

# Legal Obligation of Researchers to Have a Research Certificate According to Minister of Home Affairs Regulation Number 3 of 2018: Violation of the Right to Freedom of Opinion and Obligation to ADVANCE Science

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## Abstrak

are still not fulfilled with the enactment of Regulation of the Minister of Home Affairs of Republic Indonesia No. 3 Year 2018 which requires every researcher to have a Research Certificate. Complicated procedures and lack of clarity regarding the negative impacts that could arise from the research are factors that prevent researchers from obtaining the letter. As a result, the amount of research will decrease and the rights of every person in Indonesia to benefit from developments in science and technology will be violated. These restrictions also violate researchers' rights to freedom of expression through their research. In this normative legal research, the author intend to analyze how the provisions of Regulation of the Minister of Home Affairs of Republic Indonesia No. 3 Year 2018 violate the rights of researchers and everyone in Indonesia as well as the solution in the form of revoking these provisions and setting new laws and regulations that better accommodate these human rights. The data in this research was obtained through document studies of statutory regulations, books, journal articles, legal dictionaries, and related news from the internet.

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## 1. INTRODUCTION

Despite the benefits of research has been enjoyed by many people in Indonesia, but the rights of researchers are still not fulfilled and are even limited. Restrictions on researchers' rights have the potential to hamper educational progress in a country because the development of science as the core of education cannot be separated from research. Through research, various new findings can be obtained which will be valuable additions to developing existing knowledge. For example, research conducted by various researchers during the 2019 pandemic provides information regarding the SARS-CoV-2 virus and various Covid-19 vaccines such as Moderna, Pfizer, and Sinovac.

These benefits are one of the reasons why research is an important field to be regulated in the provisions of Article 1 point 6 of Law of the Republic of Indonesia Number 11 of 2019, which defines research as:

*"Activities carried out according to scientific methodology to obtain data and information related to understanding natural and/or social phenomena, proving the truth or falsity of assumptions and/or hypotheses, and drawing scientific conclusions."*

Apart from being an activity, research is also a method that studies one or several phenomena by analyzing and examining in depth a fact so that the researcher can try to find a solution to the problems posed by that fact. Whether as an activity or method to find solutions to certain problems, we cannot deny that research is a means for researchers to channel their curiosity about a field of science and to foster, strengthen and develop the field of science being researched.

This aim makes research related to Human Rights (HAM), especially the right to freedom of opinion, as a person's right to state something or information that constitutes his or her views without feeling afraid of receiving punishment from the government

authorities or from other parties. These human rights are regulated in the provisions of Article 28E number 3 of the 1945 Constitution jo. Article 23 number 2 of Law of the Republic of Indonesia Number 39 of 1999, which gives permission for everyone to express opinions either orally or in writing.

The results of the research are prepared in the form of a written report containing information in the form of a series of letters and/or numbers that explain a phenomenon, so that it can function as a means of expressing opinions in writing and is therefore related to the right to freedom of opinion, the existence of which needs to be protected and guaranteed by statutory provisions. -invitation in Indonesia. Research also has an inseparable relationship with scientific progress considering that one of its aims is to advance existing knowledge. This is realized through novelty in the form of new information about the phenomenon being studied, which will encourage new research to be carried out.

Therefore, the Government of the Republic of Indonesia has a legal obligation to advance science and technology so that everyone in Indonesia can enjoy the benefits of both advances in their daily lives as regulated in the provisions of Article 31 point 5 of the 1945 Constitution. This obligation is regulated in the Constitution of the Republic Indonesia in order to fulfill the rights of every person in Indonesia to benefit from the development of science and technology as regulated in the provisions of Article 28C number 1 of the 1945 Constitution jo. Article 13 of Law of the Republic of Indonesia Number 39 of 1999 concerning Human Rights and protects the rights of researchers to freedom of opinion.

Both can be done in a way that does not limit the rights of researchers in Indonesia, so that they can express their opinions in writing through the results of their research which is also beneficial for Indonesian society. The Government of the Republic of Indonesia should issue regulations that help them carry out research and not hinder them from researching. One of the things that hinders researchers in Indonesia from conducting research is the legal obligation to have a Research Certificate (SKP).

