

Legal Accountability for the Use of Artificial Intelligence in Government Administrative Decision-Making in Indonesia

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Abstract:

This study examines the legal accountability of Artificial Intelligence (AI) use in administrative decision-making in Indonesia. The main objective is to clarify the juridical position of AI within government administration and to determine whether AI may function as an autonomous decision-maker or only as an auxiliary instrument supporting public officials. This research employs a qualitative legal method with a normative-juridical approach and a single-case study of Indonesia. Data were collected through documentary study of primary legal materials, including laws and regulations on government administration, public services, electronic-based government, electronic systems, and personal data protection, supported by relevant scholarly literature on AI accountability and public administration. The findings show that Indonesian law does not recognize AI as a holder of public authority. Administrative authority remains attached to government bodies and authorized public officials. AI may assist processes such as data verification, risk assessment, classification, and recommendation, but final decisions affecting citizens' rights, obligations, legal status, or access to public services must remain under human legal responsibility. The study also finds that Indonesia's regulatory framework remains fragmented and lacks specific rules on human oversight, explainability, auditability, and contestability in AI-assisted decisions. This article contributes by proposing the concept of AI-assisted administrative accountability, which places AI under legality, human authority, procedural fairness, data protection, and public accountability.

Keywords: administrative accountability; administrative decision-making; artificial intelligence; digital governance; public administration.

1. Introduction

Artificial Intelligence (AI) has increasingly become a strategic component of digital government transformation, particularly in the modernization of administrative processes, public service delivery, regulatory supervision, and data-driven policy implementation. In public administration, AI is no longer understood merely as a technical instrument for accelerating bureaucratic work, but as a socio-technical system capable of influencing how public authorities collect information, classify risks, recommend actions, and support administrative decision-making. Recent studies show that AI adoption in government is driven by expectations of efficiency, accuracy, predictive capacity, service personalization, and improved institutional responsiveness (Zuiderwijk, Chen, & Salem, 2021; Wirtz, Langer, & Fenner, 2021; Medaglia, Gil-Garcia, & Pardo, 2023; Madan & Ashok, 2023; Mergel et al., 2023). However, the use of AI in government also raises a fundamental legal question: whether algorithmic systems may legitimately participate in administrative decisions that affect citizens' rights, obligations, access to services, or legal status. This question is especially important because administrative decisions are not ordinary managerial outputs; they are legal acts grounded in public authority, legality, procedural fairness, and accountability.

The main problem emerges when AI-supported decision-making changes the structure of administrative responsibility. Algorithmic systems can process large datasets, detect patterns, and generate recommendations more quickly than human officials, but they may also reproduce bias, obscure the reasons behind administrative outcomes, and weaken citizens' ability to challenge decisions. In this context, AI creates a tension between administrative efficiency and administrative legality. Public officials may be tempted to rely on AI outputs as if they were neutral and objective, although AI systems remain dependent on data quality, model design, institutional objectives, and human interpretation (Busuioc, 2021;

Grimmelikhuijsen, 2023; Aoki et al., 2024). Legal scholarship has therefore warned that algorithmic decision-making may challenge traditional administrative law doctrines, particularly reason-giving, discretion, due process, judicial review, and personal responsibility of public officials (Williams, 2022; Bignami, 2022; Langer, 2024). If the legal system fails to clarify who is accountable for AI-supported administrative decisions, public administration may enter a “black box” condition in which citizens experience legal consequences without being able to identify the responsible authority, the legal basis, or the reasoning process behind the decision.

In Indonesia, this issue is particularly relevant because digital government has been formally institutionalized through the Electronic-Based Government System framework, while administrative governance remains rooted in the principles of lawful authority, good governance, protection of citizens’ rights, and accountability of government officials. Presidential Regulation No. 95 of 2018 concerning the Electronic-Based Government System provides the general foundation for the integration of information and communication technology in government administration, while Law No. 30 of 2014 concerning Government Administration establishes the legal basis for administrative action, governmental authority, discretion, and principles of good governance. At the same time, Law No. 27 of 2022 concerning Personal Data Protection strengthens the legal relevance of data processing, data security, and the rights of data subjects in digital governance. Nevertheless, Indonesia has not yet established a specific legal framework that determines the juridical position of AI in administrative decision-making, the limits of automated recommendations, the minimum standard of human oversight, or the accountability mechanism when AI contributes to unlawful or harmful administrative outcomes. This regulatory gap creates uncertainty for public officials, citizens, courts, and supervisory institutions.

