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## **A Legal Analysis of The Bandung Administrative Court Decision No. 180/G/2024/Ptun.Bdg Regarding A Dispute Over The Transfer of Civil Servants from The Perspective of The General Principles of Good Governance**

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### **Abstract**

*This study examines the legality of Bandung Administrative Court Decision Number 180/G/2024/PTUN.BDG concerning a dispute over the transfer of a civil servant position through the perspective of the General Principles of Good Governance. The research employed a non empirical normative juridical approach based on statutory analysis, case analysis, and conceptual analysis. Primary sources consisted of the court decision and relevant Indonesian administrative law regulations governing state administrative justice, government administration, and the state civil apparatus. The findings indicate that the disputed transfer decision was issued by a competent authority but contained significant procedural and substantive defects. The court identified the use of an expired technical recommendation, administrative error, insufficient objective justification, and non compliance with merit based personnel management standards. These deficiencies resulted in violations of legal certainty and due care principles that form essential components of good governance. The analysis further demonstrates that the General Principles of Good Governance function as substantive standards for reviewing administrative discretion beyond formal legality. The decision strengthens judicial oversight, promotes bureaucratic accountability, reinforces merit system implementation, and contributes to the development of governance oriented administrative law in Indonesia.*

**Keywords :** *Administrative Court, Civil Servant Transfer, Good Governance, Judicial Review, Merit System.*



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## **INTRODUCTION**

Contemporary public administration has undergone a profound transformation driven by the convergence of governance reform, digitalization, and demands for institutional accountability, resulting in renewed scholarly attention to the exercise of administrative discretion in public personnel management. Across diverse jurisdictions, the effectiveness of state institutions is increasingly measured not only through organizational performance but also through their capacity to ensure legality, transparency, fairness, and responsiveness in administrative decision making. Recent developments demonstrate that personnel management within the public sector has become a critical arena in which tensions between managerial efficiency and legal accountability are negotiated, particularly as governments adopt more sophisticated administrative technologies and data driven governance mechanisms (Plantinga, 2024). The expansion of digital governance frameworks and interoperable administrative systems has simultaneously increased expectations for procedural consistency and objective decision making in public employment matters (Campmas et al., 2022). In parallel, contemporary governance scholarship emphasizes that administrative authority must remain grounded in democratic values and public service ethics rather than merely managerial imperatives, reinforcing the importance of legal safeguards in personnel decisions that directly affect civil servants and institutional legitimacy (Denhardt & Denhardt, 2015). These developments are especially relevant in the context of civil service transfers, where administrative discretion intersects with questions of career development, organizational restructuring, and protection against arbitrary governmental action.

Existing scholarship has consistently demonstrated that public personnel decisions represent one of the most sensitive dimensions of administrative governance because they influence organizational effectiveness, employee motivation, and public trust simultaneously. Research on public human resource management has highlighted the growing importance of objective criteria, evidence based assessment, and merit oriented administrative practices as prerequisites for professional bureaucracy and institutional performance (Johnson et al., 2022). Comparative studies of governmental coordination and administrative adaptation have further shown that effective governance increasingly depends upon transparent procedural arrangements capable of balancing institutional flexibility with legal certainty (Navarro & Velasco, 2022). At the same time, public administration theorists have argued that administrative legality cannot be reduced to formal compliance alone because governmental decisions derive legitimacy from the interaction between managerial considerations, political accountability, and legal norms that collectively shape administrative action (Rosenbloom et al., 2022). The cumulative implication of these studies is that personnel policies such as transfers and appointments should not be understood merely as managerial instruments but as legal acts subject to principles of fairness, rationality, and procedural integrity. Nevertheless, while the literature successfully establishes the normative importance of these principles, it provides less clarity regarding how courts evaluate alleged deviations from such standards in concrete administrative disputes.

