SHIFTING CORRUPTION PREVENTION TO CORRUPTION PROTECTION THROUGH GOVERNMENT POLICY IN INDONESIA?

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ABSTRACT

Objective: The purpose of this article is to discuss the policy of handling public complaints based on the Memorandum of Understanding signed jointly by the Attorney General, the Chief of the Indonesian National Police and the Minister of Home Affairs in 2023, namely Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 based on the principle of prioritizing State Administrative Law (primum remedium) in handling cases of alleged abuse of authority by government officials.

Methodology: The analysis in discussing legal policies for handling public complaints in Indonesia is based on normative legal research methods with a statutory approach and policy studies on Law No. 30 of 2014 on Government Administration, regulations regarding the eradication of corruption and Memorandum of Understanding Number: 100.4.7/437/SJ Number: NK/1/I/2023.

Results: Based on the discussion of the current policy for handling public complaints in Indonesia, it is found that Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 places administrative procedures in handling public complaints against alleged abuse of authority by government officials by prioritizing the settlement of state administrative law before handling using corruption criminal law.

Conclusion: The policy of handling public complaints based on the Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 is intended to structuring the system for handling allegations of abuse of authority by government officials based on the principle of State Administrative Law as a prioritized step (primum remedium) and Criminal Law as the last legal remedy if the State Administrative Law effort is inadequate to apply (ultimum remedium). The policy of handling public complaints based on that Memorandum of Understanding which is oriented towards prevention of alleged abuse of authority, can resolve abuse of authority by government officials in the realm of state administrative law with the aim of improving the implementation of government policies.

Keywords: prevention, state administrative law is primum remedium, abuse of authority.
MUDANDO A PREVENCIÓN CONTRA CORRUPCIÓN PARA A
PROTEÇÃO CONTRA CORRUPÇÃO ATRAVÉS DA POLÍTICA
GOVERNAMENTAL NA INDONÉSIA?

RESUMO

Objetivo: O objetivo deste artigo é discutir a política de tratamento de queixas públicas com base no Memorando de Entendimento assinado conjuntamente pelo Procurador-Geral, o Chefe da Polícia Nacional da Indonésia e o Ministro dos Assuntos Internos em 2023, a saber, o Memorando de Entendimento Número: 100.4.7/437/SJ Número: 1 Ano 2023 Número: NK/1/1/2023 com base no princípio de priorização da Lei Administrativa do Estado (primum remedium) no tratamento de casos de alegado abuso de autoridade por funcionários do governo.

Metodologia: A análise na discussão de políticas legais para lidar com queixas públicas na Indonésia é baseada em métodos normativos de pesquisa jurídica com uma abordagem estatutária e estudos de política sobre a Lei n.o 30 de 2014 sobre a Administração do Governo, regulamentos relativos à erradicação da corrupção e Memorando de Entendimento Número: 100.4.7/437/SJ Número: NK/1/1/2023.

Resultados: Com base na discussão sobre a atual política de tratamento de reclamações públicas na Indonésia, conclui-se que o Memorando de Entendimento Número: 100.4.7/437/SJ Número: 1 Ano 2023 Número: NK/1/1/2023 coloca procedimentos administrativos no tratamento de reclamações públicas contra alegados abusos de autoridade por funcionários do governo, priorizando a resolução do direito administrativo do Estado antes de lidar com o uso do direito penal da corrupção.

Conclusão: A política de tratamento de queixas públicas com base no Memorando de Entendimento Número: 100.4.7/437/SJ Número: 1 Ano 2023 Número: NK/1/1/2023 destina-se a estruturar o sistema de tratamento de alegações de abuso de autoridade por funcionários do governo com base no princípio do direito administrativo do Estado como uma etapa prioritária (primum remedium) e o direito penal como o último recurso se o esforço do direito administrativo do Estado é inadequado para aplicar (ultimum remedium). A política de tratamento de queixas públicas com base nesse Memorando de Entendimento, que está orientada para a prevenção de alegados abusos de autoridade, pode resolver abuso de autoridade por parte de funcionários do governo no domínio do direito administrativo do Estado, com o objetivo de melhorar a implementação das políticas governamentais.