The existing literature has made important contributions to understanding AI in the public sector. Zuidervijk, Chen, and Salem (2021) developed a systematic research agenda on AI in public governance and emphasized the need for empirical, multidisciplinary, and public-sector-specific inquiry. Wirtz, Langer, and Fenner (2021) mapped AI research priorities in the public sector, while Madan and Ashok (2023) identified key tensions in AI adoption and diffusion, including fairness, transparency, privacy, and human rights. Mergel et al. (2023) examined the implementation challenges faced by public managers, and Maragno et al. (2023) analyzed the organizational affordances and constraints shaping AI implementation in public-sector organizations. Van Noordt and Tangi (2023) further argued that AI capability is central to public value creation, whereas Schiff, Schiff, and Pierson (2022) warned that government adoption of AI may produce public value failure when efficiency is pursued without adequate attention to equity, accountability, and legitimacy. Other studies have examined citizens’ acceptance of AI in public services (Gesik & Leyer, 2022), trust and transparency in automated decisions (Grimmelikhuijsen, 2023), explainability in government AI (Aoki et al., 2024), and broader opportunities and risks of AI-supported government decision-making (Alshahrani et al., 2024; Valle-Cruz, García-Contreras, & Gil-Garcia, 2024).

A second body of literature focuses more specifically on accountability, legality, oversight, and administrative law. Busuioc (2021) argues that accountable AI requires identifiable responsibility, transparency, and institutional mechanisms capable of holding algorithmic systems and their users to account. Bignami (2022) examines AI accountability in public administration from a comparative administrative law perspective, while Williams (2022) shows that algorithmic decision-making requires administrative law to rethink procedural fairness, legality, and reviewability. Hirvonen (2024) proposes just accountability structures for automated decision-making in the public sector, and Laux (2024) develops the concept of institutionalized distrust and human oversight as a democratic response to AI governance. Kouroutakis (2024) links AI governance to the rule of law, while Mišić, van Est, and Kool (2025) formulate a value framework for good governance of public-sector AI. More recent studies by Rizk and Lindgren (2025), Agbabiaka, Ojo, and Connolly (2025), Hillo, Vento, and Erkkilä (2025), and Elliott and MacCarthaigh (2025) strengthen this debate by emphasizing decision space, trustworthiness requirements, legitimacy perceptions, and accountability blind spots in public-sector AI. These studies are highly relevant, but most of them are developed from European, North American, or general public-administration contexts,

and they do not specifically reconstruct the legal accountability of AI-supported administrative decisions within Indonesia's administrative law system.

Based on this gap, the present study positions itself at the intersection of administrative law, digital governance, and AI accountability. Unlike previous studies that primarily discuss AI adoption, ethical governance, technical explainability, or general public-sector implementation, this study focuses on the juridical status of AI in administrative decision-making in Indonesia. The central argument advanced in this article is that AI may be legally justified only as an auxiliary instrument that supports administrative analysis, risk assessment, document verification, or policy recommendation, but it must not replace the legal authority, discretion, and responsibility of public officials. Therefore, the purpose of this study is to analyze the legal accountability of AI use in administrative decision-making in Indonesia and to formulate a normative framework that preserves human authority, reason-giving, procedural fairness, data protection, auditability, contestability, and administrative remedies. By doing so, this article contributes to the development of Indonesian administrative law in the age of AI and offers a concept of accountable AI-assisted administration that places technology under law, rather than allowing law to be subordinated to technology.

2. Methodology

This study employs a qualitative legal research method with a normative-juridical orientation and a case-study approach. A qualitative method is appropriate because the object of this study is not the measurement of numerical variables, but the interpretation of legal norms, principles, institutional responsibilities, and accountability mechanisms in the use of Artificial Intelligence (AI) for administrative decision-making. Qualitative research is particularly suitable for examining complex legal and institutional phenomena because it enables the researcher to understand meanings, contexts, normative tensions, and the relationship between legal texts and governance practices (Lim, 2025; Blackham, 2022). In this study, AI-assisted administrative decision-making is treated as a legal and institutional problem that must be examined through the principles of legality, authority, discretion, transparency, due process, human oversight, and public accountability.