A closer examination of the literature reveals several unresolved conceptual and empirical limitations that continue to hinder a comprehensive understanding of administrative legality in civil service transfer disputes. First, a substantial proportion of existing studies concentrate on policy design, organizational outcomes, and administrative modernization while devoting comparatively limited attention to judicial scrutiny of personnel decisions. Second, research concerning merit systems and public sector human resource management frequently assumes that institutional rules are implemented consistently, despite growing evidence that administrative discretion may generate outcomes that diverge from formal regulatory objectives (Johnson et al., 2022). Third, emerging discussions on digital governance and administrative innovation often emphasize efficiency and technological capability while insufficiently addressing the risk that procedural irregularities and informational asymmetries may undermine individual legal protection within bureaucratic processes (Plantinga, 2024). An additional gap emerges from the limited integration between governance theory and administrative adjudication, particularly regarding how principles of good governance are operationalized by courts when assessing the validity of personnel decisions. As a result, the relationship between statutory legality, merit based administration, and judicial application of governance principles remains insufficiently theorized and empirically examined.

The persistence of these gaps generates significant scholarly and practical consequences because unresolved ambiguities surrounding administrative discretion may weaken both bureaucratic professionalism and public confidence in governmental institutions. In developing administrative systems, disputes involving civil servant transfers often extend beyond individual employment concerns and become indicators of broader challenges related to accountability, institutional integrity, and the rule of law. Studies on governance and development have demonstrated that sustainable public sector performance depends upon the existence of credible legal mechanisms capable of constraining arbitrary administrative action and ensuring predictable governmental conduct (Berebon, 2025). Within the Indonesian context, the legal architecture governing administrative justice and civil service management explicitly seeks to balance governmental authority with the protection of individual rights through judicial review and merit based personnel administration, as reflected in Law Number 5 of 1986 concerning the State Administrative Court and Law Number 5 of 2014 concerning the State Civil Apparatus (Republic of Indonesia, 1986; Republic of Indonesia, 2014). Despite this regulatory framework, controversies surrounding transfer decisions continue to raise questions concerning procedural compliance, transparency, objectivity, and the extent to which administrative decisions genuinely reflect the principles of good governance.

Against this background, the dispute examined in Bandung Administrative Court Decision Number 180/G/2024/PTUN.BDG presents a particularly important case through which to investigate the interaction between administrative authority, personnel management, and judicial enforcement of governance principles. The decision addresses a challenge to a civil servant transfer that allegedly involved procedural deficiencies, inadequate justification, and departures from objective administrative standards, thereby creating an opportunity to examine how the judiciary interprets legality within the

framework of contemporary public administration (Bandung Administrative Court, 2025). Unlike many previous studies that focus predominantly on regulatory design or organizational management, the present case enables a closer exploration of how courts assess administrative discretion in practice and how the General Principles of Good Governance function as evaluative standards in judicial reasoning. This perspective situates the study at the intersection of administrative law, public management, and governance theory, contributing to ongoing international debates concerning the legal limits of bureaucratic authority and the protection of public servants within merit based administrative systems.

This study seeks to analyze the legal reasoning and judicial considerations contained in Bandung Administrative Court Decision Number 180/G/2024/PTUN.BDG concerning a dispute over the transfer of a civil servant position from the perspective of the General Principles of Good Governance. The research positions itself as a doctrinal and case based inquiry that bridges the analytical divide between administrative law and public governance scholarship by examining how principles of legality, legal certainty, transparency, due care, and merit based administration are translated into judicial review. The study contributes theoretically by refining the understanding of the relationship between administrative discretion and good governance within civil service management. It contributes methodologically by employing an integrated normative analysis that combines statutory interpretation, case examination, and governance based legal assessment to generate a more comprehensive framework for evaluating the legality of personnel decisions in contemporary administrative systems.

