



Representational Completeness: A Legal Test for Performance Information Instruments, Applied to Police Records in Indonesia

Ferroka Putra Wathan^{1*}, Didi Jhondiani², Rafsandi Dimbara³

¹⁻³ Program Studi Ilmu Hukum, Universitas Kader Bangsa, Indonesia

*Corresponding Author: ferroka.wathan@ukb.ac.id

Abstract. Article 19A(1) of Undang-Undang Nomor 5 Tahun 2026 makes police performance accountability a statutory duty, requiring professionalism, proportionality, transparency, and accountability. Although this duty is implemented through reporting instruments, no legal standard defines when such instruments are insufficient. This article addresses that gap by constructing a doctrinal benchmark. Three criteria of representational completeness—functional, temporal, and structural—are derived from the duty of due care in Article 10(1)(d) of Undang-Undang Nomor 30 Tahun 2014, three components of Peraturan Presiden Nomor 29 Tahun 2014, and three administrative court rulings restated as duties of office. Each criterion is operationalized through an indicator observable directly from the reporting instrument. The framework is tested doctrinally and empirically using crime and clearance records from one district police command and two subordinate sector commands in South Sumatra (2022–2025), supported by eight service-chain interviews. The assessment targets the reporting instrument rather than organizational performance. All three indicators reveal deficiencies: no field links crime records with the preventive-work reporting regime; 139 offences recorded over ten months are presented as annual figures without distinguishing absent events from absent entries; and subordinate totals exceed superordinate totals (51 versus 43; 10 versus 3) without any statement of reporting scope. As these deficiencies arise from the reporting artefact itself, additional personnel or funding cannot resolve them. The appropriate remedy is regulatory anchoring *de lege lata*, and the criteria are transferable to any public agency reporting through aggregate data.

Keywords: Administrative Jurisprudence; Due Care; Police Performance; Public Accountability; Representational Completeness.

1. INTRODUCTION

Two readings of Indonesian policing performance stood side by side in 2025. The National Police Public Relations Division reported the force met 91.54 percent of its performance indicators, rated very good (Polri, 2026). That year public satisfaction with police services stood at 65.1 percent, rising to 67.6 percent in 2026, when 80.6 percent judged performance improving and 82.4 percent expected further improvement (Kompas, 2026). The roughly twenty six point gap is thus no negative verdict. Meta-analytic evidence is more precise: archival and perceptual measures correlate weakly, shifting attention to the instrument's validity (Hsu & Lu, 2024).

Complaint data place that gap in institutional context. The Ombudsman of the Republic of Indonesia recorded 23,596 complaints in 2025, policing fifth by subject at 713, with alleged maladministration by negligence or disregard of legal duty at 8.75 percent; over five years it logged some 3,308 police service complaints, among the five most reported agencies (O. R. Indonesia, 2025). These figures document a symptom, not its mechanism: through what instrument is the internal reading produced, and may it lawfully discharge the duty? The instrument examined here is recorded crime and case clearance data (*Jumlah Tindak Pidana dan Penyelesaian Tindak Pidana*, JTP/PTP) at territorial command level.

The question belongs to administrative law, not management. Article 2 of Undang-Undang Nomor 2 Tahun 2002 tentang Kepolisian Negara Republik Indonesia (the Police Law) (2002), makes policing a function of state government, so compiling and presenting performance data is factual administrative action (*feitelijk handelingen*) subject to the general principles of good governance (Hadjon, 2024). The testing norms sit in Article 10(1) of Undang-Undang Nomor 30 Tahun 2014 tentang Administrasi Pemerintahan, notably due care in letter d and legal certainty (2014), Article 19A(1) of Undang-Undang Nomor 5 Tahun 2026, amending the Police Law, then binds every officer to professionalism, proportionality, transparency, and accountability; performance accountability now carries statutory force, and the validity of the means of discharge becomes a legal question Undang-Undang Nomor 5 Tahun 2026 Tentang Perubahan Ketiga Atas Undang-Undang Nomor 2 Tahun 2002 Tentang Kepolisian Negara Republik Indonesia.

