

Legal Analysis Of The Implementation Of The Immigration Management Information System (Simkim) In Passport Se Vices In Batam City Towards Transparent Public Service.

Jimmy Limou ^{1*}, Soerya Respationo ² and Ramon Nofrial ³

^{1, 2, 3} Master of Law Program, Universitas Batam

E-mail : 74123030@univbatam.ac.id

*Corresponding Author : Jimmy Limou

Received : 25 July 2025
Revised : 11 August 2025
Accepted : 29 August 2025

Published : 08 September 2025
DOI : <https://doi.org/10.54443/ijerlas.v5i5.4014>
Link Publish : <https://radjapublika.com/index.php/IJERLAS>

Abstract

Ensuring everyone can see and understand how government services work is crucial. Thanks to new technology, the immigration office in Batam City has begun using a new computer system called SIMKIM to assist with passport services. This study examines how SIMKIM regulations were created, how it is used, and the challenges and solutions. The study discusses how the law supports SIMKIM, how workers and the public use it, and the challenges they face, such as a lack of computers or a lack of familiarity with digital devices. Overall, SIMKIM helps speed up, improve, and simplify the passport application process. The study suggests that to improve services, they need to improve regulations, provide more training to workers, build better computer systems, and teach more people how to use digital technology.

Keywords: *SIMKIM, Passport Services, Public Services, Transparency, Administrative Law*

1. Introduction

Transparent, efficient, and accountable public services are one of the main requirements for achieving good governance. As a form of public service, passport services provided by the Directorate General of Immigration are in the spotlight, given their role in fulfilling citizens' rights to obtain valid travel documents. In an effort to address various issues such as bureaucratic red tape, slow service processes, and lack of transparency, the government has implemented the Immigration Management Information System (SIMKIM). SIMKIM is a technology-based innovation aimed at accelerating immigration service processes, reducing the potential for abuse of authority, and enhancing public trust in the performance of immigration agencies. However, in its implementation in Batam City, which is one of the areas with high population mobility, the implementation of SIMKIM still faces various challenges. Although theoretically this system is capable of improving transparency and efficiency in passport services, on-the-ground realities reveal challenges from technical, legal, and human resource perspectives.

The importance of fast, efficient, and transparent public services lies in their function as the fulfillment of the basic rights of citizens within the framework of the rule of law. Philipus M. Hadjon states that good public services are a reflection of the state's compliance with the principles of good governance, which include transparency, accountability, and effectiveness [1]. In the context of globalization and technological developments, efficient public services have become an urgent need. According to Sondang P. Siagian, the use of information and communication technology in public services can cut down on lengthy bureaucracy, reduce the potential for abuse of authority, and speed up the delivery of services to the public [2]. Transparency in public services plays a significant role in preventing administrative irregularities, such as illegal levies or corruption. According to Dwiyanto, transparency promotes information disclosure and service accessibility, enabling the public to monitor and assess the performance of service providers objectively [3]. With transparency, the public feels involved in the service process and has legal certainty regarding their rights. In the implementation of SIMKIM, for example, transparency is realized through an integrated system that is easy for service applicants to monitor. Additionally, fast and accountable public services play a significant role in enhancing a country's competitiveness. In the midst of global development, countries with well-functioning public service systems are more likely to be trusted in terms of investment and economic growth. Dwight Waldo, in his theory on public administration, emphasizes that the success of a government lies in its ability to effectively respond to public needs through mechanisms

that are fast, transparent, and accountable [4]. With a technology-based system, people can access services independently through digital platforms without having to rely on time-consuming manual processes. This not only improves service effectiveness but also reduces opportunities for maladministration practices such as illegal fees and abuse of authority. The implementation of information technology in public services also plays a role in realizing the principles of transparency and accountability. According to Dwiyanto, the transparency resulting from the use of technology creates openness of information, enabling the public to access, monitor, and evaluate the performance of public services [3]. The application of technology in the government sector is an integral part of bureaucratic reform known as the concept of e-Government. According to Richard Heeks in his book *Implementing and Managing e-Government*, e-Government is the government's effort to utilize digital technology to improve the effectiveness, efficiency, transparency, and accessibility of public services [5]. Bureaucratic reform through e-Government aims to respond to public needs more quickly and simplify service procedures through the integration of technology into administrative systems. Governments that adopt e-Government not only improve service quality but also create open and accountable governments. In the immigration sector, the application of technology in the form of the Immigration Management Information System (SIMKIM) is a concrete example of e-Government implementation in public services. SIMKIM aims to improve the effectiveness of immigration services, such as passport issuance, which were previously prone to lengthy bureaucracy and non-transparent practices.

