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Legal Certainty in Consumer Protection Against Abusive Debt Collection

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ABSTRACT

This research examines the legal certainty provided by Financial Services Authority Regulation (POJK) Number 22 of 2023 in protecting consumers against abusive debt collection practices in Indonesia. The study aims to analyze how the regulation establishes standards for debt collection, allocates institutional responsibility, and addresses consumer protection challenges in the digital financial services sector. **The research employs** a normative juridical approach based on statutory analysis, legal doctrine, and relevant documented cases, using statutory, conceptual, and case approaches to examine the relationship between regulatory provisions and their implementation. **The findings indicate** that POJK Number 22 of 2023 strengthens the legal framework by establishing clearer obligations for financial service institutions, reinforcing accountability for third-party debt collectors, and supporting ethical collection practices. **However, the effectiveness** of these protections remains constrained by supervisory weaknesses, limited consumer legal literacy, inconsistent enforcement, and insufficient oversight of outsourced collection activities. This study contributes to digital legal governance by demonstrating that consumer protection depends not only on the clarity of regulatory norms but also on institutional accountability, personal data protection, accessible complaint mechanisms, and consistent regulatory supervision. **It concludes** that stronger implementation and coordinated oversight are necessary to reinforce legal certainty, protect consumer rights, and support accountable financial governance in Indonesia, in line with Sustainable Development Goal 16.

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1. INTRODUCTION

The increasing practice of debt collection accompanied by threats of violence by debt collectors in recent years has become a serious concern in the Indonesian financial system. This situation indicates an imbalance between the financial services industry's need to maintain credit quality and the protection of consumer rights as vulnerable parties [1]. The enactment of Financial Services Authority Regulation Number 22 of 2023 is a strategic step in creating legal certainty and more ethical debt collection governance [2]. Data from the Financial Services Authority shows that complaints related to unethical debt collection continue to dominate consumer reports, particularly in the online lending and financing sectors [3]. Furthermore, a report from the Indonesian Consumers Foundation (YLKI) indicates that most victims experience psychological pressure

due to intimidation, the disclosure of personal data, and even physical threats. This situation not only affects individuals but also undermines public trust in the national financial system [4].

The expansion of digital financial services, particularly financial technology lending, has created new challenges for consumer protection and regulatory accountability [5]. Debt collection in this environment should not be viewed solely as a contractual or financial matter, but also as an issue of digital legal governance involving institutional responsibility, the protection of personal data, and the availability of effective complaint mechanisms. In Indonesia, Financial Services Authority Regulation Number 22 of 2023 provides an important regulatory basis for addressing these challenges by establishing consumer protection obligations for financial service institutions [6]. Its significance therefore extends beyond the regulation of individual debt collection practices to the governance of financial service providers and third-party collection agents. From this perspective, strengthening legal certainty is essential to ensuring that the development of digital financial services remains consistent with consumer rights, regulatory accountability, and the principles of Sustainable Development Goal 16 on Peace, Justice, and Strong Institutions [7].

Although regulations have been issued, a key issue that arises is the extent to which the resulting legal certainty is able to address violent practices in debt collection. One of the biggest challenges is the gap between written legal norms and actual practice [8]. Many debt collectors still use intimidatory methods due to weak oversight, a lack of integrated operational standards, and low public legal literacy [9]. This raises questions about the effectiveness of regulations in providing real protection. Furthermore, there are structural issues, such as the often poorly regulated working relationship between financing companies and third-party debt collectors, which opens up opportunities for violations [10]. From a theoretical perspective, this issue relates to the concept of legal certainty, which demands clear norms, consistent application, and fair law enforcement [11]. However, in practice, legal certainty often conflicts with economic interests and business efficiency. Therefore, this research is significant in assessing whether existing regulations are able to optimally address consumer protection needs [12]. Accordingly, this study focuses on evaluating whether POJK Number 22 of 2023 effectively bridges the gap between legal norms and debt collection practices while strengthening consumer protection through improved regulatory governance [13].