Palavras-chave: prevenção, direito administrativo estatal é primum remedium, abuso de autoridade.

¿TRASLADAR LA PREVENCIÓN DE LA CORRUPCIÓN A LA
PROTECCIÓN CONTRA LA CORRUPCIÓN A TRAVÉS DE LA POLÍTICA
GUBERNAMENTAL EN INDONESIA?

RESUMEN

Objetivo: El propósito de este artículo es discutir la política de manejo de quejas públicas basada en el Memorándum de Entendimiento firmado conjuntamente por el Fiscal General, el Jefe de la Policía Nacional de Indonesia y el Ministro del Interior en 2023, a saber, el Memorándum de Entendimiento Número: 100.4.7/437/SJ Número: 1 Año 2023 Número: NK/1/1/2023 basado en el principio de priorizar la Ley Administrativa del Estado (primum remedium) en el manejo de casos de presunto abuso de autoridad por parte de funcionarios gubernamentales.

Metodología: El análisis de las políticas jurídicas para el tratamiento de las denuncias públicas en Indonesia se basa en métodos normativos de investigación jurídica con un enfoque
reglamentario y estudios de políticas sobre la Ley N° 30 de 2014 sobre la Administración del
Gobierno, las normas relativas a la erradicación de la corrupción y el Memorándum de
Entendimiento Número: 100.4.7/437/SJ Número: NK/1/1/2023.

Resultados: A partir de la discusión de la actual política de tramitación de denuncias públicas
en Indonesia, se constata que el Memorándum de Entendimiento Número: 100.4.7/437/SJ
Número: 1 Año 2023 Número: NK/1/1/2023 sitúa los procedimientos administrativos en la
tramitación de denuncias públicas contra presuntos abusos de autoridad por parte de
funcionarios del gobierno, dando prioridad a la resolución de la ley administrativa estatal antes
de tramitar el uso de la ley penal de corrupción.

Conclusión: La política de manejo de quejas públicas basada en el Memorándum de
Entendimiento Número: 100.4.7/437/SJ Número: 1 Año 2023 Número: NK/1/1/2023 está
destinada a estructurar el sistema para el manejo de denuncias de abuso de autoridad por parte
de funcionarios del gobierno basado en el principio del Derecho Administrativo Estatal como
paso prioritario (primum remidium) y el Derecho Penal como último recurso legal si el esfuerzo
del Derecho Administrativo Estatal es inadecuado para aplicar (ultimum remidium). La política
de manejo de quejas públicas basada en ese Memorándum de Entendimiento que está orientado
da la prevención del supuesto abuso de autoridad, puede resolver el abuso de autoridad por
parte de funcionarios del gobierno en el ámbito del derecho administrativo estatal con el
objetivo de mejorar la implementación de las políticas gubernamentales.

Palabras clave: prevención, ley administrativa estatal es primum remidium, abuso de
autoridad.

