

The Transformation of State Administrative Law in Realizing Transparent and Accountable Digital Government in Indonesia

Raja Doli Jaya Ritonga¹, Arip Rachman Ritonga², Murni Sari Ritonga³ Ghina Meilani Rizki⁴

¹Sekolah Tinggi Agama Islam Sultan Syarif Hasyim, Siak, Indonesia

²Universitas Islam Negeri Sunan Kalijaga Yogyakarta, Yogyakarta, Indonesia

³Universitas Islam Negeri Maulana Malik Ibrahim Malang, Malang, Indonesia

⁴Universitas Negeri Riau, Pekanbaru, Indonesia

*Correspondance: rajadolijayar@gmail.com

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Abstract

The rapid advancement of digital technology has reshaped the landscape of public administration and challenged existing legal frameworks governing governmental authority and public service delivery. In Indonesia, the implementation of digital government has become a strategic priority to improve transparency, accountability, administrative efficiency, and the quality of public services. This study aims to analyze the transformation of State Administrative Law in supporting the realization of transparent and accountable digital government in Indonesia. The research employs a normative juridical approach by examining constitutional provisions, statutory regulations, legal doctrines, international governance standards, and relevant scholarly literature on State Administrative Law and digital governance. The findings indicate that Indonesia has developed a relatively comprehensive legal foundation for digital government through various legislative and policy instruments, particularly the Electronic-Based Government System (Sistem Pemerintahan Berbasis Elektronik SPBE). Nevertheless, the implementation of digital governance continues to face significant legal and institutional challenges, including regulatory fragmentation, limited interoperability among government institutions, unequal institutional capacity, and the absence of comprehensive legal provisions governing artificial intelligence, automated administrative decision-making, algorithmic accountability, and integrated digital governance. This study argues that the transformation of State Administrative Law should move beyond incremental regulatory adjustments toward a comprehensive legal reconstruction that integrates transparency, accountability, personal data protection, algorithmic governance, interoperability, and meaningful citizen participation. Such legal reform is essential to strengthen democratic governance, enhance legal certainty, protect citizens' constitutional rights, and ensure that Indonesia's digital government develops in accordance with the principles of the Rule of Law and Good Governance.

Keywords: *State Administrative Law; Digital Government; Good Governance; Transparency; Accountability; Indonesia.*

INTRODUCTION

The rapid growth of digital technology has reshaped the way governments carry out their responsibilities, deliver public services, formulate public policies, and engage with citizens. In recent years, digital transformation has extended far beyond the simple adoption of information and communication technologies (ICT) (Baharuddin Kasim et al., 2025). It now represents a fundamental reconfiguration of governance structures, institutional practices, and administrative processes. Across the world, governments are embracing digital government as a strategic instrument for improving the quality of public services, strengthening institutional accountability, promoting transparency, and enhancing administrative effectiveness (Organisation for Economic Co-operation and Development [OECD] (United Nations, 2024). This evolution reflects a broader shift from traditional bureaucratic administration toward governance that is increasingly integrated, citizen-oriented, and supported by data-driven decision-making (Shabnam Sharmin & Rakibul Hasan Chowdhury, 2025).

Unlike the earlier concept of electronic government (e-government), digital government encompasses a much broader institutional transformation. E-government primarily emphasizes the digitization of administrative procedures and public services through the application of information technology. Digital government, however, involves redesigning governance systems by encouraging collaboration across institutions, fostering policy innovation, and strategically utilizing digital technologies to improve governance performance (Janowski, 2015). Accordingly, digital government should not be understood merely as a technological advancement; it also represents a process of legal and institutional reform that requires regulatory frameworks capable of adapting to evolving models of public administration. (Sumardi, 2024).