The means matter because accountability runs as a relationship between actor and forum through information, discussion, and consequences phases (Bovens, 2007). JTP/PTP occupies the information phase, and its validity turns on representational completeness, the capacity to represent in full the set an instrument purports to represent. Where the first phase gives no adequate footing, the forum risks losing substantive control (Han & Tang, 2022). That forum is concrete: the same statute strengthens the Komisi Kepolisian Nasional, including receipt of complaints about police performance. Validity is therefore tested rather than assumed, asking whether and how far the criteria are met.

The difficulty is not absent reporting. Peraturan Kepolisian Negara Republik Indonesia Nomor 1 Tahun 2021 tentang Pemolisian Masyarakat (the Community Policing Regulation, 2021), requires its officers to submit problem solving reports and monthly returns, while JTP/PTP reports cases and clearances. Two readings follow. The first treats the split as a sensible division of labour, preventive work on its own channel. The second holds that while the two parallel reporting regimes stay unconnected, no single instrument represents the whole crime response duty under Article 13 of the Police Law, which assigns the maintenance of public order, law enforcement, and protection, guidance and service to the community as cumulative principal duties, read in Indonesian doctrine as the pre-emptive, preventive, and repressive functions, so a part stands for the whole: synecdochen (Bevan & Hood, 2006). An aggregate report also claims a span of time and a vertically consolidated scope.

The criterion for choosing between them is missing. According to Prunckun (2026) Criminology has matured on the dark figure of crime, while policing scholarship finds clearance rates flawed as a metric and proactive work outside evaluation rubrics; Maillard et

al., (2022) both stop at the methodological level. Administrative law applies due care to individual decisions and licensing disputes, Adawiah et al., (2026) yet the reviewed literature appears not to have converted it into a test for aggregate performance instruments. This conceptual void sharpens the gap: deficit claims often presuppose a benchmark never constructed, leaving completeness easy to dismiss as an efficiency burden. (Cane, 2021). This study derives representational completeness criteria from three rules of the *peradilan tata usaha negara* (administrative courts): evidentiary sufficiency (2024), the bar on technical excuses (2023), and the duty of factual verification (2025). All three are anchored in due care and in three of the six components of the Sistem Akuntabilitas Kinerja Instansi Pemerintah (SAKIP) established by Peraturan Presiden Nomor 29 Tahun 2014 (2014): performance measurement, performance data management, and performance reporting. Testing runs along functional, temporal, and structural axes against 2022 to 2025 records of a district command (Polres) in South Sumatra and two subordinate sector commands (Polsek). If the limitation is inherent in the instrument's design rather than in operator capacity, added personnel and budget will not close it, and the criteria transfer wherever general principles operate as binding testing norms. Recommendations take regulatory anchoring *de lege lata*, the units studied being a test case for the instrument, not objects of appraisal.

2. RESEARCH METHOD

Testing an instrument against legal criteria needs a design both doctrinal and empirical, warranted by the empirical dependency of law: norms form a closed system, yet whether a legality standard is met turns on facts outside it (Noor, 2023). The unit of analysis is the instrument, not the commands operating it: JTP/PTP across one Polres and two Polsek. Selection is purposive and the case critical, so inference is analytical, not statistical: failure in a normally functioning unit indicts the design (Yin, 2018).

Criteria are derived by reading each decision for its ratio decidendi, restating it as the official duty imposed rather than the dispute producing it, and anchoring it to a positive norm of general application; transfer from licensing and personnel disputes rests on normative ground, not factual resemblance, while Majeed et al. provides comparative context for the personnel-dispute component (Majeed et al., 2023). Foreign scholarship serves likewise as comparator, not transplanted norm: common law resists a general duty of care in policy making (2021) whereas Indonesian law elevates the principle of accuracy to a binding testing norm under Article 10 of Law 30/2014. Each axis is framed dialectically as whether and to what extent a criterion is met, testing rival constructions.

