

The Legal Liability of Local Governments in Disputes Over Athlete Bonus Payments

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Abstract

This study examines the legal liability of local governments for failing to fulfil promised bonus payments to athletes. This issue arises because, while bonuses are promised as recognition of athletes' achievements, in practice, payments are often delayed or fail to materialise. The objective of this legal study is to describe and explain in detail and fundamentally that, based on the principle of legal certainty, the principles of good governance, and statutory provisions, local governments can be held legally liable for breach of contract or negligence in fulfilling promises to pay athlete bonuses. This study is a normative, descriptive-analytical research study, utilising secondary data through a literature review and qualitative data analysis. The results of the study indicate that athlete bonuses promised by local governments carry binding legal and administrative consequences once formalised in policies, decisions, or local budgets. Therefore, athletes, as aggrieved parties, are entitled to legal protection through administrative mechanisms or legal action in accordance with applicable laws and regulations.

Keywords: Accountability, Government, Bonuses, Athletes, Disputes.

A. Introduction

Athletes' achievements are a tangible way to enhance a region or country's sports image. As a form of recognition for these achievements, local governments often promise bonuses to athletes who excel in specific sporting events.¹ The awarding of such bonuses is not merely a matter of moral support and appreciation, it also carries legal implications once it has been announced, established, or incorporated into local policies and budgets.² However, in practice, there are still various cases of delays or failures by local governments to pay athlete bonuses, leading to disputes and legal uncertainty for athletes as aggrieved parties.³

The failure to pay athlete bonuses raises the question of the extent to which local

¹ Shinta Tri Lestari and Henry Darmawan Hutagaol, "Analisis Kebijakan Pemberian Penghargaan Dan Pengenaan Sanksi Atas Pelaksanaan Anggaran Pendapatan Dan Belanja Daerah," *AL-MANHAJ: Jurnal Hukum Dan Pranata Sosial Islam* 5, no. 1 (2023): 755-72.

² Joanna Kusiak, *Radically Legal* (Cambridge University Press & Assessment, 2026), doi:<https://doi.org/10.1017/9781009516914>.

³ Dalilah Afrillia, "Implementasi Peraturan PT. Matahari Putra Prima Nomor 141 Tahun 2022 Tentang Pemberian Gaji Dan Insentif Di Matahari Department Store Medan Mall," 2024.

governments can be legally held accountable for the promises they have made. From the perspective of administrative law, government actions must be grounded in the principles of legal certainty, legitimate expectations, and good governance.⁴ When a local government promises a bonus to an athlete, that promise can create a legally binding relationship, particularly if formalised in an administrative decision or an official local policy.⁵ Therefore, failure to fulfil bonus payments can be categorised as administrative negligence, thereby imposing legal liability on the local government.⁶

This research is important because there are still few legal studies that specifically address the liability of local governments in disputes over athlete bonus payments.⁷ Previous studies have largely focused on sports policy, athlete welfare, or general local financial management, without deeply examining local government legal liability for unfulfilled bonus promises. Thus, this study offers a novel analysis of the relationship among the principle of local government liability, legal protection for athletes, and the application of the principle of legal certainty in disputes over athlete bonus payments.⁸ Based on this background, this study aims to analyse the legal liability of local governments for failing to fulfil promised athlete bonus payments and to explain the legal protections that athletes can obtain under applicable laws and regulations.

In addition, the legal basis for local governments in Indonesia to award bonuses to athletes can be found in several laws and regulations. Article 55 of Law No. 11 of 2022 on Sports stipulates that athletes who achieve outstanding results are entitled to receive awards and recognition from the central government and/or local governments. Furthermore, Law No. 23 of 2014 on Regional Government grants local governments the authority to manage sports affairs as part of governmental functions related to public services and regional development. From an administrative law perspective, Law No. 30 of 2014 on Government Administration also emphasises that every government decision and action must adhere to the principles of legality, legal certainty, accountability, and good governance. Consequently, once a local government officially promises or allocates bonuses to athletes through official policies, budget decisions, or mayoral decrees, such promises may entail legally binding consequences and administrative liability.

