards without reaching the reasoning behind a refusal, and UU 27/2022) on Personal Data Protection grants access and correction without coupling them to review of the decision. UU 30/2014 on Government Administration, as amended by UU 6/2023, binds officials to the general principles of good administration (AUPB) and presumes an official

exercising substantive judgement (art. 1(7); Puspitasari & Wiryantiningsih, 2022). It gives a system-determined decision legal effect only by attributing it to the competent official where an electronically processed application meets every requirement (art. 53(3)), so an adverse system-determined decision is not accorded a distinct legal status. Government Regulation (PP) 71/2019 on Electronic Systems and Transactions requires an audit trail of system events rather than of decisional reasoning (art. 22). Circular Letter (SE) of the Minister of Communication and Informatics 9/2023 provides that artificial intelligence should not serve as the determinant of policy or of decisions concerning humanity, but attaches no sanction (Part C.2(b)).

This creates an efficiency trade-off in which administrative speed may be achieved at the expense of the principle of care and meaningful human review (Alifpiya & Nurrozaka, 2025). Comparative cases from other jurisdictions illustrate the legal consequences of these administrative trade-offs without establishing their occurrence in Indonesia. Australia's Robodebt scheme required welfare recipients to disprove income calculations based on averaged figures, which a Royal Commission characterised as "neither fair nor legal" (Royal Commission into the Robodebt Scheme, 2023, pp. xxiv, xxix). The Hague District Court declared the legislative basis of the Dutch SyRI system to have no binding effect because it was insufficiently transparent and verifiable (NJCM et al. v. The State of the Netherlands, 2020, paras. 6.86, 7.2; Hickok, 2024)). In the MiDAS litigation, a United States appellate court accepted at the pleading stage the allegation that Michigan's Auditor General had found 93 per cent of more than 22,000 reviewed fraud determinations to be false (Cahoo v. SAS Analytics Inc., 2019, pp. 6, 17; see also Gules-Guctas, 2026).

UU 30/2014 regulates electronic decisions without expressly identifying automated adverse determinations (Puspitasari & Wiryantiningsih, 2022). Article 53(3) attributes favourable system-determined decisions to competent officials but does not distinguish machine-generated eligibility, classification, or scoring from substantive human judgement. Alifpiya et al. (2025) propose KTUN Otomatis based on verifiable facts and legal reasons, calling for government regulation of an enforceable explanation right. Comparative scholarship confirms the possibility of administrative judicial review (Gontarz, 2023) and embedding explanation duties in existing procedure (Szot, 2025).

One literature documents deficits of transparency, explanation, and accountability in automated decision-making (Maghfirli, Farina, & Ali, 2025); another applies *Asta Gatra* to legal norms and policy (Lee, 2025; Sekti & Firdaus, 2024) and finds that Perpres 132/2022 on the national SPBE architecture has not explicitly accommodated national resilience (Simanjuntak et al., 2024). In the literature reviewed for this study, the two run in parallel, and procedural protection over automated decisions has not been examined as a condition of the political and socio-cultural *gatra*.

Four research questions (RQ1-RQ4) follow, ordered so that the resilience question governs. First, how may the absence of procedural protection erode throughput legitimacy and institutional trust, and thereby the political and socio-cultural *gatra* of national resilience? Second, what does Indonesian positive law presently supply and withhold by way of the aforementioned protection? Third, what doctrinal category is required to bring these decisions within administrative review? Fourth, what standard of algorithmic due process should attach, and how should its intensity be calibrated to the stakes for the citizen?

The study contributes a doctrinal account of fragmentation as a threat to procedural legitimacy, specifies KTUN Otomatis through an authorship indicator grounded in

existing law (Alifpiya et al., 2025), and proposes nine safeguards in three risk-calibrated tiers. It links those safeguards to the political and socio-cultural *gatra* of national resilience through legal certainty, due care, accountability, proportionality, and procedural justice. These categories and connections are proposed doctrinal constructions, not settled law. The following sections review the literature and methods, address RQ1-RQ4, and conclude.