Indonesia has placed digital government at the center of its bureaucratic reform agenda and national digital transformation strategy. An important milestone was the issuance of Presidential Regulation Number 95 of 2018 concerning the Electronic-Based Government System (Sistem Pemerintahan Berbasis Elektronik/SPBE), which established the foundation for integrating digital governance across public institutions (Yulianto et al., 2026). Since then, the government has introduced various initiatives aimed at modernizing public administration, including integrated business licensing services, digital identity systems, online public complaint platforms, electronic procurement, and interoperable government databases. These programs are expected not only to improve the efficiency and accessibility of public services but also to reinforce transparency, accountability, and good governance throughout governmental institutions Kementerian PANRB, 2024 (Fitriyanti, 2024).

Although meaningful progress has been achieved, the implementation of digital government in Indonesia continues to face a number of structural and legal challenges. Many public institutions still operate independent information systems that lack interoperability, resulting in duplicated administrative procedures, fragmented public services, and inefficient data management (Anto et

al., 2025). In addition, unequal institutional capacity, disparities in digital infrastructure, and varying levels of digital competence among civil servants have hindered the realization of integrated digital governance across regions. These circumstances demonstrate that technological innovation alone cannot ensure successful digital transformation. Instead, sustainable reform requires corresponding legal adjustments that provide institutional coherence, legal certainty, and effective governance mechanisms (Wahid et al., 2024).

From the perspective of State Administrative Law, these developments raise important questions regarding the capacity of Indonesia's existing legal framework to govern digital administration effectively. Traditionally, State Administrative Law has focused on regulating governmental authority, administrative discretion, public decision-making, administrative accountability, and judicial control over administrative actions (Efendi et al., 2024). However, the emergence of digital government has introduced legal issues that extend beyond the scope of conventional administrative regulation. Matters such as automated administrative decision-making, algorithmic accountability, digital evidence, cybersecurity, data governance, artificial intelligence, interoperability, and the protection of personal data have become increasingly relevant within modern public administration. Consequently, State Administrative Law must evolve from regulating conventional bureaucratic activities toward governing increasingly complex digital administrative ecosystems (Haim, 2023). Such legal transformation is essential because the legitimacy of digital government depends not only on technological capability but also on the existence of a legal framework that effectively safeguards citizens' rights. Fundamental principles of administrative law including legality, legal certainty, due process, proportionality, and the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik/AUPB) remain indispensable standards that should continue to guide administrative decision-making in digital environments (Hadjon, 2011). Without legal adaptation, digitalization may unintentionally generate new forms of administrative injustice, weaken public accountability, and increase the potential for arbitrary governmental actions (Henman, 2021).

Transparency and accountability have likewise become indispensable pillars of contemporary governance. Transparency enables citizens to obtain government information, monitor administrative activities, and participate more actively in public decision-making. Accountability, on the other hand, requires public officials and institutions to remain answerable for the legality and consequences of their decisions and actions (Bovens, 2007). Advances in digital technology provide unprecedented opportunities to strengthen these principles through initiatives such as open government data, electronic public participation, integrated monitoring systems, and real-time evaluation of public service performance. Nevertheless, these opportunities are accompanied by significant challenges, including cybersecurity threats, algorithmic bias, unequal access to information, and misuse of personal data. These risks highlight the necessity of stronger legal regulation and more effective institutional oversight to ensure that digital innovation serves the public interest (Jin, 2024).

Indonesia has enacted several important legal instruments to support the implementation of digital governance. These include Law Number 30 of 2014 concerning Government Administration, Law Number 25 of 2009 concerning Public Services, Law Number 14 of 2008 concerning Public Information Disclosure, Law Number 27 of 2022 concerning Personal Data Protection, and Government Regulation Number 71 of 2019 concerning the Implementation of Electronic Systems and Transactions. Collectively, these regulations provide a normative basis for digital governance. However, because they were developed independently and primarily address sector-specific concerns, they do not yet constitute a comprehensive legal framework capable of governing digital administration in an integrated manner. As a result, regulatory fragmentation remains one of the principal challenges in establishing a coherent, transparent, and accountable digital government system (Wahyudi et al., 2025). The existing body of literature has examined digital government from a variety of perspectives, including information systems, public administration, and technological innovation. Likewise, extensive scholarship has analyzed State Administrative Law in relation to governmental authority, administrative discretion, and judicial review (Craig, 2021). Despite these contributions, relatively limited attention has been devoted to examining how State Administrative Law should be restructured to address the institutional and legal implications of digital government while simultaneously ensuring transparency, accountability, and the protection of citizens' rights within the Indonesian legal context. Existing studies generally discuss digital governance and administrative law as separate fields of inquiry, leaving an important gap concerning the interaction between these two disciplines (Ninu, 2026).

