

## PROVISION OF ASSISTANCE BY LEGAL ADVISORS/ADVOCATES TO WITNESSES IN THE INVESTIGATION STAGE EXAMINATION

[1] **Anang Shophan Tornado;**

[1] Lambung Mangkurat University

Email: [anang.tornado@ulm.ac.id](mailto:anang.tornado@ulm.ac.id)

\* *Corresponding Author*

**Citation:** Tornado, Anang S., 2022. Provision Of Assistance By Legal Advisors/Advocates To Witnesses In The Investigation Stage Examination. *Int' Journal of Law, Environment, and Natural Resources (INJURLENS)*, 2 (1), 91-101.

**Academic Editor:** Muhammad Hendri Yanova  
Received: 20 December 2021  
Revised: 18 February 2022  
Accepted: 14 April 2022  
Published: 24 april 2022

**Publisher's Note:** Scholar Center stays neutral with regard to jurisdictional claims in published maps and institutional affiliations.



**Copyright:**

© 2022 by the authors. Submitted for open access publication in International Journal of Law, Environment, and Natural Resources (INJURLENS) under the terms and conditions of the Creative Commons Attribution-NonCommercial-ShareAlike 4.0 license (CC BY NC SA 4.0). For more information visit (<http://creativecommons.org>).

**Abstract:** *The Criminal Procedure Code only provides an opportunity for legal advisers to accompany the suspect in the Minutes of Examination with limited provisions, only to see and hear during the examination, this is regulated in Article 54 of the Criminal Procedure Code. Meanwhile, there is no regulation for witnesses in the Criminal Procedure Code. The problem in examining witnesses is when the witness being examined has the potential to become a suspect, where the concept of a witness who has the potential to become a suspect has become known as the concept of a potential suspect. So that it will be very urgent when the rights of witnesses being examined must really have their rights protected, one of the efforts to protect it is the presence of a legal adviser or advocate. The problem can be narrowed down to how witnesses who have the potential to become suspects in the investigation stage become more cooperative and "tame" towards investigators' summons to be examined, this of course needs to be made in a method that gains strong legitimacy at the norm level. In Article 27 paragraph (1) letter a Regulation of the Chief of Police Number 8 of 2009 concerning Implementation of Human Rights Principles and Standards in the Implementation of Duties of the Indonesian National Police firmly states that "every officer who conducts examination of witnesses, suspects or examinees is obliged to: a. provide an opportunity for witnesses, suspects or being investigated to contact and be accompanied by a lawyer before the examination begins.*

**Keywords:** *Legal Certainty, Assistance, Witness, Examination of the Investigation Stage.*

## 1. INTRODUCTION

At the conceptual level, the purpose of law enforcement is for three things, namely like a road that must be traversed in its performance, the three that are meant are justice, legal certainty and expediency. All three are theoretically difficult to realize simultaneously, although they are not impossible to realize at the same time .<sup>1</sup>

The rights of the parties involved in the investigation are quite completely regulated in the Criminal Procedure Code, such as the rights of suspects and defendants which are regulated in Articles 50 to 68 of the Criminal Procedure Code. The differentiator that is quite a contrast between the Criminal Procedure Code and the HIR is regarding the assistance of legal advisors/advocates to suspects during the investigation stage. We really respect this, because our country has accommodated the protection of human rights for suspects. However, this does not apply to witnesses, because the Criminal Procedure Code does not allow legal advisors or advocates to accompany witnesses during the examination phase of the investigation. The Criminal Procedure Code only provides an opportunity for legal advisers to accompany the suspect in the Minutes of Examination with limited provisions, only to see and hear during the examination, this is regulated in Article 54 of the Criminal Procedure Code. Meanwhile, there is no regulation for witnesses in the Criminal Procedure Code.

The problem in examining witnesses is when the witness being examined has the potential to become a suspect, where the concept of a witness who has the potential to become a suspect has become known as the concept of a potential suspect. The concept of potential suspects is contained in the Constitutional Court Decision Number 21/PUU-XII/2014 in its legal considerations. So that it will be very urgent when the rights of witnesses being examined must really have their rights protected, one of the efforts to protect it is the presence of a legal adviser or advocate. The problem can be narrowed down to how witnesses who have the potential to become suspects in the investigation stage become more cooperative and "tame" towards investigators' summons to be examined, this of course needs to be made in a method that gains strong legitimacy at the norm level.