Although previous studies have examined consumer protection, legal certainty, and debt collection practices, further analysis is needed to clarify how financial consumer protection regulations operate as instruments of digital legal governance [14]. In particular, the relationship between regulatory clarity, institutional accountability for outsourced debt collectors, personal data protection, and the practical accessibility of consumer complaint mechanisms requires closer examination. This study addresses that gap by evaluating Financial Services Authority Regulation Number 22 of 2023 through the perspective of legal certainty and regulatory governance in Indonesia's financial services sector [15]. Its contribution lies in connecting the interpretation of consumer protection norms with the institutional conditions necessary for their consistent implementation, particularly in a financial environment increasingly shaped by digital services.

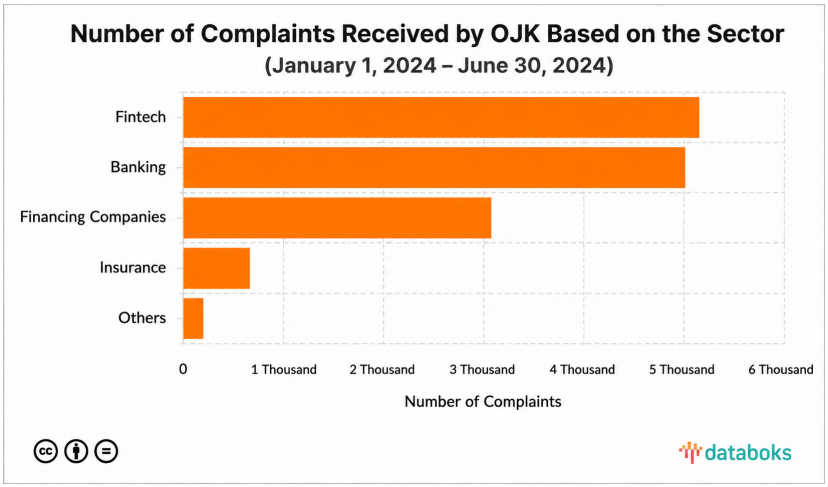


Figure 1. Trends in Debt Collector Complaints in Indonesia (January 1–June 30, 2024)

Figure 1 illustrates the distribution of consumer complaints received by the Financial Services Au-

thority (OJK) across financial service sectors during the period of January 1 to June 30, 2024. The figure shows that the fintech sector recorded the highest number of complaints, followed closely by the banking sector, while financing companies accounted for a considerably lower number of complaints [16]. In contrast, the insurance and other financial sectors contributed only a relatively small proportion of the total complaints. This distribution indicates that consumer complaints are concentrated primarily in sectors characterized by intensive lending activities, where debt collection practices frequently become a source of consumer disputes [17]. The concentration of complaints in the fintech and banking sectors highlights the continuing challenges of consumer protection within Indonesia's financial services industry. Although Figure 1 presents overall consumer complaints rather than complaints exclusively related to debt collection, the dominance of sectors in which debt collection activities are common reinforces the importance of strengthening regulatory oversight under Financial Services Authority Regulation (POJK) Number 22 of 2023 [18]. These findings underscore the need for ethical debt collection practices, stronger institutional supervision, and effective regulatory enforcement to enhance consumer protection, improve public trust in the financial system, and support the achievement of SDG 16 (Peace, Justice, and Strong Institutions) [19].

2. LITERATURE REVIEW

This study focuses on the concepts of legal certainty, consumer protection, and debt collection practices in the rapidly evolving financial services sector in the digital era. Legal certainty is a fundamental principle in the legal system, requiring clear norms, consistent application, and guaranteed protection of individual rights [20]. According to classical theory, legal certainty relates not only to the existence of written regulations but also to how these regulations can be effectively implemented in practice. In the context of the financial services sector, legal certainty is crucial because it involves the relationship between financial institutions and consumers, who have an unequal bargaining position [21]. Regulations such as Financial Services Authority Regulation Number 22 of 2023 exist to provide a clear legal framework to protect consumers from detrimental practices, including unethical debt collection practices [22]. Recent international studies demonstrate that effective fintech governance requires integrated consumer protection frameworks, mandatory compliance monitoring, ethical debt collection standards, and digital supervisory mechanisms [23]. These findings provide important theoretical support for evaluating Indonesia's regulatory approach under POJK Number 22 of 2023. Debt collection practices have the potential to violate human rights, particularly when accompanied by intimidation or threats of violence. Therefore, this study positions legal certainty as a key variable in assessing the effectiveness of consumer protection in the financial services sector [24].