## **RESEARCH METHODS**

This study employed a non empirical legal research design grounded in normative juridical inquiry. The research focused on the examination of legal norms, judicial reasoning, and administrative law principles relevant to civil servant transfer disputes within the framework of good governance. The primary sources of data consisted of Bandung Administrative Court Decision Number 180/G/2024/PTUN.BDG, Law Number 5 of 1986 concerning the State Administrative Court, Law Number 5 of 2014 concerning the State Civil Apparatus, and Law Number 30 of 2014 concerning Government Administration (Republic of Indonesia, 1986; Republic of Indonesia, 2014a; Republic of Indonesia, 2014b; Bandung Administrative Court, 2025). Secondary sources included scholarly books and academic literature addressing public administration, administrative law, public service governance, and legal research methodology (Denhardt & Denhardt, 2015; Rosenbloom et al., 2022; Pollitt & Bouckaert, 2017; IRAC Academy, 2023). The selection of sources was guided by their doctrinal relevance to administrative discretion, merit based personnel management, judicial review, and the General Principles of Good Governance. The analytical framework combined statutory analysis, case analysis, and conceptual analysis in order to assess the legality of the disputed transfer decision and its conformity with recognized principles of good administration.

The analysis was conducted through a systematic process of legal interpretation and doctrinal evaluation. Relevant legal provisions, judicial findings, and administrative governance principles were identified, classified, and interpreted to examine the relationship between administrative authority, procedural legality, and substantive fairness in the contested transfer decision. Particular attention was devoted to evaluating whether the exercise of administrative discretion reflected the principles of legal certainty, due care, transparency, proportionality, and accountability that constitute the General Principles of Good Governance. Analytical rigor was ensured through source triangulation across statutory instruments, judicial materials, and scholarly literature, as well as through the consistent application of legal reasoning techniques that connected normative provisions with the factual circumstances established in the court decision. Because the study relied exclusively on publicly accessible legal documents and published academic sources, no human participants were involved and formal ethical approval was not required.

## **RESULTS AND DISCUSSION**

### **Legal Construction of Administrative Authority and Civil Servant Transfer Decisions in Indonesian Administrative Law**

The dispute examined in Bandung Administrative Court Decision Number 180/G/2024/PTUN.BDG raises a fundamental question concerning the legal boundaries of administrative authority in personnel management within the Indonesian civil service system. Administrative authority in public employment matters derives from statutory delegation and must

operate within the framework established by public law. Contemporary public administration scholarship recognizes that personnel decisions constitute legal acts with direct consequences for individual rights and institutional legitimacy (Rosenbloom et al., 2022). Judicial scrutiny of such decisions becomes necessary when the exercise of authority potentially exceeds procedural or substantive limitations prescribed by law.

The legal foundation governing civil servant transfers in Indonesia is primarily located within Law Number 5 of 2014 concerning the State Civil Apparatus and Law Number 30 of 2014 concerning Government Administration. These statutes establish that personnel management must be conducted according to merit principles, legality, accountability, and administrative fairness (Republic of Indonesia, 2014a; Republic of Indonesia, 2014b). Administrative discretion remains permissible within certain institutional circumstances. Legal discretion nevertheless remains constrained by procedural obligations and objective considerations recognized in administrative governance.

The court decision demonstrates that the contested transfer originated from the authority of the regional personnel management structure acting through the competent administrative office. From a formal perspective, the authority to issue transfer decisions was not disputed by the court. The central controversy concerned the manner in which authority was exercised rather than the existence of authority itself (Bandung Administrative Court, 2025). This distinction reflects a classical administrative law approach that differentiates competence from legality in the implementation of governmental power.

Public administration literature increasingly argues that modern bureaucratic legitimacy depends upon lawful procedural conduct rather than mere possession of institutional authority. Administrative organizations are expected to justify personnel actions through transparent and objective criteria that can withstand legal review (Denhardt & Denhardt, 2015). Similar observations emerge from comparative governance studies emphasizing accountability as a condition of public trust (Acharya & Scott, 2022). The reasoning developed by the Bandung Administrative Court aligns with this broader theoretical orientation.

The legal dispute also illustrates the growing complexity of personnel governance in contemporary administrative systems. Public institutions are increasingly expected to integrate managerial flexibility with legal certainty in decision making processes (Pollitt & Bouckaert, 2017). Administrative transfers may serve organizational interests when supported by objective considerations. Problems emerge when procedural compliance becomes secondary to administrative expediency.