Whereas Article 27 paragraph (1) letter a of the Chief of Police Regulation Number 8 of 2009 concerning Implementation of Human Rights Principles and Standards in the Implementation of Duties of the Indonesian National Police firmly states that "every officer who conducts an examination of a witness, suspect or examinee is required to: a. . provide an opportunity for witnesses, suspects or being investigated to contact and be accompanied by a lawyer before the examination begins. Provisions regarding witness assistance are limited to before the examination, so that it has not touched the substance

---

<sup>1</sup> Samuel Wahidin. 2017. *The Politics of Law Enforcement in Indonesia* . Yogyakarta: Student Library, p. 3.

of the essential assistance, which actually occurs in the assistance of the Minutes of Examination.

## 2. METHODS

The type of research used is normative legal research, namely research that obtains legal materials by collecting and analyzing legal materials related to the issues to be discussed. The nature of the research here is the nature of prescriptive research, namely re-examining according to legal theory of norms that are considered to be vague (vague of norms) and that is a research that aims to get suggestions about what should be done to overcome certain problems.<sup>2</sup>The type of research is about the obscurity of norms contained in Article 27 paragraph (1) letter a Regulation of the Indonesian National Police Number 8 of 2009 concerning Implementation of Human Rights Principles and Standards in the Implementation of Duties of the Republic of Indonesia National Police firmly states that "every officer who conducts an inspection of witness, suspect or examinee must: a. provide an opportunity for witnesses, suspects or being investigated to contact and be accompanied by a lawyer before the examination begins. Sources of legal materials include primary legal materials in the form of laws and regulations, namely the Criminal Code (KUHP), the Criminal Procedure Code (KUHP) or the Law of the Republic of Indonesia Number 8 of 1981, Constitutional Court Decision Number 21/PUU -XII/2014. Regulation of the Chief of Police of the Republic of Indonesia Number 8 of 2009 concerning Implementation of Human Rights Principles and Standards in the Implementation of Duties of the Indonesian National Police. As well as secondary legal materials in the form of books/literature, articles, magazines, writings by legal experts, opinions of legal experts, as well as scientific works related to this research. The technique for collecting legal materials for laws and regulations is collected by carrying out an inventory of laws and regulations related to aspects of legal certainty regarding the assistance of legal advisors/advocates to witnesses during the examination of the investigative stage. While the library data is collected through a literature study that is arranged based on the subject matter.

## 3. RESULTS AND DISCUSSION

### *1.1 Position of Legal Counsel in Investigation*

The Republic of Indonesia includes human rights arrangements in its Constitution (UUD). The Preamble of the 1945 Constitution does not specifically mention human rights in the words: "that freedom is the right of all nations...". So the elaboration of the concept

---

<sup>2</sup> Soerjono Soekanto. 1986. *Introduction to Jakarta Legal Research* : University of Indonesia, p. 15.

of legal protection of human rights is regulated in the body of the 1945 Constitution (after the amendment), namely in Article 27, Article 28A-J, Article 29, Article 30, Article 31 and Article 34.

Article 27 paragraph (1) states: "All citizens have the same position before law and government and are obliged to uphold that law and government without exception." Article 28G paragraph (1) states: "Everyone has the right to protection of himself/herself, family, honor, dignity and property under his control, and has the right to feel safe and protected from threats of fear to do or not do something which is a human right." ."  
Article 28G paragraph (2): "Every person has the right to be free from torture or treatment that degrades human dignity..."

The Criminal Procedure Code has explicitly tried to provide protection to avoid abusive treatment of suspects or defendants, as contained in Article 52 of the Criminal Procedure Code and its elucidation which requires suspects to be examined in situations free from fear or fear due to intimidation and harsh treatment from investigators. Therefore, coercion or pressure must be prevented against suspects or defendants. If we also look at Article 117 of the Criminal Procedure Code which states that the statements of suspects and/or witnesses to investigators are given without pressure from anyone and/or in any form.