Legal materials are the statutes, regulations, and three court decisions read from official texts in force. The corpus is monthly Polres records across 25 to 26 offence categories, annual records for two Polsek, and eight interviews across reporting, investigation, patrol, community policing, and complainants (119 paired items). Each source carries its probative weight: norms establish duty, decisions direct interpretation, theory frames reasoning. Records and accounts are triangulated vertically across ranks; interview material grounds a claim only where positions converge, single testimony labelled as such. Recording defects become legal defects only when mediated through administrative law construction.

Scope is fixed at the outset: agency performance reports, internal evaluation documents, and community policing files are not examined; claims about that regime stay normative, absence means absence from this instrument, intent is never claimed. Preventive volumes, case records, and population denominators were unavailable; Polsek data are annual. A test run to falsify the expectation that clearance varies by unit returned $\chi^2 = 3.520$, $df = 2$, $p = 0.172$ on theft categories. Participation was consented, units anonymised by role; full disclosure preserves checkability, leaving the criteria to be stated in the norms' own terms.

3. RESULTS AND DISCUSSION

Deriving the Criteria of Representational Completeness

A deficit claim is only as good as the benchmark it presupposes, and that benchmark has rarely been built (Rock, 2019). It is built here from law. Three administrative court rulings supply duties of office, each restated as the duty it lays on an official rather than the dispute producing it. The Jakarta Administrative Court held that insufficiency in the supporting file is a substantive legal defect rather than ordinary technical omission according to Putusan No. 16/G/2024/PTUN.JKT, and that organisational complexity, coordination failure, and system weakness cannot excuse an act taken without care, verification being inherent to the exercise of public office, as held in Putusan No. 127/G/TF/2023/PTUN.JKT. The Bengkulu Administrative Court held that due care requires complete examination, clarification and impact analysis beforehand, according to Putusan No. 5/G/2025/PTUN.BKL. Table 1 attaches one duty to each axis.

All three sit in the information phase, where a forum can question only what the actor supplies and loses substantive control once supply is defective (Bovens, 2007; Han & Tang, 2022). That placement makes them legal rather than managerial: a performance system does not improve conduct by existing, its work depending on instrument quality (Gerrish, 2016). Comparative scholarship supplies the functional warrant, finding proactive work routinely

uncounted in evaluation rubrics (Koper & Lum, 2020), and names a part presented for the whole as synecdoche (Bevan & Hood, 2006).

Table 1. Criteria of representational completeness: anchors, judicial rules, and indicators

Axis	Criterion	Normative anchor	Judicial rule	Indicator of failure
Functional	The instrument represents the whole mandate whose discharge it reports	Article 13, Police Law; Community Policing Regulation; performance measurement component, SAKIP	Evidentiary sufficiency, No. 16/G/2024/PTUN. JKT	No field or instrument links the preventive reporting regime to the crime response record
Temporal	The period reported is continuously recorded, and the instrument can show whether it was	Article 10(1)(d), Government Administration Law; performance data management component, SAKIP; Article 7(1), Satu Data Indonesia	Factual verification, No. 5/G/2025/PTUN.B KL	No marker separates a recorded zero from an unrecorded period
Structural	Figures reconcile across the ranks that produce them	Article 10(1)(d); Peraturan Kepolisian Negara Republik Indonesia Nomor 2 Tahun 2021 jo. Nomor 7 Tahun 2025; Article 3, Peraturan Presiden Nomor 39 Tahun 2019; Article 17(4)(d) and performance reporting component, SAKIP	No technical excuse, No. 127/G/TF/2023/PT UN.JKT	A subordinate aggregate exceeds the superordinate aggregate for the same category and period

Source: compiled by the author from the instruments and decisions cited.