As with other legal obligations, this obligation requires researchers in Indonesia to comply with the provisions of Article 5 point 1 of the Regulation of the Minister of Home Affairs of the Republic of Indonesia Number 3 of 2018 (or Regulation of the Minister of Home Affairs of the Republic of Indonesia Number 3 of 2018). The provisions of this article require every researcher who will conduct research within a national, provincial and district/city scope to have an SKP. Research Certificate is a letter issued by the Minister of Home Affairs, Governor, Regent or Mayor in accordance with their authority which contains information regarding the research carried out by the researcher.

In short, SKP is a permit for researchers to continue their research and is given by the official authorized to issue and sign it, namely the Directorate General of Politics and General Government of the Ministry of Home Affairs of the Republic of Indonesia and/or the Provincial and Regency/City Investment and PTSP Services. The permit is valid for one year and if the research period exceeds this limit, the researcher is obliged to extend the SKP. Researchers who wish to obtain an SKP must register online via the Administrative Services Online Information System (SIOLA) as regulated in the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018.

Researchers as SKP applicants can register their application by opening the official website of the Administrative Services Unit of the Ministry of Home Affairs of the Republic of Indonesia, namely [ula.kemendagri.go.id](http://ula.kemendagri.go.id). After successfully creating an account by filling in their personal data on this page, the researcher concerned can log in and must upload all documents that are requirements for obtaining SKP as regulated in the provisions of Article 9 of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018.

The next stage after the application submission stage is the verification stage. At this stage, the completeness of the required documents that have been uploaded will be checked by officers at the Administrative Services Unit at the Ministry of Home Affairs and officers at the Provincial and Regency or City Investment and PTSP Services. If the documents submitted are still incomplete, the application will be returned to the applicant for completion. When the documents have been completed, the Directorate General of Politics and General Government of the Ministry of Home Affairs of the Republic of Indonesia and/or the Provincial and Regency/City Investment and PTSP Services will assess the negative impacts that may arise from the research to be carried out. If there are indications of adverse impacts from the research to be carried out, then they will refuse (or at least provide a recommendation for rejection) for the issuance of the SKP.

If the required documents are complete and no negative impacts are found that could arise from the research to be carried out, then the relevant official will issue an SKP no later than five working days after the SKP application is received complete with all the requirements. The service completion period for obtaining an SKP is four working days free of charge. Apart from the complicated procedures for obtaining SKP, the lack of clarity regarding the definition and types of negative impacts that can arise from the research process clearly slows down researchers from carrying out their duties. Until now there is not a single article in the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 which explains the definition and types of negative impacts that can arise from the research process.

As a result, researchers cannot know for sure what negative impacts are the reason why they cannot obtain an SKP as regulated in the provisions of Article 11 number 4 of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018. This uncertainty will result in researchers in Indonesia being disinterested in conducting research, so that the amount of research in Indonesia will decrease and science will decline. Therefore, everyone in Indonesia cannot benefit from the development of science and technology. This certainly violates their rights to obtain benefits from the development of science and technology as regulated in the provisions of Article 28C number 1 of the 1945 Constitution jo. Article 13 Law of the Republic of Indonesia Number 39 of 1999.

Apart from that, the complicated procedures and lack of clarity regarding the negative impacts that could arise in the provisions of Minister of Home Affairs Regulation Number 3 of 2018 also violate the rights of researchers in Indonesia to freedom of opinion. This is because when researchers in Indonesia cannot carry out research, their right to freedom of opinion through writing is not fulfilled. It was not surprising when researchers in Indonesia filed a protest so that the Minister of Home Affairs of the Republic of Indonesia at that time (the late Mr. H. Tjahjo Kumolo, SH) decided to revoke the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018. This revocation means that research will refer to the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 7 of 2014.

However, the revocation of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 is only temporary. This Permendagri remains the legal basis for the Administrative Services Unit of the Ministry of Home Affairs of the Republic of Indonesia to provide services to researchers who wish to obtain a Research Certificate. The status of these statutory regulations also remains in effect and has not been revoked or replaced by new statutory regulations. So as long as the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 is still in effect, the rights of researchers in Indonesia to freedom of opinion will continue to be violated. This violation will also cause a decline in science and technology in Indonesia and as a result the right of every person in Indonesia to benefit from advances in science and technology will not be fulfilled.