In addition to Article 52 and Article 117 of the Criminal Procedure Code above, Article 51 paragraph (1) of the Criminal Procedure Code also emphasizes the right of a suspect to provide information freely to investigators. In line with that, if Article 51 paragraph (1), Article 52, and Article 117 of the Criminal Procedure Code are linked to the universal principle of the suspect's right not to blame himself (non-self *-incrimination*) as implicitly reflected in Article 66 of the Criminal Procedure Code which confirms that the suspect or the defendant is not burdened with the obligation to prove, and if it is linked again with Article 189 paragraph (3) of the Criminal Procedure Code which emphasizes that the defendant's statement can only be used for himself, then on this basis investigators should be aware of and willing to respect the Criminal Procedure Code as a rule of the game in the process of enforcing criminal law in when the investigator will examine the suspect.

There are powers that are also prone to being misused by both investigators and prosecutors, namely regarding the authority regarding "discretion" related to coercive measures, for example regarding the authority to make arrests, detentions, searches, confiscations, and termination of investigations. Considerations for using this authority are highly subjective, depending on the personal will of investigators and prosecutors, thereby opening up opportunities for abuse of the use of coercive measures, which in the end are often not based on legal considerations, namely the interest to seek material truth, but based on considerations of "benefits" that will be obtained by investigators and prosecutors. Those who have "deep pockets" and have economic or political access have

the opportunity to be free from coercion, even though their actions are very detrimental to many people and cause widespread damage. On the other hand, this does not apply to people who cannot afford it, both economically and politically, even if their actions are only small and do not have a broad impact.

The position of legal advisers in investigative examinations is considered by some groups to be reactive and a blemish that tarnishes the existence of the Criminal Procedure Code.

For Adnan Buyung Nasution, the provisions of Article 115 are still optional. It is true that the provisions of Article 115 of the Criminal Procedure Code are truly proportional to the philosophical and constitutional basis which recognizes and exalts human dignity as a creature of God who must be treated based on fair and civilized humanity, as well as from the basis of the rule of law or legality which equates humans before law (equality before the law) and the principle of presumption of innocence, the word "can" in Article 115 must be interpreted as a "right" for legal advisers and "obligations" for investigating officials, with the outline that this right may only be limited investigator in matters that are "very limited".<sup>3</sup>

The position and presence of the legal adviser following the course of the investigative examination is "passive". That is the meaning of the elucidation of Article 115 paragraph (1), namely the position of a legal adviser following the course of the examination at the investigative level, only as a "spectator". Limited only "see and hear" or within sight and within hearing.

In connection with the discussion of legal advisers during investigative examinations, it is necessary to pay attention to Article 69, which gives the "right" to legal advisers to contact the suspect from the moment he is caught. What is specified in Article 69 is "rights". Whenever the legal advisor wants to have contact with the suspect, it must be allowed. Of course it has to be based on fairness, and in urgent and necessary cases, it can be done out of the ordinary. The fairness in question is primarily about the use of time. For example, the time of dawn is certainly not natural.

### ***1.2. Witnesses Who Potentially Become Suspects in the Investigation***

In criminal procedural law, the process of determining a suspect is the final part in the investigation process, which is an action to seek and collect evidence against a case and find someone who, due to circumstances and actions, should be suspected of being the perpetrator of a crime. Article 183 of the Criminal Procedure Code stipulates that a judge may not impose a sentence on a person unless, with at least two valid pieces of evidence, a conviction is obtained that a crime has actually occurred and the defendant

---

<sup>3</sup>M. Yahya Harahap. 2002. *Discussion of Problems and Application of Criminal Procedure Code of Investigation and Prosecution*. Jakarta: Sinar Graphics, p. 129.

is guilty of committing it. Experts and various court decisions define valid evidence as evidence obtained by means of law. Evidence obtained in a way that is not based on the law must be set aside.

To arrive at the conviction that someone can be named a suspect, investigators must examine evidence, starting from witness statements, expert statements, letters, and other evidence. In order to qualify as evidence, the testimony of witnesses must be at least two people witnesses, and the quality of the testimony must also be checked, not just the presence of witnesses.

By arguing in Article 183 of the Criminal Procedure Code, normatively there was no examination of potential suspects. The term potential suspect is not found in the Criminal Procedure Code or other laws. Once there are at least two pieces of evidence or even sufficient preliminary evidence, before being interpreted in a limited way by the Constitutional Court, a person can be named a suspect. In fact, police reports have also been qualified as evidence, so armed with only one police report plus the testimony of two witnesses, a person who has been reported can be named a suspect.