The implementation of e-Government such as SIMKIM is not only oriented towards improving service quality, but also aims to build public trust in government performance. According to Dwight Waldo, technology in public administration serves as a means to create a more responsive, transparent, and accountable government in fulfilling the rights of the people [6]. In the context of passport services in Batam City, the implementation of SIMKIM is an important part of the government's efforts to reduce bureaucratic barriers and respond to public demands for more modern, effective, and legally certain services. The Immigration Management Information System (SIMKIM) is a technology-based innovation developed by the Directorate General of Immigration of the Ministry of Law and Human Rights of the Republic of Indonesia to support more modern and efficient immigration services. SIMKIM is an integrated system that covers various immigration services, such as passport issuance, border control, and immigration data management. According to Erna Susanti in her book *Inovasi Pelayanan Publik Berbasis Teknologi Informasi (Information Technology-Based Public Service Innovation)*, SIMKIM was introduced as a solution to the challenges of manual services, which are often prone to bureaucratic red tape, delays, and a lack of transparency [6]. As an innovation in public services, SIMKIM is also in line with the principles of e-Government, where technology is used to improve the effectiveness and efficiency of government administration. According to Richard Heeks, technology-based systems such as SIMKIM are capable of creating better public service governance through process simplification, more accurate data management, and wider accessibility for the public [5].

The use of technology in public services has a strong legal basis in Indonesia's administrative law system. The principles of effective, efficient, and transparent public services are regulated in Law No. 25 of 2009 on Public Services, which states that the government is obligated to provide quality services by utilizing information technology. Article 21 of this Law stipulates that public service providers must implement information technology systems as part of efforts to improve the efficiency and accessibility of services. In the field of immigration, the legal basis for the use of technology is stipulated in Law No. 6 of 2011 on Immigration, which regulates immigration supervision and services. Article 40 of this Law states that the implementation of immigration services must support the interests of the state through the effective and transparent use of technology. This aligns with the principles of good governance, which emphasize efficiency, transparency, and accountability in public services. More specific regulations regarding the implementation of SIMKIM can be found in Regulation of the Minister of Law and Human Rights Number 11 of 2024 concerning Amendments to Regulation of the Minister of Law and Human Rights Number 22 of 2023 concerning Visas and Stay Permits. This regulation emphasizes that the use of information technology is intended to accelerate immigration services and increase transparency in every stage of service. Article 2 of the regulation states that the technology system must be used in an integrated manner to minimize deviations and expedite decision-making. In the context of passport services, Minister of Law and Human Rights Regulation No. 18 of 2022 amending Minister of Law and Human Rights Regulation No. 8 of 2014 on Ordinary Passports and Travel Documents Equivalent to Passports serves as the legal basis for the implementation of SIMKIM as a system facilitating the issuance of passports in a fast and transparent manner. Article 11 of this regulation states that the immigration information system must be used to simplify administrative processes and improve the quality of services provided to the public. With this regulation, passport services through SIMKIM are not only administrative in nature but also have a legal basis supporting the improvement of public services. According to Miftah Thoha, technology-based service policies must be implemented with professional governance to ensure efficiency and public trust in government services [7]. The main problem (core problem) in the use of SIMKIM in passport services in Batam City lies in the suboptimal implementation of the system in realizing fully transparent and accountable

public services. Although the system has streamlined administrative processes and reduced face-to-face interactions, challenges remain, such as limited public access to clear service information, low digital literacy, and inconsistencies in the implementation of standard operating procedures (SOPs) by field staff. Additionally, internal oversight of system usage is weak, leaving room for maladministration practices that have not yet been fully eliminated. This issue indicates that the legal implementation of SIMKIM is not yet fully aligned with the principles of transparency and accountability mandated by Law No. 25 of 2009 on Public Services. Therefore, an in-depth legal analysis is needed to assess the effectiveness of the system and to provide recommendations for improvements in terms of regulations and implementation in the field.

2. Literature Review

2.1. Definition of Administrative Law and Public Services

Administrative law is a branch of law that regulates how government administration is carried out and how the relationship between state administrators and the public is conducted. According to Philipus M. Hadjon, administrative law is the law that regulates the obligations and authorities of administrative officials in carrying out governmental functions, as well as the legal remedies available to members of the public who feel they have been wronged by administrative actions [1]. In other words, administrative law serves as the legal basis for the provision of public services by the government to the community, as well as providing a mechanism for controlling the authority of state administrative officials. State administrative law is also related to the management of public services that are fair, transparent, and accountable. State administrative law is a legal rule that regulates all actions or decisions of the government in providing services to the community, both in the form of policies and concrete actions taken by public officials. This law aims to create an orderly, organized, and lawful system of government. Therefore, administrative law plays a crucial role in ensuring citizens' rights to access good and fair public services [8].

2.2 Basic Principles of Administrative Law

Law Number 25 of 2009 concerning Public Services stipulates the basic principles that must be fulfilled by public service providers. The principle of transparency is one of the main principles regulated in this Law. Transparency requires openness of information regarding procedures, costs, and service timelines, enabling the public to understand and monitor every stage of the service process. According to Dwiyanto, the principle of transparency aims to minimize the abuse of authority and build public trust in government institutions [3]. The next principle is accountability, which is the obligation of service providers to be responsible for every policy, action, and result of the services provided. This principle ensures that public services are carried out professionally and are accountable both legally and ethically. According to Sondang P. Siagian, accountability in public services is an absolute requirement to prevent corruption and irregularities in administrative services [2].

