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Implementation of the principle ultimum remedium in police action: A juridical analysis of the realization a just and humane lex certa

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ABSTRACT

The principle of ultimum remedium is a fundamental principle in criminal law that places criminal sanctions as a last resort in law enforcement. This study analyzes the implementation of the principle of ultimum remedium in police action from a fair and humanist lex certa perspective. The research uses normative legal methods with a statutory approach, a case approach, and a theoretical approach. The problems studied include (1) the theoretical conception of the principle of ultimum remedium in the Indonesian criminal law system; (2) the practice of implementing the principle of ultimum remedium in police actions and its challenges; and (3) the ideal construction of the application of the principle of ultimum remedium that is just and humane. The results of the study show that the principle of ultimum remedium has not been fully implemented in police actions due to the unclear norms (lex certa), repressive orientation in law enforcement, and lack of control mechanisms. This study recommends a reformulation of legal provisions that more firmly regulate the principle of ultimum remedium, strengthening the restorative justice approach, and establishing an independent oversight mechanism for police discretion to realize fair and humane law enforcement.

Keywords: humanis; justice; lex certa; police action; principle of ultimum remedium; restorative justice

1. INTRODUCTION

Indonesia, as a constitutional state (rechtsstaat) established under Article 1 paragraph (3) of the 1945 Constitution, positions law as the highest authority in governing national and state affairs. The logical implication of this rule of law principle is that all state administrative actions, including law enforcement efforts, must be grounded in applicable legislation and respect human dignity and worth. Within the criminal law enforcement framework, the police force, as a key law enforcement agency, plays a crucial role in preserving public order and safety while combating criminal activities. The extensive powers granted to police, spanning from preliminary inquiries and investigations to the application of coercive measures, carry the risk of power misuse if not founded on clear and restrictive legal principles (Ar, 2012). A core principle in criminal law that should guide police conduct is the ultimum remedium principle, which designates criminal law and penal sanctions as final recourse after alternative measures prove unsuccessful. This principle aligns with Sudarto's concept of criminal law subsidiarity, suggesting that criminal law should serve as a last resort in addressing crime when other approaches are insufficient.

However, in actual practice, applying the ultimum remedium principle in police operations encounters several fundamental challenges. First, there is ambiguity in legal norms (lex certa) within regulations governing police authority, particularly regarding the boundaries and procedures for implementing the ultimum remedium principle. Law Number 2 of 2002 concerning the Indonesian National Police has not explicitly or comprehensively regulated the application of the ultimum remedium principle across all stages of police action. Second, law enforcement approaches remain predominantly punitive, emphasizing punishment over humanistic and restorative solutions. Third, there are inadequate control and oversight mechanisms for police discretion when deciding whether cases should proceed to criminal prosecution or be resolved through alternative mechanisms. The implementation challenges of the ultimum remedium principle have resulted in over-criminalization, where cases that could reasonably be addressed through non-penal mechanisms instead enter the criminal justice system Arief (2010). This situation not only strains an already overburdened criminal justice system but also risks creating injustice for minor offenders or those acting under specific circumstances. Examples include petty theft driven by pressing economic necessity, domestic conflicts escalating to minor offenses, or juvenile acts that should prioritize resolution through restorative justice approaches.

The significance of this research lies in the pressing necessity to develop a clear and comprehensive legal framework for implementing the ultimum remedium principle in police operations based on lex certa (legal certainty), justice, and humanistic values. This study aims to contribute theoretically to criminal law scholarship, particularly concerning the application of criminal law principles in law enforcement practices, while offering policy recommendations for reformulating legal provisions and police Standard Operating Procedures (SOPs) that better reflect justice and humanitarian values. This article advances three interrelated arguments: first, that the failure of ultimum remedium in practice stems primarily from lex certa gaps namely the absence of explicit operational criteria in Law No. 2 of 2002 and Perkap 8/2021rath er than from officer misconduct alone; second, that discretionary decision-making without measurable KPIs (such as resolution quality, recidivism rates, and victim satisfaction) structurally incentivizes over-criminalization; and third, that a progressive-humanist model integrating legislative reform, institutional mediation units, and independent oversight can transform ultimum remedium from a doctrinal aspiration into enforceable practice. Given this context, this study addresses the following research questions: What is the theoretical conceptualization of the ultimum remedium principle within Indonesia's criminal law system and its connection to just and humanistic lex certa principles?, What characterizes the practical implementation of the ultimum remedium principle in police operations and what obstacles exist in achieving fair and humane law enforcement?, and What would constitute an ideal framework for applying the ultimum remedium principle in police operations that embodies lex certa, justice, and humanism within Indonesia's criminal law system?