A relevant case occurred in the City of Surabaya during the 2022 East Java Provincial Sports Week (Porprov Jatim VII). The Surabaya City Government openly promised financial bonuses to medal-winning athletes; however, these payments faced significant delays due to budget adjustments and the need for additional allocations through the Regional Budget Amendment (PAK). This situation sparked criticism from members of the Surabaya Regional People's Representative Council (DPRD). It caused dissatisfaction among athletes who had fulfilled their obligations by representing the city and bringing home achievements. Although the Surabaya City Government subsequently issued Mayor's Decree No. 100.3.3.3/309/436.1.2/2024 regarding financial awards for athletes and coaches, the prior delays demonstrate that administrative and budgetary obstacles can lead

⁴ Steffen Böhm et al., "Ethics at the Centre of Global and Local Challenges: Thoughts on the Future of Business Ethics," *Journal of Business Ethics* 180, no. 3 (2022): 835–61.

⁵ Manotar Tampubolon, Nelson Simanjuntak, and Fernando Silalahi, "Birokrasi & Good Governance" (PT Global Eksekutif Teknologi, 2023).

⁶ Laurence Ferry and Thomas Ahrens, "'A Practice of Fairness': Social Equity Budgeting in Freedom City," *Public Administration* 103, no. 4 (2025): 1022–37.

⁷ Barrett J Taylor, *Wrecked: Deinstitutionalization and Partial Defenses in State Higher Education Policy* (Rutgers University Press, 2022).

⁸ Stuart Thomas, Kieran D Tierney, and Jason Potts, *Blockchain in Sports: Insights* (Taylor & Francis, 2025).

to legal disputes and uncertainty regarding the fulfilment of athletes' rights.⁹

The case in Surabaya illustrates that promises of athlete bonuses are not merely political or symbolic statements, but can constitute administrative commitments that entail legal accountability. Therefore, this study is relevant for analysing the extent to which local governments can be held accountable for delays or non-payment of bonuses, particularly in light of the principles of legal certainty, legitimate expectations, and the protection of athletes' rights within the framework of Indonesian administrative law.

In addition, the issue of unpaid athlete bonuses can also be analysed through the concept of state liability in administrative law. In principle, any government action that gives rise to a legitimate expectation on the part of citizens must be accompanied by legal liability.¹⁰ The doctrine of *legitimate expectation* recognises that individuals who have relied on official government promises or policies are entitled to legal protection when those promises are not fulfilled. In the context of athlete bonus payments, athletes who have achieved sporting accomplishments based on official announcements, local policies, or government commitments have a legitimate expectation that the promised rewards will be fulfilled. Therefore, a local government's failure to meet such commitments constitutes maladministration and a violation of the *Principles of Good Governance*.

Furthermore, the principle of accountability in public administration requires local governments to ensure transparency, consistency, and legal certainty in the implementation of policies related to public expenditures, including athlete bonuses. According to the theory of governmental accountability, public officials and institutions are legally accountable for actions or omissions that cause harm to individuals or groups. This concept is closely related to the principle of *rechtmatigheid van bestuur*, which requires that every governmental action be based on legitimate authority and proper administrative procedures. Consequently, once bonus payments have been officially incorporated into the local budgeting mechanism or an administrative decision, the local government cannot arbitrarily delay or disregard their fulfilment without a valid legal justification.

From the perspective of legal protection theory, athletes, as citizens, have a constitutional right to fair treatment and legal certainty under Article 28D(1) of the 1945 Constitution of the Republic of Indonesia. The delay or non-payment of bonuses can not only cause material losses but also erode athletes' trust in government institutions and weaken the state's commitment to sports development. Therefore, legal action is essential to ensure justice for athletes, whether through administrative appeals, mediation, or judicial mechanisms before the Administrative Court, depending on the nature of the government's actions or decisions involved.

