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The Validity of the Imposition of Restrictions on Community Activities in Indonesia as an Effort to Overcome the Covid 19 Pandemic

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ABSTRACT

The purpose of this article is to analyse the legal aspects of micro and emergency PPKM and what are the legal implications of implementing micro and emergency PPKM. This type of legal research uses a statute approach, a conceptual approach and is analysed prescriptively. Based on the results of the study, PPKM, both micro and emergency, has no legal basis for its implementation. Instruction of the Minister of Home Affairs No. 32 of 2021 could not be used as a legal basis for the implementation of PPKM. The character of the Instruction of the Minister of Home Affairs is not a statutory regulation, but a policy regulation. Policy regulations cannot have a general binding force, as is the case with statutory regulations.

Keywords: *The Validity, PPKM, Covid-19*

1. INTRODUCTION

The COVID-19 pandemic has changed the life of countries in the world, including Indonesia. Many attempts by the government to counter this 19-covid virus have been increasing over time, resulting in a mutated virus. The 19th Pandemic Covid. Response attempt is not an easy one, because the government is faced with a controversial choice, which is to restrict public activities so that the numbers of virus infections can be controlled but the economic wheels become almost paralyzed, or prioritize economic development, but the consequences Covid 19 infection is increasing.

The legal reference in dealing with the COVID-19 pandemic actually already exists, namely Law No. 6 of 2018 concerning about Health Quarantine. In these laws there are four ways to counter this pandemic Covid 19: lockdown, massive social restrictions, home quarantine and hospital quarantine. The law also stipulates that all four methods of counteracting the virus are governed by government regulations.

President Joko Widodo designated Indonesia as the country that experienced the 19th pandemic covid in March 2020 through President No. 11/2020 on the Health Care Cluster of the Corona Virus Disease 2019 Society (COVID-19). The outcome of this President's decision was then followed up by the outcome of Government Regulation No. 21st of 2020 on Social-Large-Scale Restriction in the Accelerated Corona Virus Disease 2019 (COVID-19). If it refers to the No. Law. In the 6th of 2018, there should be a government regulation on county quarantine, hospital quarantine and home quarantine. But the government is only determined to issue Government regulation on social restrictions on a large scale.

The President's decree that only the Government's regulations on social restrictions on a large scale are not willing to issue the Government regulations on county quarantine, hospital quarantine and home quarantine, suspected from the outset, the government is unwilling to choose a regional quarantine option. The government's efforts not to choose a regional quarantine option because there will be an obligation on the government to pay citizens as a result of the implementation of this area's quarantine policy.

The Government's task becomes even more difficult if it chooses the regional quarantine option because the Government also has to think about how the economy in Indonesia can still run. Therefore, the Government has taken the decision to implement large-scale social restrictions rather than regional quarantine. This large-scale social restriction is considered a middle ground between dealing with the pandemic and economic recovery.

The choice of large-scale social restriction policy is due to President Jokowi's policy of strengthening the economy based on investment. Thus, it will be very risky if the area quarantine option is chosen. Large-scale social restriction policies have been implemented in several regions in Indonesia with the aim of reducing the transmission rate of COVID-19.

After the implementation of large-scale social restrictions was deemed successful in reducing the number of Covid-19 transmissions in several regions, the Government began to evaluate the implementation of these large-scale social restrictions. The government sees that this large-scale social restriction policy also poses a considerable risk to economic recovery. Therefore, the Government began to look for other formulas that were more economically friendly than this large-scale social restriction.

The government finally set a formula that is considered more friendly than large-scale social restrictions. The formula is called the Implementation of Micro Community Activity Restrictions (PPKM). The reason the Government chose the PPKM option was because it would be very risky if it chose the lockdown option. Even President Joko Widodo said firmly, "don't let only a few people get infected with the virus, but we do a wide lockdown." This micro PPKM is based on the Rukun Tetangga (RT)/Rukun Warga (RW) which is the spearhead of pandemic prevention at the lowest level.

According to the Government's assessment, this PPP is more effective than large-scale social constraints. The direct involvement of the public at the RT/RW level can be said to be capable of making the 19th Covid infection figure more controlled. However, there are problems associated with this PPKM policy, there is no legal basis for this PPKM micro. If it refers to Law No. 6 of 2018 there was no term for restricting the activities of the public in this law.