Against this background, the present study investigates the transformation of State Administrative Law in supporting the realization of transparent and accountable digital government in Indonesia. The research specifically examines how fundamental principles of administrative law should adapt to the realities of digital governance, evaluates the adequacy of Indonesia's existing regulatory framework, and identifies legal reforms necessary to strengthen transparency, accountability, and the protection of citizens in the digital era (Firdaus et al., 2025). By integrating perspectives from State Administrative Law, public governance, and digital transformation, this study seeks to enrich contemporary discussions on digital governance while proposing a normative legal framework capable of supporting the development of an adaptive, transparent, accountable, and sustainable digital government in Indonesia.

RESEARCH METHOD

This study employs a normative juridical (doctrinal legal) approach to examine the transformation of State Administrative Law in supporting the development of transparent and accountable digital government in Indonesia. This study employs a normative juridical (doctrinal legal) approach to examine the transformation of State Administrative Law in supporting transparent and accountable digital government in Indonesia. The research focuses on analyzing legal norms, statutory regulations, legal doctrines, and governance principles to evaluate the adequacy of Indonesia's legal framework and formulate recommendations for legal reform (Dorania Lumbanraja, 2020).

The study applies statutory, conceptual, and comparative approaches. The statutory approach examines the 1945 Constitution of the Republic of Indonesia, Law Number 30 of 2014 concerning Government Administration, Law Number 25 of 2009 concerning Public Services, Law Number 14 of 2008 concerning Public Information Disclosure, Law Number 27 of 2022 concerning Personal Data Protection, Government Regulation Number 71 of 2019, and Presidential Regulation Number 95 of 2018 concerning the Electronic-Based Government System (SPBE). The conceptual approach draws upon theories of administrative law, the Rule of Law, good governance, and digital government, while the comparative approach refers to international standards developed by the OECD, the United Nations, and the World Bank.

The research uses primary, secondary, and tertiary legal materials, including legislation, judicial decisions, scholarly literature, institutional reports, and legal reference sources. Legal materials were collected through library research and analyzed using qualitative normative legal analysis with grammatical, systematic, and teleological interpretation. The analysis evaluates the relationship between administrative law principles and emerging issues in digital governance, including transparency, accountability, interoperability, artificial intelligence, automated decision-making, and personal data protection. Based on these findings, the study formulates prescriptive recommendations to strengthen Indonesia's administrative legal framework in accordance with the principles of the Rule of Law and Good Governance (Mudhoffar et al., 2024).

RESULTS

The findings of this study indicate that the transformation of State Administrative Law in Indonesia has entered an important stage following the government's commitment to accelerating digital governance through the implementation of the Electronic-Based Government System (Sistem Pemerintahan Berbasis Elektronik SPBE). The existing regulatory framework reflects a gradual transition from conventional bureaucratic administration toward a digital governance model characterized by integrated public services, electronic administrative processes, interoperable information systems, and citizen-oriented governance. This transition illustrates that digital transformation is no longer confined to the adoption of information technology but increasingly reshapes the legal and institutional foundations of public administration. Nevertheless, the analysis also demonstrates that although technological modernization has progressed considerably, the legal framework required to support a transparent, accountable, and sustainable digital government has yet to develop at the same pace (Syam et al., 2026).