Based on these considerations, the legal issue in this study is whether local governments can be held legally accountable for failing to fulfil promised athlete bonus payments and, to what extent, such accountability can be enforced within the framework of Indonesian administrative law. This issue is significant because it concerns not only the fulfilment of local governments' financial obligations but also broader principles of legal certainty, government accountability, and the protection of citizens' rights in public administration.

Based on the background described above, the primary legal issue examined in this

⁹ Drewery Dyke and Hadi Enayat, "The Administration of Criminal Justice in Iran: Ideology, Judicial Personalism, and the Cynical Manipulation of Security," in *The Rule of Law in the Islamic Republic of Iran: Power, Institutions, and the Limits of Reform*, ed. Hadi Enayat and Mirjam Künkler (Cambridge: Cambridge University Press, 2025), 66–103, doi:DOI: 10.1017/9781108630603.003.

¹⁰ Dewanti Zafitri, "Perlindungan Hukum Terhadap Kesejahteraan Atlet Sepak Takraw Di Kabupaten Pinrang Menurut UU No. 11 Tahun 2022 Tentang Keolahragaan" (IAIN Parepare, 2024).

study is whether local governments can be held accountable for failing to fulfil their promises to pay bonuses to athletes. This issue arises because the promises made by local governments are not merely moral or political statements but also administrative commitments that may give rise to legal consequences once they are officially announced, regulated, or incorporated into local policies and budgeting mechanisms. In this context, the failure to fulfil bonus payments raises questions regarding the extent of government liability, the protection of athletes' rights, and the application of legal certainty within the framework of Indonesian administrative law.¹¹

Therefore, the legal research question in this study is: *Can local governments be held legally accountable for failing to fulfil their promise to pay athlete bonuses?* This legal issue is examined through the perspectives of administrative law, the principles of good governance, and the doctrine of legitimate expectations, to determine the legal consequences arising from the government's failure to fulfil its promise to athletes as rights-holders.

B. Research Method

This study employs a normative legal research method using a descriptive-analytical approach.¹² Normative legal research involves examining legal principles, doctrines, legislation, and theories relevant to local government liability for failing to fulfil promised bonus payments to athletes.¹³ The descriptive-analytical approach is used to systematically describe and analyse the legal consequences arising from the delay or non-payment of athlete bonuses by local governments under Indonesian administrative law.¹⁴

The legal approaches applied in this study include the *statutory*, *conceptual*, and *case approaches*. The statutory approach involves examining laws and regulations related to sports, local government, public administration, and legal protection, specifically Law No. 11 of 2022 on Sports, Law No. 23 of 2014 on Local Government, and Law No. 30 of 2014 on Government Administration. The conceptual approach is used to analyse the doctrines of legal certainty, legitimate expectations, state liability, and the principles of good governance. Meanwhile, the case study approach is conducted through an analysis of the dispute regarding the delayed payment of athlete bonuses in the City of Surabaya following the 2022 East Java Provincial Sports Week (Porprov Jatim VII).¹⁵

This study relies on secondary data comprising primary, secondary, and tertiary legal materials. Primary legal materials include laws, regulations, and official government policies related to athlete bonuses and local financial administration. Secondary legal materials include legal textbooks, journal articles, academic opinions, and previous legal studies relevant to government accountability and administrative law.¹⁶ Tertiary legal materials include legal dictionaries, encyclopedias, and supporting references related to legal terminology and concepts. Data collection was conducted through library research, and the collected data were analysed qualitatively by systematically interpreting and relating legal norms, principles, and doctrines to the legal issues under study.

¹¹ Megandaru Widhi Kawuryan et al., "Sustainable Tourism Development in Indonesia: Bibliometric Review and Analysis," *Indonesian Journal of Geography* 54, no. 1 (2022): 154–66, doi:10.22146/ijg.64657.

¹² Peter Mahmud Marzuki, *Teori Hukum* (Prenada Media, 2020).