**Table 1. Normative Dimensions of Administrative Authority in Civil Servant Transfer Decisions**

<b>Legal Dimension</b>	<b>Normative Requirement</b>	<b>Relevance to Judicial Review</b>
Authority	Competence granted by law	Verification of legal power
Procedure	Compliance with statutory process	Assessment of procedural legality
Substance	Objective and rational justification	Evaluation of administrative reasonableness
Accountability	Ability to justify decisions	Prevention of arbitrary action
Merit Principle	Competence based personnel management	Protection of professional bureaucracy

Source: Developed from Republic of Indonesia (2014a), Republic of Indonesia (2014b), Rosenbloom et al. (2022), and Bandung Administrative Court (2025).

The analytical dimensions presented in Table 1 indicate that administrative legality extends beyond formal authorization. Judicial review examines whether authority, procedure, substance, accountability, and merit principles operate coherently within a specific administrative act. Such an approach reflects contemporary understandings of governance that view legality as a multidimensional concept rather than a narrow procedural requirement (Mamokhere, 2022). The court applied a similar logic when evaluating the disputed transfer decision.

The decision also resonates with recent scholarship examining the relationship between governance quality and institutional integrity. Studies suggest that public confidence in governmental institutions depends significantly upon the perception that administrative decisions are impartial and

legally justified (Koeswayo et al., 2024). Personnel transfers lacking objective foundations may create perceptions of favoritism or administrative arbitrariness. Such perceptions can weaken organizational credibility even when formal authority exists.

Comparative research concerning administrative disputes involving civil servants demonstrates similar legal concerns across different jurisdictions. Investigations into civil servant transfer disputes have shown that courts frequently focus on procedural legality, objective reasoning, and protection against arbitrary personnel actions (Ago et al., 2025; Nurfransiska et al., 2025). The Bandung case reflects these broader patterns within administrative adjudication. Judicial intervention functions as a corrective mechanism when personnel management departs from statutory standards.

The admissibility of challenges against personnel decisions also reflects the broader role of administrative courts in protecting legal interests affected by governmental action. Administrative litigation is generally premised upon the existence of a concrete legal interest that has been adversely affected by an administrative act (Yassine et al., 2024). The plaintiff in the present dispute claimed professional and administrative harm resulting from the transfer decision. Such claims provided the legal basis for judicial examination of the contested administrative act.

From a doctrinal perspective, the findings indicate that authority alone cannot guarantee the legality of a civil servant transfer decision. Indonesian administrative law requires a combination of competence, procedural compliance, objective reasoning, and adherence to merit based governance principles. The court's analysis reinforces the understanding that public authority exists to serve lawful administrative objectives rather than institutional convenience. This interpretation corresponds with contemporary administrative law scholarship that emphasizes legality, accountability, and protection of individual rights as essential foundations of democratic governance (Bauer, 2024; Roznai & Cohen, 2023).

### **Judicial Assessment of Procedural Legality and Merit System Compliance in Civil Servant Transfer Disputes**

The central issue examined by the Bandung Administrative Court concerned the legality of the administrative process that produced the disputed civil servant transfer decision. The judicial review did not focus on the existence of administrative authority because that issue had already been established within the applicable personnel management framework. Judicial attention was directed toward the legality of the decision making process and the quality of administrative reasoning underlying the transfer (Bandung Administrative Court, 2025). This approach is consistent with the function of administrative courts as institutions responsible for evaluating whether governmental actions comply with statutory and procedural requirements (Republic of Indonesia, 1986).

The court identified several procedural deficiencies that collectively undermined the validity of the contested decision. Administrative legality requires not only formal compliance with statutory authority but also adherence to procedural safeguards designed to ensure fairness and rationality. Legal research methodology recognizes that procedural defects may invalidate administrative acts even when the issuing authority acts within its jurisdiction (IRAC Academy, 2023). The judicial reasoning reflected this doctrinal position by examining the procedural integrity of the transfer process rather than merely confirming administrative competence.