The first finding shows that Indonesia has established a relatively strong normative foundation for the implementation of digital government. At the constitutional level, the 1945 Constitution guarantees citizens' rights to obtain public information, receive equal access to public services, and enjoy legal certainty under the principles of the Rule of Law. These constitutional guarantees are operationalized through Law Number 30 of 2014 concerning Government Administration, which regulates governmental authority, administrative discretion, administrative decisions, and the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik AUPB). In addition, several sectoral regulations including Law Number 25 of 2009 concerning Public Services, Law Number 14 of 2008 concerning Public Information Disclosure, Law Number 27 of

2022 concerning Personal Data Protection, and Presidential Regulation Number 95 of 2018 concerning SPBE collectively provide the legal basis for integrating digital technology into public administration. Taken together, these legal instruments demonstrate Indonesia's commitment to promoting digital governance while preserving the principles of legality, accountability, and public oversight (Hadjon, 2011).

Despite this relatively comprehensive legal foundation, the study finds that Indonesia's regulatory framework remains fragmented. Most of the regulations governing digital administration were enacted separately to address specific sectors rather than being designed as part of a unified legal architecture. As a result, institutional responsibilities related to electronic governance, public information disclosure, personal data protection, digital public services, and electronic systems are distributed across different government agencies, each operating under its own regulatory standards. This fragmentation has created overlapping authority, inconsistent implementation, and limited coordination among institutions. Although SPBE seeks to encourage interoperability across government agencies, many public institutions continue to operate isolated information systems that hinder data integration and reduce administrative efficiency. Consequently, fragmented regulation not only weakens institutional coordination but also complicates legal accountability because administrative responsibilities are frequently dispersed among multiple (Sipayung et al., 2025). The second finding concerns the transformation of administrative decision-making within digital governance. Traditionally, Keputusan Tata Usaha Negara (administrative decisions) were issued through lengthy bureaucratic procedures involving extensive human intervention and manual documentation. The digitalization of public administration has significantly changed this model by introducing electronic licensing services, online administrative approvals, electronic procurement, integrated taxation systems, and digital complaint-handling mechanisms. These innovations have substantially reduced administrative processing time, simplified bureaucratic procedures, and expanded citizens' access to government services. From the perspective of administrative efficiency, digitalization has therefore contributed positively to improving both the quality and accessibility of public services (Prayoga & Nazrullah, 2025).

However, the study also reveals that digital administrative decision-making introduces legal issues that have not yet been comprehensively addressed within Indonesia's administrative legal framework. Existing legislation recognizes the legal validity of electronic documents and electronic administrative procedures, yet it provides limited guidance regarding automated governmental decisions, algorithm-assisted administrative processes, explainability of algorithmic outcomes, and the legal responsibilities arising from the use of artificial intelligence in public administration. Likewise, there remains no comprehensive regulation governing citizens' rights to challenge algorithm-generated administrative decisions. This legal vacuum may undermine procedural fairness whenever automated systems produce inaccurate, discriminatory, or biased outcomes without adequate legal remedies or institutional safeguards (Puspitasari & Wiryantiningsih, 2022).

The third finding demonstrates that digital government has significantly strengthened administrative transparency. The expansion of electronic procurement systems, integrated licensing platforms, open government data initiatives, and online public information portals has considerably increased public access to government information. Citizens are now able to monitor procurement activities, licensing procedures, budget realization, institutional performance, and other aspects of public administration through digital platforms. These developments not only encourage greater public participation but also reduce opportunities for corrupt practices by minimizing direct interaction between public officials and service users. Consequently, digital technology has become an important instrument for enhancing transparency and improving public trust in government institutions (Bertot et al., 2010). Nevertheless, the implementation of transparency remains uneven across governmental institutions. Central government agencies generally demonstrate stronger institutional capacity and more advanced digital infrastructure than many regional governments. Differences in technological readiness, organizational capacity, financial resources, and digital literacy continue to create significant disparities in the quality of digital public services. Furthermore, several government institutions still provide incomplete, outdated, or inconsistent public information, thereby limiting meaningful public oversight. Weak interoperability among government databases also contributes to inconsistencies in administrative records, reducing the effectiveness of integrated digital services and limiting the realization of fully transparent governance (Syafaruddin Syafaruddin & Andi Rizka, 2025).

