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## Legal Analysis Of Administrative Court Decision No. 16/G/2024/PTUN.JKT In A Civil Service Dispute

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### Abstract

*This study examines Administrative Court Decision Number 16/G/2024/PTUN.JKT concerning a civil service dispute through a normative juridical approach that combines statutory, case based, and conceptual analyses. The research evaluates the legal validity of the contested administrative decision by examining the applicable regulatory framework, the judicial reasoning adopted by the court, and the relevance of the General Principles of Good Governance in administrative adjudication. The findings indicate that the court applied a comprehensive assessment of administrative legality by scrutinizing the conformity of governmental action with statutory requirements, procedural obligations, and governance standards recognized in Indonesian administrative law. The decision affirms the importance of legal certainty, accountability, transparency, and fairness as essential benchmarks for evaluating administrative conduct. The analysis further demonstrates that judicial review serves as an effective mechanism for protecting civil servants from arbitrary personnel actions while reinforcing merit based governance within public administration. The judgment contributes to the development of Indonesian administrative law by strengthening legal protection, promoting responsible administrative decision making, and enhancing institutional commitment to professional and rule based civil service governance.*

**Keywords :** Administrative Law, Civil Service Dispute, Judicial Review, Good Governance, Merit System.



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## INTRODUCTION

The contemporary development of administrative law demonstrates a significant global shift from a traditional authority centered model of governance toward a legality centered paradigm that places judicial oversight at the core of public administration accountability. In many democratic jurisdictions, administrative courts increasingly function not merely as institutions for reviewing procedural compliance but as constitutional mechanisms for safeguarding individual rights against arbitrary governmental action. This transformation reflects a broader recognition that public power must always be exercised within legally prescribed boundaries and subject to effective judicial scrutiny in order to preserve the rule of law and maintain public trust in government institutions (Craig, 2021). The expansion of judicial review over administrative decisions has become particularly relevant in disputes involving civil servants because employment related decisions issued by public authorities directly affect legal status, professional careers, and access to public office. Theoretical developments in administrative legality further emphasize that governmental discretion cannot be detached from substantive standards of fairness, rationality, and accountability, even under circumstances where public officials possess broad managerial authority (Dyzenhaus, 2017). Within the Indonesian context, this global trajectory has been institutionalized through the Administrative Court system established under Law Number 5 of 1986 and subsequently strengthened through amendments introduced by Law Number 9 of 2004 and Law Number 51 of 2009, which collectively position the Administrative Court as an essential instrument for reviewing the legality of state administrative decisions and protecting citizens from unlawful governmental conduct (Republik Indonesia, 1986; Republik Indonesia, 2004; Republik Indonesia, 2009).

Previous studies have consistently demonstrated that civil service disputes constitute one of the most complex domains within administrative adjudication because they involve a direct confrontation

between governmental authority and individual legal protection. Research examining the Indonesian administrative justice system reveals that disputes concerning appointment, transfer, demotion, and dismissal of civil servants frequently emerge from tensions between managerial discretion and legal safeguards designed to prevent abuse of power (Enny Agustina & SH, 2022). At the same time, empirical and doctrinal studies indicate that the quality of administrative decision making is strongly influenced by adherence to principles of good governance, particularly legal certainty, transparency, accountability, and procedural fairness, all of which significantly affect the legitimacy of public management outcomes (Sari, 2023). Analyses of Indonesian legal development further suggest that the interaction between civil law traditions, administrative governance principles, and judicial review mechanisms has produced a distinctive legal environment in which administrative decisions are increasingly evaluated not only on the basis of formal legality but also according to broader standards of substantive justice (Wardhani et al., 2022). Studies addressing the legal status and protection of civil servants similarly emphasize that effective dispute resolution mechanisms are indispensable for ensuring that public officials retain meaningful access to remedies when administrative actions adversely affect their professional rights and legal standing (Rosada & Sulastri, 2026). Collectively, these findings suggest that contemporary administrative adjudication has evolved beyond a narrow examination of statutory compliance toward a more comprehensive assessment of governmental accountability and protection of individual rights.