Representational completeness is not exhaustiveness, and the criteria would be useless if it were, since every aggregate omits something. The threshold comes from the evidentiary sufficiency rule, which measures a file against what the decision it supports requires rather than against completeness in the abstract. An instrument fails an axis only where the omission bears on the judgment the instrument invites and the instrument cannot show, on its own face, that the omitted portion is immaterial. The indicators in Table 1 are drawn to that standard: each is a feature the instrument either has or lacks, visible without recourse to anything outside it. Each axis is accordingly put as whether and to what extent a criterion is met.

Three objections are worth meeting. An instrument may lawfully be narrow, and a record built for case clearance is not defective for recording it; but the criteria attach to use rather than design, and bite where a narrow record stands unaccompanied as the basis for judging a wider mandate. The rulings concern acts touching individual legal positions, whereas performance data touches none directly; but the duty attaches to the official act of compiling and presenting, and such data grounds decisions that do carry legal effect (Hadjon, 2024;

Ridwan, 2010). Differences in recording scope may explain vertical mismatch; whether they do is what the structural test asks.

The three are cumulative, not alternative: an instrument failing any one has not represented what it claims. That is demanding, and deliberately so. Legal certainty is preferred over administrative economy: a forum unable to verify what it reads cannot judge lawfully, and the cost of economy falls on those least able to detect it. The criteria travel wherever general principles of good governance operate as binding testing norms, a condition holding in Indonesian law and not everywhere (Cane, 2021). What remains is to put them to the records.

Testing the Instrument on Three Axes

The three axes are now applied to the records. Two boundaries hold throughout. The documents examined are the monthly and annual JTP/PTP returns held by the three units; case files, evaluation reports, and community policing files were not accessed. And recorded offences are not offences occurring, since decisions to report and decisions to record filter the count systematically rather than randomly (Pina-Sánchez & Shvets, 2023). Neither boundary weakens the test, because what is tested is how the instrument represents what it claims to represent, not how closely its figures track crime.

The functional criterion asks whether and to what extent the record represents the mandate whose discharge it reports. Article 13 of the Police Law imposes three principal duties cumulatively: maintaining public order, enforcing the law, and protecting, guiding and serving the community. Indonesian doctrine reads these as the pre-emptive, preventive, and repressive functions, and what matters here is only that none is subordinate to the others. The Community Policing Regulation requires officers holding the preventive function to submit problem solving reports and monthly recapitulations. The crime record reports offences and their clearance. Two reporting duties therefore run at once, on separate schedules and to different recipients. The indicator sought is a field or instrument in which the two meet.

No such field appears. All 26 rows of the record are offence categories, and every column is either an offence count or a clearance count, across four annual sheets and their monthly detail. Nothing in the layout admits an entry for counselling, village visits, patrol hours, or problems settled without a case being opened. Table 2 inventories the two streams. Both run monthly and both arrive at Polres level, so they reach the same office on the same schedule without meeting. A field satisfying the indicator would be modest: a column, an appended sheet, or a cross reference by which a reader of the crime record could reach the preventive return for the same month and area.

Table 2. Structure Of The Two Reporting Streams

Feature	Crime And Clearance Record	Community Policing Return
Unit of entry	Offence category	Problem addressed or activity performed
Categories carried	26	Not specified in the instrument examined
Value columns	Offences recorded; cases cleared	Reports submitted; monthly recapitulation
Fields recording preventive output	None	All
Interval	Monthly, consolidated annually	Monthly
Recipient	Polres	Polres, separate line
Cross reference to the other stream	None	None

Preventive work is nonetheless being done and described. Every one of the eight informants referred to it, and seven described it in substance. The community policing officer reported legal counselling, village visits, community guidance, and public education, carried out two to four times a month depending on local conditions. The patrol officer reported routine mobile and stationary patrols concentrated on high risk hours and locations, and ranked patrol together with community cooperation, street lighting, and revived night watch as the most effective preventive measures. The village head described night watch still running in some neighbourhoods and less regularly in others. A resident and a complainant described patrol visibility and public advisories. One further detail is directional: the patrol officer described how patrol areas are chosen, from incoming theft reports, from evaluation of community reports, and from crime data. Information travels from the crime record to preventive deployment, and nothing in the record receives what that deployment produces.