2.3 The Concept of E-Government in the Provision of Public Services

The concept of e-Government is the use of information and communication technology (ICT) by the government to improve the quality of public services, transparency, and efficiency in the management of state administration. According to Richard Heeks, e-Government is the transformation of public services through digital technology that connects the government with the community, the business world, and other stakeholders [5]. The main objective of implementing e-Government is to create a transparent, efficient, effective, and community-oriented government. According to Dwiyanto in Reformasi Birokrasi Publik di Indonesia (Public Bureaucratic Reform in Indonesia), e-Government enables public services to run faster, reduces red tape, and minimizes opportunities for abuse of authority [3]. The use of information technology in public services aims to overcome traditional bureaucratic obstacles, such as slow, inefficient processes and a lack of transparency. Technology enables the government to provide faster and more efficient services through integrated digital systems. According to Erna Susanti in Inovasi Pelayanan Publik Berbasis Teknologi Informasi (Information Technology-Based Public Service Innovation), digitizing public services can cut through long bureaucratic chains, resulting in faster services and lower operational costs [6].

2.4 Definition and Objectives of the Immigration Management Information System (SIMKIM)

The Immigration Management Information System (SIMKIM) is an information technology-based system developed by the Directorate General of Immigration of the Ministry of Law and Human Rights of the Republic of Indonesia to support digital immigration administration. SIMKIM covers the management of immigration services, such as passport issuance, border control of people, and the management of data on foreign nationals entering and exiting Indonesia. According to Heru Santoso in his journal titled Implementation of Information Technology in the Immigration System

in Indonesia, SIMKIM aims to accelerate service processes, minimize administrative errors, and enhance transparency in public services [9]. Thus, SIMKIM is a strategic step in supporting the modernization of immigration bureaucracy. The main objective of implementing SIMKIM is to improve the effectiveness and efficiency of public services in the field of immigration. This system enables centralized and real-time management of immigration data, thereby streamlining administrative processes and improving accuracy. According to Bambang Riyanto, the implementation of SIMKIM aims to support government policies on bureaucratic reform by utilizing digital technology as a tool for modernizing public services [10].

3. Methodology

The specifications and/or type of research in this thesis is normative legal research combined with sociological (empirical) legal research using secondary data obtained directly from primary sources through field research via interviews and primary data as sources/information in the form of primary legal materials, secondary legal materials, and tertiary legal materials. Thus, research methods can be defined as the principles and procedures for solving problems encountered in conducting research. Methods are used in research, which is essentially a process of rediscovering the truth. This will answer questions that arise about a research object. Research is a means used to strengthen, nurture, and develop knowledge. The specification of this research is only to conduct analysis up to the level of detection, which is analyzing and presenting facts systematically so that they are easier to understand and conclude. The approach used in this study is a combination of the normative approach of “legal research” and the empirical approach of “juridical sociologies.” The research mechanism using this combined approach is carried out by analyzing the research explanation using inductive reasoning, which leads to deductive reasoning and vice versa. This is done by the author to help explain the relationship between the research variables and the research object, thereby producing an understanding that is very helpful to readers, especially researchers and academics. The location of this study was carried out in the Riau Islands Province, specifically at the Class I Special Immigration Office in Batam. This location was determined based on the data that was the object of this thesis research.

In the thesis titled “Legal Analysis of the Implementation of the Immigration Management Information System (SIMKIM) in Passport Services in Batam City Towards Transparent Public Services,” the data collection techniques used were a combination of library research and field research. Library research was conducted to examine and analyze the legal basis and policies related to the implementation of SIMKIM, referring to various primary legal sources such as Law No. 6 of 2011 on Immigration, Law No. 25 of 2009 on Public Services, Minister of Law and Human Rights Regulations, as well as secondary legal materials in the form of books on administrative law, scientific journals, and relevant literature. This technique aims to gain theoretical and legal understanding of the subject matter and strengthen the normative analysis in the research.

4. Results and Discussion

4.1 Legal Regulations on the Immigration Management Information System (SIMKIM) in Passport Services Towards Transparent Public Services

Public services in the context of administrative law are a manifestation of the state's obligation to fulfill the basic rights of citizens. Normatively, public services are defined as all forms of service provision by state administrators to the community with the aim of meeting needs in the areas of services, goods, and administration. According to Philipus M. Hadjon, public services are the concrete form of the performance of governmental functions by state administrative officials, which must be based on the principles of legality and protection of citizens' rights [1]. In this context, passport services provided by immigration offices are part of the state's legal responsibility to ensure the right to valid travel documents. In the context of immigration services, these principles form the legal basis for developing technology-based service innovations, such as the implementation of the Immigration Management Information System (SIMKIM). As an information technology-based system, SIMKIM must be able to meet the requirements of administrative law principles by ensuring transparency in service processes, clarity in administrative procedures, and accountability from implementing officials. Therefore, the existence of SIMKIM in passport services is not merely a technical administrative issue but also an integral part of the implementation of good governance principles rooted in public administrative law. The state, within the framework of modern administrative law, has a legal responsibility to utilize advances in information technology as a means of providing public services. This obligation is reflected in Law No. 25 of 2009 on Public Services, particularly Article 21, which states that public service providers are required to provide public service facilities and infrastructure that are in line with advancements in science and technology. This underscores that the use of technology is not merely a bureaucratic innovation but has become a legal obligation for the state to fulfill the public's right to fast, easy, and transparent services. In the context of immigration, this obligation is realized through the implementation of SIMKIM as regulated in Regulation of the Minister of Law and Human Rights of the Republic of Indonesia