Despite these important contributions, the existing literature remains fragmented in several critical respects. Most studies focus predominantly on abstract normative discussions concerning civil service protection or administrative legality without undertaking a detailed examination of judicial reasoning within specific Administrative Court decisions. Research analyzing dismissal related disputes often concentrates on regulatory interpretation while paying insufficient attention to how judges evaluate procedural defects, evidentiary standards, and substantive administrative justification in concrete cases. For example, studies examining dismissal decisions within Indonesian Administrative Courts provide valuable insights regarding legal violations committed by administrative authorities, yet they rarely explore how judicial bodies balance competing considerations between organizational efficiency and protection of civil servants' rights in reaching their conclusions (Sari et al., 2023). Likewise, recent analyses concerning the legality of civil servant dismissal decisions primarily focus on statutory requirements and employment consequences, leaving unresolved questions regarding the practical application of administrative law principles and judicial control mechanisms within contemporary bureaucratic governance (Yuwono & Lie, 2026). As a result, significant conceptual and empirical gaps remain concerning the manner in which Administrative Courts interpret procedural fairness, legal certainty, and administrative accountability when reviewing contested personnel decisions.

These limitations generate both scientific and practical concerns that warrant further scholarly investigation. From a scientific perspective, the absence of detailed case based analyses restricts the development of a more nuanced understanding of how administrative legality is operationalized through judicial review in real disputes involving civil servants. Theoretical debates concerning discretion, legality, and administrative justice cannot be adequately resolved without examining how courts apply these concepts within specific factual contexts. From a practical perspective, unresolved uncertainties regarding the limits of administrative authority create substantial risks for bureaucratic governance because personnel decisions that lack adequate procedural safeguards may undermine merit based administration, reduce institutional legitimacy, and expose civil servants to arbitrary treatment. The increasing frequency of disputes arising from personnel management decisions demonstrates that legal protections established within statutory frameworks remain vulnerable to inconsistent implementation. Under these circumstances, a rigorous examination of judicial responses to allegedly unlawful personnel decisions becomes essential for assessing whether existing accountability mechanisms are capable of preventing abuses of administrative power while simultaneously preserving effective public administration.

Against this backdrop, Administrative Court Decision Number 16/G/2024/PTUN.JKT occupies a particularly significant position within the contemporary discourse on administrative justice and civil service governance. The dispute emerged from the dismissal of an administrator position within the Ministry of Agrarian Affairs and Spatial Planning or National Land Agency, where the claimant alleged that the contested administrative decision violated procedural requirements and adversely affected his

legal status as a civil servant. The decision is especially important because it required the Administrative Court to assess not only the formal validity of the challenged administrative act but also its conformity with fundamental principles of good governance, including legal certainty, prudence, transparency, and fairness. The judicial determination that the disputed decision contained both procedural and substantive defects raises broader questions concerning the extent to which administrative authorities may exercise personnel management powers without infringing upon the legal rights of civil servants. Consequently, the case provides a valuable analytical lens through which the relationship between administrative discretion, judicial control, and legal protection within the Indonesian civil service system can be critically examined.

This study aims to analyze Administrative Court Decision Number 16/G/2024/PTUN.JKT in a civil service dispute concerning the dismissal of an administrator position within the Ministry of Agrarian Affairs and Spatial Planning or National Land Agency. Using a normative juridical method supported by statutory, case based, and conceptual approaches, the research examines the legal reasoning employed by the court in evaluating the validity of the disputed administrative decision and the application of principles of good governance within the adjudicative process. The study seeks to contribute theoretically to the development of administrative law scholarship by clarifying the relationship between judicial review, administrative discretion, and civil servant protection within contemporary governance structures. Methodologically, it contributes through a comprehensive integration of doctrinal analysis, judicial reasoning assessment, and administrative law principles in order to generate a more systematic understanding of how Administrative Courts function as instruments of legality, accountability, and protection of rights in civil service disputes.

## **RESEARCH METHODS**

This study adopts a non empirical normative juridical research design that conceptualizes law as a coherent system of norms, principles, and legal doctrines examined through statutory, case based, and conceptual approaches. The primary legal materials consist of Administrative Court Decision Number 16/G/2024/PTUN.JKT, Law Number 5 of 1986 concerning the Administrative Court together with its subsequent amendments under Law Number 9 of 2004 and Law Number 51 of 2009, Law Number 30 of 2014 concerning Government Administration, Law Number 20 of 2023 concerning the State Civil Apparatus, and Government Regulation Number 17 of 2020 concerning Civil Servant Management. Secondary legal materials are derived from scholarly literature, leading administrative law treatises, and academic publications addressing judicial review, administrative legality, civil service governance, and principles of good administration (Cane, 2021; Craig, 2021; Dyzenhaus, 2017; McConville & Chui, 2017). All legal materials were collected through a systematic library based research process to establish a comprehensive understanding of the legality of governmental action in civil service disputes.