Whether and to what extent, then: the record represents the repressive function in full and does not represent the pre-emptive and preventive functions, and the indicator of failure is present, since no field or instrument connects the two regimes. Two limits attach. Community policing files were not examined, so this states that the regimes are unconnected in the instrument, not that preventive work goes unreported elsewhere. And interview material is used here only to establish that such work occurs, never its volume, which no source in this study measures.

The temporal criterion asks whether and to what extent the period reported is continuously recorded, and whether the record can show that it was. The indicator sought is a marker separating a recorded zero from an unrecorded period, a critical distinction under the duty of care, under performance data management, and under the requirement that data produced by government be accompanied by metadata.

For 2023 the monthly sheets carry zero in November and December across all 26 categories, in both the offence and the clearance columns, and the monthly totals row carries zero for both months. Ten months yield 139 offences and 91 clearances. Those are the figures the annual sheet presents as the year. The ten recorded months range from 10 to 20 offences and show no downward drift toward the year end: October, the month immediately preceding, is among the highest at 17 offences and 11 clearances.

Table 3 places the year against its neighbours. Across the four years, 2023 is the only year in which any month carries no entry at all, and it carries two consecutively. How large the unrecorded interval is cannot be estimated from within the year. The two missing months fall at the year end, and year end volumes vary sharply across the series: November and December together carry 18 offences in 2022, 23 in 2024, and 69 in 2025. Monthly volumes also vary widely within a year without vanishing, 2022 opening at 56 offences in January and declining to 9 in December. Any point estimate would therefore rest on an assumption the series contradicts, that months within a year are interchangeable. What can be said without assumption is narrower and sufficient: the figure presented as the year is a ten month figure.

Table 3. Recorded months and year end entries, 2022 to 2025

	Months carrying entries	Offences	Clearances	November	December
2022	12	228	148	9	9
2023	10	139	91	0	0
2024	12	247	113	16	7
2025	12	315	196	41	28

The question is not which explanation is right. It is whether the record can be asked. It cannot. A cell in these sheets holds a number and nothing else. A month in which no offence occurred and a month in which nothing was entered are written identically, and no annotation, footnote, or status field distinguishes them anywhere across the four years. The annual figure of 139 carries no indication that it rests on ten months rather than twelve, so a forum reading it alone suffers an information deficit and cannot evaluate performance (Bovens, 2007), while a forum reading the monthly sheets sees two zeros it cannot interpret without metadata according to Peraturan Presiden Nomor 39 Tahun 2019 tentang Satu Data Indonesia, Lembaran Negara Republik Indonesia Tahun 2019 Nomor 112, Art. 7(1) (Morewood, 2023). One effect is arithmetic and can be stated exactly. Clearance against offences for 2023 stands at 65.5 per cent, the highest of the four years, against 64.9 in 2022, 45.7 in 2024, and 62.2 in 2025. Both terms of that fraction are drawn from ten months, and the sheet does not say so. Whether and to what extent, then: the reported period is not continuously recorded for 2023, and the indicator of failure is present, because the record supplies no marker by which a reader could tell whether

the two zeros are events or entries. The finding holds on either explanation, which is why it is stated in that form. Case files were not accessed, so nothing here identifies which explanation is true, and nothing here concerns intent.