LITERATURE REVIEW

Theoretical Studies

National resilience supplies the analytical frame. Contemporary scholarship describes it as the agility and tenacity that let a state keep functioning amid political, economic, and technological turbulence, its eight dimensions managed holistically (Simanjuntak et al., 2024; Soepandji & Farid, 2018), and as a balance between security and welfare (Seki & Firdaus, 2024). *Asta Gatra* has been used to test whether positive legal norms cohere with resilience objectives (Lee, 2025). The *gatra* are interdependent. Distributive unfairness depresses social trust and unsettles social and ideological resilience (Karimullah et al., 2025), while state neglect and slow, apathetic institutions accompany low public trust and rising intolerance that threatens ideological resilience at regional level (Budiman, Taufiq, & Nurholis, 2022). This scholarship treats trust as a hinge between governance and resilience but has not examined the procedural validity of decisions produced by machines.

A second body of work describes how algorithmic governance reshapes administrative decision-making. Discretion moves from street-level officials to the designers of a system-level bureaucracy (Bovens & Zouridis, 2002), and data-protection law separates solely automated decisions from those with meaningful human intervention, attaching different safeguards to each (Malgieri & Comandé, 2017). This study further separates decision support, profiling, and scoring, since each allocates a different measure of authority to the machine. Fully automated outputs may carry the legal force of an administrative decision without human mediation (Almada, 2023), although courts may still tie a valid decision to a human mental process (Huggins, 2021). Rigid templates fetter discretion and transfer public power to machines and vendors (Langer, 2024; Oswald, 2018), while a supply chain running from using agency to data owner, operator, vendor, and validating official disperses accountability across multiple actors (Cobbe, Lee, & Singh, 2021), to the point that no one may be held responsible (Grimmelikhuijsen & Meijer, 2022).

Procedural theory supplies the bridge. Technological due process holds that systems fusing adjudication with rule-making escape the safeguards each function demands (Citron, 2008; Crawford & Schultz, 2014). Opacity, complexity, and blurred responsibility threaten throughput legitimacy (Grimmelikhuijsen & Meijer, 2022), and procedural features bear on the perceived legitimacy of algorithmic decisions and on public trust in government use of artificial intelligence, respectively (Martin & Waldman, 2023; Robles & Mallinson, 2025). Institutional resilience is the capacity of administration to keep functioning and adapt rapidly under crisis conditions (Roehl & Hansen, 2024); this study adds that, for administration, functioning includes remaining lawful and accountable.

Empirical Studies

Empirical work shows why these safeguards cannot be assumed to function. Human overseers often cannot evaluate the accuracy of algorithmic predictions or calibrate their reliance on them (Green & Chen, 2019), and human involvement can shrink to performative rubber-stamping (Haitsma & Brink, 2025; Koulu, 2020). Decision-makers may adopt algorithmic advice selectively where it matches prevailing stereotypes (Alon-Barkat & Busuioc, 2023), and transparency can yield seeing without knowing (Ananny & Crawford, 2018). Indonesian studies record siloed, inaccurate, and hard-to-verify cross-agency data (Sayogo, Yuli, & Wiyono, 2020), distrust of data quality and sources in government data sharing (Sayogo, Yuli, & Amalia, 2024), and automated refusals that reach citizens as error codes foreclosing challenge (Alifpiya et al., 2025).