Legal Analysis Of The Implementation Of The Immigration Management Information System (Simkim) In Passport Services In Batam City Towards Transparent Public Service.

Jimmy Limou et al

Number 17 of 2016 concerning Information Technology-Based Immigration Services and Management. This system is designed to support the efficient implementation of immigration services, particularly in terms of passport application management, border control, and the integration of national immigration data. With a digital system such as SIMKIM, the state can minimize bureaucratic red tape and maladministration, as well as build public trust in immigration agencies as service providers. Furthermore, the state's obligation to provide technology-based services also includes the responsibility to protect public data, ensure the accuracy of information, and prevent the abuse of authority by officials. According to administrative law theory, this responsibility is not only administrative in nature but also involves legal protection for the public as legal subjects receiving services. Therefore, the state is not only required to provide a system such as SIMKIM, but also to ensure that the system operates in accordance with the law, is transparent, and is institutionally accountable. In the context of Batam City as a border area with high mobility, this obligation becomes even more important in order to realize transparent, fast, and legally certain passport services. Under Law No. 6 of 2011, SIMKIM is defined as an ICT (Information and Communication Technology) system that supports the collection, processing, and presentation of information in the implementation of immigration functions. This not only covers administrative services but also supports border control of people crossing borders and supports data-driven decision-making.

The use of SIMKIM is therefore not only administrative but also strategic in supporting the functions of state sovereignty. In Law No. 63 of 2024, which is the third amendment to Law No. 6 of 2011, the importance of enhancing immigration functions by expanding the authority of immigration officials, including in law enforcement, is reaffirmed. Although this law does not directly add new clauses on SIMKIM, the context of strengthening the role of immigration in the digital era continues to underpin the need for a strong and reliable management information system such as SIMKIM. In Law No. 25 of 2009 on Public Services, passport services by immigration are categorized as part of state administrative services. Article 1(1) of this law states that public services are activities aimed at fulfilling the public's needs for administrative services in accordance with laws and regulations. Therefore, the use of SIMKIM in passport services is part of the state's efforts to fulfill the public's administrative rights efficiently and in accordance with regulations. Article 4 of Law No. 25 of 2009 establishes the principles of public service delivery, such as transparency, accountability, legal certainty, efficiency, and speed. The implementation of SIMKIM is aimed at fulfilling these principles. This system enables passport applicants to obtain information on costs, schedules, and the status of their applications digitally, thereby reducing reliance on direct interaction and minimizing opportunities for corruption and bureaucratic red tape. Law No. 25 of 2009 also stipulates that every service provider must establish service standards and provide a public information system (Articles 21–23). SIMKIM serves as the concrete form of a public service information system capable of providing accurate, up-to-date, and electronically accessible data, as outlined in Article 1(9) of this Law.

Ministerial Regulation No. 8 of 2014 regulates the operational implementation of SIMKIM for passport services and other immigration-related services. This regulation emphasizes the importance of using an electronic-based system for collecting and processing immigration data to expedite service processes and oversight of both foreign nationals and Indonesian citizens. Ministerial Regulation No. 8 of 2014 also states that SIMKIM is used as a tool for integrating immigration data between work units, including Immigration Offices in regions such as Batam City. The use of this system ensures legal certainty, as every process is recorded electronically and documented, thereby minimizing the potential for abuse of authority and strengthening the accountability of service providers. Ministerial Regulation No. 17 of 2016 subsequently updated the previous provisions by emphasizing the importance of interoperability among immigration systems and improving the quality of public services through the development of an advanced SIMKIM system.

The aim is to ensure that digital-based services are not only fast and convenient but also secure and accountable. From a normative perspective, the legal regulation of SIMKIM in passport services in Batam City has a strong foundation in legislation, starting from Law No. 6 of 2011 and its amendments, Law No. 25 of 2009, to Ministerial Regulations governing technical implementation. However, the effectiveness of its implementation depends heavily on how consistently these regulations are translated into practice to ensure compliance with the principles of transparent and accountable public service. The results of document studies and annual immigration reports indicate that the implementation of SIMKIM in Batam has supported several aspects of transparent public service principles, such as the availability of online service schedules, passport status tracking, and restrictions on direct interaction. However, based on data processed from reports by the Ombudsman and the Inspector General's Office of the Ministry of Law and Human Rights, it was found that in some cases, there were still complaints from the public regarding system delays, limited access to information, and a lack of understanding of digital procedures, particularly among applicants from the general public. The relationship between national regulations and technical implementation in Batam City also shows a gap between norms and reality. Normatively, regulations provide a clear mandate to provide passport services efficiently and free from illegal fees. However, in practice, processes such as photo and biometric data collection still involve manual queuing and have not been integrated with an online appointment booking system. This indicates that the substantive legal

provisions at the national level have not yet been fully translated into standardized and responsive technical procedures at the local level.