¹³ Peter Mahmud Marzuki, *Penelitian Hukum Edisi Revisi* (Prenada Media Group, 2022).

¹⁴ Women Judges et al., "Feminist Judgments : Reimagining the International Criminal Court," 2023.

¹⁵ Zafitri, "Perlindungan Hukum Terhadap Kesejahteraan Atlet Sepak Takraw Di Kabupaten Pinrang Menurut UU No. 11 Tahun 2022 Tentang Keolahragaan."

¹⁶ Tampubolon, Simanjuntak, and Silalahi, "Birokrasi & Good Governance."

Based on the approach described above, this study relies on secondary legal materials, including primary, secondary, and tertiary sources. Primary legal materials include legislation and official government policies related to athlete bonuses and local financial administration. Secondary legal materials include legal textbooks, journal articles, academic opinions, and prior studies relevant to administrative law and government accountability. Meanwhile, tertiary legal materials include legal dictionaries, encyclopedias, and other supporting legal references.

To provide a systematic legal analysis of local governments' liability for unpaid athlete bonuses, this study employs several legal research approaches. These approaches aim to examine the legal basis, conceptual framework, and practical implementation of government liability regarding disputes over athlete bonus payments. The approaches used in this study are presented in the following table.

Table 1. Relevance to Research Problem

Research Approach	Focus of Analysis	Relevance to Research Problem
Statutory Approach	Examining laws and regulations related to sports, regional government, and public administration	To determine the legal basis of local government liability for unpaid athlete bonuses
Conceptual Approach	Analysing legal doctrines such as legal certainty, legitimate expectation, and state liability	To explain the legal consequences arising from unfulfilled government promises
Case Approach	Analysing the Surabaya athlete bonus dispute following Porprov Jatim VII 2022	To examine the practical implementation of government accountability

Through this approach and methodology, this study aims to provide a comprehensive legal analysis of the liability of local governments for their failure to fulfil their promise to pay bonuses to athletes. This qualitative legal analysis is expected to identify the legal consequences arising from such failure and to evaluate the forms of legal protection available to athletes under Indonesian administrative law.

A concrete example of disputes over bonus payments for athletes occurred in Surabaya following the 2022 East Java Provincial Sports Week (*Porprov Jatim VII*). During this event, the Surabaya City Government publicly announced financial bonuses for athletes and coaches who won medals and contributed to the city's achievements. However, despite these official promises, bonus disbursements faced significant delays due to budget adjustments and the need for additional allocations through the Budget Amendment (PAK). This situation has caused dissatisfaction among athletes and drawn criticism from members of the Regional People's Representative Council (DPRD), as the delay creates uncertainty about the fulfilment of athletes' rights. The following table illustrates the legal aspects and implications arising from the dispute over the Surabaya athletes' bonuses.

Table 2. Surabaya Athlete Bonus Dispute Analysis

Aspect	Description	Legal Implication
Event	Porprov Jatim VII 2022	Athlete achievements created entitlement expectations
Government Promise	Bonus announcements by Surabaya City Government	Created administrative commitment
Problem	Delay in bonus payment	Triggered legal uncertainty and

		disputes
Government Response	Budget adjustment through PAK and Mayor's Decree 2024	Indicates administrative and budgetary responsibility

The case in Surabaya demonstrates that promises made by local governments regarding athlete bonuses are not merely symbolic or political statements but administrative commitments that carry legal consequences once incorporated into official government policies or budgetary mechanisms. Delays in making these bonus payments indicate administrative and budgetary issues that can affect the application of the principles of legal certainty, accountability, and good governance.¹⁷ Therefore, the dispute over athlete bonuses in Surabaya serves as a relevant case study for analysing the extent to which local governments can be legally held accountable for failing to fulfil promises made to athletes as beneficiaries of public policy.