The fourth finding concerns the evolution of administrative accountability within the context of digital government. The widespread use of digital technologies has significantly expanded opportunities for real-time monitoring, electronic auditing, performance measurement, and evidence-based policy evaluation. Unlike conventional paper-based administration, digital systems automatically generate electronic records that document administrative activities in a systematic and traceable manner. These electronic records facilitate internal supervision, external audits, and public scrutiny, thereby strengthening institutional accountability and improving administrative integrity (Bovens, 2007). Despite these improvements, digital governance also presents new accountability challenges. Administrative failures occurring within interconnected digital ecosystems frequently involve multiple actors, including government agencies, software developers, technology vendors, cloud service providers, and outsourced digital operators. Under these circumstances, determining legal responsibility becomes increasingly complex. Existing State Administrative Law continues to assume that accountability rests primarily with identifiable public officials exercising governmental authority. In practice, however, digital governance operates through collaborative technological ecosystems in which responsibility is often shared among various public and private actors. The absence of clear legal standards governing institutional responsibility in such situations may weaken accountability whenever failures occur within digital administrative systems (Forsyth, 2014).

Another important finding relates to the protection of citizens' digital rights. As digital government increasingly relies on the collection, storage, processing, and exchange of personal information,

data governance has become an integral component of administrative legality. The enactment of Law Number 27 of 2022 concerning Personal Data Protection represents a significant milestone in strengthening legal protection for citizens within Indonesia's digital governance framework. Nevertheless, the implementation of this legislation remains uneven because many public institutions continue to face limited institutional readiness, inadequate technical standards, and varying levels of regulatory compliance. Moreover, numerous government agencies still depend on legacy information systems that were not originally designed to comply with contemporary cybersecurity and personal data protection standards (Kurniawan et al., 2024). These weaknesses expose public institutions to risks involving unauthorized data access, cyberattacks, and misuse of personal information, thereby highlighting the need for stronger institutional safeguards and more effective regulatory enforcement (Paguay-Chimarro et al., 2025). The findings further indicate that institutional capacity plays a decisive role in determining the effectiveness of digital legal transformation. Although Indonesia has adopted ambitious national policies promoting digital government, implementation capacity differs substantially across ministries, regional governments, and public institutions. Variations in technological infrastructure, financial resources, organizational culture, digital literacy, and human resource competencies continue to influence the quality of digital public service delivery. These findings suggest that legal reform, by itself, is insufficient to ensure successful digital governance. Sustainable transformation requires parallel investments in institutional strengthening, digital infrastructure, organizational adaptation, and continuous capacity development for civil servants responsible for implementing digital administration (Saputra et al., 2025).

Finally, the study finds that the transformation of Indonesia's State Administrative Law remains predominantly regulatory rather than doctrinal. Although numerous legal instruments have been enacted to facilitate digital government, these reforms have not fundamentally reconstructed the theoretical foundations of administrative law in response to emerging technological developments. Critical issues including artificial intelligence governance, algorithmic accountability, digital administrative discretion, cross-border data governance, automated administrative decision-making, and interoperability among public institutions remain only partially addressed within the current legal framework. International organizations such as the OECD and the United Nations increasingly advocate adaptive governance models capable of regulating rapidly evolving digital technologies while simultaneously safeguarding democratic values, transparency, accountability, and human rights. Compared with these international standards, Indonesia's administrative legal framework continues to rely heavily on conventional legal doctrines that require substantial modernization to remain responsive to the realities of digital governance (Craig, 2021).

Overall, the results demonstrate that Indonesia has made considerable progress in establishing the normative and institutional foundations necessary for implementing digital government. Legislative reforms, digital public services, and institutional modernization collectively reflect the government's commitment to transforming public administration through digital innovation. Nevertheless, the legal transformation of State Administrative Law remains an ongoing process.

To realize a truly transparent and accountable digital government, future reforms must move beyond fragmented regulatory amendments and toward a coherent administrative legal framework that integrates technological innovation with legal certainty, institutional accountability, protection of citizens' constitutional rights, and the enduring principles of the Rule of Law. Such an approach would enable Indonesia to develop a digital governance system that is not only technologically advanced but also legally robust, democratically accountable, and capable of responding to the increasingly complex challenges of contemporary public administration (Bingham, 2010).