Furthermore, the concept of consumer protection in the financial sector has evolved along with the increasing complexity of financial products and services, including fintech-based loans. A study conducted by the Financial Services Authority (OJK) shows that increased access to digital financial services is accompanied by an increased risk of consumer abuse, particularly in the debt collection process [25]. Unethical debt collection practices often involve psychological pressure, misuse of personal data, and even physical threats. Previous research emphasizes that consumer protection must be based not only on regulations but also supported by public financial literacy and effective complaint mechanisms [26]. In this regard, the role of institutions such as the Indonesian Consumers Foundation (YLKI) is crucial in advocating for consumer rights and providing public education [27]. Furthermore, international literature shows that countries with robust consumer protection systems tend to have higher levels of public trust in the financial sector, which ultimately impacts overall economic stability [28].

From the perspective of debt collection practices, the involvement of third-party collection agents raises questions concerning institutional accountability, consumer rights, and the effectiveness of regulatory supervision [29]. These challenges become particularly relevant in digital financial services, where the use of online platforms and electronic communication may increase the importance of protecting personal data and maintaining accessible complaint channels [30]. Although outsourcing may improve operational efficiency, it should not diminish the responsibility of financial service institutions to ensure that collection activities comply with applicable legal standards. Accordingly, this study connects the concept of legal certainty with digital regulatory governance by examining whether the obligations established under POJK Number 22 of 2023 are supported by adequate institutional accountability and supervisory mechanisms. This perspective also relates to Sustainable Development Goal 16, particularly the promotion of accountable institutions, access to justice, and effective legal protection [31].

3. RESEARCH METHODS

This research methodology is designed to provide a comprehensive analysis of legal certainty in the implementation of Financial Services Authority Regulation Number 22 of 2023 and its relationship to the practice of threats of violence by debt collectors [32]. This research uses a normative juridical approach, focusing on the study of written legal norms, legal principles, and doctrines developed in the legal literature. This approach was chosen because the research aims to evaluate the effectiveness of regulations in providing legal protection, rather than to measure phenomena statistically. The primary data sources in this study are primary, secondary, and tertiary legal materials [33]. Primary legal materials include related laws and regulations, including regulations issued by the Financial Services Authority, as well as other legal provisions relevant to consumer protection. Secondary legal materials include books, scientific journals, and previous research results discussing legal certainty and debt collection practices. Meanwhile, tertiary legal materials, in the form of legal dictionaries and encyclopedias, were used to strengthen understanding of key concepts in this study [34].

The legal materials were analyzed qualitatively through statutory, conceptual, and case approaches [35]. The statutory approach was used to examine the relevant legal provisions, particularly POJK Number 22 of 2023 and related consumer protection regulations [36]. The conceptual approach was applied to clarify the relationship between legal certainty, consumer rights, institutional accountability, and digital regulatory governance. The case approach was used to examine documented cases and complaint reports where relevant source materials were available. The analysis focused on the consistency of regulatory norms, the allocation of responsibility among financial service institutions and third-party debt collectors, and the legal safeguards available to consumers [37]. This approach enabled the study to assess the regulatory framework and identify implementation challenges without claiming to measure the empirical effectiveness of the regulation through original field data [38].

Table 1. Research Design Framework

Research Component	**Description**
Research Approach	Normative juridical research focusing on legal certainty in debt collection practices under Financial Services Authority Regulation (POJK) Number 22 of 2023.
Research Object	Legal regulation governing consumer protection against abusive debt collection practices in Indonesia.
Legal Materials	Primary, secondary, and tertiary legal materials, including statutory regulations, scientific journals, legal textbooks, legal dictionaries, and encyclopedias.
Data Collection Technique	Library research through a systematic review of legislation, legal doctrine, official reports, and relevant scholarly literature.
Analytical Approaches	Statutory, conceptual, comparative legal, and case approaches were employed to evaluate regulatory implementation.
Data Analysis	Qualitative legal interpretation was used to assess the consistency between legal norms and their practical implementation.
Research Output	Evaluation of the effectiveness of POJK Number 22 of 2023 in strengthening legal certainty and consumer protection against abusive debt collection practices.