1 INTRODUCTION

The government issued a number of policies to prevent the occurrence of corrupt
practices through the handling of cases of abuse of authority that prioritize the settlement
of state administrative law before handling criminal law. One of the policies made by the
Indonesian government is the making of a Memorandum of Understanding signed jointly
by the Attorney General, the Chief of the Indonesian National Police and the Minister of
Home Affairs in 2023, namely Memorandum of Understanding Number: 100.4.7/437/SJ
Number: 1 Year 2023 Number: NK/1/1/2023. The Memorandum of Understanding signed
by the Attorney General, the Chief of Police of the Republic of Indonesia and the Minister
of Home Affairs in State Administration Law can be placed as a product of a policy
agreement regarding the use of authority (beleidsovereenkomst bevoegdheden) between
government officials and for law enforcers is a binding "order" to be implemented. In
essence, through the Memorandum of Understanding, law enforcement officials from the
Prosecutor's Office and the Police if they receive complaints regarding alleged abuse of
authority by local government officials must prioritize administrative resolution by first
submitting to investigative examinations of government internal control apparatus,
namely the Inspectorate or the Financial and Development Supervisory Agency (BPKP)
Based on supervision by the government internal control apparatus on complaints of alleged abuse of authority by local government officials, administrative errors can be found in the form of first, there is no state financial loss. Second, there is a loss of state finances and has been processed through a compensation claim or treasury claim no later than 60 (sixty) days after the report on the results of the examination of the government internal supervisory apparatus or the Supreme Audit Agency as an external auditor. The policy or action taken by government officials turns out to be discretion as long as the objectives and conditions for the use of discretion are met. The conditions for the use of discretion in Administrative Law have been strictly regulated and limited in Law No. 30 of 2014 concerning Government Administration. Law No. 30 of 2014 concerning Government Administration regulates discretion in chapter VI Article 22 to Article 32. Restrictions on discretion are regulated in Article 24 which determines that discretion may only be exercised under the following conditions: a. in accordance with the purpose of Discretion as referred to in Article 22 paragraph (2); b. not contrary to the provisions of laws and regulations; c. in accordance with the General Principles of Good Government; d. based on objective reasons; e. not causing Conflict of Interest; and f. carried out in good faith. Article 27 paragraph (1) also stipulates that Officials who use Discretion as referred to in Article 25 paragraph (3) and paragraph (4) must describe the purpose, objectives, substance, and administrative impact that have the potential to change the state financial burden. The arrangement regarding the complaint handling procedure that must prioritize administrative settlement is intended to apply the principle in State Administrative Law known as the in cauda venenum principle, meaning that like a bee sting in the tail, handling complaints regarding alleged abuse of authority by government officials must put criminal law handling at the very last stage after administrative settlement is used and is no longer effective to be implemented and has been considered to meet the elements of the crime of corruption. The pattern of resolving complaints of abuse of authority that must prioritize administrative resolution has also been regulated in advance in policies and laws relating to national strategic projects, namely Presidential Instruction No. 1 of 2016 concerning Acceleration of Implementation of National Strategic Projects, Government Regulation No. 42 of 2021 concerning Ease of National Strategic Projects, Presidential Regulation No. 3 of 2016 concerning...
Acceleration of Implementation of National Strategic Projects which was amended several times through Presidential Regulation No. 109 of 2020, Presidential Regulation No. 58 of 2017 and Presidential Regulation No. 56 of 2017. All policies and laws and regulations on national strategic projects also require the handling of complaints about alleged abuse of authority in the implementation of national strategic project policies to be resolved first through administrative settlement and place settlement based on corruption criminal law as the last step, if there are elements of a criminal offense or administrative handling does not succeed in resolving it effectively.

A series of policies and arrangements regarding national strategic projects that require law enforcement officials to prioritize administrative resolution of public complaints regarding alleged abuse of authority have implications for the following problems - first, are policies and arrangements regarding the handling of complaints that must prioritize administrative resolution in accordance with the principles of state administrative law? Second, what are the implications of these policies and arrangements in handling public complaints regarding alleged abuse of authority by government officials?

The purpose of this study is to first analyze the suitability of handling complaints that must prioritize administrative resolution based on the principles of state administrative law. The second objective of this research is to analyze the policy implications of regulating the handling of public complaints regarding allegations of abuse of authority by government officials.

This research is principally carried out using normative legal research methods with a legislative approach and policy studies based on the author's research when carrying out training facilitation in the application of policies and laws in the field of corruption prevention for law enforcement officials, government internal control officials and BPK auditors as well as high judges of the Corruption Court. The training was organized by the Coordination, Supervision and Prevention Division of the Corruption Eradication Commission of the Republic of Indonesia (KPK - RI) which was held in Bengkulu, Lampung, Makassar, Ambon, Central Java, Yogyakarta Special Region, East Java and Jayapura Papua.
2 THEORITICAL FRAMEWORK

2.1 HANDLING OF COMPLAINTS IN THE RESOLUTION OF CASES OF ALLEGED ABUSE OF AUTHORITY BY GOVERNMENT OFFICIALS.

2.1.1 Policies and Regulations Regarding the Handling of Complaints That Must Prioritize Administrative Settlement in View of the Principles of Administrative Law