One of the most significant findings involved the use of a technical recommendation that had already exceeded its period of validity. The court considered this circumstance incompatible with administrative requirements because personnel decisions must rely on legally effective supporting documents. Administrative actions based upon outdated recommendations create uncertainty regarding the factual and legal basis of governmental decisions (Bandung Administrative Court, 2025). The existence of an expired recommendation weakened the procedural foundation upon which the transfer decision was constructed.

The legal significance of this finding extends beyond the specific facts of the dispute. Administrative procedures function as mechanisms for ensuring that governmental decisions remain connected to current institutional conditions and objective administrative needs. Studies of civil servant transfer disputes have shown that procedural irregularities frequently become the decisive factor leading courts to invalidate personnel decisions (Ago et al., 2025). Similar patterns appear in analyses of regional administrative disputes where procedural legality serves as a primary benchmark of judicial review (Nurfransiska et al., 2025).

The court also examined evidence indicating the presence of human error within the administrative documents supporting the transfer. Such errors were not treated as insignificant technical mistakes because they directly affected the reliability of the administrative record. Administrative law requires decision makers to verify factual information before issuing legally binding decisions. Inaccurate administrative data may compromise the rational basis necessary for lawful governmental action (Republic of Indonesia, 2014b).

**Table 2. Judicial Findings on Procedural and Substantive Defects in Decision No. 180/G/2024/PTUN.BDG**

Judicial Issue	Court Finding	Legal Consequence
Authority	Lawful	Not annulled
Expired Technical Recommendation	Unlawful	Procedural defect
Human Error	Proven	Administrative defect
Lack of Objective Basis	Proven	Merit system violation
Procedural Non Compliance	Proven	Decision annulment

Source: Developed from Bandung Administrative Court (2025), Republic of Indonesia (2014a), and Republic of Indonesia (2014b).

The findings summarized in Table 2 reveal that the court distinguished between lawful authority and unlawful implementation. Authority itself was considered legally valid, yet the supporting administrative process failed to satisfy the standards required for a legally sustainable decision. This distinction reflects a mature approach to judicial review in which courts evaluate the quality of administrative conduct rather than relying exclusively on formal competence. The reasoning also demonstrates that legality in public personnel management encompasses procedural and substantive dimensions simultaneously.

Another important aspect of the judgment concerned the absence of a sufficiently objective basis for the transfer. The court found that the contested decision lacked persuasive evidence demonstrating that the transfer was grounded in measurable organizational needs or professional considerations. Merit based personnel management requires decisions to be connected to competence, performance, and institutional requirements rather than subjective preferences (Republic of Indonesia, 2014a). This interpretation corresponds with contemporary public human resource management scholarship emphasizing objectivity as a core element of personnel governance (Johnson et al., 2022).

The deficiency of objective justification also affected the principle of legal certainty. Legal certainty requires administrative decisions to be supported by clear reasons that can be understood, verified, and evaluated through legal review mechanisms. When the rationale for a personnel decision cannot be identified with sufficient precision, affected individuals encounter difficulty in assessing the legality of governmental action. The court regarded this condition as incompatible with standards of administrative fairness embodied in Indonesian administrative law (Republic of Indonesia, 2014b).

Judicial analysis further highlighted the importance of due care in administrative decision making. Due care requires public officials to collect relevant information, verify factual accuracy, and evaluate administrative consequences before exercising discretionary authority. The existence of outdated supporting documents and factual inaccuracies indicated deficiencies in administrative diligence that could not be reconciled with responsible public management. Comparable findings appear in studies examining administrative dispute resolution where insufficient verification frequently contributes to unlawful personnel decisions (Ago et al., 2025; Nurfransiska et al., 2025).

The judgment ultimately demonstrates that procedural legality and merit system compliance are inseparable elements of lawful civil service management. Administrative discretion remains legitimate only when exercised through procedures capable of producing objective and rational outcomes. Judicial review in this case reinforced the principle that personnel decisions must be supported by accurate information, valid documentation, and transparent reasoning capable of withstanding legal scrutiny (Yassine et al., 2024). The annulment of the disputed transfer decision reflects a judicial commitment to preserving legality, fairness, and professionalism within public sector personnel administration.