4.2 Implementation of the Immigration Management Information System (SIMKIM) in Passport Services Towards Transparent Public Services at the Class I Special TPI Batam Immigration Office

The Batam Special Class I Immigration Office has a long and dynamic history, reflecting the rapid growth of Batam City as an economic and tourism hub. The origins of this institution date back to 1971 when it began as a Landing Post at Batu Ampar Port, which was then under the jurisdiction of the Directorate General of Immigration in Belakang Padang. As the region developed, its status was upgraded to the Sekupang Directorate General of Immigration Office in 1979, which was officially inaugurated on April 7, 1980. This change marked the beginning of a more significant role in managing immigration traffic in Batam. On April 15, 1991, the jurisdiction of the Sekupang Immigration Office was expanded to officially include the city of Batam, though it did not include the Belakang Padang district. This development was also accompanied by the relocation of the office to a more representative building in Batam Centre, which was officially inaugurated on April 30, 1994. This relocation not only reflected an increase in physical capacity but also demonstrated a commitment to providing better services in line with the city's infrastructure development. At this time, the office oversaw five Immigration Checkpoints (TPI), indicating an expanding operational scope.

Another important milestone occurred on August 7, 1995, when the name of the Sekupang Immigration Office was changed to the Batam Immigration Office. The office was then classified as a Class I Immigration Office, with its jurisdiction adjusted to align with Batam's authority, covering Batam Island, Rempang, Galang, and Galang Baru. This classification confirmed the office's strategic position as the frontline in immigration control and services in one of Indonesia's most important border areas. The Batam Special Class I Immigration Office has the primary task of carrying out some of the main duties and functions of the Ministry of Immigration and Corrections in the field of immigration. As a Technical Implementation Unit (UPT) under the Regional Office of the Directorate General of Immigration for the Riau Islands, this office plays a crucial role in implementing immigration policies. This includes providing public services, monitoring foreign nationals, and enforcing immigration laws to uphold national sovereignty and public order. The functions of this office are diverse and encompass various aspects of immigration. Internally, it handles administrative tasks, immigration-related information technology, and communication. In terms of public services, its functions include issuing travel documents such as passports and immigration residence permits. This role is vital, given the high mobility of residents and tourists in Batam. Additionally, intelligence and enforcement functions are also important to ensure compliance with regulations and prevent violations.

With the advancement of technology, the role of the Special Class I Immigration Office TPI Batam is increasingly required to adapt to technological innovations. The operation of nine TPI offices in its jurisdiction, including the Batam Centre Port which has been operational since 2003, demonstrates the growing operational complexity. In this context, the implementation of the Immigration Management Information System (SIMKIM) is a strategic step to enhance the efficiency and transparency of passport services, ensuring that the people of Batam can enjoy more modern and accountable public services. Prior to the implementation of the Immigration Management Information System (SIMKIM), passport issuance services at the Batam Special Class I Immigration Office were still dominated by manual and semi-digital mechanisms. Based on interviews with senior service staff, initial processes such as registration, form filling, and document submission were conducted directly at the counter using paper forms. This led to long queues, potential data overlap, and high dependence on administrative staff. The average passport processing time ranged from 7 to 10 working days, and service transparency was often suboptimal due to the lack of publicly available information for the public [11].

Following the full implementation of SIMKIM in 2018, passport service procedures underwent significant transformation. Based on observations and field data, the passport application process now begins with online registration through the M-Paspor application, which is directly integrated with the central SIMKIM system. Applicants are required to fill in their personal details, select an appointment time, and upload the required documents digitally. Upon arriving at the immigration office at the scheduled time, verification, biometric data collection, and interviews are conducted in an integrated system, eliminating the need to move between counters. This change has reduced service time to an average of 3–4 working days, as confirmed by service counter staff during interviews. In interviews with service users, the majority stated that after the implementation of SIMKIM, transparency and certainty of service time had improved [12]. One indicator of this is the availability of passport application status notifications via email or the app, as well as the availability of information on costs and requirements in digital form.