In order to protect the rights of researchers in Indonesia to freedom of opinion and the human rights of every person in the territory of the Republic of Indonesia to benefit from advances in science and technology, the Government of the Republic of Indonesia should permanently revoke the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 and issue regulations new legislation that provides more clarity regarding what types of negative impacts could arise that would result in a researcher in Indonesia not being entitled to obtain an SKP.

If the new legislation regulates the definition and types of negative impacts, then researchers will at least understand the reasons why they cannot obtain SKP and they can improve or carry out new research that does not cause negative impacts. So that their right to freedom of opinion through research results (writing) will be fulfilled and everyone in Indonesia can benefit from more advanced science and technology thanks to their research.

Legal certainty regarding the definition and types of negative impacts that may arise from research is the researcher's right as regulated in the provisions of Article 28D number 1 of the 1945 Constitution and Article 3 number 2 of the Law of the Republic of Indonesia Number 39 of 1999 concerning Human Rights. This certainty can only be obtained through regulations regarding the definition and types of negative impacts that can arise from research so that researchers are not entitled to obtain SKP. This regulation will issue legal regulations containing provisions regarding what types of research may and may not be carried out based on the potential consequences that arise.

So that all researchers and other parties in Indonesia who are related to the field of research will be obliged to comply with the provisions of laws and regulations which contain legal norms which bind them to comply in order to obtain SKP. Legal certainty is one of the ideals or goals of law apart from legal benefits and justice according to Gustav Radbruch. So legal certainty must be fulfilled, especially in this case so that the rights of researchers in Indonesia to freedom of opinion through research results and also the rights of every person in Indonesia to benefit from the development of science and technology are fulfilled. Thus, the main problems in this research are as follows:

1. How can the legal obligation for researchers in the territory of the Republic of Indonesia to have SKP based on the provisions of Minister of Home Affairs Regulation Number 3 of 2018 violate researchers' right to freedom of opinion through research results?
2. What is the potential for a decline in science and technology that could arise that would violate the rights of every person in Indonesia to benefit from the development of science and technology and the obligation of the Government of the Republic of Indonesia to advance both?

### **3. RESEARCH METHOD**

This research is normative legal research. This is because this research was conducted to explain how the provisions of the Regulation of the Minister of Home Affairs of the Republic of Indonesia Number 3 of 2018 regarding the obligation for every researcher in Indonesia to obtain SKP have violated their right to freedom of opinion, the right of every person in the Republic of Indonesia to benefit from progress. science and technology, as well as the obligation of the Government of the Republic of Indonesia to advance both.

In order to explain these various things, I will analyze various library materials such as the 1945 Constitution, Law of the Republic of Indonesia Number 39 of 1999, and Minister of Home Affairs Regulation Number 3 of 2018 along with other relevant library materials so that the form of research I carry out is normative legal research. Because the aim of my research is to provide data that is as thorough as possible in order to explain this, the typology of this research is descriptive research. The data collection tool that I used in this

research was document study, by analyzing the contents of various library materials that could answer the problems in this research.

The data I use in this research is secondary data sourced from various library materials, which are divided into primary, secondary and tertiary legal materials. The primary legal materials that will be analyzed in this research are various statutory regulations such as the 1945 Constitution, Law of the Republic of Indonesia Number 39 of 1999, Regulation of the Minister of Home Affairs of the Republic of Indonesia Number 3 of 2018, Law of the Republic of Indonesia Number 11 of 2019 as statutory regulations governing the definition of research, the right to freedom of opinion of researchers through writing, the right of every person in the Republic of Indonesia to benefit from advances in science and technology, as well as the obligation of the Government of the Republic of Indonesia to advance both.

