



Deregulation and Digitalization in Bureaucratic Reform: A Perspective of Administrative Law

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Abstract

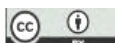
Bureaucratic reform in Indonesia faces persistent challenges, including overlapping regulations, complex procedures, and service inefficiencies. This article examines deregulation, which simplifies regulations to enhance legal certainty, and digitalization through the Electronic-Based Government System (SPBE), which improves efficiency, transparency, and accountability.

Using a normative legal approach, the study finds that integrating deregulation and digitalization can create a more adaptive and law-based bureaucracy, provided legal safeguards, equitable access, and adequate human and technological resources are ensured. The findings contribute to understanding bureaucratic reform in Indonesia within the framework of *good governance* and progressive law.

Keywords:

Bureaucratic reform, deregulation, digitalization, administrative law, good governance, SPBE.

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Background

Bureaucracy constitutes a crucial instrument in the administration of government, as it serves as the primary mechanism through which the state delivers public services, implements policies, and ensures the proper functioning of state administration. Nevertheless, the Indonesian bureaucracy continues to face fundamental challenges that consistently hinder the realization of effective and efficient governance. Various studies and reports indicate that the Indonesian bureaucratic apparatus is frequently associated with overlapping regulations, convoluted procedures, and inefficiency in public service delivery.

First, the issue of overlapping regulations poses a significant obstacle to the creation of legal certainty. The proliferation of sectoral laws and regulations, often drafted without adequate coordination, has resulted in considerable complexity in policy implementation. Consequently, both citizens and business actors frequently encounter confusion in interpreting applicable rules and, in some cases, face contradictory provisions. This situation is further exacerbated by a bureaucratic culture that tends to emphasize administrative formalities over the substantive quality of services, thereby slowing licensing processes and limiting access to public services.¹

One of the most pressing problems of the Indonesian bureaucracy is the overlapping of regulations, which obstructs the establishment of legal certainty. For instance, the implementation of the Risk-Based Online Single Submission (OSS) system, as stipulated in Law No. 11 of 2020 on Job Creation, continues to clash with sectoral regulations issued by ministries or regional governments that persist in applying the previous licensing mechanisms. As a result, business actors often encounter a dual regulatory framework in the investment licensing process.²

Second, since the Reform Era of 1998, the Indonesian government has begun to place serious attention on bureaucratic reform as part of the national agenda. Bureaucratic reform is regarded as an essential prerequisite for realizing the principles of good governance, which emphasize transparency, accountability, participation, and the rule of law in state administration. Through the *Grand Design of Bureaucratic Reform 2010–2025*, the government underscores the necessity of transforming the bureaucracy from a mere administrative executor into a result-oriented bureaucracy capable of delivering high-quality public services.³ This policy signifies a paradigm shift toward a more adaptive bureaucracy, responsive to public demands and the dynamics of contemporary development.

Third, in its implementation, two key instruments stand out in bureaucratic reform policies, namely deregulation and digitalization. Deregulation is understood as an effort to simplify or revoke regulations that are considered to hinder investment, public services, and

¹ Regional Autonomy Implementation Monitoring Committee (KPPOD). *Study on Overlapping Regulations in Indonesia*. Jakarta: KPPOD, 2018.

² See Law Number 11 of 2020 on Job Creation, State Gazette of the Republic of Indonesia Year 2020 Number 245.

³ Ministry of Administrative and Bureaucratic Reform (KemenPAN-RB). *Grand Design of Bureaucratic Reform 2010–2025*. Jakarta, 2010.

the effectiveness of state administration. The primary objective is to establish a more streamlined governance system, ensure legal certainty, and reduce economic costs resulting from excessively complex regulations.⁴ On the other hand, bureaucratic digitalization has developed in tandem with advances in information technology, particularly through the implementation of e-government programs and the Electronic-Based Government System (*Sistem Pemerintahan Berbasis Elektronik / SPBE*). Digitalization is expected to enhance the quality of public services, strengthen transparency, and minimize maladministrative practices that often arise in face-to-face interactions between public officials and citizens.⁵

Nevertheless, both deregulation and digitalization are not without challenges. Deregulation often raises concerns about the potential for legal vacuums or even the emergence of new legal uncertainties if the simplification process is not carried out comprehensively. Meanwhile, bureaucratic digitalization faces issues related to infrastructure, the digital divide in remote and underdeveloped, and the risks of personal data protection violations. Therefore, it is essential to examine how the perspective of Administrative Law can provide an analytical framework for the implementation of deregulation and digitalization, while ensuring that bureaucratic innovations do not disregard the principles of legality, accountability, and the protection of citizens rights.