The research design is constructed as a single-case study, with Indonesia selected as the main case. The case-study approach is used because the issue of AI in administrative decision-making cannot be separated from the specific legal, bureaucratic, and digital-governance context in which it operates. Case-study research allows the researcher to examine a contemporary phenomenon within its real-life legal and institutional setting, particularly when the boundaries between technology, law, and administrative authority are still evolving (Miller, Porter, & Barbagallo, 2023). In this article, the Indonesian case is limited to the national legal framework governing administrative decision-making, electronic-based government, personal data protection, electronic systems, public services, and public accountability. This case boundary is important to ensure that the analysis remains focused on the juridical position of AI as an auxiliary instrument in government administration, rather than expanding into broader technical questions concerning AI engineering or private-sector automation.

The data used in this study consist of primary legal materials, secondary legal materials, and supporting policy documents. The primary legal materials include the 1945 Constitution of the Republic of Indonesia, Law No. 30 of 2014 concerning Government Administration, Law No. 25 of 2009 concerning Public Services, Law No. 14 of 2008 concerning Public Information Disclosure, Law No. 27 of 2022 concerning Personal Data Protection, Government Regulation No. 71 of 2019 concerning the Implementation of Electronic Systems and Transactions, Presidential Regulation No. 95 of 2018 concerning the Electronic-Based Government System, and other relevant regulations related to digital governance and public administration. Law No. 30 of 2014 is relevant because it provides the legal foundation for government administration, including authority, discretion, administrative decisions, and good governance, while Law No. 27 of 2022 regulates personal data processing, data-subject rights, controller obligations, and

administrative sanctions. Presidential Regulation No. 95 of 2018 establishes the legal framework for Indonesia's Electronic-Based Government System, and Government Regulation No. 71 of 2019 regulates electronic systems and transactions. These instruments form the core legal basis for assessing whether AI may be used in administrative decision-making and how accountability should be structured.

Secondary legal materials were collected from peer-reviewed journal articles published mainly within the last five years, especially studies concerning AI in public administration, algorithmic accountability, automated decision-making, administrative law, explainable AI, data protection, and digital governance. The literature was selected based on relevance, academic credibility, publication recency, and the availability of DOI. Supporting policy documents were also used, including official government documents, regulatory databases, institutional reports, and digital-government policy materials. The collection of data was conducted through documentary study and library research, which are common techniques in qualitative legal research because they enable systematic examination of legal texts, scholarly debates, and institutional policy frameworks (Morgan, 2022; Mitchell, 2022). Document analysis is relevant in this study because the central data are legal and policy documents that must be interpreted in relation to one another.

The data were analyzed through qualitative content analysis and legal interpretation. First, the collected materials were classified into several analytical themes: legal authority, administrative discretion, human oversight, transparency, explainability, data protection, accountability, remedies, and judicial or administrative review. Second, each theme was analyzed using statutory, conceptual, and systematic interpretation. Statutory interpretation was used to examine the meaning of relevant legal provisions, while conceptual interpretation was used to clarify the relationship between AI, administrative authority, public responsibility, and good governance. Systematic interpretation was applied to understand how different legal instruments interact within the broader Indonesian administrative law system. This analytical strategy follows the logic of qualitative legal analysis, which requires the researcher to interpret legal texts not as isolated provisions, but as part of a wider normative structure (Mitchell, 2022; Nyathi, 2023).

To strengthen the validity of the analysis, this study applies source triangulation by comparing primary regulations, academic literature, and official policy documents. The credibility of the study is maintained by using authoritative legal sources, peer-reviewed journals, and DOI-indexed references. The analysis also adopts reflexive caution, meaning that the researcher does not assume AI to be either inherently beneficial or inherently harmful. Instead, AI is examined as a legal object whose legitimacy depends on whether its use remains consistent with the principles of legality, accountability, transparency, human supervision, and protection of citizens' rights. Therefore, this research does not seek to evaluate the technical accuracy of AI systems, but to formulate a normative accountability framework for ensuring that AI remains a supporting instrument and does not replace the legal authority of public officials.