The analytical framework is grounded in the principles of legality, protection of civil servant rights, and the General Principles of Good Governance as the principal standards for assessing the validity of administrative decisions. The analysis was conducted through an examination of the ratio decidendi of the court decision, a normative evaluation of the relevant statutory framework, and a doctrinal assessment of the limits of administrative authority and discretionary power exercised by the Personnel Management Authority. Legal materials were interpreted qualitatively through descriptive analytical techniques and deductive legal reasoning, moving from general principles of administrative law toward an assessment of the legal facts and judicial considerations presented in the case. This interpretative approach enables a critical evaluation of the consistency of the decision with the principles of legal certainty, procedural fairness, transparency, accountability, and substantive justice while also elucidating its contribution to strengthening legal protection for civil servants within the Indonesian administrative justice system.

## **RESULTS AND DISCUSSION**

### **Judicial Review of Administrative Legality in Civil Service Personnel Decisions**

The legal dispute examined in Administrative Court Decision Number 16/G/2024/PTUN.JKT demonstrates the continuing importance of judicial review as a mechanism for controlling administrative authority within the civil service system. Indonesian administrative law recognizes that every administrative decision affecting legal rights must satisfy requirements of competence, legality, procedural propriety, and substantive rationality before it can produce binding legal consequences

(Craig, 2021). The contested decision concerned the dismissal of an administrator from a strategic bureaucratic position within the Ministry of Agrarian Affairs and Spatial Planning. Such decisions possess direct implications for legal status, professional reputation, and career continuity within the public administration framework.

The statutory framework governing administrative disputes establishes that administrative courts possess authority to assess whether a state administrative decision complies with legal norms and administrative principles recognized by the legal system (Republik Indonesia, 1986; Republik Indonesia, 2004; Republik Indonesia, 2009). Judicial review in this context extends beyond verification of formal authority because legality also encompasses procedural integrity and consistency with substantive legal standards. Contemporary administrative law scholarship emphasizes that legality functions as a multidimensional doctrine connecting public authority to accountability and justification requirements (Cane, 2021). This perspective is particularly relevant when personnel decisions alter the legal position of civil servants without transparent administrative reasoning.

The court identified that the disputed decision lacked sufficient legal grounding despite being issued by an institution possessing general authority over personnel management. Administrative competence alone does not validate an administrative act when supporting legal requirements remain unfulfilled. Legal doctrine consistently distinguishes between possession of authority and lawful exercise of authority because administrative power must operate within normative limits established by legislation and legal principles (Dyzenhaus, 2017). The judgment illustrates how courts increasingly evaluate the quality of administrative justification rather than merely confirming the existence of institutional jurisdiction.

The reasoning adopted by the judges reflects a broader evolution in administrative adjudication where legality is interpreted through both formal and substantive dimensions. Formal legality concerns compliance with statutory requirements while substantive legality concerns rationality, fairness, and consistency with public law values. Similar tendencies have been observed in studies examining Indonesian administrative disputes involving personnel management decisions and bureaucratic restructuring (Rahman & NK, 2022). The decision under review contributes to this jurisprudential development by reinforcing a more demanding standard of legality assessment.

The evidentiary findings revealed that the contested administrative action was not supported by adequate documentation concerning organizational necessity, competency evaluation, or position analysis. Such deficiencies weakened the legal basis of the decision because personnel management within a merit based bureaucracy requires objective administrative assessment. Research concerning administrative disputes involving civil servant transfers has similarly shown that absence of documented justification frequently becomes a central factor leading to judicial intervention (Ago et al., 2025). The court therefore treated evidentiary insufficiency as an indicator of substantive legal defect rather than a merely technical administrative omission.