The effectiveness of this micro PPKM was then tested with the increase in the number of Covid 19 transmissions in July-August 2021 due to the entry of the delta variant. Based on data released by the Ministry of Health of the Republic of Indonesia (Kemenkes), the average transmission rate in July-August 2021, even reached over fifty thousand every day. Micro PPKM based on pandemic response at the RT/RW level is unable to overcome the number of Covid 19 transmission which is getting more massive from day to day.

To overcome the increasing number of transmissions, due to the inclusion of this delta variant, President Joko Widodo finally set a policy that was different from the previous policy, namely Emergency PPKM. The difference between micro PPKM and emergency PPKM is that emergency PPKM has a wider scale than micro PPKM. In this emergency PPKM, it covers Java and Bali.

Micro PPKM and emergency PPKM have the same problematic when viewed from the juridical aspect. Both micro PPKM and emergency PPKM have no legal basis. Law No. 6 of 2018 also does not recognize the term emergency PPKM. Policies that do not have a legal basis will certainly have problems both in terms of validity and implications.

Based on the description of the background above, the problem can be formulated as follows: How is the legitimacy of micro and emergency PPKM which has no legal basis in its application and what are the legal implications of implementing micro and emergency PPKM

2. RESEARCH METHODOLOGY

The kind of research in this writing uses the kind of legal research with some approaches among which are the approaches to law-making and conceptual approaches. The gathering of legal material is done by inventing the rules of the law. All legal material that has been collected and further inventoried will be processed and analyzed in a prescriptive manner. The legal material used in this study is primary law, and relevant laws and secondary law, journals and books, and non-lawful materials, are relevant Internet sources.

3. RESULTS AND DISCUSSION

A. PPKM Legitimacy

Emergency PPKM was originally done in Jawa-Bali, because Jawa-Bali contributed the highest number of infections compared to other areas. Emergency PPKM was then expanded not only to Jawa-Bali but also to include outside Jawa, as Jawa also had quite high infection rates outside.

The term emergency PKM as the separator of micro-PPKM is actually inappropriate, because the term emergency was used in President's Decision No. 11 of 2020 on blood-laying public health corona virus in 2019 [1]. Thus, the use of the term emergency in the PKM is not only a mundane term because Indonesia's condition is still in a state of health emergency as laid down in President's Decision No. 11 of 2020.

The concept of the PPKM then changed not to use the term emergency, but to use a level that corresponds to the conditions of each region. The ground law of the PPKM with this level model is set out in the Minister of the Home Affairs' Instructions No. 32 of 2021 on the Restriction of Level 3 and Level 1 Public Activity and Optimized Post Office handling of the Corona Virus Disease 2019 at Village Level and Exuberance for the Control of the Corona Disease 2019. The instructions of the Minister of the Home Affairs are impressed as an

attempt to fill the void of the law term PPKM that is not regulated in law no. 6 of 2018.

However, to filling the void of law against terms not regulated in the laws, then it must comply with the logic of the rules of law. At least we should see first whether the term has consequences for the restriction of citizens' rights. If the term has consequences for the restriction of citizens' rights, then the provision must be made through the law. The regulation through the laws is related to the restriction of citizens' rights, because theoretically the only thing that can restrict citizens' rights is the citizen himself, through his deputies in parliament.

Thus, the provision relating to restrictions on the rights of citizens outside the law is unconstitutional. Restrictions on citizens' rights can only be done through the product of legislation, not the product of regulation,[2] because only the product of legislation gives the public room to engage itself in its deflection process. Meanwhile, in the product of the law regulation the process of public debate in the process of its formation is not possible, because the product of the law regulation is indeed formed by the institution with the relevant authority without the consent of the parliament.

Arrangements through the Minister's Instructions to fill the legal void that is not regulated in the No. Act. 6 of 2018 this became more unconstitutional, because these Minister of the Home Affairs' instructions are not the rules of the law-making as defined in No. 12 of 2011 on the establishment of the rules of the law-making. The rules of the law-invitation as defined in the Law No. 12 of 2011 is a written rule that imposes law that binds in general and is formed or established by a state institution or official through a procedure laid down in the Rules of Law.