2. RESEARCH METHOD

This study employs a normative legal research methodology, which focuses on analyzing the implementation of regulations or principles within existing law. The research utilizes three primary approaches: the statutory approach, the case-based approach, and the conceptual approach. The statutory approach involves reviewing all relevant legislation and regulations pertaining to the ultimum remedium principle and police powers, including the Criminal Code (Law Number 1 of 1946), the Criminal Procedure Code (Law Number 8 of 1981), the Indonesian National Police Law (Law Number 2 of 2002), and their associated implementing regulations, particularly the National Police Chief's Letter (Surat Kapolri) Number B/3022/XII/2009/SDEOPS and Perkap Number 8 of 2021 on Restorative Justice. The case-based approach entails examining documented police case management decisions and restorative justice outcomes drawn from: (a) cases categorized under Perkap 8/2021 criteria (offenses with imprisonment threats below five years that are not repeat offenses), selected across the 2021–2024 period; (b) cases involving petty theft, domestic disputes, and juvenile offenses in which investigators exercised or declined to exercise discretion; and (c) instances where over-criminalization was documented through civil society reports or academic case studies. The cases were selected based on offense category, geographic distribution across Polda jurisdictions, and availability of documented outcomes. The conceptual approach involves exploring legal theories, doctrines, and concepts connected to the principles of ultimum remedium, lex certa, justice, and humanistic values in criminal law.

3. RESULTS AND DISCUSSION

3.1. Theoretical Conception of the Ultimum Remedium Principle in the Indonesian Criminal Law System and Its Relevance to the Principle of Lex Certa that is Just and Humanist

The ultimum remedium principle has etymological roots in Latin, translating to "final remedy" or "ultimate measure." Within the framework of criminal law, this doctrine designates criminal penalties as the last available option, to be employed only when alternative approaches have proven ineffective in addressing legal transgressions. This philosophy corresponds with the criminal law subsidiarity principle espoused by numerous criminal law scholars, which advocates for selective and prudent application of criminal law given its severe consequences and substantial influence on individuals' lives. Sudarto asserted that criminal law reform must recognize criminal law as the ultimate remedium. The deployment of criminal law should weigh the anticipated outcomes of designating an act as criminal against the potential negative repercussions for society. This perspective highlights the necessity of exploring more compassionate alternatives that avoid imposing enduring social stigma on offenders before implementing criminal sanctions (Justian, 2023).

Within Indonesia's criminal justice framework, the ultimum remedium doctrine is implicitly embedded across multiple statutory provisions. Article 5 paragraph (1) of Law Number 48 of 2009 on Judicial Authority mandates that judges and constitutional justices must discover, observe, and comprehend the legal principles and societal conceptions of justice. This clause enables law enforcement to evaluate substantive justice considerations beyond merely procedural-formal justice. Concerning police powers, Article 18 paragraph (1) of Law Number 2 of 2002 on the Indonesian National Police authorizes police officers to exercise discretionary judgment to preserve order and protect public security. Nevertheless, implementing the ultimum remedium principle in law enforcement encounters fundamental challenges regarding the lex certa doctrine or legal certainty. The lex certa principle, which derives from the legality maxim (nullum delictum nulla poena sine praevia lege poenali), mandates that criminal law provisions be articulated clearly, definitively, and unambiguously. In relation to the ultimum remedium principle, the lack of explicit and comprehensive regulations specifying the circumstances and methods for applying this doctrine creates legal ambiguity and permits inconsistent implementation. The connection between the ultimum remedium principle and justice principles lies in criminal law's purpose, which should extend beyond retributive considerations to encompass restorative and preventive dimensions. Justice, as conceptualized in John Rawls's theoretical framework, assumes equitable allocation of societal burdens

and benefits. Excessive or inappropriate application of criminal penalties for minor violations generates injustice because the burden imposed on offenders is disproportionate to their conduct. The humanistic dimension in applying the principle of ultimum remedium reflects the recognition of human dignity and dignity as guaranteed in Articles 28A to 28J of the 1945 Constitution.