**Table 1. Normative Assessment of Administrative Legality in Decision Number 16/G/2024/PTUN.JKT**

<b>Legal Requirement</b>	<b>Normative Standard</b>	<b>Court Assessment</b>
Administrative Authority	Decision issued by competent official	Fulfilled
Legal Basis	Clear statutory foundation required	Not fulfilled
Procedural Compliance	Compliance with administrative procedures	Not fulfilled
Position Analysis	Supported by objective administrative assessment	Not fulfilled
Organizational Justification	Demonstrable institutional necessity	Not fulfilled
Administrative Fairness	Consistency with public law principles	Not fulfilled

Source: Adapted from Administrative Court Decision Number 16/G/2024/PTUN.JKT (Pengadilan Tata Usaha Negara Jakarta, 2024) and Republic of Indonesia legislation.

The findings presented in Table 1 demonstrate that judicial invalidation was not primarily based on absence of authority but on cumulative deficiencies affecting legal validity. Administrative law theory recognizes that a legally competent authority may nevertheless issue an unlawful decision when statutory and procedural conditions remain unmet (Ahdout, 2022). The court adopted this analytical approach by distinguishing institutional competence from lawful administrative conduct. Such reasoning strengthens doctrinal consistency within Indonesian administrative jurisprudence.

The legal significance of this distinction becomes clearer when examined through the concept of bureaucratic autonomy. Administrative institutions require discretion to manage personnel and organizational structures efficiently. At the same time, bureaucratic autonomy cannot be interpreted as immunity from judicial scrutiny because discretionary authority remains subordinate to legal constraints (Bersch & Fukuyama, 2023). The judgment reflects an effort to preserve this balance by acknowledging administrative authority while invalidating its improper exercise.

Comparative studies indicate that courts in several jurisdictions increasingly require public institutions to demonstrate objective and documented reasons when implementing personnel decisions affecting civil servants (Bone & Yassine, 2025). This trend reflects a broader movement toward evidence based administrative governance and enhanced accountability mechanisms. Similar concerns appear within Indonesian scholarship discussing procedural weaknesses in civil service dispute resolution processes (Aufa & Widodo, 2025). The decision examined in this study aligns with these international and domestic developments by emphasizing demonstrable administrative justification.

The judgment also contributes to ongoing debates concerning the relationship between legal certainty and public administration effectiveness. Some administrative actors perceive extensive judicial review as potentially limiting managerial flexibility within government institutions. Contemporary administrative law scholarship argues that effective governance is strengthened rather than weakened when administrative decisions are supported by transparent reasoning and legally defensible procedures (Anwary, 2022; Moynihan, 2022). The court implicitly adopted this perspective by treating procedural rigor as a prerequisite for legitimate administrative action.

From a normative standpoint, Decision Number 16/G/2024/PTUN.JKT reinforces the proposition that legality functions as the foundational principle governing public administration. Administrative decisions affecting civil servants cannot rely exclusively on hierarchical authority or institutional discretion. Legal validity requires demonstrable compliance with statutory norms, rational administrative reasoning, and procedural safeguards protecting individual rights (Enny Agustina & SH, 2022). The case therefore represents an important judicial affirmation that administrative power remains inseparable from accountability within a constitutional system governed by the rule of law.

### **Application of Good Governance Principles and Procedural Fairness in Administrative Decision Making**

The normative examination of Decision Number 16/G/2024/PTUN.JKT demonstrates that the court did not confine its assessment to formal compliance with administrative procedures but extended its reasoning toward the substantive application of the General Principles of Good Governance as a benchmark for evaluating governmental conduct. Contemporary administrative law scholarship increasingly recognizes that legality alone is insufficient to ensure administrative justice when public decisions affect individual rights and professional status. The principles of legal certainty, transparency, prudence, fairness, and equality function as normative safeguards against arbitrary exercises of public power within modern bureaucratic systems (Cane, 2021). This orientation reflects a broader transition from authority centered governance toward value based administration that emphasizes accountability and responsible decision making (Sari, 2023).

The judicial reasoning contained in the decision indicates that legal certainty was treated as an indispensable component of administrative legitimacy rather than a merely procedural requirement. Legal certainty requires administrative actions to be supported by clear reasoning, predictable standards, and transparent justification capable of being scrutinized by affected individuals and reviewing institutions (Craig, 2021). The absence of a clearly articulated rationale behind the disputed personnel decision created uncertainty regarding the legal position of the civil servant and weakened confidence in the integrity of administrative governance. Similar concerns have been identified in comparative

jurisprudence where vague personnel policies frequently generate institutional instability and increase administrative disputes (Leheza et al., 2023).