Comparative failures also mark the limits of borrowing, since legal solutions do not transplant directly across jurisdictions (Johari, 2026). Because common-law correction leans on ex post natural-justice review while a civil-law order proceeds from written legality, this study refracts foreign lessons through the AUPB and the jurisdiction of the Administrative Court. Within Indonesian law, the right to object to solely automated decisions defers its operating rules to a government regulation (UU 27/2022, art. 10(2)), its objection mechanism is not regulated in detail (Maghfirli et al., 2025), and the Law is not integrated with population administration law (Triyanti, Handayani, & Karjoko, 2025). Positive law confines decision-making authority to officials, leaving autonomous decisions with an unresolved problem of attribution (Puspitasari & Wiryantiningsih, 2022). An algorithmic due process would integrate these fragments by converting the AUPB into parameters that remain intelligible and controllable when algorithms are used (Alifpiya et al., 2025; Widlak, van Eck, & Peeters, 2021).

METHODS

This normative-doctrinal study interprets algorithmic administrative decisions through official legal authorities (Kharel, 2018; Taekema, 2018). It combines statutory analysis of fragmentation (Alifpiya et al., 2025), conceptual safeguards under the General Principles of Good Governance (AUPB) (Widlak et al., 2021), functional comparison of foreign legal reasoning (Johari, 2026), and assessment of soft law against hard law (Taeihagh, 2021). Primary materials comprise official legislation in the BPK database, including UU 30/2014 as amended by UU 6/2023; scholarship supplies secondary authority. Comparative cases require automated eligibility or benefit decisions documented by courts or commissions. National reporting from 7-9 October 2026 provides context only. Interpretation applies legal hierarchy, judicial reasoning, and *lex superior*, *lex specialis*, and *lex posterior*; circular letters constitute soft law.

Analysis cross-checks legal propositions against official texts and scholarship, diagnoses fragmentation without presuming a legal vacuum (Alifpiya et al., 2025), and constructs KTUN Otomatis and nine safeguards across gateway, corrective, and structural tiers. Each safeguard is fulfilled when binding law supplies its core function and enforcement, partially fulfilled where separate regimes, exceptions, or missing implementation restrict it, and unmet where duties are merely indirect. *Asta Gatra* guides conceptual mapping to national resilience (Lee, 2025; Simanjuntak et al., 2024). Political indicators comprise legitimacy, accountability, and institutional trust (Grimmelikhuijsen & Meijer, 2022); socio-cultural indicators comprise participation, inclusion, rights protection (Sukti & Firdaus, 2024), and social trust (Karimullah et al., 2025). Each failure

maps to the most directly exposed *gatra*; economic and ideological effects remain possible downstream pathways (Budiman et al., 2022; Karimullah et al., 2025). Institutional trust is conceptual, not measured (Grimmelikhuijsen & Meijer, 2022; Parviainen et al., 2025). Doctrinal coherence and bounded normative claims establish validity without empirical testing (Taekema, 2018).

RESULT AND DISCUSSION

Positive-Law Foundations and the Fragmentation Baseline (RQ2)

Read generously, Indonesian positive law appears to cover the essential safeguards. Every decision must comply with the AUPB and carry juridical, sociological, and philosophical reasons (UU 30/2014, arts. 7(2)(b), 10(1), 55); a citizen must be given an opportunity to be heard before a decision, as legislation provides, and told of an adverse one within ten working days (art. 7(2)(f)-(g)); and objection and appeal remain open (arts. 75, 77, 78). Data subjects may obtain information, correct and access their records, and object to solely automated decisions with legal effect (UU 27/2022, arts. 5-7, 10). System operators owe an audit trail directed, among other purposes, to dispute resolution (PP 71/2019, art. 22). Table 1 separates what each regime supplies from where it stops.

Table 1. Positive-law foundations: legal rule, gap, supporting authority, and the authors' interpretation.