Every individual possesses the right to humane treatment, including throughout law enforcement procedures. A humanistic approach demands that law enforcement view criminal offenders not merely as legal objects requiring punishment, but as legal subjects possessing fundamental rights and the capacity for rehabilitation and reintegration into society (Justian, 2023). Incorporating the principles of ultimum remedium, lex certa, justice, and humanism into Indonesia's criminal law system necessitates reformulating legal provisions to more rigorously define the criteria and procedures for implementing the ultimum remedium principle. This aligns with Satjipto Rahardjo's progressive legal theory, which posits that law exists to serve humanity, not vice versa. Law enforcement should be directed toward achieving substantive justice and societal well-being, rather than focusing exclusively on rigid textual-formal application of legal provisions.

3.2. The Practice of Implementing the Ultimum Principle in Police Actions and the Challenges in Realizing Fair and Humane Law Enforcement

The implementation of the ultimum remedium principle in Indonesian police operations demonstrates ambivalent and inconsistent conditions. To distinguish what the law says from what occurs in practice, this section first outlines the normative framework before examining empirical evidence of its application. Normatively, two key instruments regulate restorative approaches: the National Police Chief's Letter (Surat Kapolri) Number B/3022/XII/2009/SDEOPS dated December 14, 2009, regarding Case Resolution through Alternative Dispute Resolution (ADR), and the National Police Chief's Regulation (Perkap) Number 8 of 2021 on Crime Resolution Based on Restorative Justice. Perkap 8/2021 specifies that restorative justice applies to offenses carrying imprisonment threats below five years that are not repeat offenses. While these instruments represent progressive steps, both share a critical normative gap: neither establishes measurable criteria for when investigators must prefer restorative pathways, nor do they specify quality indicators such as victim satisfaction, recidivism rates, or resolution durability to evaluate outcomes. In practice, the gap between normative aspiration and field reality is significant. Studies examining police case management patterns in the post-Perkap 8/2021 period document that: (a) investigators continue to route petty theft and minor domestic dispute cases through formal prosecution channels rather than mediation, citing career risk concerns; (b) restorative justice is applied inconsistently across Polda jurisdictions, with urban units showing higher uptake than rural ones; and (c) cases involving economically vulnerable perpetrators committing minor offenses the population most appropriate for restorative resolution are disproportionately prosecuted. A small but illustrative set of contrasting cases reveals the mechanism of inconsistency: cases resolved restoratively typically involved proactive investigator initiative and informal community pressure, while cases pushed toward prosecution despite minor gravity involved investigators defaulting to safer quantitative performance metrics. This pattern shows that ambiguity in norms, combined with performance incentives, produces the inconsistency not individual officer character (Yusuf, 2024).

The barriers to consistent ultimum remedium application can be organized into five interrelated subtopics, each generating a "so what" implication for reform. (A) Norm Clarity / Lex Certa Gaps: Law Number 2 of 2002 on the Indonesian National Police does not explicitly mandate police application of the ultimum remedium principle. Article 18 paragraph (1), which grants police discretionary authority, lacks clear parameters defining boundaries and procedures for exercising that discretion (Nefri & Faniyah, 2024). Perkap 8/2021 improved matters but retained the overbroad under-5-year threshold without categorical sub-criteria. Without precise offense classification criteria, any investigator can justify either prosecuting or not prosecuting the same case type, producing jurisdictional inconsistency. (B) Discretionary Policy and SOP Deficiencies: The Surat Kapolri 2009 and Perkap 8/2021 policy instruments lack binding SOPs specifying step-by-step decision trees for investigators. The absence of structured guidance delegates momentous decisions to individual judgment, increasing error variance and enabling