Accordingly, the discussion on deregulation and digitalization within the framework of bureaucratic reform becomes both relevant and urgent, from theoretical and practical standpoints. Theoretically, this study can enrich academic discourse on the dynamics of administrative law in responding to the demands of modern bureaucratic transformation. Practically, it serves as an important basis for evaluating the effectiveness of Indonesia's bureaucratic reform policies, which have been underway for more than two decades.

Research Methodology

This study employs a normative juridical approach, examining legislation and the doctrines of administrative law relevant to bureaucratic reform, particularly deregulation and digitalization.

- a. The approaches used include: Statute approach, which involves analyzing regulations such as Law No. 30 of 2014 on Government Administration, the Electronic Information and Transactions Law (UU ITE), Government Regulation No. 71 of 2019 on the Implementation of Electronic Systems and Transactions, and Presidential Regulation No. 95 of 2018 on the Electronic-Based Government System (SPBE).
- b. Conceptual approach, which reviews the principles of administrative law, including legality, legal certainty, and accountability.

⁴ Directorate General of Treasury. "Good Governance and Bureaucratic Reform." Ministry of Finance of the Republic of Indonesia, 2023. <https://djpb.kemenkeu.go.id>.

⁵ Yanuar Nugroho et al. *Study on the Implementation of the Electronic-Based Government System (SPBE)*. National Institute of Public Administration (LAN), 2019.

Through these approaches, the study aims to provide a normative analysis of Indonesia's bureaucratic reform, highlighting both legal frameworks and doctrinal considerations.

Discussion

1. Bureaucratic Reform as an Effort to Realize Good Governance

Regulatory overlap poses a significant obstacle to establishing legal certainty in Indonesia. The proliferation of sectoral laws and regulations, often drafted without adequate coordination, creates considerable complexity in policy implementation. As a result, both citizens and business actors frequently experience confusion in interpreting applicable rules and are often confronted with conflicting regulations. For instance, although Law No. 11 of 2020 on Job Creation has introduced a risk-based licensing system through the Online Single Submission (OSS) to facilitate investment, in practice, sectoral regulations issued by ministries or regional governments still require business actors to follow the previous licensing procedures. This results in a dual regulatory framework that creates confusion and diminishes legal certainty for business actors.⁶

This issue is further exacerbated by a bureaucratic culture that emphasizes administrative formalities over the substance of public service, as evidenced by lengthy licensing procedures and layered document requirements. In contrast, the principles of good governance and legal certainty, as stipulated in Law No. 30 of 2014 on Government Administration, demand public services that are efficient, transparent, and result oriented.⁷

From a legal theory perspective, this condition contradicts Gustav Radbruch's principle of legal certainty, which emphasizes that the law must be clear and consistent so that society can adjust its behavior accordingly. It also aligns with Lawrence M. Friedman's legal system theory, which highlights the interaction between legal structure, legal behavior, and legal culture. In the context of Indonesia, the complex legal structure, formalistic bureaucratic behavior, and a legal culture that is not yet responsive to public service interact in ways that further undermine legal certainty. Therefore, harmonizing regulations across ministries and regional governments, consistently enforcing the risk-based licensing principle, and pursuing bureaucratic reform that prioritizes effective public service constitute strategic measures to address legal uncertainty and enhance the quality of public services in Indonesia.

2. Deregulation as an Instrument for Simplifying Administrative Law

Regulatory overlap remains a major challenge in Indonesia's administrative law system, particularly in the context of public service modernization and digital transformation. This complexity arises because many regulations are enacted sectorally without adequate coordination, so that a single administrative issue may be governed by multiple regulations

⁶ Law Number 11 of 2020 on Job Creation, State Gazette of the Republic of Indonesia Year 2020 Number 245.

⁷ Law Number 30 of 2014 on Government Administration, State Gazette of the Republic of Indonesia Year 2014 Number 123; Ministry of Administrative and Bureaucratic Reform (KemenPAN-RB), *Bureaucratic Reform Report 2022*, p. 17, available at: <https://www.menpan.go.id>

that sometimes conflict. This phenomenon not only causes confusion for citizens and businesses but also impedes innovation, bureaucratic efficiency, and adaptation to technological developments. For example, although Law No. 19 of 2016 on Information and Electronic Transactions (ITE Law) provides a legal foundation for electronic transactions and digital documents, and Government Regulation No. 71 of 2019 on the Implementation of Electronic Systems and Transactions establishes procedures for risk-based OSS in the digital realm, in practice, sectoral regulations still require physical documents or conventional signatures. This creates legal uncertainty for digital service providers and users because authority, procedures, and the validity of transactions can become ambiguous.⁸