Regime	Legal rule supplied	Gap	Supportin g authority	Authors' interpretation : <i>gatra</i> first exposed (onward)
UU 30/2014 as amended	AUPB (art. 10(1)); hearing, notice (art. 7(2)(f)-(g)); reasons (art. 55); objection, appeal (arts. 77-78); system-determined grants (art. 53(3))	No rule for adverse system- determined decisions	Puspitasari & Wiryantini ngsih (2022)	Political: authority need not justify itself
UU 27/2022	Information, correction, access (arts. 5-7); objection to automated decisions (art. 10); compensation (art. 12)	Not integrated into sectoral law or validity review; arts. 10(1), 11 exemptible (art. 15)	Triyanti et al. (2025)	Socio-cultural: person excluded from correction (economic)
PP 71/2019	Operator responsibility (art. 3); audit trail (art. 22)	Logs events, not reasoning	Cobbe et al. (2021)	Political: error invisible to courts (ideological)
UU 25/2009	Complaint handling (art. 36)	No reasons; no structured	Alifpiya et al. (2025)	Socio-cultural: no voice

Regime	Legal rule supplied	Gap	Supportin g authority	Authors' interpretation : <i>gatra</i> first exposed (onward)
		channel to contest system output		
Perpres 95/2018, 39/2019, 132/2022, 82/2023	Interoperability; IT audit (Perpres 95/2018, arts. 55-58)	Silent on national resilience; technical framing of audit	Simanjunta k et al. (2024); Bachtiar (2025)	Political: legality unexamined
SE 9/2023	Artificial intelligence not to determine decisions concerning humanity	Soft law; no sanction	Taeihagh (2021)	Political: no enforceable right

Source: Authors' conceptual-doctrinal analysis of the instruments and authorities listed (2026).

Read closely, the coverage dissolves at the joints. Correction is not coupled to review of the decision the data produced, so a citizen may repair the record and still hold the adverse decree. The audit trail records system events rather than the reasoning that disposed of a claim (PP 71/2019, art. 22), and objection presupposes reasons that an error code cannot supply (Alifpiya et al., 2025). Art. 38 of UU 30/2014, as amended, governs the medium of a decision, while art. 53(3) attributes to the competent official a decision that the system determines, but only where an application meets every requirement in the system. On its terms, UU 30/2014 thus already separates determination by a system from the medium of a decision, yet confines that recognition to favourable outcomes and leaves adverse, *ex officio* determinations including deactivation unaddressed. The deficit is a fragmentation gap rather than the regulatory vacuum diagnosed in part of the literature (Alifpiya et al., 2025): protective elements exist, but none is coupled to the trigger or forum located in another regime.

A technocratic reading locates the residual problem in institutional capacity and data quality (Sayogo et al., 2024), technical audit, or data-protection compliance rather than in administrative validity, a technical-efficiency framing that Bachtiar (2025) criticises. That reading is necessary but insufficient. Technical soundness alone does not sustain trust in public-sector artificial intelligence (Cojocar, 2025), and an algorithm may pass a technical audit and satisfy data-protection duties while still breaching the statutory duty to give reasons (UU 30/2014, art. 55), because a statistical correlation is not a legal reason (Gules-Guctas, 2026). What fragments across these regimes is the citizen's capacity to know, contest, and correct a decision, which on the criteria stated above is what the political *gatra* protects.

The Legitimacy-Eroding Mechanism (RQ1)

Fragmentation can become harm through four pathologies. Opacity hides the basis of a decision from citizen and court alike (Oswald, 2018). Bias reproduces historical

inequality through proxy variables (Barocas & Selbst, 2016). Flawed data generates misclassification and automatic exclusion. Weak contestability leaves the citizen without the practical capability to contest (Koulu, 2020) and, in Indonesian digital services, forces the person least able to bear it to guess the error behind a refusal (Alifpiya et al., 2025), while PP 71/2019 relieves an operator of liability where user error is proved (art. 3(3)). Indonesian scholarship also identifies gaps in the protection of population data (Triyanti et al., 2025). The PBI JK episode displays flawed data and weak contestability together: two thirds of 3,283 classification challenges in Surabaya changed the decile after field verification (Jawa Pos, 2026), and reactivation requires the person removed to obtain supporting letters within six months (Permensos 3/2026, arts. 20-21).