The Instruction of the Minister of Home Affairs is not a statutory regulation, but is a policy regulation. In contrast to laws and regulations which can be binding in general, policy regulations cannot be binding in general. Policy regulations can only be binding on policy makers and their subordinates [3]. Policy regulations are regulations that are issued based on immediate action and free authority from government officials.

Forms of Policy Regulations:

a. Policy Regulations in the Form of Regulations;
b. Policy Regulations in the Form of Decisions;
c. Policy Regulations in the Form of Instructions;
d. Policy Regulations in the Form of Circulars;
e. Policy Regulations in the Form of Announcements.

Policy regulations in the form of regulations are substantially the same as statutory regulations, such as Ministerial Regulations, but policy regulations in the form of regulations only have internal binding power. For example, the Regulation of the Minister of Home Affairs means that the regulation only applies to the internal ministry of the Home Affairs from the central to the regional levels.

Policy regulations in the form of decisions, for example the Decree of the Chancellor of the State University of Surabaya regarding the appointment of lecturers at the State University of Surabaya as members of the business development unit of the State University of Surabaya. This decision is an internal decision. This decision cannot be used to appoint a person outside the agency from the official who issued the decree.

Policy regulations in the form of instructions are orders from superiors to subordinates. Therefore, materially the content of this instruction is narrower than the regulation. Thus, the instruction cannot be used as a reference for officials to make a general binding rule.

Policy Regulations in the form of Circular Letters are policy regulations containing appeals. For example, every Friday every employee in the province of East Java is encouraged to wear batik clothes. Circulars, like other policy regulations, apart from being advisory in nature, are only binding internally, they cannot be binding in general. However, in practice, many Circulars are generally binding. For example, the Circular Letter of the Covid 19 Officers Unit regarding the ban on going home. Policy Regulations in the form of announcements are announcements made by authorized officials regarding certain information. For example, the announcement of CPNS registration.

There are differences in policy regulations from one agency to another. Policy regulations in each agency are regulated in laws and regulations. The laws and regulations governing policy regulations are regulations regarding the Administration of Official Manuscripts. In the laws and regulations that regulate the Administration of Official Manuscripts, it contains setting the format and other matters which are letters or rules in the service environment where the legislation is addressed.

Within the Ministry of Home Affairs, this Service Manuscript is regulated in Domestic Regulation No. 54 of 2009. The rules regarding instructions are also regulated in the Minister of Home Affairs Regulation No. 54 of 2009. Instructions are regulated in Article 15 letter a of this Regulation of the Minister of Home Affairs.

The difference between the Imposition of Restrictions on Community Activities and Large-Scale Social Restrictions, according to the coordinating minister for Maritime Affairs and Investment, lies in the concept. If PPKM is determined directly by the central government. The government is more flexible in determining which areas will carry out PPKM based on various indicators, including the level of spread of covid 19. Thus, PPKM is more top-down [4]. Meanwhile, the PSBB is more

bottom-up from the regions proposing the PSBB which is then ratified by the Minister of Health [5].

Law No. 6 of 2018 does not regulate in detail the PSBB mechanism which is more bottom-up. The PSBB mechanism, which is based on submissions from the regions to the central government, is not regulated in Law No. 6 of 2018, but regulated in Government Regulation No. 21 of 2020 in conjunction with the Regulation of the Minister of Health No. 9 of 2020. Thus, the difference between PSBB and PPKM is not based on law, but based on Government Regulations and Regulations of the Minister of Health. Government Regulations and Regulations of the Minister of Health are regulatory regulations, where the formation is carried out by the Government itself,

A policy without a legal basis does not mean that the policy is based on discretionary authority. Discretionary authority does not mean that the policies issued by the Government do not have a legal basis, but that discretionary authority is issued because there are unclear legal norms, so that if the Government is not given the discretionary authority to interpret legal norms that are not clear in the laws and regulations, the Government will have difficulty to implement laws and regulations in the social field. The discretionary authority also does not mean that the Government can take any action without any limitation because every action of the Government must still be based on the applicable laws and regulations.

B. Legal Implications of PPKM

Indonesia is a state of law, and that has been the case since the beginning of Indonesia's independence. In the explanation of the 1945 Constitution before the amendment it was stated "The Indonesian state is based on law (rechtsstaat), not based on mere power (Machtsstaat). After the amendment to the 1945 Constitution of the Republic of Indonesia, Indonesia's position as a state of law became stronger with the inclusion of regulations regarding the rule of law in the Articles of the 1945 Constitution of the Republic of Indonesia.