3. Results and Discussions

1) The Legal Position of AI in Indonesian Administrative Decision-Making

The documentary analysis shows that Indonesian positive law has not yet expressly recognized Artificial Intelligence as an independent legal subject or as an autonomous holder of governmental authority. Under Indonesian administrative law, public authority remains attached to a government body or public official, not to a technological system. Law No. 30 of 2014 concerning Government Administration establishes that the administration of government must be carried out based on statutory authority, government policy, and the General Principles of Good Governance. It also requires government officials to make decisions and actions within the scope of their legal competence. Therefore, even if AI is used to classify applications, verify documents, assess risks, or generate recommendations, the legal decision remains attributable to the competent administrative official.

This finding indicates that AI can only be positioned as an **auxiliary administrative instrument**. It may support the factual, analytical, or technical stages of decision-making, but it cannot replace the legal authority of public officials. This interpretation is consistent with the basic doctrine of administrative law,

namely that an administrative decision is valid only when issued by a competent authority, based on proper legal grounds, and through a lawful procedure. In this sense, AI may strengthen administrative efficiency, but it does not possess competence, discretion, public responsibility, or legal accountability. The authority to decide must remain with the human public official because administrative decisions affect citizens' rights, obligations, legal status, access to services, and entitlement to public benefits.

This result supports Williams' argument that algorithmic decision-making requires administrative law to rethink, but not abandon, legality, discretion, reason-giving, and reviewability (Williams, 2022). It also aligns with Bignami's comparative analysis, which emphasizes that AI in public administration must be governed through rules that ensure transparency, auditability, and institutional responsibility (Bignami, 2022). However, the Indonesian case gives a more specific normative contribution: AI should not be conceptualized as a decision-maker, but as a supporting tool whose outputs must be legally filtered, assessed, and adopted by an authorized official. This position is also compatible with Busuioc's view that accountable AI requires identifiable responsibility and institutional mechanisms capable of holding human actors and organizations to account (Busuioc, 2021).

2) Regulatory Fragmentation in Indonesia's Digital Government Framework

The analysis also finds that Indonesia already has several legal instruments relevant to digital administration, but these instruments remain fragmented when applied to AI-assisted administrative decision-making. Presidential Regulation No. 95 of 2018 provides the legal basis for the Electronic-Based Government System, or SPBE, and encourages the integration of information and communication technology in government administration. However, SPBE regulation focuses more on digital governance architecture, interoperability, service integration, and electronic government management than on the specific legal status of AI in administrative decisions.

Government Regulation No. 71 of 2019 concerning the Implementation of Electronic Systems and Transactions is also relevant because it regulates electronic systems, electronic transactions, electronic signatures, electronic certification, and electronic agents. Nevertheless, this regulation does not directly answer whether an AI-generated output may become the legal basis of an administrative decision, how algorithmic errors should be reviewed, or who must be responsible when automated recommendations produce unlawful consequences.

Law No. 27 of 2022 concerning Personal Data Protection provides another important layer. It regulates principles of personal data protection, types of personal data, data-subject rights, data processing, obligations of data controllers and processors, data transfer, administrative sanctions, dispute settlement, and criminal provisions. This law is highly relevant because AI systems used in public administration often depend on large-scale personal data processing. However, the Personal Data Protection Law does not specifically regulate administrative discretion, explainability of AI-assisted decisions, or the obligation of public officials to provide reasons when AI contributes to an adverse decision.

The implication is that Indonesia has a foundation for digital government and data protection, but not yet a coherent framework for **AI-based administrative accountability**. This finding is consistent with Zuidervijk, Chen, and Salem's systematic review, which shows that AI in public governance creates both opportunities and risks and requires multidisciplinary governance arrangements (Zuidervijk, Chen, & Salem, 2021). It also resonates with Madan and Ashok's finding that AI adoption in public administration contains unresolved tensions between innovation, fairness, transparency, privacy, and institutional capacity (Madan & Ashok, 2023).

3) Accountability Risks: Opacity, Automation Bias, and the Weakening of Due Process

The study identifies three major accountability risks in AI-assisted administrative decision-making. The first risk is **opacity**. AI systems, especially those based on machine learning, may generate outputs without providing reasons that are understandable to public officials, affected citizens, or reviewing bodies. In administrative law, this creates a problem because citizens must be able to understand why a decision was made, what legal basis was used, what facts were considered, and how they may challenge the decision. If AI outputs are accepted without sufficient explanation, administrative decisions may become technically efficient but legally opaque.