DISCUSSION

The findings of this study confirm that Indonesia's transition toward digital government should not be viewed solely as a technological shift but as a broader transformation of State Administrative Law. The increasing adoption of digital technologies in public administration has fundamentally altered the interaction between government institutions and citizens by introducing electronic services, integrated information systems, data-driven governance, and automated administrative processes. These developments indicate that State Administrative Law can no longer function merely as a legal framework regulating conventional bureaucratic procedures. Instead, it must evolve into a dynamic legal system capable of governing digital administrative ecosystems while safeguarding the constitutional values of legality, legal certainty, accountability, transparency, and the protection of citizens' rights (Craig, 2021). In this context, digital transformation should be understood not simply as technological innovation but as a comprehensive legal and institutional reform that redefines how governmental authority is exercised in the digital era.

One of the most significant findings of this research concerns the fragmented nature of Indonesia's regulatory framework governing digital administration. Although the government has enacted numerous legal instruments supporting digital governance including Law Number 30 of 2014 concerning Government Administration, Law Number 25 of 2009 concerning Public Services, Law Number 14 of 2008 concerning Public Information Disclosure, Law Number 27 of 2022 concerning Personal Data Protection, and Presidential Regulation Number 95 of 2018 concerning the Electronic-Based Government System (SPBE) these regulations continue to operate largely within separate policy domains. As a result, institutional responsibilities frequently overlap, coordination among government agencies remains limited, and implementation standards differ across sectors. Such fragmentation weakens administrative integration and reduces the effectiveness of SPBE as a national digital governance framework. From the perspective of State Administrative Law, this condition undermines the principle of legal certainty because citizens often encounter inconsistent administrative procedures and differing legal standards depending on the institution providing public services. (Bingham, 2010) argues that the Rule of Law requires legal norms that are clear, predictable, and consistently implemented. Therefore, fragmented regulation not only diminishes administrative efficiency but also weakens citizens' confidence in governmental decision-making.

The findings further reveal that Indonesia's administrative legal framework still reflects the characteristics of a conventional bureaucratic model. Law Number 30 of 2014 was formulated at a time when administrative authority was primarily exercised directly by public officials through manual bureaucratic procedures. Consequently, the law places considerable emphasis on governmental authority, administrative discretion, administrative decisions, and accountability within a traditional institutional setting. However, the emergence of digital government has fundamentally changed the nature of administrative decision-making. Today, many governmental functions involve interoperable databases, electronic verification systems, predictive analytics, and algorithm-assisted administrative processes. These technological developments expand the scope of administrative action beyond direct human intervention and create legal questions that were largely absent from traditional administrative governance. Accordingly, the transformation of State Administrative Law must extend beyond regulating the conduct of public officials and encompass the governance of digital administrative systems themselves (Forsyth, 2014).

This finding is consistent with (Janowski, 2015) argument that digital government represents a process of institutional transformation rather than a simple digitization of existing administrative procedures. Likewise, the OECD 2020 emphasizes that digital government should be understood as an integrated governance model in which digital technologies become embedded within policymaking, administrative processes, and public service delivery. In other words, digital transformation is not merely about replacing paper-based procedures with electronic systems but about redesigning governance structures to improve institutional performance and public value. Consequently, adapting isolated legal provisions to technological developments will not be sufficient. What is required instead is a broader reconstruction of administrative legal doctrines capable of responding to emerging forms of governmental action, digital interaction, and technological governance (Daly et al., 2022).