Prudence emerged as another central principle in the court's assessment because administrative decisions affecting career status require careful factual examination and objective institutional evaluation. The disputed decision lacked evidence of position analysis, workload assessment, and competency evaluation that ordinarily serve as indicators of rational bureaucratic planning. Such deficiencies suggest that the decision was produced without sufficient administrative diligence, a condition that undermines the quality of governmental decision making and weakens public trust in administrative institutions (Sari, 2023). Scholarly discussions on contemporary public administration similarly emphasize that prudent decision making constitutes a prerequisite for sustainable governance and institutional credibility (Bauer, 2024).

The principle of transparency occupies a strategic position within administrative governance because transparency enables affected individuals to understand the reasons, objectives, and consequences of governmental actions. The court identified that the claimant was not adequately informed regarding the basis of the personnel action before the issuance of the contested decision. This condition restricted meaningful participation and prevented the affected civil servant from evaluating whether the decision complied with standards of administrative fairness. Transparency has long been regarded as a core feature of constitutional administration because it reduces informational asymmetry between public authorities and citizens while enhancing institutional accountability (Dyzenhaus, 2017).

The assessment of fairness and equality further demonstrates that administrative discretion must operate within normative boundaries designed to prevent discriminatory or disproportionate treatment. Fairness requires a reasonable balance between organizational interests and individual rights, whereas equality demands that comparable situations be treated according to consistent standards. The absence of documented criteria explaining the personnel action made it difficult to establish whether equal standards had been applied across similarly situated officials. Research on civil service governance repeatedly shows that inconsistent personnel practices create perceptions of favoritism and weaken the legitimacy of merit based administrative systems (Bersch & Fukuyama, 2023).

**Table 2. Assessment of General Principles of Good Governance in Decision Number 16/G/2024/PTUN.JKT**

<b>AUPB Principle</b>	<b>Legal Requirement</b>	<b>Factual Condition</b>	<b>Judicial Assessment</b>
Legal Certainty	Clear legal basis and justification	Absent	Violated
Prudence	Administrative examination and assessment	Absent	Violated
Transparency	Notification and explanation	Absent	Violated
Fairness	Objective and balanced treatment	Not demonstrated	Violated
Participation	Opportunity to respond	Absent	Violated

Source: Adapted from Administrative Court Decision Number 16/G/2024/PTUN.JKT and Law Number 30 of 2014 concerning Government Administration (Pengadilan Tata Usaha Negara Jakarta, 2024; Republik Indonesia, 2014).

The findings summarized in Table 2 reveal a pattern of cumulative procedural deficiencies rather than an isolated administrative irregularity. Each violated principle reinforced the impact of the others, producing a decision making process that lacked transparency, participation, and adequate justification. From a governance perspective, such accumulation of deficiencies increases the probability of arbitrary outcomes because institutional checks that ordinarily constrain administrative discretion become ineffective. The interaction among these principles supports the argument that good governance should be understood as an integrated normative framework rather than a collection of independent standards (Wardhani et al., 2022).

A significant aspect of the decision concerns the recognition of procedural fairness through the protection of the right to be heard before adverse administrative measures are implemented. Procedural fairness requires affected individuals to receive meaningful opportunities to present explanations, objections, or relevant information before a decision is finalized. The absence of notification and consultation deprived the claimant of participation in a process that directly affected professional status and career development. Comparative studies of administrative adjudication demonstrate that participatory procedures contribute to more legitimate and sustainable administrative outcomes because they improve both factual accuracy and institutional acceptance (Bone & Yassine, 2025).

The reasoning adopted by the court also reflects the enduring influence of the principle of *audi alteram partem* within contemporary administrative law. Although originally associated with judicial proceedings, the principle has gradually become an essential component of administrative decision making whenever governmental actions may adversely affect individual rights. The exclusion of the claimant from the decision making process created an imbalance between administrative authority and individual protection that is incompatible with modern standards of procedural justice (Craig, 2021). Similar observations have been made in studies examining civil service disputes where inadequate opportunities for participation frequently become the central basis for judicial intervention (Mayluvinda & Aurellia, 2024).