The structural criterion asks whether and to what extent figures reconcile across the ranks that produce them. The organisational regulation places the Polsek under the Polres in a single reporting line, and the performance data management component of SAKIP expressly includes compilation and summarising among the activities an entity must perform, so superordinate figures should be the consolidation of subordinate ones, as provided in Peraturan Kepolisian Negara Republik Indonesia Nomor 2 Tahun 2021 tentang Susunan Organisasi dan Tata Kerja pada Tingkat Kepolisian Resor dan Kepolisian Sektor, Berita Negara Republik Indonesia Tahun 2021 Nomor 26, Arts. 1(7) and 59(1), jo. Peraturan Kepolisian Negara Republik Indonesia Nomor 7 Tahun 2025, Berita Negara Republik Indonesia Tahun 2025 Nomor 650; Peraturan Presiden No. 29 Tahun 2014, Art. 17(4)(d); and Peraturan Presiden Nomor 39 Tahun 2019 tentang Satu Data Indonesia, Lembaran Negara Republik Indonesia Tahun 2019 Nomor 112, Art. 3. The indicator sought is a subordinate aggregate exceeding the superordinate aggregate for the same category and period.

Comparison is possible only where a category appears in all three sheets under labels that can be matched to the same statutory referent. The Polres sheet carries 26 categories and the two Polsek sheets six and seven, with wording that differs between them: aggravated theft appears as Curas, as Pencurian dengan kekerasan, and as CURAS, while motor vehicle theft appears as Curanmor in all three. Those two match and are used. The remaining labels do not align across all three sheets, and whether that non-alignment is itself a defect is a question of category construction rather than of representational completeness, and is not pursued. For aggravated theft across 2022 to 2025 the Polres records 43 offences while the two Polsek record 39 and 12, totalling 51. For motor vehicle theft the Polres records 3 while the two Polsek record 4 and 6, totalling 10. Table 4 sets both out by unit and year, the first Polsek being the unit recording 39 and 4 and the second the unit recording 12 and 6. The arithmetic is recomputable from the annual sheets.

Table 4. Offences recorded by unit, two comparable categories, 2022 to 2025

Category	Unit	2022	2023	2024	2025	Total
Aggravated theft	Polres	8	5	9	21	43
Aggravated theft	Polsek A	10	10	12	7	39
Aggravated theft	Polsek B	1	3	2	6	12
Aggravated theft	Two Polsek combined	11	13	14	13	51
Motor vehicle theft	Polres	3	0	0	0	3
Motor vehicle theft	Polsek A	1	3	0	0	4

Motor vehicle theft	Polsek B	2	1	1	2	6
Motor vehicle theft	Twon Polsek combined	3	4	1	2	10

Source for Tables 2 to 4: compiled by the author from the unit returns examined.

The annual distribution shows the pattern is not a single anomaly. In aggravated theft the two Polsek together exceed the Polres in 2022, 2023, and 2024, and fall below it in 2025. In motor vehicle theft the Polres records 3 offences in 2022 and none in 2023, 2024, or 2025, while the two Polsek record 4, 1, and 2 in those years; for three consecutive years the subordinate units record offences in a category the superordinate sheet shows as empty. The clearance columns behave differently and are reported here for completeness: in aggravated theft the Polres records 24 clearances against 20 for the two Polsek combined, so the indicator is absent on that measure, while in motor vehicle theft it records 1 against 7.

Whether and to what extent, then: the offence figures do not reconcile in two categories, the clearance figures do not reconcile in one, and the indicator of failure is present. One counter-explanation is available and cannot be settled from the documents. The Polres sheet may cover the whole jurisdiction, in which case its totals should have absorbed the Polsek figures; or it may cover only offences handled at Polres level, in which case the two sets were never additive. Nothing in the sheets states which. Either reading would satisfy the criterion if the sheet declared it, since a record stating its own scope can be reconciled or knowingly left unreconciled; the failure lies in the silence rather than in the difference. Taken together, the three axes return the same result on three independent kinds of evidence, one documentary, one temporal, and one arithmetic. What that convergence means for the duty the instrument exists to discharge is the question it leaves open.

From Three Findings To One Legal Argument

Three tests, three kinds of evidence, one result on each. What follows sets out what that result means: why the shortfall in representational completeness is legal rather than managerial, why it belongs to the artefact rather than to those who complete it, what it does to the accountability relation, what it implies for a statutory duty, and what would change if the remedy were taken. The value premise is stated rather than left to be inferred: legal certainty is preferred to administrative economy, because a forum that cannot verify what it reads cannot judge lawfully.