systemic bias toward prosecution. (C) Performance Metrics: The police performance evaluation system relies on quantitative indicators case clearance rates and suspect processing numbers rather than measuring resolution quality, victim satisfaction, or recidivism. Investigators face rational incentives to prosecute rather than mediate, as successful mediations are invisible in current KPI frameworks. (D) Oversight and Accountability: Internal oversight bodies (Propam) and the National Police Commission (Kompolnas) exist normatively but lack authority to issue binding recommendations or to audit restorative justice implementation quality. Without enforcement-capable oversight, moral hazard persists and public trust erodes. (E) Socio-Cultural Demand for Retribution: Communities, particularly victims' families, often prefer criminal prosecution as a signal of seriousness, reflecting limited familiarity with restorative justice philosophy. Demand-side retributivism reinforces supply-side institutional inertia, making legal-only reform insufficient without parallel public education efforts (Pratama & Prasetyo, 2025.).

These five barriers interact systemically: lex certa gaps create SOP voids, which are filled by performance metrics that incentivize prosecution, unchecked by weak oversight, and sustained by public retributivism. Any reform strategy must address all five simultaneously rather than treating them as isolated problems.

3.3. The Ideal Construction of the Application of the Ultimum Remedium Principle in Police Actions that Reflect Lex certa, Justice, and Humanism

The optimal framework for implementing the ultimum remedium principle in police operations must rest on three fundamental pillars: legal certainty (lex certa), substantive justice, and humanitarian values. These three pillars must be systematically integrated within legislation, police operational policies, and field-level enforcement practices. To be genuinely implementable rather than aspirational, reform must be sequenced and assigned to specific institutional actors (Srijadi, 2023). First, and most urgently, regarding the legislative dimension: Law Number 2 of 2002 on the Indonesian National Police must be revised to explicitly mandate ultimum remedium application in all law enforcement activities. Critical provisions must include: (a) an operational definition of ultimum remedium within police operations; (b) classification of offenses mandatorily addressed through non-penal mechanisms first; (c) binding decision-tree protocols for each stage from preliminary inquiry through case termination; and (d) oversight frameworks with enforcement teeth. This legislative reform should be led by DPR Commission III in coordination with the National Police and Attorney General's Office, with a target implementation timeline of two legislative years.

The categorization of criminal acts that are prioritized for non-penal settlement needs to be prepared with clear and measurable criteria. Some of the criteria that can be used include: (a) a maximum criminal threat of less than 5 years and not a serious crime; (b) the material loss incurred is relatively minor and is refundable or replaceable; (c) does not cause any disturbance or serious disturbance to public order; (d) the perpetrator is the first offender (not a recidivist); (e) the perpetrator shows good faith to correct the wrongdoing; (f) there is an agreement between the perpetrator and the victim to resolve it familially or restoratively; and (g) take into account the specific conditions of the perpetrator such as age (children or elderly), economic conditions, or certain psychological conditions (Wazuk & Aminulloh, 2024). Second, the institutional aspect. It is necessary to establish a Special Unit for Mediation and Restorative Justice at every level of the police, from the Police to the National Police Headquarters, which is tasked with: (a) conducting an assessment of every report or complaint to determine whether the case meets the criteria for restorative resolution; (b) facilitate the mediation process between the perpetrator and the victim by involving a credible community leader or mediation institution; (c) monitoring and evaluation of the implementation of restorative justice; and (d) prepare periodic reports on the implementation of restorative justice and the obstacles faced.

Establishing this Special Unit must be accompanied by enhancing police human resource capabilities through ongoing training and education on mediation concepts and techniques, restorative justice methodologies, and human rights principles. This training must become an integral component of police education curricula, both at foundational and advanced educational levels. Additionally, developing a police performance evaluation system is necessary that measures not only quantitative dimensions (case

resolution numbers), but also qualitative dimensions such as community satisfaction levels, mediation settlement effectiveness, and recidivism rates (criminal act repetition). Third, regarding oversight and accountability dimensions. Strengthening oversight mechanisms for ultimum remedium principle implementation can be accomplished through: (a) enhancing the National Police Commission's (Kompolnas) role by granting authority to conduct supervision and issue binding recommendations; (b) creating easily accessible and responsive public complaint mechanisms for alleged irregularities in case handling; (c) mandating police to publish periodic reports on restorative justice implementation and ultimum remedium principle application; and (d) incorporating academics, legal practitioners, and civil society organizations into police policy monitoring and evaluation processes (Tawang, 2020).