From an administrative law perspective, regulatory overlap presents a dilemma between legal certainty and bureaucratic flexibility. Gustav Radbruch's principle of legal certainty emphasizes that law must be clear, consistent, and predictable so that citizens can adjust their behavior accordingly. When regulations overlap, this principle is undermined because citizens and businesses cannot accurately interpret their legal obligations, increasing the risk of disputes and administrative burdens. Furthermore, Lawrence M. Friedman's legal system theory emphasizes the alignment of legal structure, legal behavior, and legal culture. In Indonesia's context, the complex legal structure, sometimes formalistic bureaucratic behavior, and a legal culture not fully responsive to technology interact to exacerbate legal uncertainty and hinder innovation in public service delivery.⁹

As a solution, deregulation serves as a strategic instrument to simplify regulations that are irrelevant, conflicting, or obstructive to administrative efficiency. Deregulation is not merely the elimination of rules but a process of harmonization, alignment, and simplification of administrative procedures to create a leaner, more consistent, and easily understandable legal framework. A concrete example in digital service delivery is the government's effort to remove unnecessary physical document requirements and align sectoral provisions with the ITE Law and risk-based OSS regulations. These measures not only simplify procedures for citizens but also enhance legal certainty for digital service providers and innovative businesses.¹⁰

Deregulation also strengthens the protection of citizens' rights. When regulations overlap, citizens risk being trapped in unclear or contradictory administrative procedures, potentially compromising their access to fair, transparent, and timely public services. By streamlining and aligning regulations through deregulation, the government can prioritize relevant rules, eliminate unnecessary procedures, and increase legal certainty for both the public and businesses. This aligns with administrative law principles emphasizing legal

⁸ Law No. 19 of 2016 on Information and Electronic Transactions, State Gazette 2016 No. 194.

⁹ Lawrence M. Friedman, *The Legal System: A Social Science Perspective*, New York: Russell Sage Foundation, 1975; Gustav Radbruch, *Legal Philosophy*, Oxford: Clarendon Press, 1972.

¹⁰ Government Regulation No. 71 of 2019 on the Implementation of Electronic Systems and Transactions, State Gazette 2019 No. 112; Coordinating Ministry for Economic Affairs, *Deregulation Evaluation Report 2021*, Jakarta: Coordinating Ministry for Economic Affairs, 2021.

certainty and fair treatment, as well as the principles of good governance that require the government to deliver efficient, accountable, and transparent public services.¹¹

Moreover, deregulation enhances the adaptive capacity of the bureaucracy to social and technological changes. By simplifying complex regulations, the bureaucracy is relieved from irrelevant procedural burdens and can focus on substantive and innovative service delivery. This approach is consistent with the concept of regulatory governance, which emphasizes the government's role as a facilitator, creating clear, adaptive legal conditions that support innovation. Deregulation enables the government to balance legal certainty with administrative flexibility, making the administrative law system more responsive to social, economic, and technological dynamics.¹²

In conclusion, deregulation as an instrument of administrative law simplification is not merely a technical measure but also a legal strategy that strengthens bureaucratic legitimacy, improves public service quality, and provides greater legal certainty for citizens and businesses. Harmonizing regulations, removing conflicting provisions, and simplifying administrative procedures lay a stronger foundation for an efficient, adaptive, and accountable administrative law system while promoting innovation in modern digital public service delivery.

3. Bureaucratic Digitalization and the Implementation of the Electronic-Based Government System (SPBE)

The digitalization of bureaucracy through the implementation of the Electronic-Based Government System (SPBE) represents a strategic initiative in Indonesia to modernize public services, enhance transparency, and improve governmental accountability. SPBE aims to integrate administrative processes, services, and information systems across government institutions electronically, enabling public services to be accessed more quickly, efficiently, and based on accurate data. The legal foundations of SPBE include Presidential Regulation No. 95 of 2018 on the Electronic-Based Government System, which mandates all government agencies to harmonize systems and services electronically, as well as Law No. 11 of 2020 on Job Creation, which promotes risk-based digital licensing and online public services.¹³

The implementation of SPBE brings several legal and administrative benefits. First, SPBE increases legal certainty because all administrative processes are digitally documented, minimizing the risk of document manipulation or procedural inconsistencies. Second, SPBE enables internal regulatory harmonization, as electronic systems can integrate multiple sectoral regulations, facilitate compliance monitoring, and align procedures across agencies. Third, bureaucratic digitalization facilitates public accountability, as all processes are

¹¹ Mohammad Zainal Arifin, *Administrative Law in Indonesia: Theory and Practice*, Jakarta: RajaGrafindo, 2019, pp. 118–123.