C. Results and Discussion

Legal Liability of Local Governments for Unfulfilled Athlete Bonus Payments

The obligation of local governments to fulfil promised bonus payments to athletes is closely tied to the principle of government accountability under administrative law.¹⁸ In the context of public administration, every government action or policy that creates a legal expectation for citizens must be implemented in accordance with the principles of legality, accountability, and legal certainty. Bonuses for athletes promised by local governments are not merely symbolic recognition but also constitute an administrative commitment once they are officially announced, regulated, or incorporated into local government policies and budgeting mechanisms.¹⁹

The legal basis for this government responsibility is found in Article 55 of Law No. 11 of 2022 on Sports, which recognises that athletes who achieve extraordinary accomplishments are entitled to receive awards and recognition from the government and/or local governments. Furthermore, Law No. 30 of 2014 on Government Administration requires that every government decision and action comply with the principles of good governance, including legal certainty, transparency, proportionality, and accountability.²⁰ Therefore, when a local government publicly promises bonuses to athletes through official statements, mayoral decisions, or local budget mechanisms, such commitments may give rise to legally binding consequences.²¹

From the perspective of the *legitimate expectations* doctrine, athletes who have relied on official government promises have the right to expect that those promises will be fulfilled. This doctrine emphasises that citizens are entitled to legal protection when government policies or commitments create reasonable expectations. Following the 2022 East Java Provincial Sports Week (Porprov Jatim VII), the Surabaya City Government announced financial bonuses, creating a legitimate expectation among athletes who represented the city and achieved sporting accomplishments. However, delays in disbursement due to budget adjustments under the Regional Budget Amendment (PAK) have created uncertainty about the fulfilment of these rights.

¹⁷ Sinto Adi Prasetyorini, *Reformulasi Pengaturan Pendirian Lembaga Bantuan Hukum Dalam Upaya Mewujudkan Kepastian Hukum* (Penerbit Lawwana, 2024).

¹⁸ Afrillia, "Implementasi Peraturan PT. Matahari Putra Prima Nomor 141 Tahun 2022 Tentang Pemberian Gaji Dan Insentif Di Matahari Department Store Medan Mall."

¹⁹ Neil H Buchanan and Michael C Dorf, "Justice Delayed: Government Officials' Authority to Wind Down Constitutional Violations," *BUL Rev.* 103 (2023): 2065.

²⁰ Lutfiadi Lutfiadi et al., "The Constitutional Legitimacy of Temporary Advocate Identification in the Indonesian Legal System," *Jurnal Ilmu Hukum Kyadiren* 7, no. 1 (2025): 279-95.

²¹ Ferry and Ahrens, "A Practice of Fairness': Social Equity Budgeting in Freedom City."

Furthermore, the concept of *state liability* holds that government agencies may be held legally responsible for negligence or administrative failures that harm citizens. Therefore, the delay or non-payment of athlete bonuses can be categorised as maladministration because the government failed to fulfil obligations publicly promised.²² Such failure not only causes material losses for the athletes but can also erode public trust in government institutions and undermine the credibility of public sports policy. Thus, local governments can be legally accountable when the payment of athlete bonuses is officially incorporated into administrative decisions or local financial policies.²³

Regarding the legal issues examined in this study, the liability of local governments for unpaid athlete bonuses must also be analysed under the principle of *rechtmatigheid van bestuur*, which requires that every government action be carried out with lawful authority and in accordance with proper administrative procedures. Under Indonesian administrative law, government promises officially incorporated into public policy or local financial mechanisms cannot be arbitrarily disregarded or postponed without a valid legal basis. Consequently, when a local government publicly announces athlete bonuses and subsequently incorporates them into administrative instruments or the budget, that government has a legal obligation to ensure their fulfilment. Therefore, failure to fulfil this obligation may be considered maladministration and a violation of the principles of good governance.