The relationship between procedural fairness and accountability is particularly evident when administrative authorities exercise discretion in personnel management. Accountability requires decision makers to explain not only the outcome of a decision but also the reasoning process that generated it. Administrative systems characterized by opaque procedures often experience declining institutional legitimacy because affected individuals perceive decisions as products of unilateral authority rather than objective evaluation (Moynihan, 2022). Discussions concerning digital and algorithm assisted decision making likewise emphasize that transparency and explainability remain indispensable elements of accountable governance regardless of technological or organizational developments (Barysè & Sarel, 2023).

The broader significance of the decision lies in its affirmation that good governance principles operate as substantive standards capable of protecting civil servants from procedurally defective administrative actions. The court's interpretation illustrates that accountability, transparency, integrity, and public trust are not abstract administrative aspirations but enforceable normative expectations within the Indonesian legal system. This perspective is consistent with contemporary understandings of constitutional governance that view administrative justice as a mechanism for preserving the legitimacy of public institutions while protecting individual rights (Mahy, 2022). The decision consequently strengthens the practical relevance of the General Principles of Good Governance as an operational framework for evaluating personnel decisions and promoting procedural fairness in public administration (Pengadilan Tata Usaha Negara Jakarta, 2024).

### **Implications of the Decision for Civil Service Protection and Merit Based Bureaucratic Governance**

The normative significance of Decision Number 16/G/2024/PTUN.JKT extends beyond dispute resolution because it reinforces the institutional position of civil servants as legal subjects entitled to protection against arbitrary administrative action. The decision demonstrates that employment relations within the public sector remain governed by legal norms rather than unilateral administrative preferences. This orientation strengthens the protective function of administrative justice in maintaining the balance between governmental authority and individual rights within the civil service framework (Rosada & Sulastri, 2026). The judgment also reflects a broader commitment to safeguarding legal certainty in personnel administration through judicial oversight of administrative conduct (Pengadilan Tata Usaha Negara Jakarta, 2024).

A central implication of the decision concerns the recognition of career security as an integral component of civil servant protection. Public employment is not merely an organizational relationship but also a legal status accompanied by procedural and substantive guarantees established by statutory law. The protection of career rights contributes to institutional stability because civil servants are able to perform their functions without excessive concern regarding arbitrary personnel actions (Yuwono & Lie, 2026). Such protection aligns with contemporary administrative governance models that emphasize professionalism and predictability within public institutions (Rosada & Sulastri, 2026).

The judgment also highlights the importance of effective administrative remedies within the Indonesian civil service system. Administrative justice serves not only to correct unlawful actions but also to restore confidence in the fairness of personnel management mechanisms. Studies on civil service disputes indicate that accessible remedial structures are essential for preventing institutional distrust and organizational conflict (Aniq et al., 2026). The decision therefore reinforces the role of judicial institutions as safeguards of employment rights within the broader framework of administrative accountability (Mayluvinda & Aurellia, 2024).

The implications of the ruling become particularly significant when examined through the perspective of the merit system established under Indonesian civil service law. Law Number 20 of 2023 and Government Regulation Number 17 of 2020 require personnel decisions to be linked to objective criteria, competency requirements, and organizational needs rather than subjective considerations (Republik Indonesia, 2020; Republik Indonesia, 2023). Merit based administration seeks to ensure that appointments, transfers, and other personnel actions support institutional effectiveness and professional development. Judicial intervention in the present case reinforces the normative expectation that personnel management must remain consistent with meritocratic standards (Kusuma et al., 2025).

The decision also contributes to the strengthening of competency based placement as a foundational principle of modern bureaucracy. Personnel decisions that disregard competency considerations risk undermining organizational performance and reducing public confidence in administrative institutions. Research on regional personnel disputes demonstrates that deviations from merit principles frequently generate legal challenges and institutional inefficiency (Ago et al., 2025). The judgment therefore serves as a reminder that public administration must maintain a rational connection between employee qualifications and organizational assignments (Nurfransiska et al., 2025).