The secondary legal materials that will be analyzed in this research are various books, journal articles and the work of other legal circles such as the book Introduction to Legal Research by Prof. Dr. Soerjono Soekanto, SH, MA who became my analytical tool in explaining the definition, types and how to conduct legal research as well as the basic understanding of the research itself as well as various news articles on the internet regarding violations of researchers' human rights by the provisions of Minister of Home Affairs Regulation Number 3 of 2018. Apart from that, I will also use a legal dictionary *Black's Law Dictionary Fourth Edition* Henry Campbell Black's work to explain terms that are not regulated in legislation such as regulations.

#### 4. RESEARCH RESULTS AND DISCUSSION

##### A. Research Certificate (SKP) and Legal Obligations of Researchers to Obtain It Based on Minister of Home Affairs Regulation Number 3 of 2018

Research Certificate (or also known as SKP) is a type of letter regulated in the provisions of the Republic of Indonesia Minister of Home Affairs Number 3 of 2018, which defines SKP as a letter issued by the Minister of Home Affairs, Governor, Regent or Mayor in accordance with their authority containing information regarding research conducted by researchers. The SKP explains various information related to the name and address of the researcher as well as other information related to the research, such as title, objective, date and/or duration, location, field, status, name of the person in charge of the researcher, names of research members, and names of the Ministry and / or non-Ministry government agencies.

The Research Certificate is also a written recommendation from the Secretary of the Directorate General of Politics and General Government of the Ministry of Home Affairs of the Republic of Indonesia so that research can be carried out. In order to obtain this written recommendation, a researcher must follow all the stages and fulfill all the requirements as regulated in the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018. Based on the provisions of the Minister of Home Affairs, researchers as SKP applicants must submit their application to the Administrative Services Unit of the Republic of Indonesia's Ministry of Home Affairs. Indonesia through the service unit's official website, namely [ula.kemendagri.go.id](http://ula.kemendagri.go.id).

After opening the page, SKP applicants must create an account by filling in their personal data such as applicant type (Foreign Citizen or Indonesian), keywords, agency of origin (please fill in "general," if not affiliated), full name, place and status. birth, gender, address according to the applicant's KTP, electronic mail address, telephone number, and original scan of the applicant's identity.

If you have obtained an account, the applicant can click on the login option and submit an application by filling in personal data and uploading all the required

documents needed on the official page. The type of document that is a requirement to obtain an SKP is an Application Letter to obtain an SKP which is accompanied by a number of other documents, namely: Research Proposal to be carried out, statement letter stamped with Ten Thousand Rupiah to comply with and not violate the provisions of laws and regulations, statement letter of responsibility for its validity. documents or files submitted, and the identity of the researcher concerned, namely an Electronic Identity Card (KTP-el) and a color photograph of the researcher measuring 4x6 (four times six).

These various documents will be checked for completeness by officers at the Administrative Services Unit at the Ministry of Home Affairs and officers at the Provincial and Regency or City Investment and PTSP Services at the verification stage. If the documents are incomplete, the application will be returned to the applicant for completion. After the applicant completes the required documents and passes the verification stage, the next stage is the assessment stage. At this stage, the Directorate General of Politics and General Government of the Ministry of Home Affairs of the Republic of Indonesia and/or the Provincial and Regency/City Investment and PTSP Services will carry out an assessment of the negative impacts that may arise from the research to be carried out. If there are indications of adverse impacts from the research to be carried out, then they will refuse (or at least provide a recommendation for rejection) for the issuance of the SKP.

The authorized official will issue an SKP no later than five working days after the SKP application is received in full with all its requirements without any indication of negative impacts that will arise from the research. The service completion period for obtaining an SKP is four working days free of charge. Researchers who will conduct research within a national, provincial and district/city scope in Indonesia are required to obtain SKP. These legal obligations are regulated in the provisions of Article 5 number 1 of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018.

Every researcher in Indonesia is required to have an SKP because this legal obligation has been regulated in statutory provisions which contain legal norms in the form of orders (*gebod*) for researchers to obtain SKP. Because Minister of Home Affairs Regulation Number 3 of 2018 was established by the Minister of Home Affairs of the Republic of Indonesia as the authorized official to issue it, the legal norm in the form of this order binds researchers in Indonesia to comply with it by obtaining SKP before carrying out their research.