Furthermore, the principle of legal certainty plays a crucial role in determining the government's responsibility toward athletes as rights holders. Legal certainty requires that government actions remain predictable, transparent, and consistent with applicable laws and official commitments. In this regard, athletes who have fulfilled their obligations by representing their region and achieving sporting success should receive legal protection against arbitrary delays or the non-payment of promised bonuses. This protection is reinforced by Article 28D(1) of the 1945 Constitution of the Republic of Indonesia, which guarantees every citizen the right to recognition, protection, and fair legal certainty before the law.

The issue of unpaid athlete bonuses can also be linked to the concept of abuse of authority when the government's discretion in budget management results in the neglect of obligations officially promised.²⁴ Although local governments possess discretionary authority in managing local finances under Law No. 23 of 2014 on Regional Government, such discretion must still be exercised in accordance with laws and regulations and in accordance with the principles of accountability.²⁵ Therefore, budget adjustments or administrative obstacles cannot automatically absolve the government of its responsibility to fulfil the bonus promise, especially when athletes have relied on that promise and suffered losses due to delayed payments.

Thus, the legal issue in this study, whether local governments can be held legally

²² Achmad Surya et al., *Perlindungan Hukum Di Indonesia* (Repository.ubharajaya, 2025).

²³ Philipus M Hadjon, *Dinamika Hukum Tata Negara, Pemilu, Dan Demokrasi Indonesia: Dalam Rangka Memperingati 80 Tahun Guru Kami, Prof. Dr. Philipus Mandiri Hadjon, SH* (Prenada Media, 2025).

²⁴ Sony Cipto Leksono and Hadi Purnomo, "Criminal Justice System in the Perspective of Integration," *International Journal of Asia Pasific Collaboration* 1, no. 3 (2023): 82-90.

²⁵ Sitti Fatimah Maddusila and H Maulana Amin Tahir, *Buku Ajar Hukum Acara Perdata* (Divya Media Pustaka, 2025), Dalam Kitab Undang-Undang Hukum Acara Pidana (KUHP), istilah yang digunakan adalah Advokat, yaitu seseorang yang memenuhi syarat untuk memberikan bantuan hukum sebagaimana diatur oleh undang-undang. Na-mun demikian, baik Kitab Undang-Undang Hukum Acara Pidana (KUHP) maupun Undang-Undang Nomor 18 Tahun 2003 tentang Advokat belum mengatur secara komprehensif mengenai kedudukan, hak, dan perlindungan hukum bagi advokat, khususnya terkait aspek administratif profesi.

accountable for failing to fulfil bonus payment promises to athletes, must be understood not merely as a financial or political matter, but as an issue related to the enforcement of administrative justice and the protection of citizens' rights.²⁶ In this context, the local government's liability arises because the promise of athlete bonuses creates a legal relationship between the government and the athletes as beneficiaries of public policy. Therefore, when such promises are not fulfilled, athletes may seek legal protection through administrative remedies, mediation, or judicial mechanisms in accordance with Indonesian administrative law and the applicable legal framework.²⁷

To provide a clearer understanding of the legal framework governing local government liability in disputes over the payment of athlete bonuses, several fundamental legal concepts must be analysed.²⁸ These concepts serve as the legal basis for determining whether local governments can be held legally liable for delays or failures in fulfilling their promises to provide bonuses to athletes. The following table outlines the relationship between the relevant legal concepts, their legal basis, their application in the athlete bonus dispute in Surabaya, and the legal consequences arising from the government's actions.

Table 3. Legal Concepts in Athlete Bonus Payment Disputes

Legal Concept	Legal Basis	Application in Athlete Bonus Dispute	Legal Consequence
Legal Certainty	Article 28D(1) of the 1945 Constitution	Athletes expected promised bonuses to be paid	Government must fulfil official commitments
Legitimate Expectation	Administrative Law Doctrine	Official bonus announcements created reasonable expectations	Athletes are entitled to legal protection
State Liability	Law No. 30 of 2014 on Government Administration	Delay in bonus payment constitutes administrative negligence	Local government may bear legal responsibility
Good Governance	Principles of Good Governance (AUPB)	Budget delays affected transparency and accountability	Indicates maladministration
Rechtmatigheid van Bestuur	Principle of Lawful Government Action	Bonus promises incorporated into local policies and budget	Government actions must comply with lawful procedures

Based on the table above, it is clear that the local government's responsibility for unpaid

²⁶ Evi Oktarina, "Peran Politik Hukum Dalam Pembaharuan Hukum Tata Negara Untuk Mewujudkan Tujuan Negara Indonesia," *Lex Librum* 8, no. 2 (2022): 227–38.