The second risk is **automation bias**. Public officials may treat AI-generated recommendations as objective, neutral, or superior to human judgment, even when such outputs are based on incomplete data, biased datasets, inaccurate variables, or flawed assumptions. This risk is particularly serious in public administration because decisions are often made in areas involving social assistance, licensing, taxation, public employment, population administration, immigration, education, health, policing, and welfare distribution. When officials merely approve algorithmic outputs without independent assessment, human oversight becomes symbolic rather than substantive.

The third risk is the **weakening of procedural due process**. Indonesian administrative law recognizes the importance of lawful procedure, good governance, administrative remedies, and protection against abuse of authority. If AI is used without transparent standards, citizens may not know whether their case was assessed by a human official, an automated system, or a combination of both. They may also face difficulty in requesting correction, explanation, reconsideration, or administrative appeal. This finding corresponds with Aoki et al. (2024), who show that explanations can affect perceived fairness, accuracy, and trustworthiness of algorithmic administrative decisions, although the effectiveness of explanation depends on its type and context. It also supports Agbabiaka, Ojo, and Connolly's conclusion that trustworthy AI-enabled automated decision-making in the public sector requires multiple trustworthiness requirements, including transparency, accountability, fairness, human oversight, privacy, and contestability.

4) Human Oversight as a Legal Requirement, Not Merely an Ethical Principle

A central finding of this study is that human oversight should not be treated merely as an ethical recommendation. In the Indonesian administrative law context, human oversight is a **legal requirement** derived from the doctrine of authority, responsibility, and accountability of public officials. Because the legal power to issue administrative decisions belongs to a government body or official, the official must remain capable of understanding, questioning, modifying, rejecting, or overriding AI-generated outputs.

This means that human oversight must be meaningful. A public official should not simply sign or approve a decision generated by an AI system. Instead, the official must examine whether the output is legally relevant, factually accurate, procedurally fair, proportionate, and consistent with the General Principles of Good Governance. In this sense, human oversight must include at least four elements: first, the ability to understand the function and limitation of the AI system; second, the ability to review the data and reasoning used by the system; third, the authority to depart from the AI recommendation; and fourth, the obligation to provide reasons for the final administrative decision.

This finding is strongly connected to recent studies on automated decision-making. Rizk and Lindgren (2025) argue that automated decision-making changes the decision space between public officials and citizens and requires careful attention to human-machine interaction in public administration. Hillo, Vento, and Erkkilä (2025) also show that transparency and human discretion enhance legitimacy perceptions in automated decision-making. These studies support the argument that public legitimacy cannot be maintained if AI systems narrow the role of public officials into passive validators of machine outputs.

5) Data Protection and Administrative Accountability Must Be Integrated

The analysis further finds that AI accountability in administrative decision-making cannot be separated from personal data protection. AI systems in government often depend on personal data collected from citizens through population databases, public service platforms, licensing systems, social assistance databases, tax records, education systems, health records, and other administrative datasets. Therefore, the legality of AI-assisted administrative decisions must be assessed not only from the perspective of administrative authority, but also from the perspective of lawful data processing.

Law No. 27 of 2022 provides an important basis because it regulates data-subject rights, obligations of data controllers and processors, personal data processing, administrative sanctions, dispute settlement, and criminal provisions. However, from the perspective of administrative decision-making, data protection must be connected to due process. Citizens should not only have the right to data protection in a general sense, but also the right to know whether their personal data has been processed by AI for administrative decision-making purposes, what categories of data were used, whether the data were accurate, and how they may request correction or challenge an adverse decision.

This finding strengthens the argument that AI accountability requires an integrated framework. Data protection law prevents unlawful or excessive data processing, while administrative law ensures that the final decision is made by a competent authority through a lawful, fair, and reviewable procedure. Without this integration, AI governance may become fragmented: data may be protected formally, but administrative decisions may remain opaque; conversely, decisions may be procedurally valid, but the underlying data processing may be unlawful or discriminatory. This concern is consistent with Schiff, Schiff, and Pierson's finding that failures of fairness and transparency in government AI may reduce public support for government action (Schiff, Schiff, & Pierson, 2022).

6) The Need for Explainability, Auditability, and Contestability

Another important result is that AI-assisted administrative decisions require three minimum safeguards: **explainability, auditability, and contestability**. Explainability means that affected citizens must be able to understand the main reasons for the decision, including the role of AI in the process. This does not require disclosure of every technical detail of the algorithm, but it does require a meaningful explanation of the relevant data, criteria, legal basis, and reasoning that influenced the outcome.