**Table 3. Implications of Decision Number 16/G/2024/PTUN.JKT for Civil Service Governance**

<b>Dimension</b>	<b>Before Judicial Intervention</b>	<b>After Judicial Intervention</b>
Legal Protection	Limited certainty	Enhanced protection
Career Rights	Vulnerable to discretionary action	Protected through judicial review
Merit System	Weakly enforced	Strengthened
Administrative Accountability	Procedural gaps	Increased compliance
Bureaucratic Governance	Authority oriented	Rule based governance

Source: Adapted from Administrative Court Decision Number 16/G/2024/PTUN.JKT (Pengadilan Tata Usaha Negara Jakarta, 2024), Law Number 20 of 2023 concerning State Civil Apparatus (Republik Indonesia, 2023), and Government Regulation Number 17 of 2020 concerning Civil Servant Management (Republik Indonesia, 2020).

The findings summarized in Table 3 indicate a transition from authority centered personnel management toward a governance structure characterized by stronger legal control and institutional accountability. The most notable transformation concerns the enhanced protection of career rights through judicial supervision. This development reflects the broader evolution of Indonesian administrative law toward a governance model that prioritizes rights based administration and institutional responsibility (Adiyatma, 2023). The decision therefore possesses relevance beyond the individual dispute because it establishes normative guidance for future personnel practices.

Another important implication relates to bureaucratic accountability. Accountability within public administration requires decision makers to justify personnel actions according to objective standards capable of legal verification. Contemporary governance scholarship identifies accountability as a defining feature of professional bureaucratic systems because it links administrative authority to public responsibility (Kusuma et al., 2025). The reasoning adopted by the court encourages public institutions to strengthen internal controls and documentation mechanisms before implementing personnel decisions (Pengadilan Tata Usaha Negara Jakarta, 2024).

The judgment also contributes to the development of professional civil service governance. Professionalism in public administration depends on institutional arrangements that reward competence, preserve organizational neutrality, and promote career advancement through objective criteria. Comparative studies of administrative dispute resolution reveal that effective judicial oversight

often encourages administrative agencies to adopt more transparent and consistent personnel practices (Bone & Yassine, 2025). The decision therefore supports broader bureaucratic reform efforts aimed at improving governance quality and institutional performance (Nurfransiska et al., 2025).

From a national perspective, the ruling establishes an important reference point for Personnel Management Authorities when exercising administrative discretion. Administrative discretion remains necessary for organizational management, yet its exercise must remain compatible with statutory objectives and meritocratic governance principles. Previous analyses of civil service litigation have shown that excessive discretion frequently becomes a source of personnel disputes and legal uncertainty (Arif & Boediningsih, 2022). The decision contributes to the formation of clearer operational standards that may reduce future conflicts within public employment administration (Ago et al., 2025).

The broader contribution of the judgment lies in its capacity to strengthen the rule of law within Indonesian administrative governance. Effective legal protection, meaningful access to remedies, and stronger institutional accountability collectively support the consolidation of democratic public administration. Scholarship on civil servant dispute resolution emphasizes that judicial protection functions not only as an individual remedy but also as a mechanism for improving governance structures and administrative legitimacy (Aniq et al., 2026). Decision Number 16/G/2024/PTUN.JKT therefore represents an important development in the continuing effort to strengthen civil service governance, access to justice, and the institutional foundations of administrative law in Indonesia (Yuwono & Lie, 2026).

## CONCLUSION

Administrative Court Decision Number 16/G/2024/PTUN.JKT demonstrates the central role of administrative justice in ensuring that personnel decisions affecting civil servants remain consistent with statutory requirements, principles of good governance, and the broader objectives of merit based public administration. The legal reasoning adopted by the court confirms that administrative authority must operate within normative boundaries established by administrative law and civil service regulations while respecting fundamental standards of fairness, accountability, and transparency. The decision also highlights the importance of procedural safeguards in maintaining the legitimacy of governmental action and protecting civil servants from arbitrary administrative measures. Beyond resolving an individual dispute, the judgment contributes to the strengthening of legal protection, career security, and institutional accountability within the Indonesian civil service system. Its broader significance lies in reinforcing meritocratic governance, limiting excessive administrative discretion, and promoting a rule based model of public administration. The decision therefore represents an important jurisprudential development that advances administrative legality, enhances access to justice, and supports the continuing transformation of civil service governance in Indonesia toward greater professionalism, integrity, and democratic accountability.

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