Table 1 summarizes the overall research design adopted in this study. The framework demonstrates the systematic relationship between the research approach, legal materials, analytical methods, and expected research outcomes. This structured presentation enhances methodological transparency and clarifies how the normative juridical analysis was conducted to evaluate the effectiveness of POJK Number 22 of 2023 in strengthening legal certainty and consumer protection [39].

To maintain the validity and legitimacy of the research, source triangulation was conducted by comparing various legal references and relevant literature. Furthermore, the researchers ensured that all data used came from credible and authoritative sources in their respective fields [40]. The limitations of this research lie in its normative nature, which means it does not directly measure consumer perceptions or experiences through empirical data [41]. Nevertheless, this approach remains relevant because it provides a strong analytical basis

for legal certainty and regulatory effectiveness [42]. With this methodology, it is hoped that this research can make a significant contribution to the development of consumer protection policies in the financial services sector, as well as support the creation of a fair and sustainable legal system in accordance with the principles of the Sustainable Development Goals (SDGs), particularly in terms of justice and strong institutions [43].

4. RESULTS AND DISCUSSION

This study outlines key findings regarding the effectiveness of Financial Services Authority Regulation No. 22 of 2023 in providing legal certainty against the practice of threats of violence by debt collectors [44]. Based on a normative analysis of existing regulations, it was found that POJK No. 22 of 2023 explicitly regulates consumer protection principles, including the obligation of financial services institutions to ensure that the debt collection process is conducted humanely, free from intimidation, and respects consumers' privacy rights [45]. This regulation also introduces ethical standards for debt collection and clarifies company responsibilities for the actions of third parties, including debt collectors operating through outsourcing systems [46]. From a normative perspective, this provision demonstrates an improvement in regulatory quality compared to the previous regulation, particularly in terms of protecting consumers from potentially unlawful practices [47]. Furthermore, the existence of a complaint mechanism facilitated by the Financial Services Authority provides a space for consumers to obtain justice and legal protection.

Table 2. Summary of Research Findings and Institutional Implications

Research Findings	**Implications for Legal Certainty**	**Recommended Institutional Actions**
POJK Number 22 of 2023 establishes clearer ethical standards for debt collection.	Provides a stronger legal basis for protecting consumers against abusive collection practices.	Ensure consistent implementation of ethical standards across all financial service institutions.
Financial institutions remain responsible for outsourced debt collectors.	Strengthens institutional accountability for third-party misconduct.	Improve supervision and contractual control over outsourcing partners.
Consumer complaints involving intimidation and privacy violations continue to occur.	Demonstrates a gap between regulatory provisions and practical implementation.	Strengthen regulatory enforcement and increase compliance monitoring.
Limited legal literacy reduces consumers' ability to exercise their rights.	Weakens the effectiveness of consumer protection mechanisms.	Expand legal awareness and financial literacy programs for consumers.
Digital monitoring and complaint systems remain limited.	Delays the detection and resolution of regulatory violations.	Develop integrated digital complaint platforms and data-driven supervisory systems.

Table 2 illustrates that the legal certainty established by POJK Number 22 of 2023 depends on the relationship between regulatory obligations and institutional implementation. Clear standards for debt collection provide an essential legal basis for consumer protection, but their practical significance depends on how financial service institutions supervise third-party collection agents, respond to complaints, and address violations involving intimidation or personal data misuse. Within digital financial governance, these responsibilities require consistent internal controls, reliable complaint-handling procedures, and effective regulatory oversight. The findings therefore suggest that the quality of consumer protection should be assessed not only through the content of regulatory provisions but also through the accountability mechanisms that support their implementation. This interpretation reinforces the importance of transparent, rights-oriented, and institutionally accountable governance in Indonesia's financial services sector [48].