Another important implication emerging from this study concerns the concept of administrative discretion in the digital era. Traditionally, administrative discretion enables public officials to make decisions when legislation provides flexibility or when legal rules cannot fully anticipate every administrative situation. The increasing use of algorithmic systems and artificial intelligence, however, has begun to influence this decision-making process. Digital technologies are capable of processing vast amounts of administrative data, identifying patterns, and generating recommendations more rapidly than conventional bureaucratic procedures. While these capabilities undoubtedly improve administrative efficiency and consistency, they also introduce legal concerns relating to fairness, transparency, explainability, and accountability (Young et al., 2019). From the perspective of administrative justice, algorithmic systems should not replace the legal responsibility of public officials. Administrative discretion is not merely a technical exercise but also a legal obligation requiring careful reasoning, proportionality, impartiality, and respect for constitutional rights. Algorithms may assist public officials by providing recommendations or analytical support, but the ultimate authority to make administrative decisions should remain vested in legally accountable government officials. This principle is particularly important because algorithmic systems may inadvertently reproduce biases embedded within data or produce

inaccurate outcomes that adversely affect citizens. Therefore, maintaining meaningful human oversight over automated administrative decisions remains essential for preserving due process and protecting citizens against arbitrary governmental action. This conclusion is consistent with (Craig, 2021) view that governmental authority must remain subject to legal control regardless of the administrative mechanisms or technologies employed.

The study also demonstrates that transparency has become one of the defining characteristics of digital governance. The expansion of electronic procurement systems, integrated licensing platforms, open government data initiatives, and online public information portals has significantly improved public access to governmental information. Compared with conventional bureaucratic administration, digital platforms allow citizens to monitor government activities more efficiently, evaluate institutional performance, and participate more actively in public governance. These developments contribute to stronger democratic accountability while simultaneously reducing opportunities for corruption by minimizing discretionary face-to-face interactions between citizens and public officials. Similar conclusions have been reached by (Bertot et al., 2010) who argue that information and communication technologies can transform transparency from a passive disclosure mechanism into an active instrument of citizen participation and anti-corruption.

Nevertheless, transparency in the context of digital government extends beyond simply making government information publicly accessible. The findings suggest that contemporary digital governance also requires algorithmic transparency, whereby citizens have the right to understand how automated administrative decisions are generated, what information is used during decision-making, and how administrative errors may be challenged or corrected. This issue becomes increasingly significant as governments begin adopting artificial intelligence and predictive analytics in public administration (Henman, 2021). Without sufficient transparency regarding algorithmic processes, citizens may face administrative decisions whose underlying reasoning cannot be meaningfully examined or contested. Such conditions conflict with the principles of due process, procedural fairness, and legal certainty that have long been recognized as fundamental principles of State Administrative Law (Bingham, 2010). Closely associated with transparency is the issue of administrative accountability. The findings demonstrate that digital government substantially strengthens accountability by creating electronic records that facilitate real-time monitoring, digital auditing, institutional supervision, and evidence-based evaluation. Electronic documentation provides greater traceability than traditional paper-based administration, making it easier to identify administrative actions, evaluate institutional performance, and investigate procedural irregularities. Consequently, digital governance creates stronger mechanisms for both internal and external oversight, thereby reinforcing institutional accountability and public trust (Setyarto et al., 2025).

However, digital governance also complicates traditional concepts of accountability. Administrative decisions are increasingly produced through interactions among government agencies, software developers, cloud service providers, data processors, and artificial intelligence systems. Under such circumstances, determining legal responsibility becomes considerably more

complex than under conventional bureaucratic administration. Traditional administrative law generally assumes that governmental authority is exercised by identifiable public officials who bear legal responsibility for administrative decisions. In digital governance, by contrast, administrative functions are distributed across interconnected technological ecosystems involving both public and private actors. Therefore, future administrative law should develop more sophisticated accountability mechanisms capable of clearly allocating legal responsibility without diminishing governmental accountability to citizens. Public institutions should remain legally responsible for administrative outcomes even when technological systems or external service providers participate in administrative processes (Adelmant & Raso, 2025).