## The General Principles of Good Governance as a Framework for Reviewing Administrative Discretion

The examination of Decision Number 180/G/2024/PTUN.BDG demonstrates that the General Principles of Good Governance functioned as a substantive framework for assessing the legality of administrative discretion rather than merely as supplementary ethical standards. The court evaluated whether the disputed transfer decision satisfied fundamental requirements of administrative rationality and fairness that are embedded in Indonesian administrative law (Bandung Administrative Court, 2025). Such an approach reflects the contemporary understanding that legality extends beyond formal authority and includes compliance with principles governing responsible public administration (Republic of Indonesia, 2014b). Administrative governance scholarship similarly recognizes that good governance principles provide normative benchmarks for evaluating public decisions and institutional legitimacy (Rosenbloom et al., 2022).

Legal certainty emerged as a central criterion in the judicial review process because administrative decisions affecting civil servants must be based on clear legal foundations and predictable procedures. The court concluded that reliance upon an expired technical recommendation weakened the legal reliability of the transfer decision and generated uncertainty regarding its validity (Bandung Administrative Court, 2025). From a governance perspective, legal certainty contributes to public trust because administrative actions become foreseeable and verifiable through objective legal standards (Koeswayo et al., 2024). Similar findings have been observed in comparative governance studies where institutional credibility depends heavily on adherence to established procedural norms (Mamokhere, 2022).

The principle of due care occupied an equally significant position in the court's assessment. Administrative authorities are expected to verify relevant facts and evaluate the consequences of personnel decisions before exercising discretionary power (Republic of Indonesia, 2014b). The judicial findings indicated deficiencies in administrative diligence because the factual and technical basis of the transfer decision was not adequately supported by valid administrative documentation (Bandung Administrative Court, 2025). Contemporary public administration literature identifies due care as an essential safeguard against arbitrary decision making and organizational error (Denhardt & Denhardt, 2015).

Transparency also represents an indispensable component of administrative legitimacy within modern governance systems. Public decisions gain greater legitimacy when affected parties can understand the reasoning and evidentiary basis supporting governmental actions (Akpan Obong et al., 2023). The dispute revealed limitations in the demonstrable justification underlying the contested transfer decision, creating concerns regarding the openness of administrative reasoning (Bandung Administrative Court, 2025). Similar observations have been advanced in studies of digital governance which emphasize that transparent decision structures strengthen accountability and public confidence (Campmas et al., 2022).

The principle of accountability further reinforces the requirement that administrative officials remain answerable for the legal and practical consequences of their decisions. Accountability is not restricted to identifying individual responsibility but also encompasses institutional mechanisms capable of correcting administrative errors (Bracci, 2023). The court's intervention effectively operated as a corrective mechanism by scrutinizing whether the exercise of discretion conformed to applicable legal standards (Bandung Administrative Court, 2025). Such judicial oversight aligns with governance theories emphasizing that accountability structures are necessary to prevent misuse of public authority (Rich, 2023).

**Table 3. Assessment of Good Governance Principles in the Contested Transfer Decision**

AUPB Principle	Evidence from Case	Compliance Status
Legal Certainty	Reliance on expired technical recommendation	Not Satisfied
Due Care	Insufficient verification of administrative basis	Not Satisfied
Transparency	Limited objective explanation supporting transfer	Partially Satisfied

Accountability	Judicial review required to correct administrative action	Partially Satisfied
Non Abuse of Power	No evidence of direct malicious intent but discretion improperly exercised	Partially Satisfied
Public Interest	Administrative objective not adequately demonstrated	Partially Satisfied

Source: Adapted from Bandung Administrative Court (2025) and Republic of Indonesia (2014b). Processed through normative legal analysis.