²⁷ Emad H Atiq, "Legal Positivism and the Moral Origins of Legal Systems," *Canadian Journal of Law & Jurisprudence* 36, no. 1 (2023): 37–64, doi:DOI: 10.1017/cjlj.2022.17.

²⁸ Philipus M. Hadjon et al., *Pengantar Hukum Administrasi Indonesia (Introduction To The Indonesian Administrative Law)* (Yogyakarta: Gadjah Mada University Press, 2024).

athlete bonuses is not merely a political or administrative issue, but also a legal matter closely tied to the principles of legal certainty, legitimate expectations, state accountability, and good governance. The Surabaya case demonstrates that official promises made by local governments can give rise to binding legal consequences once incorporated into administrative decisions or local financial policies. Therefore, delays or failures in fulfilling such commitments can be categorised as maladministration and provide a legal basis for athletes to seek protection and accountability under Indonesian administrative law.

Legal Protection for Athletes in Disputes Over Bonus Payments

Legal protection for athletes in disputes regarding unpaid bonuses is fundamentally linked to the constitutional principles of legal certainty and the protection of citizens' rights. Article 28D(1) of the 1945 Constitution of the Republic of Indonesia guarantees that every person has the right to recognition, assurance, protection, and fair legal certainty before the law.²⁹ In this context, athletes, as citizens, have the right to legal protection when local governments fail to fulfil bonus promises that have created administrative obligations.

The theory of legal protection developed in Indonesian administrative law emphasises that government actions affecting citizens' rights must provide mechanisms for accountability and legal remedies.³⁰ According to Philipus M. Hadjon, legal protection in administrative law encompasses both preventive and repressive forms. Preventive protection aims to prevent the abuse of government authority through transparency and proper administrative procedures. In contrast, repressive protection is intended to resolve disputes after a violation has occurred through legal remedies and judicial mechanisms.

In the Surabaya athlete bonus dispute, the delay in bonus payments led to dissatisfaction among athletes because the promised compensation had not been paid within the expected timeframe. Although the Surabaya City Government eventually issued Mayor's Decision No. 100.3.3.3/309/436.1.2/2024 regarding financial awards for athletes and coaches, the prior delay highlights the vulnerability of athletes' rights when administrative and budgetary mechanisms are not effectively implemented. Consequently, athletes, as the aggrieved party, have the right to pursue legal remedies through administrative appeals, mediation, or judicial review before the Administrative Court if government decisions or omissions violate the principles of good governance.

Furthermore, the principle of *rechtmatigheid van bestuur* requires that every government action be based on lawful authority and proper administrative procedures.³¹ When a local government fails to fulfil promised bonus payments without a valid legal basis, such conduct may be categorised as an abuse of administrative authority or maladministration. Therefore, legal protection mechanisms are essential not only to ensure justice for athletes but also to strengthen government accountability and maintain public trust in state institutions.

Based on the above analysis, legal protection for athletes in bonus payment disputes reflects a broader implementation of legal certainty, government accountability, and the rule of law within Indonesian administrative law. The Surabaya case demonstrates that the fulfilment of athletes' bonuses should not rely solely on political discretion or budgetary

²⁹ Max Houwing, Irena Dukovska, and Nikolaos G Paterakis, "A Reputation Management System for the Fair Utilization of Community Energy Storage Systems," *IEEE International Conference on Computer and Information* 14, no. 1 (2022): 582-92.