¹² Organisation for Economic Co-operation and Development (OECD), *Regulatory Policy Outlook 2021*, Paris: OECD Publishing, 2021.

¹³ Presidential Regulation No. 95 of 2018 on the Electronic-Based Government System, State Gazette 2018 No. 201; Law No. 11 of 2020 on Job Creation, State Gazette 2020 No. 245.

traceable, easing audits and reinforcing good governance principles emphasizing transparency, responsiveness, and effective public service delivery.¹⁴

From an administrative law perspective, SPBE also serves as an instrument to address regulatory overlaps and procedural uncertainties. With an integrated electronic system, applicable regulations are openly accessible, procedures are consistently implemented, and all bureaucratic units follow standardized processes. According to Mohammad Zainal Arifin, the use of electronic systems in state administration enhances legal certainty because authority, procedures, and requirements are systematically documented, allowing citizens and businesses to clearly understand their rights and obligations.¹⁵

Several ministries and agencies have become examples of SPBE implementation, including the Ministry of Finance through the e-Bupot and e-Faktur systems, the Ministry of Home Affairs through e-KTP and online civil registration services, and the Ministry of Investment through the OSS RBA system. These systems demonstrate how digitalization can accelerate service delivery, reduce bureaucratic complexity, and provide legal certainty for both citizens and businesses. However, SPBE implementation faces significant challenges, such as uneven digital infrastructure across regions, limited human resources with adequate competence, cybersecurity risks, and resistance to cultural change in bureaucracy that still emphasizes physical procedures and administrative formalities.¹⁶

In addition to technical challenges, legal aspects also need to be strengthened. Regulations supporting SPBE must address data security, public information privacy, user rights protection, and mechanisms for resolving electronic disputes. Law No. 19 of 2016 on Information and Electronic Transactions (ITE Law) and Government Regulation No. 71 of 2019 on the Implementation of Electronic Systems and Transactions provide the legal basis for digital transaction security and validity, but they must be harmonized with other sectoral regulations to ensure consistent SPBE implementation across all government institutions.¹⁷

Theoretically, SPBE aligns with the concept of regulatory governance, which emphasizes the government's role as a facilitator in creating clear, adaptive legal conditions that support innovation. Through bureaucratic digitalization, the government not only simplifies administrative procedures but also enhances its adaptive capacity to social, economic, and technological changes. Deregulation and SPBE integration work together to eliminate overlapping provisions, harmonize regulations, and provide legal certainty to citizens. This strengthens public administrative legitimacy, improves service quality, and fosters innovation in modern public service delivery.¹⁸

¹⁴ Mohammad Zainal Arifin, *Administrative Law in Indonesia: Theory and Practice*, Jakarta: RajaGrafindo, 2019, pp. 118–123.

¹⁵ *Ibid.*

¹⁶ Ministry of State Apparatus Empowerment and Bureaucratic Reform (PANRB), *Guidelines for SPBE Implementation 2022*, Jakarta: Ministry of PANRB, 2022.

¹⁷ Law No. 19 of 2016 on Information and Electronic Transactions; Government Regulation No. 71 of 2019 on the Implementation of Electronic Systems and Transactions.

¹⁸ Organisation for Economic Co-operation and Development (OECD), *Digital Government Review: Indonesia*, Paris: OECD Publishing, 2021.

In conclusion, SPBE implementation is not merely a technological transformation but a significant legal-administrative reform. By integrating electronic systems, harmonizing regulations, strengthening human resource capacity, and ensuring adequate legal protections, SPBE serves as a strategic tool to achieve a bureaucracy that is efficient, transparent, accountable, and responsive to public needs, while simultaneously enhancing legal certainty and public service quality in Indonesia. The success of SPBE will be an indicator of progress in bureaucratic reform, state administration modernization, and the government's ability to leverage information technology for better public services.¹⁹

4. Integration of Deregulation and Digitalization: A State Administrative Law Perspective

The integration of deregulation and digitalization represents a key strategy in bureaucratic reform and modernization of state administrative law in Indonesia. These two instruments complement each other: deregulation simplifies complex legal frameworks and eliminates overlapping provisions, while digitalization enables the more efficient, transparent, and accountable implementation of regulations through electronic systems. This approach is highly relevant in modern state administration, where efficiency, legal certainty, and high-quality public services are the primary demands of citizens and businesses.²⁰