Article 1 paragraph 3 of the 1945 Constitution of the Republic of Indonesia states "Indonesia is a State of Law." Mahfud MD is of the opinion that there is a significant difference between the concept of the rule of law as regulated in the Elucidation of the 1945 Constitution before the amendment and the 1945 Constitution after the amendment [6]. The concept of the rule of law before the amendment, explicitly stated that the rule of law in Indonesia was Rechsstaat, although in brackets. Meanwhile, the post-amendment 1945 Constitution only mentions the term rule of law.

Therefore, the post-amendment Indonesian rule of law concept does not adhere to one of the most dominant legal state systems in the world, namely between rechstaat and the rule of law, because there is no mention of either of the two terms in Article 1 paragraph (3) of the Constitution. NRI 1945. According to Mahfud MD, the absence of any mention of the term rechsstaat in the 1945 Constitution of the Republic of Indonesia indicates that Indonesia adheres to the concept of prismatic law. Prismatic law is a law that integrates the good elements contained in various laws (legal systems) so that a new and complete law is formed [7].

The rule of law (rechtsstaat) emphasizes the legal certainty aspect, while the rule of law emphasizes the justice aspect. In the rechtsstaat tradition, more emphasis is placed on the aspect of legal certainty, because in this tradition of the rule of law the creation of legal products in the form of statutory regulations can be said to be more prominent than the formation of law through the judicial process. Meanwhile, in the tradition of the rule of law, more emphasis is placed on the aspect of justice, because in this tradition of the rule of law the formation of law is more on the formation of law in the judicial process.

Indonesia after the amendment to the 1945 Constitution no longer adheres to rechstaat an such, which emphasizes legal certainty, but Indonesia also adheres to the rule of law which emphasizes justice. Therefore, after the amendment to the 1945 Constitution, the Indonesian state of law is not only a state of law with legal certainty, but also a state of law that is just. After the amendment to the 1945 Constitution of the Republic of Indonesia, especially after the establishment of the Constitutional Court, the process of law formation through the courts often occurred, because in its decisions the Constitutional Court often issued positive legislator decisions.

However, even though there is a shift in the teachings of the rule of law in Indonesia, which previously was rechsstaat to be a combination of rechsstaat and the rule of law, the existence of rechsstaat cannot be completely eliminated. In a state of law (rechtsstaat), especially in the phase of a formal state of law, the most central element is the principle of legality. The essence of the principle of legality is to achieve legal certainty and so that legal certainty can be achieved, all laws must be written.

The principle of legality can be placed in two contexts. First in the context of criminal law. In criminal law the principle of legality is affirmed "Nullum Delictum, Nulla poena sine praevia lege poenali," which means that there is no act that can be punished unless there are rules that regulate it beforehand. Therefore, in criminal law there is no retroactive or retroactive rules. The second is in the context of constitutional law/administrative law. The principle of legality in constitutional law/administrative law implies that every government action must have a legal basis.

The teaching of the formal legal state has indeed shifted to a material law state or a welfare state. This welfare state emphasizes the responsibility of the state in the welfare of its citizens. The understanding of the welfare state argues that this law is often lagging behind the development of society. Thus, there must be a breakthrough so that the law can adapt to the development of society.

In anticipation of the Government being able to make legal breakthroughs, in this understanding of the welfare state, the Government is equipped with discretionary authority. This discretionary authority in the Government is not in the sense that it can be interpreted freely. There are limits to the use of this discretionary authority. The first limitation is statutory regulations. The second limitation is the general principles of good governance.

This understanding of the welfare state does not mean shifting the principle of legality as the center of the formal legal state. Even though in a welfare state, the emphasis is on government discretion, the use of this discretion must still be based on laws and regulations. Therefore, the government cannot use its authority beyond what is stipulated in the legislation.

The determination of PPKM, both micro and emergency, which has no legal basis in Law no. 6 of 2018 actually violates the principle of legal certainty. The government cannot argue that its actions are based on the "principle of sollus populis suprema lex esto," which means that the people's safety is above the highest law, based on discretion. Discretion must still be based on the applicable laws and regulations, so that if in law no. 6 of 2018 does not recognize the term PPKM, so the government cannot create the term PPKM for discretionary reasons.