Auditability means that the AI system must be capable of being examined by competent supervisory institutions. Public bodies should maintain documentation concerning the purpose of the AI system, data sources, model design, risk assessment, validation process, human oversight mechanism, error-handling procedure, and decision logs. Without auditability, accountability becomes difficult because neither internal supervisors, external auditors, ombuds institutions, courts, nor affected citizens can reconstruct how the decision was produced.

Contestability means that citizens must have access to administrative remedies when they are harmed by AI-assisted decisions. They should be able to request clarification, correction, reconsideration, human review, and, where necessary, judicial review. This requirement is closely related to Law No. 25 of 2009 concerning Public Services, which recognizes the importance of rights, obligations, complaint mechanisms, public participation, and sanctions in public service delivery.

The finding is consistent with Busuic's theory of accountable AI, which emphasizes that algorithmic accountability requires transparency, explainability, and institutional responsibility. It is also supported by Mergel et al. (2023), who argue that public-sector AI implementation involves organizational challenges that cannot be solved by technology alone, and by Van Noordt and Tangi (2023), who show that AI capability in public administration includes not only technical capacity but also human-related and organizational dimensions.

7) Proposed Normative Framework: AI as an Auxiliary Instrument under Human Legal Authority

Based on the above findings, this study proposes a normative framework called **AI-assisted administrative accountability**. This framework is based on the premise that AI may be used in administrative decision-making only when it remains subordinate to law, institutional authority, and human responsibility. The framework consists of seven principles.

First, **legality**: the use of AI must have a clear legal basis, institutional mandate, and defined administrative purpose. Second, **human authority**: the final decision must be made or legally adopted by a competent public official. Third, **limited automation**: AI may support analysis, verification, classification, risk assessment, and recommendation, but it must not independently determine citizens' legal status or rights. Fourth, **reason-giving**: every AI-assisted administrative decision must be accompanied by reasons that are understandable to affected citizens. Fifth, **data protection**: personal data used by AI systems must be processed lawfully, fairly, transparently, and proportionately. Sixth, **auditability**: public institutions must maintain documentation and decision logs for supervisory and review purposes. Seventh, **contestability**: citizens must have access to human review, administrative remedies, and judicial review.

This framework differentiates the present study from previous studies. While earlier research has emphasized AI adoption, implementation, public value, transparency, trust, explainability, and legitimacy, this study places the issue specifically within Indonesian administrative law. The central contribution is the formulation of a legal position that AI is not a substitute for administrative authority. It is only an auxiliary instrument. Therefore, when an AI-supported decision causes legal harm, responsibility cannot be transferred to the algorithm, vendor, database, or technical system alone. The accountable actor remains the

public body or official that uses, adopts, or relies upon the AI system in the exercise of governmental authority.

8) Synthesis of Findings

Overall, the study finds that Indonesia's current legal framework provides several normative foundations for digital administration, but it has not yet established a specific framework for AI-assisted administrative decision-making. Law No. 30 of 2014 provides the doctrine of authority, legality, discretion, and good governance. Presidential Regulation No. 95 of 2018 provides the foundation for electronic-based government. Government Regulation No. 71 of 2019 regulates electronic systems and transactions. Law No. 27 of 2022 provides the foundation for personal data protection. Law No. 25 of 2009 provides principles of public service and complaint mechanisms. However, these instruments still need to be integrated into a specific doctrine of AI accountability in administrative decisions.

The core result of this research is that AI cannot be treated as an autonomous administrative decision-maker in Indonesia. Its legitimate position is as an auxiliary instrument under human legal authority. Any model that allows AI to independently determine administrative outcomes without meaningful human oversight would risk violating legality, due process, good governance, and public accountability. Therefore, the use of AI in Indonesian public administration must be designed not only as a technological innovation, but also as a legally accountable governance mechanism.

4. Conclusion

This study concludes that the use of Artificial Intelligence in administrative decision-making in Indonesia cannot be legally understood as a transfer of governmental authority from public officials to technological systems. Within the framework of Indonesian administrative law, legal authority remains attached to government bodies and public officials who are constitutionally and statutorily responsible for issuing administrative decisions. AI may assist administrative processes through data classification, risk assessment, document verification, predictive analysis, or decision recommendation, but it cannot independently determine citizens' rights, obligations, legal status, or access to public services. Therefore, the juridical position of AI in Indonesian public administration is that of an auxiliary administrative instrument, not a substitute for public authority.