However, a number of respondents from the elderly and low-educated communities admitted that they still had difficulty accessing and understanding digital procedures, so they still needed assistance from other parties or immigration officers [13]. However, this innovation is not without challenges. Qualitative surveys in the field found that access to digital technology and digital literacy remain major obstacles for some groups in society. In addition, network disruptions and a lack of backup devices during technical problems are obstacles to maintaining service stability. Some respondents expressed concerns about delayed queue schedules due to system downtime, particularly during periods of high server load, such as before holidays or during the Hajj season. From an effectiveness perspective, the implementation of SIMKIM has successfully improved the speed and ease of passport services significantly. The average processing time for passports before SIMKIM was 7–10 working days, while after SIMKIM was implemented, this time was reduced to 3–5 working days. Interviews with the Head of the Travel Documents Section revealed that the existence of SIMKIM has helped to speed up the data validation process and reduce bribery, as all transactions and service processes are monitored within the system [14]. In addition to speed, the ease of access to services has also improved. Based on a brief survey of passport applicants, the majority of respondents expressed satisfaction with the SIMKIM system because it allows them to prepare documents and register from home. However, certain groups of the population, particularly the elderly and those with limited digital literacy, still face difficulties in understanding the process of using the M-Paspor and SIMKIM applications. This highlights the need for ongoing guidance and education.

The next transparency indicator is access to official fee information. In the SIMKIM system, passport fees are automatically listed according to the type of application selected by the applicant. Based on interviews with counter staff and cashiers, there is no room for fee manipulation because the system has locked the nominal amount in accordance with PNBP (Non-Tax State Revenue) regulations. Interviews with applicants also showed that they did not encounter any additional costs beyond the stipulated fees. This proves that SIMKIM plays an important role in preventing illegal fees (pungli) and strengthening the integrity of public services [15]. Normatively, indicators of transparency and accountability in SIMKIM-based public services are in line with the principles of Administrative Law. According to administrative law doctrine, public services must adhere to the principles of transparency, efficiency, and legal certainty, as stipulated in Law Number 25 of 2009 on Public Services. SIMKIM, as an information technology-based system, is deemed to have largely fulfilled these principles, particularly in ensuring the public's right to access open, certain, and directly accessible services.

4.3 Challenges and Solutions of the Immigration Management Information System (SIMKIM) in Passport Services Toward Transparent Public Services at the Class I Special TPI Batam Immigration Office

One of the main obstacles in the implementation of SIMKIM in Batam City is legal obstacles, particularly related to overlapping regulations and the lack of synchronization of standard operating procedures (SOPs). Interviews with structural officials at the Immigration Office revealed that there are differences in interpretation between central regulations (such as the Minister of Law and Human Rights Regulation) and technical implementation in the field, particularly regarding document validation, approval processes, and service timelines [16]. In addition, weak internal oversight of system implementation is also a significant legal obstacle. Based on observations and interviews with technical staff, monitoring of SIMKIM usage is still carried out conventionally and has not been fully integrated into a digital audit system that can record all service activities in real time. As a result, there are gaps in monitoring procedural non-compliance, service delays, or other irregularities that could potentially undermine the principles of transparency and accountability in public services [17]. In addition to legal and technical barriers, this study also identified social barriers, particularly in the form of low digital literacy among the public. Interviews with passport applicants revealed that many people still do not understand the online registration process, how to use the M-Paspor app, and the digital verification process. The most affected groups are the elderly and applicants from low-educational backgrounds. They tend to rely on third-party assistance or intermediaries, which indirectly creates opportunities for brokerage practices and misinformation [18]. Considering these three types of obstacles—legal, technical, and social—it can be concluded that the implementation of SIMKIM in Batam City has indeed brought progress in terms of service speed and efficiency. However, structural and cultural barriers remain obstacles to achieving truly transparent and accountable passport services. Therefore, regulatory updates, enhanced technical capacity, and an educational approach toward the public are essential as an integrated strategy to address these barriers sustainably. One of the main strategies recommended based on the results of field research is the improvement of regulations and adjustment of standard operating procedures (SOPs) for digital services. Based on interviews with structural officials and technical staff at the Batam Special Class I Immigration Office, it was found that some of the SOPs used are still manual-based and not fully integrated with the SIMKIM digital system. Therefore, revisions and synchronization of SOPs are needed to align them with application-based service workflows and information technology, including emergency response procedures in the event of system disruptions. Internal

regulations also need to be revised to make them more adaptive to technological developments and responsive to the needs of service users [19]. In the context of strengthening the implementation of these regulations, it is crucial to improve the capacity of immigration officials through ongoing technical training. Based on observations and interviews with service officers, the training currently provided is still basic and rarely updated in line with developments in SIMKIM versions or updates. Officers are expected to not only master technical operational aspects but also be able to handle complaints, educate applicants, and implement the principles of excellent service. Therefore, a regular training scheme is needed that covers system updates, technical troubleshooting, and public service communication approaches [20].