The legal implications of implementing PPKM can lead to acts of abuse of authority and can even lead to criminal acts of corruption because PPKM is not regulated in law and is only regulated in the Minister's instructions, then any Government action, especially related to the budget is considered invalid. The government does not need to worry about PSBB, which in its application cannot be as flexible as PPKM. As is known, PPKM can be applied more flexibly by determining PPKM based on level. The determination of PPKM based on this level will depend on conditions in the area related to the rate of transmission of COVID-19.

PSBB can also be applied based on the level as PPKM. When the PSBB is applied based on the level according to the conditions of each region, the determination of the PSBB based on this level is included in the scope of the Government's discretion. PSBB is regulated in Law No. 6 of 2018, so that the legal basis for the Government is clear in its implementation, while in its application the Government can be more flexible by using discretionary authority based on conditions on the ground.

4. CONCLUSION

The PPKM neither micro nor emergency has any basis in law in its application. In the law No. 6th of 2018 on Health Care only knew four terms, namely county quarantine, large-scale social restrictions, hospital quarantine and home quarantine. The Minister of Home Affairs instructions. 32 of 2021 can't be the law for the operation of the PPKM. The character of the Minister of the Home Affairs' instructions is not a rule of law, but a rule of policy. Policy rules can't have general binding force, like rules of law and order.

The PPKM has no legal basis in the Law No. 6th of 2018 has a pretty serious implication for legal certainty in Indonesia. Indonesia is the law after all. The most central element in formal law is the legal basis. The purpose of the legal basis for a country to have legal certainty. The legal basis demands that all laws be written. Thus, the PPKM should be firmly regulated in the laws of law, not the policy rules, to achieve legal certainty in order to counter Pandemic Covid 19.

The recommendation that can be made in this paper regarding the PKM is a limited change to the No. 6th year 2018 on health care quarantine. However, if the President considers the changes to the No. Act. This six-year 2018 takes a long time and can be considered to impede the government's performance in countering this 19 covid, so the President can issue a Presidential Decree to replace the Act so that this PECM policy can be legally adapted. The President's move to remove Perppu may be considered by some to be a danger, but this move is much better than issuing a policy without legal basis.

The other step is to keep the policy in line with No. Six years 2018, like the United Nations, but with its implementation more flexible than before. The president can also change PP No. The 21st year of the United Nations so that the mechanism of the United Nations is not only a proposal from the Regional Government, but can also be based on the will of the Central Government.

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REFERENCES

[1] H. Widodo, "PPKM Darurat Tak Miliki Dasar Hukum?" Media Merah Putih, 2021. https://mediamerahputih.id/baca-303-ppkm-darurat-t.

[2] H. Widodo, Modul Hukum Administrasi. Surabaya: Unesa Press, 2011.

[3] B. M. dan K. Magnar, Beberapa Masalah Hukum Tata Negara. Bandung: Alumni, 1993.

[4] F. C. Rosana, "Luhut Jelaskan Beda PPKM Darurat dan PSBB Setelah Dikritik Gonta-ganti Istilah," Bisnis Tempo, 2021. https://bisnis.tempo.co/read/1480459/luhut-jelaskan-beda-ppkm-darurat-dan-psbb-setelah-dikritik-gonta-ganti-istilah.

[5] F. C. Farisa, "Apa Beda PSBB dengan PPKM Darurat? Ini Penjelasan Menko Luhut," kompas.com, 2021. https://nasional.kompas.com/read/2021/07/02/11461111/apa-beda-psbb-dengan-ppkm-darurat-ini-penjelasan-menko-luhut?page=all.

[6] Nurhidayat, "Rujukan dan Aplikasi Sistem Hukum Indonesia Berdasarkan Pasal 1 ayat (3) UUD NRI Tahun 1945," UIR Law Rev., vol. 1, no. 2, pp. 191–200, 2017.

[7] A. Hidayat, "Negara Hukum Berwatak Pancasila," 2019. https://www.mkri.id/public/content/infoumum/artikel/pdf/artikel_15_03_arief_hidayat.pdf.

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