Deregulation, as regulated under Presidential Regulation No. 87 of 2014 on the National Policy and Strategy for Bureaucratic Reform, functions to review outdated, conflicting, or obstructive regulations with the aim of creating a leaner administrative law system that is easier to understand. Deregulation emphasizes the principle of legal certainty by reducing ambiguities caused by regulatory overlap, simplifying the execution of citizens' rights and obligations, and increasing procedural certainty within the bureaucracy.²¹

Meanwhile, bureaucratic digitalization through the Electronic-Based Government System (SPBE), as stipulated in Presidential Regulation No. 95 of 2018, allows for a more effective implementation of deregulation. Digital integration enables procedural harmonization across agencies, accurate electronic documentation, and more transparent monitoring and auditing. As a result, regulations simplified through deregulation can be consistently applied across all bureaucratic units, minimizing divergent interpretations and legal uncertainty.²²

From the perspective of administrative law, the integration of deregulation and digitalization aligns with good governance principles, including transparency, accountability, efficiency, and citizen-oriented public service. Digitalization provides a platform for the bureaucracy to implement regulations in real time, monitor compliance, and provide public

¹⁹ *Ibid.*

²⁰ Presidential Regulation No. 95 of 2018 on the Electronic-Based Government System, State Gazette 2018 No. 201; Law No. 11 of 2020 on Job Creation, State Gazette 2020 No. 245.

²¹ □ Presidential Regulation No. 87 of 2014 on the National Policy and Strategy for Bureaucratic Reform, State Gazette 2014 No. 180.

²² Mohammad Zainal Arifin, *Administrative Law in Indonesia: Theory and Practice*, Jakarta: RajaGrafindo, 2019, pp. 118–123.

access to legal and administrative information. This also supports the principle of fair treatment, as administrative procedures become clearer, documented, and accountable.²³

Implementation of this integration is evident in initiatives such as the Online Single Submission (OSS) Risk-Based Approach, which combines deregulated licensing procedures with a digital system to facilitate investment and public service. OSS RBA simplifies licensing requirements, eliminates layered procedures, and provides time-bound, electronically traceable processes. This integration demonstrates how deregulation and digitalization together can create a more responsive, accountable, and efficient bureaucracy while enhancing legal certainty for citizens and businesses.²⁴

However, integrating deregulation and digitalization also faces significant challenges. First, digital infrastructure disparities between urban and rural areas can limit SPBE implementation. Second, a bureaucracy still oriented toward formalistic procedures and conventional work culture may resist innovation. Third, cybersecurity and personal data protection are legal issues that must be strengthened to prevent misuse of public information. Therefore, integrating deregulation and digitalization requires not only technology and regulatory simplification but also bureaucratic culture reform, human resource training, and strengthened regulations on data security and service user rights.²⁵

Conceptually, integrating deregulation and digitalization emphasizes that modernization of state administrative law is not only normative but also operational, meaning regulations are simplified while ensuring their consistent, accurate, and transparent implementation through information technology. This approach bridges the gap between administrative law theory such as legal certainty, administrative justice, and accountability and modern bureaucratic practice based on technology.²⁶

Thus, the integration of deregulation and digitalization represents a strategic step toward building an efficient, adaptive, and accountable administrative law system. Through regulatory harmonization, procedural simplification, and utilization of digital technology, the bureaucracy can provide fast, transparent, and consistent public services, while strengthening legal certainty for citizens and businesses. This integration confirms that modern bureaucratic reform is not merely about regulatory simplification or digitalization alone, but a comprehensive transformation uniting the legal framework, technology, and bureaucratic culture to achieve professional and responsive public administration.²⁷

Conclusion

Bureaucratic reform in Indonesia faces persistent challenges, including overlapping regulations, complex administrative procedures, and inefficiencies in public services. From

²³ Ministry of State Apparatus Empowerment and Bureaucratic Reform (PANRB), *Guidelines for SPBE Implementation 2022*, Jakarta: Ministry of PANRB, 2022.

²⁴ OSS Risk-Based Approach (RBA), Ministry of Investment/BKPM, 2021.

²⁵ Organisation for Economic Co-operation and Development (OECD), *Digital Government Review: Indonesia*, Paris: OECD Publishing, 2021.

²⁶ *Ibid.*

²⁷ *Ibid.*

the perspective of administrative law, deregulation serves to simplify regulations and strengthen legal certainty, while digitalization through the Electronic-Based Government System (SPBE) enhances efficiency, transparency, and accountability.

The synergy of these two instruments can promote a more adaptive, responsive, and law-based bureaucracy. However, it must continue to uphold the principles of legality, protection of public rights, and equal access to technology. Thus, bureaucratic reform based on deregulation and digitalization offers a modern approach aligned with the principles of *good governance* and progressive law.

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