The managerial literature reaches these phenomena and stops short of them. Recording error, gaming under targets, and narrowing performance to what is countable are documented (Maillard et al., 2022; Pina-Sánchez & Shvets, 2023), and the weak correlation between archival and perceptual measures is a measurement result (Hsu & Lu, 2024). None of it yields

a standard by which an instrument may be called insufficient, which is the gap Rock identified: deficit claims presuppose benchmarks nobody has built (Rock, 2019). The standard applied here was built from law: performance data is compiled and presented by officials, and that act is factual administrative action bound by the general principles of good governance (Hadjon, 2024), and three rulings fix what sufficiency, excuse, and verification require. The contribution lies there. Where that account documents a defect, this analysis states the standard it offends and where the standard comes from.

Each failure belongs to the artefact. On the functional axis there is no field to complete, since the layout admits offence categories and clearance counts and nothing else, so preventive output has nowhere to go however diligently produced; and the evidentiary sufficiency rule measures a file against what the judgment it supports requires according to Putusan No. 16/G/2024/PTUN.JKT, so a file carrying one of three mandated functions cannot support a judgment on all three. On the temporal axis a cell carries a number and no qualifier, so a zero cannot be annotated by anyone who wished to annotate it. On the structural axis no field states the scope a sheet reports. Diligence changes none of the three. Presenting a part for the whole is synecdoche (Bevan & Hood, 2006), and no performance system improves conduct merely by existing, since it works only through the instrument it is given (Gerrish, 2016).

The consequence runs through the accountability relation, because what falls short is its information phase, and information conditions discussion as discussion conditions consequences (Bovens, 2007). A forum receiving these returns can ask whether clearance rose, but not whether prevention occurred, the year is whole, or which scope the figures describe. It cannot form the questions the second phase exists to permit, causing an accountability deficit where judgment in the third rests on a base it had no means of checking (Han & Tang, 2022). Rather than a classic forum drift, where a principal fails to evaluate quality reports defective supply in this case precludes evaluation itself, decoupled as myth and ceremony where accountability is reduced to a mere administrative formality (Hanifa et al., 2026; Meyer & Rowan, 1977).

This is where the resource explanation belongs, and the analysis places it rather than displaces it. Informants described real constraints: personnel measured against the area covered, limited patrol vehicles, reports at unpredictable hours, wide areas of engagement. Those accounts are accurate, explaining how much preventive work can be done and how quickly cases are handled. They do not explain why the record has no field to receive preventive output, why a zero cannot be qualified, or why a sheet does not state its scope, since none of those features responds to effort. Doctrine reaches the same conclusion independently: the no-

technical-excuse rule expressly rejects these defences, treating verification as an inherent duty of office rather than one contingent upon available resources, as reflected in Putusan No. 127/G/TF/2023/PTUN.JKT. Adding personnel, vehicles, and budget would change the quantity of work and leave the three indicators where they stand.

For the duty this bears directly. Article 19A(1) of Undang-Undang Nomor 5 Tahun 2026 requires every officer to act on the principles of professionalism, proportionality, transparency, and accountability, which makes accountability an obligation imposed by statute rather than a management preference. An obligation is discharged through the means employed to fulfil it, and the record does not establish such discharge with respect to the mandate, continuity, or scope reported. The verification rule reinforces the same principle, requiring complete examination before an act is undertaken rather than after the fact, as reflected in Putusan No. 5/G/2025/PTUN.BKL. The statement should stay narrow: the obligation is real, what consequences attach to it is a question this study does not settle, and what is missing is the evidentiary basis on which discharge could be established. On the reading advanced here that is not an imperfect norm but a complete norm awaiting an adequate instrument.