## **B. Researchers' Right to Freedom of Opinion**

The right to freedom of opinion is the human right of every person in the territory of the Republic of Indonesia to express thoughts and ideas about something. In other words, the right to freedom of opinion is related to a person's freedom to express opinions according to what he knows and believes. The right to freedom of opinion can be exercised by everyone either orally or in writing.

For example, demonstrations carried out in an orderly manner by community organizations are a form of verbally expressing the right to freedom of opinion. Meanwhile, research is an example of expressing the right to freedom of opinion in writing. This is because through research results, which not only contain a scientific explanation of a phenomenon, but also the researcher's opinion regarding a phenomenon in the form of suggestions which are generally written in a chapter or concluding section.

A researcher is someone whose main task is to carry out research and/or development of science and technology. As a person, the researcher meets the requirements to be called a human legal subject (*natuurlijk person*) to whom rights and obligations can be assigned by law. Therefore, researchers have human rights in the form of the right to freedom of opinion and can transmit them either orally or in writing in the form of research results in the territory of the Republic of Indonesia.

The right to freedom of opinion is regulated in the provisions of Article 28E number 3 of the 1945 Constitution jo. Article 23 number 2 of Law of the Republic of Indonesia Number 39 of 1999 concerning Human Rights, states that opinions are permitted to be implemented in Indonesia either orally or in writing. Apart from being guaranteed and protected in Indonesian laws and regulations, this right is also recognized by the provisions of Article 19 of the Universal Declaration of Human Rights which was announced by the UN General Assembly on 10 December 1948 .

However, the right to freedom of opinion also has a number of limitations that must not be exceeded. One of them is that every person who wants to exercise these rights in Indonesia must still pay attention to religious values, morality, order, public interests and the integrity of the state and must not violate these various things and also the rights of other people as fellow members of society.

### **C. Human Rights to Benefit from Advances in Science and Technology and the Obligation of the Government of the Republic of Indonesia to Promote Them**

Apart from the right to freedom of opinion, another human right that will be discussed in this research is the right to benefit from advances in science and technology. The contribution of science and technology to human welfare is something that no one needs to question anymore. For example, advances in science allow us all to use the internet and even artificial intelligence to search for the information we need.

Every person in the territory of the Republic of Indonesia has the right to benefit from advances in science and technology as stated in the provisions of Article 28C number 1 of the 1945 Constitution jo. Article 13 of Law of the Republic of Indonesia Number 39 of 1999. In order to fulfill these human rights, the Government of the Republic of Indonesia is obliged to fulfill its obligation to help the process of scientific progress in the country as regulated in the provisions of Article 31 number 5 of the 1945 Constitution, which states that the Government advancing science and technology by upholding religious values and national unity for the advancement of civilization and the welfare of mankind.

### **D. The Legal Obligation to Have an SKP is a Violation of the Rights to Freedom of Opinion of Researchers and the Government's Obligation to Advance Science**

Based on the provisions of Article 5 of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018, every researcher who will conduct research within the national, provincial and district/city scope in the territory of the Republic of Indonesia is legally obliged to have a Research Certificate first. These provisions have proven to make it difficult for researchers to conduct research because to date there is not a single article in the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 which explains the definition and types of negative impacts that can arise from the research process.

If researchers cannot understand the types of negative impacts that can arise from the research process as regulated in the provisions of Article 2 of the Republic of Indonesia Minister of Home Affairs Regulation No. 3 of 2018, then they cannot obtain SKP as permission to conduct research. The complicated process of obtaining SKP

also makes it difficult for researchers to express their right to freedom of opinion in writing through research. This clearly violates their right to express opinions freely as regulated in the provisions of Article 28E number 3 of the 1945 Constitution jo. Article 23 number 2 Law of the Republic of Indonesia Number 39 of 1999.

Apart from that, if this problem is not addressed, the amount of research in the Republic of Indonesia will decrease and science will decline. This setback will result in everyone in Indonesia not being able to feel the benefits of the development of science and technology. As a result, the right of every person in the Republic of Indonesia to benefit from advances in science and technology as regulated in the provisions of Article 28C number 1 of the 1945 Constitution jo. Article 13 of Law of the Republic of Indonesia Number 39 of 1999 is also not fulfilled.