Implementation evidence derived from official OJK complaint statistics, YLKI consumer reports, and documented enforcement cases demonstrates that although complaint resolution mechanisms have improved following the enactment of POJK Number 22 of 2023, recurring violations involving intimidation, privacy breaches, and outsourcing accountability remain prevalent [49]. These findings indicate that stronger institu-

tional supervision and more consistent regulatory enforcement are required to fully achieve the objectives of legal certainty. Based on consumer complaint data compiled by the Indonesian Consumers Foundation, debt collection practices accompanied by threats of violence, psychological pressure, and misuse of personal data are still common, particularly in the online lending sector [50]. This gap demonstrates that legal certainty cannot be achieved solely through normative regulation. Rather, regulatory effectiveness depends upon institutional enforcement capacity, supervisory accountability, consumer legal awareness, and the governance of outsourced debt collection services [51]. Consequently, legal certainty should be understood as an interaction between regulatory design and institutional implementation. One of the main factors contributing to this situation is weak oversight of third-party debt collectors. Furthermore, contractual relationships between financing companies and collection agents are often not accompanied by strict oversight, opening up opportunities for violations. Low levels of legal literacy also pose a challenge, as many consumers do not understand their rights or are unaware of available complaint mechanisms. From a legal certainty perspective, this situation demonstrates that regulations alone are not sufficient; they must be accompanied by consistent and effective law enforcement.

The comparative perspective provides an additional basis for considering improvements to Indonesia's regulatory framework. Experiences from Singapore, Australia, and the United Kingdom may offer useful points of comparison regarding the supervision of debt collection activities and the protection of financially vulnerable consumers. However, differences in institutional structures and applicable legal rules must be considered before adopting foreign regulatory practices. For Indonesia, potential improvements include clearer compliance standards, more effective oversight of outsourced collection agents, and accessible complaint mechanisms supported by appropriate digital infrastructure. Any proposed reform should remain consistent with the existing legal framework and the allocation of responsibilities established under POJK Number 22 of 2023.

Furthermore, the findings of this study also have strong relevance to the Sustainable Development Goals (SDGs), particularly Goal 16, which emphasizes the importance of justice, legal protection, and strong institutions. The high number of complaints related to debt collectors demonstrates that challenges remain in creating an inclusive and equitable legal system. Therefore, the implementation of OJK Regulation No. 22 of 2023 must be accompanied by efforts to improve public financial and legal literacy, so that consumers better understand their rights and obligations. Furthermore, collaboration between the government, financial institutions, and consumer protection organizations is key to creating a healthy and sustainable financial ecosystem. Therefore, this study confirms that regulatory success is determined not only by the quality of the rules but also by the commitment of all parties to consistently implement and oversee their implementation.

Compared with Singapore, Australia, and the United Kingdom, debt collection activities are generally governed through stricter licensing systems, mandatory professional certification, operational codes of conduct, and stronger supervisory enforcement. These comparative experiences indicate potential institutional reforms that may further strengthen the implementation of POJK Number 22 of 2023.

5. MANAGERIAL IMPLICATIONS

The findings of this study indicate that financial service institutions should strengthen their internal governance systems to ensure that all debt collection activities comply with the provisions of POJK Number 22 of 2023. This can be achieved by developing standardized operating procedures, establishing dedicated internal compliance units to monitor debt collection practices, and incorporating regular risk assessments into consumer protection policies. Institutions should also periodically evaluate their internal controls to identify potential violations, assess compliance performance, and ensure that corrective measures are implemented effectively. These measures can reduce the risk of legal disputes, strengthen organizational accountability, and ensure that debt collection practices are conducted in accordance with applicable legal requirements and ethical standards.