Normatively it is true that the determination of a suspect is sufficient based on two pieces of evidence. It is not even obligatory for investigators to examine mitigating witnesses or experts submitted by the suspect, because bringing in witnesses and experts is only the right of the suspect after being named a suspect, not before. Access to being accompanied by a legal advisor is not as easy as it should be. Even though a suspect can be subject to various restrictions on his human rights, this does not mean that he can be treated arbitrarily so that it seems that all his rights as a citizen have been completely lost. Restrictions on the rights of citizens in a country based on law, according to Mardjono, are only permissible if justified by the law itself through a fair criminal justice process (due process of law) *as opposed to an arbitrary process* or judicial process.<sup>4</sup>

According to Andi Hamzah, the principle of legality in the Criminal Procedure Code is about how to prosecute in criminal proceedings which must be carried out based on the law, not based on the regulations under the law.<sup>5</sup>

Against such a complete guarantee of the rights of suspects, it is necessary to ask the question, why does the state have to protect the human rights of suspects in such a way when they are "bad people" who have committed criminal acts for which it is only natural that they should be punished. These are questions that often arise in the public, especially those who are unfamiliar with law.

By accepting the determination of the suspect as part of a coercive measure, the process of determining the suspect must also be carried out in the same way as the

---

<sup>4</sup>Arief Setiawan's opinion in the Constitutional Court Decision Number 21/PUU-XII/2014, p. 45.

<sup>5</sup>Andi Hamzah et al. 2015. *Pre Trial Discretionary Justice in the Criminal Procedure Code of Various Countries*. Jakarta: Sinar Graphics, p. 27.

process of arrest, detention, confiscation and search, which must be based on the principles of due process of law and the *acusatoir* principle. With the change in the meaning of the designation of a suspect as part of a coercive measure, the rights of citizens must be protected not only before being named a convict or at the time of being a suspect, but also must be protected before being made a suspect.

Thus, the rights inherent in suspects because they are so close to becoming convicts, also need to be granted to those who will be named suspects, or are called potential suspects. The qualifications of suspects and defendants and convicts are very similar. Because, in practice, it is not only convicts who can be subject to restrictions or deprivation of their human rights, but also suspects and defendants, whose human rights are deprived and limited, especially in relation to detention which is almost no different from the sentencing process.

A person who is designated as a suspect is not given a definite time limit when his suspect status ends. This has its own legal consequences for the suspect. Even though juridically there is no certainty of being found guilty, socially the person is considered guilty and bears shame in society. In fact, in certain cases, on the one hand, suspects cannot use their legal rights to the fullest, so they are considered very detrimental and do not provide a sense of justice. On the other hand, it is not certain when the status of the suspect will end, there is a high potential for human rights violations to occur.

With regard to the rights of suspects to be accompanied, to be heard freely, and to be examined by being obliged to appear before a court hearing, these rights should also be granted to those who are still in status as potential suspects before being named suspects. This was conveyed by Eddy OS Hiariej in his statement at the Constitutional Court, that in order to prevent arbitrary designation of a person as a suspect or arrest and detention, any initial evidence must be confronted with one another, including potential suspects. This is needed to prevent what is called unfair prejudice.<sup>6</sup> It is not uncommon in practice for a person to be suddenly named a suspect without being summoned beforehand, let alone being given the opportunity to defend himself or prepare a defense.

### ***1.3. Legal Counsel Assistance for Witnesses who Potentially Become Suspects***

In the interest of defence, a suspect or defendant has the right to receive legal protection from one or more legal advisers during and at every level of examination, according to the procedure specified in Article 56 of the Criminal Procedure Code. Suspects or defendants are suspected of or charged with committing a crime which is

---

<sup>6</sup>Opinion of Eddy OS Hiariej in the Constitutional Court Decision Number 21/PUU-XII/2014 p. 65.

punishable by death or imprisonment for fifteen years or more or for those who are not capable which is punishable by five years or more who do not have their own legal counsel, officials concerned at all levels examination in the judicial process must appoint a legal adviser for them.

The right to be accompanied by a legal adviser is obligatory where the investigator or officer who examines is obliged to notify the suspect's right to be accompanied by a legal adviser then the suspect has the right to choose his own legal adviser or if he is not able the investigator will appoint a legal adviser for him so that he is accompanied when examined according to Article 56 paragraph (1) Criminal Procedure Code.