The assessment summarized in Table 3 indicates that the disputed decision encountered substantial difficulties in satisfying several core principles of good governance. Legal certainty and due care appear as the most problematic dimensions because both were directly linked to the evidentiary and procedural weaknesses identified by the court. Transparency, accountability, and public interest considerations exhibited partial compliance because the administrative authority retained formal competence while failing to fully justify the substantive basis of its action (Bandung Administrative Court, 2025). The pattern illustrates how governance evaluation increasingly focuses on both procedural and substantive dimensions of administrative legality (Girginov, 2023).

The principle prohibiting abuse of power requires particular attention because modern administrative law recognizes that unlawful conduct may occur even in the absence of malicious intent. The court did not identify evidence suggesting deliberate misuse of authority, yet it determined that the exercise of discretion failed to satisfy legal and governance standards applicable to personnel management (Bandung Administrative Court, 2025). This distinction is important because contemporary governance frameworks increasingly evaluate administrative outcomes alongside administrative intentions (Rosenbloom et al., 2022). Studies of public sector accountability similarly argue that institutional responsibility extends beyond proving subjective bad faith (Bracci, 2023).

The findings also possess significant implications for bureaucratic reform within the Indonesian public sector. Merit based personnel management requires decisions to be grounded in competence, objectivity, and documented administrative reasoning rather than procedural shortcuts or outdated information (Republic of Indonesia, 2014a). Administrative reforms across multiple jurisdictions have demonstrated that sustainable governance improvements depend on strengthening procedural safeguards and decision quality simultaneously (Pollitt & Bouckaert, 2017). Research on civil servant dispute resolution similarly emphasizes the importance of judicial review as a mechanism for reinforcing merit system integrity (Nurfransiska et al., 2025).

Beyond bureaucratic reform, the decision contributes to contemporary debates concerning digital administration and algorithm assisted governance. Emerging scholarship highlights that technological innovation cannot substitute for legal accountability, transparency, and human oversight in public decision making (Criado et al., 2025). The governance challenges identified in the case illustrate broader concerns regarding data quality, procedural verification, and administrative responsibility that remain relevant in digitally transformed institutions (Hossin et al., 2023). Similar concerns have been raised regarding artificial intelligence driven public administration where discretion must remain subject to legal review and governance safeguards (Giest & Klievink, 2024).

From a theoretical perspective, the case strengthens the argument that AUPB functions as a multidimensional governance framework capable of connecting administrative law with broader public governance objectives. Contemporary governance scholarship increasingly associates good governance with transparency, accountability, legality, institutional trust, and citizen oriented public service delivery (Berebon, 2025). The Bandung Administrative Court decision illustrates how these principles can be operationalized within judicial review to evaluate administrative discretion beyond formal legality alone (Bandung Administrative Court, 2025). Such an approach supports evolving governance theories that regard legal institutions as critical actors in maintaining administrative integrity, democratic legitimacy, and responsible public management in complex governmental environments (Akpan Obong et al., 2023).

## CONCLUSION

This study demonstrates that Decision Number 180/G/2024/PTUN.BDG represents a significant judicial affirmation of the role of the General Principles of Good Governance in reviewing the legality of civil servant transfer decisions. The analysis reveals that although the issuing authority possessed formal competence to undertake personnel transfers, the contested decision failed to satisfy essential legal and administrative standards due to the use of an expired technical recommendation, the occurrence of administrative error, and the absence of sufficiently objective administrative justification. The court accordingly concluded that the transfer decision contained procedural and substantive defects that undermined legal certainty, due care, accountability, and the integrity of the merit system as mandated by Indonesian administrative law. The findings further indicate that judicial review functions not only as a mechanism for safeguarding individual rights but also as an instrument for strengthening bureaucratic accountability and good governance. From a broader governance perspective, the case confirms that AUPB operates as a substantive normative framework capable of assessing administrative discretion beyond formal legality by integrating principles of transparency, accountability, non abuse of power, and public interest into the evaluation of governmental action. The decision therefore contributes to the development of administrative law, merit based public personnel management, and contemporary governance theory in the context of ongoing bureaucratic and digital administrative transformation.

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