For managers of financing companies and financial technology (fintech) providers, particular attention should be directed toward improving the governance of outsourced debt collection services. Third-party debt collectors should be selected based on clearly defined competency standards, provided with continuous legal and ethical training, and evaluated using measurable compliance indicators. Furthermore, contractual arrangements with outsourcing partners should explicitly define legal responsibilities, reporting obligations, monitoring procedures, and sanctions for non-compliance. Regular performance evaluations should assess debt collectors' conduct, identify potential shortcomings, and ensure continued compliance with established

standards. These measures can help ensure that outsourcing arrangements do not weaken institutional accountability or compromise consumer rights.

From a regulatory management perspective, the findings highlight the importance of an integrated supervisory framework involving regulatory authorities, financial service institutions, and consumer protection organizations. Effective coordination can improve information sharing, support the identification of recurring violations, and facilitate more responsive complaint handling. Digital complaint management and data-supported compliance monitoring may strengthen supervisory processes when implemented with appropriate safeguards for personal data and consumer rights. Financial service institutions should also ensure that internal compliance systems and outsourcing arrangements are consistent with applicable legal obligations. These measures can reinforce institutional accountability, improve public confidence, and support more consistent consumer protection within Indonesia's digital financial services sector.

6. CONCLUSION

This study highlights the significant role of Financial Services Authority Regulation (POJK) Number 22 of 2023 in strengthening the legal framework governing debt collection practices and improving consumer protection within Indonesia's financial services sector. The regulation represents an important regulatory development by establishing clearer standards of conduct for debt collection activities, reinforcing the responsibilities of financial service institutions for outsourced debt collectors, and providing stronger safeguards for consumer rights. By defining the obligations of relevant parties and emphasizing institutional accountability, POJK Number 22 of 2023 contributes to greater legal certainty and provides a stronger basis for addressing abusive debt collection practices. Furthermore, the regulation reinforces the importance of ensuring that debt collection activities comply with applicable legal requirements while maintaining a balance between the legitimate interests of financial service providers and the protection of consumers from unlawful or inappropriate collection practices.

Nevertheless, the findings indicate that the effectiveness of legal certainty under POJK Number 22 of 2023 remains dependent on its practical implementation. Weak supervision, inconsistent enforcement, limited public awareness of consumer rights, and insufficient monitoring of outsourced debt collection agencies continue to hinder effective consumer protection. These challenges may create a gap between the legal protections established by the regulation and consumers' actual experiences. In particular, inadequate oversight of third-party debt collectors may weaken institutional accountability and increase the risk of violations in debt collection practices. Therefore, achieving substantive legal certainty requires not only comprehensive legal provisions but also consistent enforcement, effective institutional governance, and stronger coordination among financial service institutions, regulatory authorities, and other relevant stakeholders.

From a theoretical perspective, this study contributes to the understanding of legal certainty by connecting consumer protection with regulatory governance in the context of digital financial services. The findings indicate that the clarity of legal rules must be supported by consistent enforcement, institutional accountability, and effective supervision of third-party debt collection activities. In practical terms, financial service institutions and regulatory authorities should strengthen internal compliance, improve oversight of outsourced collection agents, protect consumer information, and maintain accessible complaint mechanisms. These measures should operate within the applicable legal framework and respect the rights of consumers. Future research could employ empirical methods involving consumers, financial service institutions, debt collection agencies, and regulatory authorities to examine how these legal safeguards operate in practice. Such research could further assess the relationship between regulatory implementation, digital complaint governance, institutional accountability, and consumer protection in Indonesia's financial services sector.

7. DECLARATIONS

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7.2. Author Contributions

Conceptualization: YY and DA; Methodology: RT and RW; Software: RW and YY; Validation: RT and DA; Formal Analysis: YY and RT; Investigation: DA and RW; Resources: YY; Data Curation: YY and DA; Writing Original Draft Preparation: RW and DA; Writing Review and Editing: RT and YY; Visualization: RT; All authors, YY, RW, RT and DA have read and agreed to the published version of the manuscript.

7.3. Data Availability Statement

The data supporting this research can be obtained from the corresponding author upon request.

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7.5. Institutional Review Board Statement

Not applicable.

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Not applicable.

7.7. Declaration of Competing Interest

The authors report no financial conflicts of interest or personal relationships that may have influenced the research or its findings.

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