These outreach efforts also need to be carried out continuously through various platforms, including social media, printed brochures, and community workshops. The officials interviewed suggested that education should also be provided when the public visits immigration offices, through digital information screens and live simulations of the application's use. This strategy not only improves public understanding of digital services but also increases public participation in monitoring passport services, ultimately strengthening the principles of transparency and accountability. Overall, based on field findings, the improvement strategy for SIMKIM implementation cannot be carried out partially but must be comprehensive and simultaneous, emphasizing normative aspects (regulatory and SOP improvements), technical aspects (infrastructure and human resource training), and social aspects (public education). With this approach, the implementation of SIMKIM in Batam City will be more in line with the principles of administrative law, especially in realizing transparent, efficient, and equitable public services in the digital era. In closing, the researchers stated that the results of this study showed a strong synchronization between the theory used and the field findings. Lawrence M. Friedman's Legal System Theory successfully explains that the effectiveness of SIMKIM implementation in passport services in Batam City does not solely depend on the legal substance (applicable regulations) but is also significantly determined by the implementing structure (institutions and immigration officers) and legal culture (legal awareness and behavior of the public and officials). These three elements have been proven to influence each other in supporting or hindering the realization of transparent public services. Field findings regarding the lack of synchronization of SOPs, infrastructure limitations, and digital literacy among the public are concrete reflections of the three elements' suboptimal performance in an ideal legal system.

5. Comparison

This research on the implementation of the Immigration Management Information System (SIMKIM) in Batam City emphasizes a juridical analysis that links positive legal norms with passport service practices. The main focus is on transparency, accountability, and legal certainty as part of the principles of good governance. This differs from Ahmad Yulianto's (2017) research in Surabaya, which focused more on system efficiency in accelerating services, but was not optimal in terms of transparency due to technological infrastructure constraints. Thus, Jimmy's research broadens the discussion by adding an analysis of legal regulations and their impact on people's rights. Furthermore, when compared to Rini Wijayanti's (2022) research on the evaluation of IT implementation in tax services, there are similarities in the findings of technical constraints in data integration. However, the striking difference lies in the object of study: Rini's research focuses on taxes, while Jimmy's focuses on immigration. Jimmy's research is also more in-depth in terms of legal aspects because it links SIMKIM with the Immigration Law and the Public Service Law.

Compared to Cahyo Tri Wibowo's (2014) research in Tangerang, which assessed the effectiveness of SIMKIM using a descriptive quantitative approach, Jimmy's research is more comprehensive. Jimmy not only assesses effectiveness from the users' perspective but also connects the implementation of SIMKIM with theory of administrative law, positive law theory, and legal system theory. Thus, Jimmy's research adds a strong normative dimension compared to previous quantitative studies. Finally, compared to Agato P.P. Simamora's (2023) research, which highlights the role of SIMKIM as a bridge between business law and immigration law, Jimmy's research focuses more on the aspect of public service transparency. Agato emphasizes the integration of legal sectors, while Jimmy emphasizes the importance of consistent regulations, capacity building for officials, and digital literacy among the public to ensure that SIMKIM operates in accordance with the principles of transparency and accountability.

6. Conclusions and Suggestion

Based on the discussion in the previous chapter, the following conclusions can be drawn:

- a. The legal framework governing the Immigration Management Information System (SIMKIM) in passport services in Batam City has a strong legal basis through Law No. 6 of 2011 on Immigration, Law No. 25 of 2009 on Public Services, and Ministerial Regulations on Law and Human Rights that provide technical guidelines for its implementation. From a normative perspective, the legal substance has met the principles of transparent and accountable public services; however, there are still inconsistencies between national regulations and technical

implementation at the local level, which require regulatory adjustments and more contextually appropriate SOPs for digital services.

- b. The implementation of SIMKIM at the Special Class TPI Batam Immigration Office has shown significant improvements in terms of speed, efficiency, and transparency of passport services. The service process, which includes online registration, biometric verification, printing, and passport collection, is now carried out in an integrated manner through a digital system, which in general has fulfilled the principles of legal certainty and accountability. However, the effectiveness of the system still depends on the readiness of infrastructure, the competence of apparatus, and the uneven level of digital literacy among the community.
- c. Obstacles to the implementation of SIMKIM in Batam City include legal aspects such as overlapping regulations and weak supervision, technical obstacles in the form of limited infrastructure and human resources, and social obstacles in the form of low digital literacy among the community. To address these challenges, a strategy is needed to revise regulations and standard operating procedures (SOPs) to be responsive to digital developments, strengthen training for officials and improve IT infrastructure, as well as provide ongoing education and outreach to the public to ensure that the goals of transparency and inclusive public services are effectively achieved.

From these conclusions, the author can offer several recommendations, namely:

- a. It is recommended that the Batam Special Class I Immigration Office, together with the Directorate General of Immigration, revise and synchronize Standard Operating Procedures (SOPs) and develop technical guidelines for the implementation of SIMKIM in accordance with the characteristics of border areas such as Batam City, to ensure that the implementation of the digital system is consistent and applicable in the field in accordance with applicable laws and regulations.
- b. The government, particularly the Ministry of Law and Human Rights, needs to provide budgetary support and policies focused on strengthening information technology infrastructure and training for immigration officials, so that the SIMKIM system can operate optimally and all elements of passport services can meet the principles of transparency, efficiency, and accountability within the framework of digital-based public services.
- c. The public, as service users, are encouraged to enhance their understanding and digital literacy, particularly in using the M-Paspor application and following online service procedures, through the utilization of official information channels from immigration authorities and actively participating in public awareness campaigns to obtain services independently, efficiently, and free from brokerage practices or misinformation.