The same statute strengthened the body best placed to use the criteria. Komisi Kepolisian Nasional receives public complaints about police performance and advises on organisational performance (Gusman & Nazmi, 2023), which places it, with internal inspectorates, as a forum judging documents it did not compile. The remedy is anchoring *de lege lata* rather than new legislation. Under Peraturan Presiden Nomor 29 Tahun 2014, the performance data management component requires performance data to be recorded, processed, and reported, expressly including compilation and summarisation among the activities encompassed by the regulation, pursuant to Articles 17(2) and 17(4)(d) (Andari & Akbar, 2024), and government data is already required to be reconcilable vertically and horizontally (Sarihastuti, 2024). Read together, those obligations support consolidating the monthly preventive return into the same reporting document rather than pointing to it, adding a status marker separating a recorded zero from an unrecorded period, and stating the scope on each sheet. The objection that such standards burden administration is met by the modesty of what is proposed, three fields on an existing form (Cane, 2021).

Three objections remain and their force should be acknowledged. No court has yet applied these rules to an aggregate performance instrument, so the transfer argued here is reasoned rather than settled, and it stands or falls on whether the duty attaches to compiling or to the dispute in which it was first stated. Other documents may supply what this record lacks, which the analysis cannot exclude, since only this instrument was examined. And one

jurisdiction cannot show how often such design fails, only that it can fail. Two matters set aside here, the construction of clearance ratios across cohorts and the alignment of offence categories between units, invite separate work. What the analysis does show reaches beyond Indonesia: wherever an agency accounts through aggregate data, the same three questions can be put to the form, and the answers are visible on its face.

4. CONCLUSION

Two questions were put. The first asked what representational completeness requires of an instrument before it can carry the accountability Article 19A (1) of Undang-Undang Nomor 5 Tahun 2026 imposes by statute. The answer is three criteria and no more, because an aggregate return claims exactly three things at once: a set of activities, a span of time, an organisational scope. Each was drawn from law: from due care under Article 10(1)(d) of the Government Administration Law, from three of the six components of Peraturan Presiden Nomor 29 Tahun 2014, and from three rulings restated as duties of office. That is the contribution: a benchmark for deficit claims built from positive law and jurisprudence with indicators readable from the face of a return.

The second asked how far the record examined meets them. On the functional axis it represents the repressive mandate and not the preventive or pre-emptive one, and no field connects it to the regime recording them. On the temporal axis 139 offences entered across ten months are presented as a year, and the record cannot distinguish an absence of events from an absence of entries. On the structural axis subordinate totals exceed superordinate ones, 51 against 43 and 10 against 3, and no sheet states its scope. Each finding concerns the instrument. None measures how well any unit performed, and none is closed by adding personnel or budget, since no indicator responds to effort.

Three limits are active. One jurisdiction was examined, so the claim is that this design can fail, not how often. The preventive regime's files were not examined, so nothing here says prevention goes unreported elsewhere. And the scope of the superordinate return is undetermined, which is why the structural finding holds either way. Two lines of work follow: putting the criteria to other agencies accounting through aggregate data wherever general principles operate as binding testing norms, and carrying the transfer of these rulings, reasoned rather than settled, to a court where it can be decided.

Based on the findings, several recommendations are proposed to strengthen the legal and practical implementation of police performance accountability and further develop the analytical framework. From a regulatory and institutional perspective, the reporting instrument

for *Jumlah Tindak Pidana* and *Penyelesaian Tindak Pidana* (JTP/PTP) should incorporate three criteria of representational completeness: functional, temporal, and structural. The instrument should link repressive and preventive activities, distinguish incomplete reporting periods from periods with no recorded events, and clearly identify the organisational scope of each dataset. These requirements should be formally integrated into the applicable regulatory framework to strengthen legal certainty and ensure compliance with the accountability obligation under Article 19A(1) of *Undang-Undang Nomor 5 Tahun 2026*. Future research should apply these criteria to additional police jurisdictions and other public agencies using aggregate performance data to assess their broader applicability and robustness. Further doctrinal and judicial analysis is also needed to examine the validity and development of these criteria through administrative court practice.

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