Where an ordinary administrative error is individual and traceable to one official's bounded rationality, these pathologies operate on a baseline applied identically to every case. The result is an algorithmic administrative error: a systemic deviation from the mandated outcome, reproduced at machine speed and hidden inside the architecture that produced it (Gules-Guctas, 2026).

The pathway from algorithmic administrative error to resilience has three layers, which this study keeps apart. Positive law establishes the first: a decision issued without the reasons or procedure the Law requires is defective (UU 30/2014, arts. 52, 55, 56). Prior scholarship supports the second: opacity and blurred responsibility threaten throughput legitimacy (Grimmelikhuijsen & Meijer, 2022), an appeal process raises the perceived legitimacy of adverse algorithmic decisions (Martin & Waldman, 2023), and procedural fairness, transparency, and accountability are associated with public trust in government use of artificial intelligence (Robles & Mallinson, 2025). The third is the authors' inference: a sustained loss of institutional trust is likely to expose the political *gatra* first and the socio-cultural *gatra* next, with onward routes to the economic and ideological *gatra*, which the resilience literature links to social trust and cohesion (Budiman et al., 2022; Karimullah et al., 2025). Figure 1 presents the chain as a conceptual-doctrinal model, not a measured causal sequence. Objection and appeal exist, but neither is coupled to the reasoning of the system, which is what a citizen would need to contest.

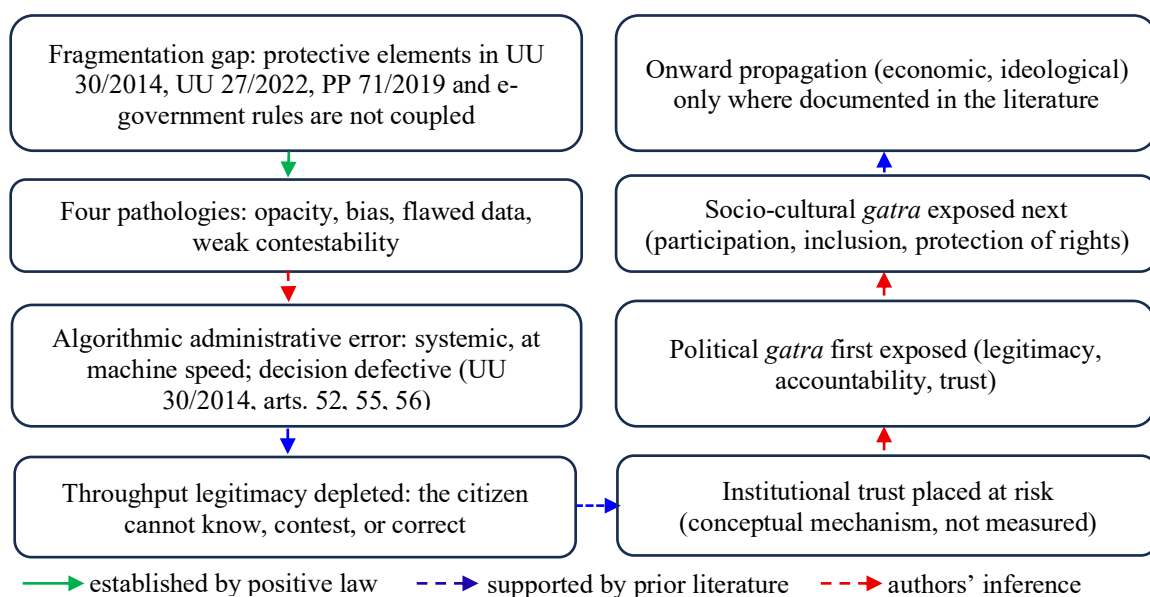


Figure 1. Conceptual-doctrinal model of the legitimacy-eroding mechanism.

Source: Authors' construction based on UU 30/2014 and the literature cited (2026).