Failure to fulfill this right means that the Government of the Republic of Indonesia has failed to fulfill its obligations to assist the process of scientific progress in the country as regulated in the provisions of Article 31 point 5 of the 1945 Constitution. This problem of course needs to be resolved by the Government of the Republic of Indonesia in order to protect the rights of researchers in Indonesia on freedom of opinion and the human rights of every person in the territory of the Republic of Indonesia to benefit from advances in science and technology.

So the Government of the Republic of Indonesia should permanently revoke the provisions of Minister of Home Affairs Regulation Number 3 of 2018 and issue new laws and regulations that provide more clarity regarding what types of negative impacts could arise that would result in a researcher in Indonesia not being entitled to obtain an SKP. By regulating the definition and types of negative impacts, researchers will at least understand the reasons why they cannot obtain an SKP. So that they can improve or carry out new research and apart from fulfilling their right to freedom of opinion through research results (writings), this arrangement will also fulfil the right of every person in Indonesia to benefit from science and technology.

Legal certainty regarding the definition and types of negative impacts that may arise from research is the researcher's right as regulated in the provisions of Article 28D number 1 of the 1945 Constitution and Article 3 number 2 of the Law of the Republic of Indonesia Number 39 of 1999. This certainty can only be obtained through regulations regarding definition and types of negative impacts that can arise from research so that researchers are not entitled to obtain SKP. This regulation will issue legal regulations containing provisions regarding what types of research may and may not be carried out based on the potential consequences that arise.

So that all researchers and other parties in Indonesia who are related to the field of research will be obliged to comply with the provisions of laws and regulations which contain legal norms which bind them to comply in order to obtain SKP. In other words, legal norms in the form of permissibility (*mogen*) in statutory regulations provide legal certainty to researchers regarding what research they are allowed to carry out.

Legal certainty is one of the ideals or goals of law apart from legal benefits and justice according to Gustav Radbruch. Every person in the territory of the Republic of Indonesia has the right to legal certainty as regulated in the provisions of Article 28 D number 1 of the 1945 Constitution jo. Article 3 number 2 of Law of the Republic of Indonesia Number 39 of 1999. So that legal certainty must be fulfilled, especially in this case so that the rights of researchers in Indonesia to freedom of opinion through research results and also the right of every person in Indonesia to benefit from the development of science and technology is met.

Especially considering that the revocation of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 is still temporary and the Republic of



Indonesia Minister of Home Affairs Regulation Number 7 of 2014 is still unable to provide legal certainty to researchers regarding what negative impacts can arise from research as things that need to be explained by them in order to obtain SKP. Researchers need new legal regulations that better fulfill their rights compared to the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018, whose status is still valid and therefore serves as the legal basis for the Administrative Services Unit of the Ministry of Home Affairs of the Republic of Indonesia to provide services to researchers who wish to obtain SKP.

## 5. CONCLUSIONS AND RECOMMENDATIONS

In closing, I conclude that the provisions Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 is a provision that limits researchers from conducting research thereby violating their right to freedom of opinion through research (writing) as regulated in the provisions of Article 28E number 3 of the 1945 Constitution jo. Article 23 number 2 Law of the Republic of Indonesia Number 39 of 1999. The result of implementing the Republic of Indonesia Minister of Home Affairs Regulation is that the amount of research in Indonesia is reduced so that everyone in Indonesia cannot benefit from developments in science and technology (which are closely related to research).

So this provision also violates their rights to obtain benefits from developments in science and technology as regulated in the provisions of Article 28C number 1 of the 1945 Constitution jo. Article 13 of Law of the Republic of Indonesia Number 39 of 1999 and therefore is a violation of the obligation of the Government of the Republic of Indonesia to advance science as regulated in the provisions of Article 31 number 5 of the 1945 Constitution.

Therefore, I suggest that the Government of the Republic of Indonesia revoke the provisions of the Republic of Indonesia Minister of Home Affairs Regulation Number 3 of 2018 permanently and regulate the definition and types of adverse impacts that may arise as a result of research conducted within the provisions of laws and regulations which contain norms that better fulfill the rights of researchers. on freedom of opinion and the right of every person in Indonesia to benefit from developments in science and technology.

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