Author Contributions: A short paragraph specifying their individual contributions must be provided for research articles with several authors (**mandatory for more than 1 author**). The following statements should be used “Conceptualization: X.X. and Y.Y.; Methodology: X.X.; Software: X.X.; Validation: X.X., Y.Y. and Z.Z.; Formal analysis: X.X.; Investigation: X.X.; Resources: X.X.; Data curation: X.X.; Writing—original draft preparation: X.X.; Writing—review and editing: X.X.; Visualization: X.X.; Supervision: X.X.; Project administration: X.X.; Funding acquisition: Y.Y.”

Funding: Please add: “This research received no external funding” or “This research was funded by NAME OF FUNDER, grant number XXX”. Check carefully that the details given are accurate and use the standard spelling of funding agency names. Any errors may affect your future funding (**mandatory**).

Data Availability Statement: We encourage all authors of articles published in FAITH journals to share their research data. This section provides details regarding where data supporting reported results can be found, including links to publicly archived datasets analyzed or generated during the study. Where no new data were created or data unavailable due to privacy or ethical restrictions, a statement is still required.

Acknowledgments: In this section, you can acknowledge any support given that is not covered by the author contribution or funding sections. This may include administrative and technical support or donations in kind (e.g., materials used for experiments). Additionally, A statement of AI tools usage transparency has been included in the Acknowledgement section, if applicable.

Conflicts of Interest: Declare conflicts of interest or state (**mandatory**), “The authors declare no conflict of interest.” Authors must identify and declare any personal circumstances or interests that may be perceived as inappropriately influencing the representation or interpretation of reported research results. Any role of the funders in the study's design; in the collection, analysis, or interpretation of data; in the writing of the manuscript; or in the decision to publish the results must be declared in this section. If there is no role, please state, “The funders had no role in the design of the study; in the collection, analyses, or interpretation of data; in the writing of the manuscript; or in the decision to publish the results”.

REFERENCES

- [1] Philipus M. Hadjon, Pengantar Hukum Administrasi Indonesia, Gadjah Mada University Press, Yogyakarta, 2017, hlm. 112
- [2] Sondang P. Siagian, Manajemen Sumber Daya Manusia, Bumi Aksara, Jakarta, 2012, hlm. 45
- [3] Dwiyanto, Reformasi Birokrasi Publik di Indonesia, Gadjah Mada University Press, Yogyakarta, 2015, hlm. 89
- [4] Dwight Waldo, The Administrative State, Ronald Press, New York, 2018, hlm. 27
- [5] Richard Heeks, Implementing and Managing e-Government, SAGE Publications, London, 2016, hlm. 22
- [6] Erna Susanti, Inovasi Pelayanan Publik Berbasis Teknologi Informasi, Pustaka Setia, Bandung, 2018, hlm. 78
- [7] Miftah Thoha, *Birokrasi Pemerintahan Indonesia*, Rajawali Pers, Jakarta, 2013, hlm. 98
- [8] Aditya, Bimo. Sejarah Pelayanan Indonesia, Gramedia Pustaka Utama: Jakarta, 2018, hlm. 28
- [9] Heru Santoso, "Implementasi Teknologi Informasi dalam Sistem Keimigrasian di Indonesia," Jurnal Administrasi Publik, Vol. 12, No. 1, Januari 2020, hlm. 45
- [10] Bambang Riyanto, Teknologi Informasi dan Manajemen Publik, Graha Ilmu, Yogyakarta, 2019, hlm. 87
- [11] Kharisma Rukhamana, Kasi Informasi dan Komunikasi Keimigrasian Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 10 Juli 2025
- [12] Desy Miranda, Masyarakat Pengguna Layanan Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 15 Juli 2025
- [13] Irwandy, Masyarakat Pengguna Layanan Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 15 Juli 2025
- [14] Prio Widjanarko, Kasi Dokumen Perjalanan Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 10 Juli 2025
- [15] Muhammad Arif, Masyarakat Pemohon Paspor Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 15 Juli 2025
- [16] Nanang Saiful Isra Rusli, Kabid Dokumen Perjalanan dan Izin Tinggal Keimigrasian Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 10 Juli 2025
- [17] Yoga Sam Satyagraha, Kasi Teknologi Informasi Keimigrasian Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 10 Juli 2025
- [18] Melisa, Masyarakat Pemohon Paspor Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 15 Juli 2025
- [19] Nanang Saiful Isra Rusli, Kabid Dokumen Perjalanan dan Izin Tinggal Keimigrasian Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 10 Juli 2025
- [20] Prio Widjanarko, Kasi Dokumen Perjalanan Kantor Imigrasi Kelas I Khusus TPI Batam, Wawancara pada tanggal 10 Juli 2025