The Automatic Administrative Decree as Doctrinal Hinge (RQ3)

The recognition of the Automatic Administrative Decree, or KTUN Otomatis, provides a doctrinal basis for determining the appropriate legal remedies where eligibility assessments, classifications, or scores are materially generated by computational logic rather than an official's substantive judgement. Grounded in legal certainty, due care, and the duty to provide reasons, this classification distinguishes decisions according to whether their substantive outcomes are determined by the system or by the official responsible for signing them, thereby extending the distinction established under art. 53(3) of UU 30/2014 for favourable decisions to adverse determinations. Under this legal construction, decisions remain attributable to the competent official and subject to administrative court review, as art. 87 encompasses factual actions and decisions with potential legal effects, while their validity depends on competence, procedure, and substance (arts. 52, 56). In PBI JK, this distinction raises the question of whether the decile resulting in a participant's removal was determined by the classification model or subjected to substantive review by the minister responsible for signing the monthly determination (Permensos 3/2026, art. 10).

The proposed classification raises three doctrinal objections concerning legislative authority, the distinction between electronic and automated decisions, and compatibility with Indonesian administrative law. The first concerns the necessity of dedicated artificial intelligence legislation, which Alifpiya et al. (2025) regard as the only sustainable remedy, whereas this study argues that legal recognition can be established through a limited reinterpretation of existing provisions, including the AUPB and art. 53(3) of UU 30/2014, the right to object to solely automated decisions under art. 10 of UU 27/2022, and operator obligations under art. 22 of PP 71/2019, consistent with the integration of explanation duties into existing procedural law (Szot, 2025). Although art. 15(1) of UU 27/2022 permits exemptions from objection and suspension rights where public interests in state administration require them, these exemptions do not extend to information, access, correction, or compensation; apply only when implementing statutory provisions (art. 15(2)); and do not displace the independent duties to provide reasons and an opportunity to be heard under UU 30/2014. The second objection equates KTUN Otomatis with electronic decisions, overlooking the statutory distinction between the medium through which decisions are issued (art. 38) and their substantive determination by a system (art. 53(3)), while the third questions the adoption of a common-law mechanism despite the proposed classification being derived from principles already binding under Indonesian law.

Calibrated Algorithmic Due Process (RQ4)

The recognition of KTUN Otomatis establishes a doctrinal foundation for risk-calibrated algorithmic due process, extending the deciding official's duties of due care, legal certainty, and reasoned decision-making to automated determinations through nine safeguards organised into three tiers. The gateway tier requires prior notification (UU 30/2014, art. 7(2)(g); UU 27/2022, art. 5), meaningful explanations through algorithm cards disclosing relevant logic, data, and weighting rather than raw code (UU 30/2014, art. 55), and access to decision-related information (UU 27/2022, art. 7; UU 30/2014, art. 7(2)(i)). However, existing provisions do not expressly require notification of automation, technical error codes inadequately explain decisions, and information rights remain disconnected from sectoral review procedures (Alifpiya et al., 2025; Langer, 2024; Szot,

2025; Triyanti et al., 2025). The corrective tier integrates data rectification and suspension (UU 27/2022, art. 6; UU 30/2014, art. 75(3)), human review with authority to overturn decisions (UU 30/2014, arts. 52(1)(a), 53(3), 77), contestability by design (UU 30/2014, arts. 7(2)(f), 77-78; UU 27/2022, art. 10(1)), and effective redress through correction and compensation (UU 30/2014, art. 7(2)(j); UU 27/2022, art. 12). These protections remain limited by cumulative conditions governing suspension, exceptions under art. 15 of UU 27/2022, objection-dependent review, inadequate contestation mechanisms, and compensation primarily confined to data protection claims (Alifpiya et al., 2025; Haitsma & Brink, 2025; Koulu, 2020; Langer, 2024; Johari, 2026). Without substantive authority and capacity to reverse automated outcomes, human review risks becoming merely procedural (Haitsma & Brink, 2025; Koulu, 2020).