State Administrative Law has long recognized the principle of in cauda venenum. The principle means "in the tail there is poison," meaning that like a bee sting in the back of the body, criminal law enforcement must be placed at the final stage after all administrative law enforcement efforts have been completed. The principle also means that State Administrative Law is a precedence (primum remidium) and Criminal Law is the last resort (ultimum remidium). The application of administrative sanctions is carried out to correct deviations from obligations and prohibitions in state administrative law relations, so that the aim is to have a direct impact and direct execution on the violating party, otherwise known as parate executie. (Mohamad Rifki, 2019) Between administrative law sanctions and criminal sanctions there are also the following fundamental differences:

Table 1
Differences between Administrative Sanctions and Criminal Sanctions

<table>
<thead>
<tr>
<th>No</th>
<th>Administrative Sanctions</th>
<th>Criminal Sanctions</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>The target of sanctions is the actions of legal subjects who violate the norms of Administrative Law (Scopum sanctionum est actio).</td>
<td>The target of sanctions is the perpetrator of violations of criminal law norms (in scopum sanctionum est auctor).</td>
</tr>
<tr>
<td>2</td>
<td>The purpose of sanctions is the correction of violating actions to not violate the norms of Administrative Law. (correctio actus violandi ut legem administrativam non violant normae)</td>
<td>The purpose of sanctions is to provide suffering to the perpetrator for his actions that violate the norms of criminal law and provide a deterrent effect on the community so as not to commit / repeat the actions of the perpetrator. (provide deterrendum effectum).</td>
</tr>
<tr>
<td>3</td>
<td>Enforcement of legal norms against violations can be done directly without going through the judicial process (parate executie).</td>
<td>Enforcement of criminal law norms must be carried out through the criminal justice process (legis per criminalis iustitia).</td>
</tr>
</tbody>
</table>

Source: author's analysis, 2024
Administrative sanctions are carried out if there is a violation in the realm of state administrative law and the violation that occurs does not meet the elements of a criminal offense. Regarding the purpose of State Administrative Law, Ranchordas and de Waard argue that: "The main purpose of administrative law is to ensure that government administration can be held accountable and liable. Put another way, the aim is that the authority of the government is always within the limits of its power (intra vires) so that citizens are protected from its irregularities." (Enrico Parulian Simanjuntak, 2020) It is possible that violations of administrative sanctions intersect with criminal sanctions, one way or another if there are elements of a criminal offense. So, the enforcement of state administrative law norms is only carried out if the elements regulated in criminal law are not fulfilled.

Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 is the basis of the policy so that if there are complaints from the public regarding alleged abuse of authority by government officials, the resolution must first be carried out by the government's internal supervisory apparatus or government auditors. If complaints from the public are submitted to law enforcement officials as the police or prosecutor, the law enforcement officials must give the government's internal supervisory apparatus the opportunity to resolve them first. If there is a finding that there is an alleged criminal act of corruption that cannot be resolved administratively, then the government's internal supervisory apparatus will hand over the resolution to the police or prosecutor.

2.1.2 Realizing Supervision Synergy Between Internal Supervision and External Supervision

Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 aims to provide priority monitoring of the use of authority and use of state finances through supervision by internal auditors. Al Ghanim and Khamies (2024) regarding the function of the auditor suggests that the purpose of auditing is to provide accurate and reliable information in financial statements. To achieve these qualities, auditors must adhere to professional ethics and behavior standards that ensure proper regulation and conduct of the auditing process. Through this auditing, state losses can be identified and appropriate solutions can be found. Besides that, resolving complaints from
the public regarding alleged abuse of authority by government officials does not need to always be forced to be resolved through corruption resolution channels by law enforcement officials. The settlement carried out prioritizes the role of administrative law.

That Memorandum of Understanding is also intended to create synergy between the government's internal supervision apparatus and law enforcement officials, without hampering their respective functions. In connection with the importance of synergy in implementing government functions, Ni Made Intan, et.al. (2023) suggests that the implementation of a government agency performance accountability system based on synergy occurs due to good communication and coordination of each component in government organizations resulting in innovation from each individual within the government civil apparatus. This attitude of synergy will have an impact on the performance accountability of public servants so that it will have an impact on the value of the performance accountability system of government agencies.