In fact there are many cases where the examination of suspects is not accompanied by legal counsel, this can be caused by several circumstances, namely:

1. The investigator did not disclose his rights as a suspect.
2. The suspect was informed of his right to be accompanied by a legal adviser, but the suspect refused to be accompanied by a legal adviser.
3. Not only did the investigator notify him of his right to be accompanied by a legal adviser, instead the investigator appointed a legal adviser, but the suspect refused.

When the threat of a sentence is over five years and the suspect is incapacitated, the investigator has the obligation to appoint a legal adviser to accompany the suspect, so based on the appointment letter as a legal adviser, a lawyer or advocate will accompany the suspect in the investigation process, but when a lawyer or advocate is presented to assist suspect, the suspect firmly refuses to be assisted and will face the problem that is alleged to the suspect himself.

Whereas at the Examination Stage at the investigation level the legal adviser has been granted the rights as stipulated in Article 115 of the Criminal Procedure Code paragraph (1), namely in the case of an investigator conducting an examination of a suspect, the legal adviser can follow the course of the examination by seeing and hearing the examination.

Preliminary examination by an investigator who is a legal adviser may only act passively, that is, he may only follow the course of the examination by looking and listening (not allowed to speak).

The qualifications of suspects and defendants and convicts are very similar. Because, in practice, it is not only convicts who can be subject to restrictions or deprivation of their human rights, but also suspects and defendants, whose human rights are deprived and limited, especially in relation to detention which is almost no different from the sentencing process.

Based on the descriptions above, the examination of potential suspects prior to the determination of suspects has relevance when examined from the perspective of the application of law philosophically, juridically, sociologically. First, the law will be said to apply philosophically if it is in line with the spirit of the nation and universal moral

principles.<sup>7</sup>In the context of Indonesia, the soul of this nation is Pancasila,<sup>8</sup>one of which is just and civilized humanity. The right to be heard and given the opportunity to defend oneself as broadly as possible is a universal right and a basic right that must be upheld. Whoever the person is must be given the opportunity to defend himself and have his testimony heard. The philosophical approach departs from three things, namely ontology, epistemology and axiology. From an ontology perspective, giving the opportunity to examine potential suspects is giving them the opportunity to defend themselves so that they are not accused of unlawfully and exceeding their authority. Epistemologically, the agency for examining potential suspects has been introduced and made possible by the Constitutional Court. Sociologically, this new institution is intended to protect the rights of suspects. According to Siswanto Sunarso, Pancasila and the 1945 Constitution can be referred to as *The Indonesian Bill of Human Rights*. In the perspective of universal human rights, giving potential suspects the opportunity to defend themselves is in line with the principle of "fair trial" as stipulated in *the Optional Protocol to the International Covenant on Civil and Political Rights (ICCPR)* 1966, which must guarantee the administration of an honest trial for all people who is accused of committing a crime. The main foundation of a fair trial are Articles 10 and 11 of *the Universal Declaration of Human Rights (UDHR)* and Articles 14 and 15 of the ICCPR which affirm the existence of a person's right to " *a fair and public hearing by a competent, independent and impartial tribunal established by law* ." <sup>9</sup>

Kindly Sociologically, Indonesian society highly respects the rights of people to be heard before being found guilty. The tradition of customary justice in Indonesia, which places both parties equally and equally, can be read as acceptance or sociological suitability. Thus, the provision of the opportunity to examine potential suspects before being named a suspect is in line with the principle of equality of parties in Indonesian society. Various ethnic groups in Indonesia are even more advanced by introducing the principle known in the modern world as restorative justice, in which the role of the victim is taken into account in determining what punishment should be imposed on the perpetrator. The community's approach is not on punishment, but on a system of restoration that emphasizes the principle of win-win.

---

<sup>7</sup>Barda Nawawi Arief. 2011. *Several Aspects of the Development of Criminal Law: Inaugural Speech of the Professor of Criminal Law, Diponegoro University*. Semarang: Master Library Publisher, p. 41.

<sup>8</sup>M. Zulfa Aulia, " *Friedrich Carl von Savigny about Law: Law as a Manifestation of the Soul of the Nation* ", *Law: Journal of Law*, 3, 1 (2020), p. 227-228.

<sup>9</sup>Muladi, 2009. "HAM in the Perspective of the Criminal Justice System", in *Human Rights: Nature, Concepts, and Implications in the Perspective of Law and Society*. Bandung: Refika Aditama, p. 106.