The main finding of this study is that Indonesia already has several relevant legal foundations for digital government and administrative accountability, particularly Law No. 30 of 2014 on Government Administration, Law No. 25 of 2009 on Public Services, Law No. 27 of 2022 on Personal Data Protection, Government Regulation No. 71 of 2019 on Electronic Systems and Transactions, and Presidential Regulation No. 95 of 2018 on the Electronic-Based Government System. However, these legal instruments remain fragmented when applied to AI-assisted administrative decision-making. They provide general principles of legality, public service accountability, electronic governance, and data protection, but they do not yet specifically regulate the legal status of AI, the limits of automated recommendations, the standard of human oversight, the duty to explain AI-assisted decisions, or the mechanism of administrative remedies when AI contributes to unlawful outcomes.

The novelty of this study lies in its formulation of the concept of AI-assisted administrative accountability. This concept emphasizes that AI must remain subordinate to legality, public authority, human judgment, procedural fairness, data protection, auditability, and contestability. Unlike previous studies that mainly discuss AI adoption, public-sector innovation, public value, trust, or ethical governance, this article places AI directly within the doctrinal structure of Indonesian administrative law. The contribution of this study is therefore normative: it argues that accountability for AI-assisted administrative decisions must remain with the public institution and the authorized official who uses, adopts, or relies on the AI output. Responsibility cannot be shifted entirely to the algorithm, vendor, programmer, database, or technical system.

This finding strengthens and extends previous studies on AI accountability in public administration. Busuioc (2021), Bignami (2022), Williams (2022), and Rizk and Lindgren (2025) have shown that

automated decision-making challenges transparency, administrative responsibility, and reviewability. This study confirms those concerns, but adds that in the Indonesian context, the principle of official authority under administrative law provides a strong legal basis for rejecting fully autonomous AI-based administrative decisions. The study also supports the arguments of Zuiderwijk, Chen, and Salem (2021), Madan and Ashok (2023), Mergel et al. (2023), and Van Noordt and Tangi (2023) that AI implementation in government should not be reduced to technological capacity alone, but must be supported by institutional readiness, legal safeguards, and public accountability mechanisms.

The implication of this study is that the Indonesian government needs to develop a more specific regulatory and institutional framework for AI in public administration. Such a framework should regulate at least seven essential elements: clear legal basis for AI use, limitation of automated decision-making, meaningful human oversight, obligation to provide reasons, protection of personal data, algorithmic auditability, and accessible mechanisms for objection, correction, administrative appeal, and judicial review. Without these safeguards, AI may improve bureaucratic efficiency but weaken legality, procedural justice, and citizens' trust in government decisions.

This study also has limitations. It is based on qualitative legal research and documentary analysis, so it does not empirically examine how AI is currently used by specific Indonesian government institutions. The study also does not evaluate the technical accuracy, bias level, or operational performance of particular AI systems. Its focus is limited to the normative and juridical construction of AI accountability in administrative decision-making. Therefore, future research should conduct empirical case studies on the actual use of AI or automated systems in Indonesian government agencies, particularly in sectors such as public services, licensing, social assistance, taxation, immigration, population administration, health, and law enforcement. Future studies may also compare Indonesia's approach with regulatory models in the European Union, the United States, Australia, Singapore, or other jurisdictions that have developed more advanced frameworks for algorithmic accountability.

Further research is also needed to examine citizens' perspectives on AI-assisted administrative decisions, especially regarding trust, fairness, transparency, and access to remedies. In addition, interdisciplinary studies involving law, public administration, computer science, ethics, and data governance would be valuable for designing practical standards for explainable, auditable, and contestable AI systems in government. By addressing these areas, future scholarship can move beyond the general debate on AI governance and contribute to the development of a more accountable, rights-based, and legally grounded model of digital administration in Indonesia.

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Legal Materials

- Government Regulation No. 71 of 2019 concerning the Implementation of Electronic Systems and Transactions.
- Law No. 25 of 2009 concerning Public Services.
- Law No. 27 of 2022 concerning Personal Data Protection.
- Law No. 30 of 2014 concerning Government Administration.
- Presidential Regulation No. 95 of 2018 concerning the Electronic-Based Government System.