3 METHODOLOGY

This article is based on the author's observations during his time as a facilitator assigned by the Corruption Eradication Commission to provide training to a number of law enforcement officers. Training was held in several province-based areas in Indonesia, namely Bengkulu, Lampung, Makassar, Ambon, Central Java, Yogyakarta Special Region, East Java and Jayapura Papua.

The training was attended by police, prosecutors, auditors and judges at the high court. While providing training, I as the author had an interactive dialogue with the participants about the concept and implementation of Law No. 30 of 2014 on Government Administration, regulations regarding the eradication of corruption and Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023. Based on information from the training participants using a juridical approach, the data was processed into this article accompanied by theory and analysis of relevant laws and regulations.
RESULTS AND DISCUSSION

Violations of criminal law norms, especially corruption crimes, often begin with violations of state administrative law norms which have implications for the fulfillment of the elements of corruption crimes. For example, the occurrence of the crime of corruption originates from the abuse of authority in State Administration Law which causes state losses. These two factors can result in the fulfillment of the elements of the crime of corruption if other factors can be proven, namely the existence of malicious intent and the motive to benefit themselves and/or others in the perpetrators who hold government positions. So, in this case, the abuse of authority in Administrative Law has entered the scope of the criminal law norm of corruption. In such conditions, only administrative sanctions can no longer be applied because the character of the perpetrator's actions has fulfilled the elements of a criminal act.

Law No. 30 of 2014 on Government Administration has provided an instrument to test the actions of government officials whether it is a form of administrative violation or is it a form of violation of criminal law norms? The testing authority is given to the State Administrative Court to test the presence or absence of elements of abuse of authority in decisions and/or actions of government administrative bodies or officials. Article 21 of Law No. 30 of 2014 concerning Government Administration stipulates that the Court is authorized to receive, examine, and decide whether or not there is an element of abuse of authority committed by a Government Official. Agencies and/or Government Officials can submit a request to the Court to assess whether or not there is an element of abuse of authority in the decision and/or action. The procedure for assessing the decision and/or action of government officials is a test within the scope of State Administrative Law to assess whether or not the element of abuse of authority is fulfilled. In fact, the assessment has also been carried out previously through the granting of authority to the government's internal supervisory apparatus to supervise the prohibition of abuse for government officials. Article 20 of Law No. 30 of 2014 concerning Government Administration stipulates that Supervision of the prohibition of abuse of Authority as referred to in Article 17 and Article 18 is carried out by the government internal supervisory apparatus. The results of the supervision of the government internal supervisory apparatus can be: a. there is no error; b. there is an administrative error; or c. there is an administrative error that causes state financial losses.
Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 places administrative procedures in handling public complaints against alleged abuse of authority by government officials by prioritizing administrative settlements, rather than resolving them through corruption criminal law mechanisms. The availability of a supervisory mechanism by the government's internal supervisory apparatus against the prohibition of abuse of authority by government officials, is actually an instrument inherent in the government administration system to prioritize the mechanism of state administrative law if there are allegations of abuse of authority by government officials. Settlement through the mechanism of corruption criminal law is a chronic phase when settlement through the mechanism of state administrative law is no longer effective to be implemented due to the absence of compliance from government officials suspected of committing acts of abuse of official authority.

The development of the relationship between State Administrative Law and Criminal Law is actually largely influenced by 2 (two) theoretical models whose development began in the European Union. First, the restriction that the application of administrative sanctions closes the settlement in criminal law (high degree of differentiation). Second, the application of administrative sanctions does not close the space for the application of criminal sanctions (low degree of differentiation). The first model, which strictly separates administrative sanctions from criminal sanctions, is adopted in countries such as Portugal, Italy, Germany, the Netherlands, Belgium and Romania. In these countries, the principle of nebis in idem applies to administrative offenses with violations of criminal law norms. The second model is adopted in countries such as the UK, Sweden and Spain, including countries that do not separate administrative and criminal sanctions. For these countries, criminal sanctions can be applied together with administrative sanctions. The second model allows the imposition of criminal sanctions even though administrative sanctions have been imposed on violators.

Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 seeks to be the middle way of the dichotomy between the concept of applying administrative sanctions closing the settlement of criminal law (high degree of differentiation) with the concept of applying administrative sanctions not closing the space for the application of criminal sanctions (low degree of differentiation). It is intended to continue to put the principle of State Administrative Law as the preferred legal problem solving (primum remidium) and Criminal Law as the last legal problem
solving (ultimum remedium) if the settlement through the State Administrative Law method is no longer effective to be applied.

Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 which is a form of policy agreement (pactum consilium) between the Minister of Home Affairs, the Chief of the Indonesian National Police and the Attorney General of the Republic of Indonesia, regulates the handling of public complaints on abuse of authority differently from the Criminal Procedure Code (KUHAP) as stipulated in Law No. 8 of 1981. Policy Agreement or beleidsovereenkomst is essentially a legal act that makes public policy as or the object of the agreement. Because the promised policy is a state administrative policy (overheidsbeleid), one of the parties to the agreement is none other than a state administrative body or official who administratively has the authority to use the promised public policy. (Laica Marzuki, 1991). This opinion is also in line with the opinion of DA. Lubach (1982: 14) formulates that a policy agreement (beleidsovereenkomst) is: "een overeenkomst die door de overheid wordt gehanteerd ter directe behartiging van haar specifieke overheidsstaak, betreffende de hantering van haar privaatrechtelijke en/of publiekrechtelijke bevoegdbeden, gesloten tussen overheid en particulier en/of overheden onderling."

If there is a complaint to the Government Internal Supervisory Apparatus (APIP) and/or law enforcement officials regarding alleged abuse of authority by government officials, the Government Internal Supervisory Apparatus is first authorized to handle it. In fact, if the complaint is submitted to Law Enforcement Officials (Police or Prosecutors), the Law Enforcement Officials must submit the matter to the Government Internal Supervisory Apparatus, something that is different from the standard handling regulated in KUHAP. The policies and arrangements for handling public complaints in the handling scheme give rise to two views. First, there is a policy of handling legal problems that can actually obscure the resolution of legal problems in handling corruption crimes. Second, the settlement pattern based on the Memorandum of Understanding improves the way legal problems are handled according to the principle that State Administrative Law takes precedence (primum remedium) before being resolved through corruption criminal law (ultimum remedium). Sharp criticism occurs if it turns out that the application of the Memorandum of Understanding Number: 100.4.7/437 / SJ Number: 1 Year 2023 Number: NK/1 / I / 2023 actually ignores the substance of the legal problems that occur by shifting the resolution of legal cases that actually have absolutely fulfilled
the elements of the crime of corruption, but the method of resolving these legal cases is forced to be resolved by using the method of settlement based on State Administrative Law. This not only damages the order of the law enforcement system in handling corruption cases, but also causes both legal systems (State Administrative Law and Corruption Criminal Law) to experience systematic damage, both at the level of norms and law enforcement systems that undermine the principle of the rule of law.

5 CONCLUSION

Based on the above discussion, the following conclusion can be drawn: First, Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 places administrative procedures in handling public complaints against alleged abuse of authority by government officials by prioritizing administrative settlement. However, this should not undermine the resolution of corruption cases if it is proven that the elements of a corruption crime have been fulfilled and the handling of state administrative law is not sufficient to be used. Second, Memorandum of Understanding Number: 100.4.7/437/SJ Number: 1 Year 2023 Number: NK/1/I/2023 its implementation must not ignore the substance of the legal problems that occur by shifting the resolution of legal cases that actually have absolutely fulfilled the elements of the crime of corruption, but the method of resolving these legal cases is forced to be resolved using a settlement based on State Administrative Law. This can cause the legal system in Indonesia to experience systematic damage, both at the level of norms and law enforcement systems that undermine the principle of the rule of law. In this way, what happens is that the prevention of corruption shifts to the protection of corruption.
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Law No. 30 Tahun 2014 on Government Administration.

Government Regulation No.42 of 2021 on Easing National Strategic Projects,

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