The structural tier combines independent auditability throughout the technological life cycle, including procurement, commissioning, and supplier involvement, with non-delegable accountability retained by public authorities across implementing agencies, data controllers, and vendors (Cobbe et al., 2021; Langer, 2024). Although Perpres 95/2018 (arts. 55-58) and PP 71/2019 (art. 22) provide technical oversight, independent scrutiny of decision legality remains unrequired (Busuioc, 2021), while UU 30/2014 (arts. 10(1)(e), 52(1)(a), 53(3)) insufficiently specifies responsibility throughout contractual arrangements (Langer, 2024). Accordingly, six safeguards are partially satisfied, comprising explanation, data access, correction with suspension, human review, redress, and accountability, whereas notification of automation, contestability by design, and independent legal auditability remain unmet. These gaps undermine participation, inclusion, and rights protection within the socio-cultural *gatra*, alongside institutional legitimacy and accountability within the political *gatra*, with potential consequences for economic welfare and ideological cohesion. Their implications warrant proportionate safeguards, particularly across four of the nine priority services involving individual eligibility or status, namely civil registration, social assistance, healthcare, and education (Perpres 82/2023, art. 2(3)). Implementation could draw upon existing provisions governing notification and hearings (UU 30/2014, art. 7(2)(f-g)), suspension (art. 75(3)), objections and appeals within statutory deadlines (arts. 77-78), attribution (art. 53(3)), complaint handling (UU 25/2009, art. 36; Perpres 95/2018, art. 67), and expanded legal audits (Perpres 95/2018, arts. 55-58). These arrangements constitute proposed doctrinal and operational developments rather than established statutory obligations specifically governing automated decisions.

CONCLUSION

Inadequate procedural safeguards in algorithmic administrative decision-making risk systemic errors that weaken throughput legitimacy and institutional trust, potentially affecting the political and subsequently the socio-cultural *gatra* of national resilience. Indonesian positive law provides for reasoned decisions, hearings, objections, data access and correction, and audits, but fragmentation across legal regimes prevents their effective integration into automated determinations. The legal gap therefore concerns fragmented protection rather than a regulatory vacuum, particularly as explicit recognition of system-determined decisions remains limited to favourable outcomes. The proposed *KTUN* provides a doctrinal basis for attributing responsibility to competent officials, applying the General Principles of Good Administration, and enabling Administrative Court review under existing law. The nine-element standard, comprising *gateway*, *corrective*,

and *structural* tiers, identifies six partially satisfied safeguards and three unmet requirements, providing a basis for calibrating protection according to decision-related risks and the *gatra* most directly affected.

The government should strengthen legal protection through a coherent interpretation of Article 53(3) of UU 30/2014 and Article 10 of UU 27/2022, supported by implementing regulations under Article 10(2) of UU 27/2022, to clarify official responsibility and enable review of adverse automated decisions. The Ministry of Social Affairs and *SPBE* administrators should provide prior notification and an opportunity to be heard before PBI JK deactivation, introduce algorithm cards explaining decision grounds, and empower reviewing officials to revise or overturn determinations. Administrative Court judges may consider the proposed doctrinal framework when assessing their legality. The study is limited by the absence of judicial validation of its proposed construction in Indonesia, the unverified degree of automation in PBI JK determinations, and the lack of empirical measurement of institutional trust and national resilience. Future research should test the proposed trust pathway, validate the indicator identifying whether the system or competent official substantively determines an outcome against adjudicated cases, and examine the allocation of the burden of proof concerning algorithmic reasoning in administrative disputes.

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Declarations

Ferroka Putra Wathan contributed to conceptualisation, methodology, legal analysis, and drafting, while Ferry Preska Wathan supervised, validated, reviewed, and approved the manuscript. The study received no external funding and involved no conflicts of interest. Both authors signed the JLRI Artificial Intelligence Declaration, with any generative AI use limited to language editing without affecting scientific content. Ethical approval and informed consent were not applicable to this doctrinal study. All sources are included in the references.

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