#### 4. CONCLUSIONS

The law will be said to apply and have a juridical basis if the rule of law has a hierarchical legal basis. In relation to the examination of potential suspects, currently it already has a legal basis, namely the decision of the Constitutional Court, although it must also be said that it is not in the form of a verdict but is sounded in its deliberations. Because the decisions of the Constitutional Court are final and binding, the contents of the decisions should be complied with by law enforcers. In the Criminal Procedure Code itself, based on the provisions of Article 114, it is stated that before conducting an examination of a person suspected of having committed a crime, the investigator is obliged to inform him about the right to obtain legal assistance, especially for crimes that carry a sentence of more than five years. According to Syarifudin Petanasse, the importance of giving a suspect the right to legal assistance before being examined is related to the possibility that he will be detained after becoming a suspect.

Arrangements for the assistance of legal advisors to witnesses during the investigation stage of investigation are not contained in the Criminal Procedure Code. However, in the world of practice, the assistance of legal advisors to witnesses during the investigation phase, especially in the case of witnesses who have the potential to become suspects, is very important. Considering that witnesses who have the potential to become suspects are sometimes difficult to summon when they are immediately named suspects. Through the media, the assistance of legal advisors to witnesses who have the potential to become suspects will make the investigation process run relatively smoothly.

#### 5. SUGGESTION

Norms should be immediately made regarding the assistance of legal advisors to witnesses, especially witnesses who have the potential to become suspects, for the sake of carrying out investigations that have legal certainty and the guarantee of human rights in general for citizens, who due to their circumstances become witnesses in the investigation stage.

With not yet regulated regarding the assistance of suspects and witnesses in more detailed regulations. It is better that in the future the new Criminal Procedure Code accommodates the matter of assisting suspects in the chapter on investigations. The urgency regarding the assistance of legal advisors for witnesses who have the potential to become suspects is already a necessity. This is necessary in order to achieve legal certainty in the future.

## REFERENCES

### Books

- Andi Hamzah et al. 2015. *Pre Trial Discretionary Justice in the Criminal Procedure Code of Various Countries* . Jakarta: Sinar Graphics, p. 27.
- Arief Setiawan's opinion in the Constitutional Court Decision Number 21/PUU-XII/2014, p. 45.
- Barda Nawawi Arief. 2011. *Several Aspects of the Development of Criminal Law: Inaugural Speech of the Professor of Criminal Law, Diponegoro University* . Semarang: Master Library Publisher, p. 41.
- IH Hijmans. 2006 . *in Het recht der werkelijkheid, in Herlien Budiono, The Principle of Balance for Indonesian Contract Law-Law of Agreement Based on Indonesian Wigati Principles* . Bandung: Citra Aditya Bakti, p. 208.
- M. Yahya Harahap. 2002. *Discussion of Problems and Application of Criminal Procedure Code of Investigation and Prosecution* . Jakarta: Sinar Graphics, p. 129.
- M. Zulfa Aulia, " *Friedrich Carl von Savigny about Law: Law as a Manifestation of the Soul of the Nation* ", *Law: Journal of Law*, 3, 1 (2020), p. 227-228.
- Muladi, 2009. "*HAM in the Perspective of the Criminal Justice System*", in *Human Rights: Nature, Concepts, and Implications in the Perspective of Law and Society* . Bandung: Refika Aditama, p. 106.
- Opinion of Eddy OS Hiariej in the Constitutional Court Decision Number 21/PUU-XII/2014 p. 65.
- Samuel Wahidin. 2017. *The Politics of Law Enforcement in Indonesia* . Yogyakarta: Student Library, p. 3.
- Satjipto Rahardjo. 2010. *Sociology of Law: Development of Methods and Choice of Problems Ctk. Second*. Yogyakarta: Genta Publishing , p. 203-204.
- Soerjono Soekanto. 1986. *Introduction to Jakarta Legal Research* : University of Indonesia, p. 15.

### Legislation

Criminal Code

The Criminal Procedure Code

Constitutional Court Decision Number 21/PUU-XII/2014.

Regulation of the Indonesian National Police Number 8 of 2009 concerning Implementation of Human Rights Principles and Standards in the Implementation of Duties of the Indonesian National Police.