³⁰ Peter Mahmud Marzuki, *Pengantar Ilmu Hukum* (Prenada Media, 2021).

³¹ Nanda Dwi Rizkia and Hardi Fardiansyah, *Metode Penelitian Hukum (Normatif Dan Empiris)* (Penerbit Widina, 2023).

considerations but must also be viewed as a legal obligation arising from administrative commitments made by the local government.

Therefore, the legal protection afforded to athletes in disputes regarding unpaid bonuses must be understood as an integral part of the state's obligation to uphold justice, accountability, and the protection of citizens' rights within the framework of administrative law.³² The failure of local governments to fulfil promises regarding bonus payments is not merely an administrative issue. Still, it may also entail legal consequences if such promises have created legitimate expectations and administrative obligations. In this context, athletes have the right to hold local governments accountable through available legal mechanisms to ensure the fulfilment of their rights and the implementation of fair administrative governance.

Furthermore, the case in Surabaya illustrates that administrative commitments made by local governments cannot rely solely on political discretion, budget adjustments, or internal government considerations.³³ Once such commitments are publicly announced and formally incorporated into local policies or financial mechanisms, they acquire a legally binding force that must be implemented consistently and responsibly. Consequently, legal protection for athletes serves not only to safeguard individual rights but also to reinforce the principles of legal certainty, good governance, and public trust in government institutions.³⁴

Thus, the issue of unpaid athlete bonuses demonstrates that local governments can be legally held accountable for failing to fulfil obligations officially promised to athletes. This accountability reflects the broader function of Indonesian administrative law in ensuring that government authority is exercised lawfully, transparently, and in accordance with the principles of justice and the rule of law.

D. Conclusion and Recommendations

Based on the findings and discussion, this study concludes that local governments can be held legally accountable for failing to fulfil promises to pay bonuses to athletes once such promises have been officially announced, regulated, or incorporated into administrative decisions and local financial mechanisms. Under Indonesian administrative law, a promise of an athlete's bonus is not merely a political or symbolic statement, but an administrative commitment that creates a legal obligation and legitimate expectations for athletes as rights holders. Therefore, the delay or non-payment of bonuses may constitute maladministration and a violation of the principles of legal certainty, accountability, and good governance. The case in Surabaya following the 2022 East Java Provincial Sports Week (Porprov Jatim VII) demonstrates that budget adjustments and administrative obstacles cannot automatically absolve local governments of their legal responsibility when athletes have reasonably relied on the government's official promises. Furthermore, athletes are entitled to legal protection through administrative remedies, mediation, or judicial mechanisms in accordance with applicable laws and regulations.

Therefore, this study recommends that local governments establish clearer, more consistent regulatory mechanisms for the awarding and disbursement of athlete bonuses,

³² Tatiek Sri Djatmiati and Philipus M Hadjon, *Argumentasi Hukum* (Ugm Press, 2024), <https://pdrh.law.ui.ac.id/koleksi/detail/4390/argumentasi-hukum-legal-argumentationlegal-reasoning>.

³³ Yovita Arie Mangesti and Slamet Suhartono, *Ilmu Hukum Kontemporer, Menembus Batas Kekakuan Hukum Normatif* (Malang: Setara Press, 2020).

³⁴ Anisa Dwi Rachamadika, "Kemandirian Kekuasaan Kehakiman Dalam Menegakkan Negara Hukum Yang Demokratis," *Hangoluan Law Review* 3, no. 1 (2024).

particularly through transparent budgeting procedures and binding administrative policies. Local governments must also ensure that promises regarding athlete awards are supported by adequate financial planning to prevent legal disputes and protect athletes' rights. Additionally, stronger administrative oversight and accountability mechanisms are needed to ensure compliance with the principles of good governance and legal certainty in public administration. Finally, this study suggests that future legal research further examine the effectiveness of available administrative and judicial remedies for athletes in disputes involving government obligations and public policy commitments.

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