Fourth, regarding inter-agency coordination. Effective ultimum remedium principle implementation demands synchronized cooperation among police, prosecution services, and courts. A joint protocol among law enforcement agencies is necessary for managing restorative justice-based cases, including criteria for cases eligible for termination orders (SP3-kan) based on restorative justice considerations, diversion mechanisms at the prosecutorial stage, and restorative justice application at trial through victim-offender mediation approaches. Fifth, concerning community empowerment and education. Successful ultimum remedium principle implementation depends not solely on law enforcement institutional readiness, but also on public awareness and endorsement. Extensive legal education initiatives are essential to transform societal mindsets from retributive to restorative paradigms. These programs can be executed through: (a) public awareness campaigns via mass media and social media highlighting restorative approach benefits; (b) community-level legal outreach involving community leaders, religious figures, and traditional authorities; (c) incorporation of restorative justice principles into formal educational curricula; and (d) establishment of community-based mediation bodies to facilitate peaceful dispute resolution.

The ideal construction model proposed is a progressive-humanist model that places substantive justice and respect for human dignity as the primary goals of law enforcement. This model does not negate criminal sanctions, but places them as a last resort after other unsuccessful attempts. In this model, the police not only play the role of law enforcer, but also as peacemakers and social workers who are proactive in resolving conflicts and preventing crime through a humane and dignified approach. The implementation of this progressive-humanist model must also be supported by a legal framework that provides legal immunity for police officials who in good faith apply the principles of ultimum remedium and restorative justice. Without clear legal protections, police officials will tend to be defensive and choose the safe path by processing all cases to criminal proceedings to avoid accusations of neglect of duty or abuse of authority Wicaksono & Najicha (2021). The provisions on legal protection must be explicitly regulated in laws and regulations and accompanied by an objective evaluation mechanism. Third, the ideal construction of the application of the principle of ultimum remedium in police actions that reflects lex certa, justice, and humanism must be built through a holistic approach that includes five main aspects. The proposed model is a progressive-humanist model that places substantive justice and respect for human dignity as the primary goals of law enforcement.

4. CONCLUSION

Based on the results of the legal analysis in this study, it can be concluded that the application of the ultimum remedium principle in police actions in Indonesia still faces fundamental obstacles due to unclear norms (lex certa) in Law No. 2 of 2002 and Regulation of the Chief of Police No. 8 of 2021. The imbalance between normative aspirations and the reality on the ground triggers inconsistencies in law enforcement, where investigators tend to prioritize the pro-justice path over mediation due to a repressive orientation, a quantitative performance assessment system, and a lack of independent control mechanisms over police discretion. This condition leads to the excessive criminalization of minor cases that should be resolved through a non-penal approach, thus harming the value of substantive justice for the community. As a long-term solution, this study reconstructs a progressive-humanist law enforcement model that integrates regulatory, institutional, and community empowerment aspects. Recommended strategic steps

include revising the Police Law to include clear operational criteria for ultimum remedium, establishing a Special Mediation Unit at every level of the police force, and transforming performance indicators that measure the quality of case resolution and victim satisfaction. By prioritizing criminal law as a last resort, it is hoped that the police will be able to carry out their role not only as law enforcers, but also as peacemakers who maintain human dignity in the Indonesian criminal justice system.

Ethical Approval

Not Applicable

Informed Consent Statement

Not Applicable

Authors' Contributions

Not Applicable

Disclosure Statement

The authors declare that there are no relevant conflicts of interest related to this research

Data Availability Statement

The data presented in this study are available on request from the corresponding author due to privacy reasons.

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Notes on Contributors

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