The protection of personal data likewise emerges as a fundamental component of contemporary administrative legality. The enactment of Law Number 27 of 2022 concerning Personal Data Protection represents significant progress in strengthening citizens' digital rights within Indonesia's evolving legal framework. Nevertheless, statutory recognition alone cannot guarantee effective protection. The findings indicate that many government institutions continue to face limitations in cybersecurity capacity, institutional readiness, technical standards, and regulatory compliance. Effective protection of personal data therefore requires not only comprehensive legislation but also strong administrative institutions capable of enforcing cybersecurity standards, ensuring lawful data processing, preventing unauthorized access, and providing effective legal remedies for individuals whose rights have been violated. In digital government, personal data have become an essential administrative asset, making data governance inseparable from administrative legality and constitutional protection (Wijaya Kusuma et al., 2025).

Another important implication concerns the continuing relevance of the General Principles of Good Governance (Asas-Asas Umum Pemerintahan yang Baik AUPB). Traditionally, these principles have served as normative standards guiding governmental conduct and evaluating administrative decisions. The findings suggest that digital transformation does not diminish the importance of AUPB; rather, it expands its application into new technological contexts. Transparency should now include algorithmic openness and explainability; accountability should encompass digital traceability and electronic auditability; proportionality should regulate automated decision-making; legal certainty should require interoperability and standardized digital procedures; and public participation should increasingly involve digital consultation and online citizen engagement. Consequently, the digital era calls not for the replacement of traditional administrative principles but for their reinterpretation and expansion to ensure their continued relevance within technologically mediated governance (HR, 2023).

The comparative analysis with international developments further reinforces these conclusions. Experience from OECD member countries demonstrates that successful digital government depends not only on investment in digital infrastructure but also on adaptive legal institutions capable of regulating emerging technologies while preserving democratic governance. Increasingly, OECD countries integrate digital government strategies with reforms in administrative law, cybersecurity regulation, data governance, and artificial intelligence

governance (Sysoyeva & Martínez-Usarralde, 2025). Likewise, the United Nations emphasizes that digital government contributes to sustainable development only when supported by transparent institutions, accountable public administration, inclusive participation, and effective legal safeguards protecting citizens' rights. These international experiences suggest that Indonesia's future reforms should focus not merely on expanding digital services but also on strengthening the legal architecture governing digital administration to ensure consistency with constitutional principles and international governance standards (Setyawan et al., 2025).

Overall, this discussion demonstrates that the future development of State Administrative Law in Indonesia should emphasize legal reconstruction rather than incremental legislative amendment. The rapid evolution of digital governance requires a legal framework capable of regulating interconnected digital ecosystems, strengthening interoperability among government institutions, governing artificial intelligence, ensuring effective personal data protection, and maintaining democratic accountability within technologically mediated administration. Such transformation would enable Indonesia not only to improve administrative efficiency but also to develop a digital government that fully embodies the principles of transparency, accountability, legal certainty, and the Rule of Law. Ultimately, technological innovation should reinforce not replace the constitutional values that underpin public administration, ensuring that the modernization of government remains firmly grounded in legal legitimacy, democratic governance, and the protection of citizens' fundamental rights (Arifin, 2024).

CONCLUSION

This study concludes that the transformation of State Administrative Law is fundamental to realizing transparent and accountable digital government in Indonesia. Although Indonesia has established a substantial legal foundation through various constitutional, statutory, and regulatory instruments, the existing framework remains fragmented and has not fully accommodated the legal complexities arising from digital governance. Key challenges include limited interoperability among government institutions, regulatory fragmentation, uneven institutional capacity, and the absence of comprehensive legal provisions governing artificial intelligence, automated administrative decision-making, and algorithmic accountability.

The findings demonstrate that the transformation of State Administrative Law should extend beyond regulatory reform toward a more integrated and adaptive legal framework that aligns technological innovation with the principles of the Rule of Law, Good Governance, legality, legal certainty, transparency, accountability, and the protection of citizens' constitutional rights. Accordingly, future legal reform should prioritize regulatory harmonization, institutional coordination, data governance, interoperability, personal data protection, and the development of a clear legal framework for emerging digital technologies. Such reforms are essential to ensure that Indonesia's digital government evolves not only as a technologically advanced system but also as a legally robust, accountable, and citizen-centered model of public governance.

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