Juridical Review of Consumer Protection for People's Credit Agency (BPR) in the Era of Digital Innovation

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Abstract. The era of digital innovation has changed the landscape of the financial sector, with BPRs being no exception, as they adopt digital technology in providing financial services to the public. Digital innovation includes online banking applications, electronic transactions, and various other digital financial services. Effective consumer protection in the digital innovation era is not only crucial to preserve consumer trust but also a prerequisite for endurable economic growth. Existing regulations and possible changes are needed to address new challenges arising from digital innovation. Apart from that, the importance of transparency and openness of information in the relationship between BPR and consumers.

Keywords: Juridical Review; Consumer Protection

1 Introduction

Consumer protection in the context of financial institutions such as BPR has a very important role in maintaining public welfare and trust in the banking sector. Consumer protection is a fundamental legal principle, which aims to protect the rights, interests, and financial security of consumers in transactions with financial service providers. In this case, Regulation Number 10 of 1998 concerning Corrections to Regulation Number 7 of 1992 concerning Banking is an important legal basis for regulating consumer protection in the Indonesian banking sector.

BPR as one of the financial institutions in Indonesia, has a big responsibility in running its business by ensuring adequate protection for its customers. Therefore, a judicial review of consumer protection by Law Number 10 of 1998 is necessary, not only to understand the governing legal framework but also to evaluate its implementation in practice.

A bank is a monetary establishment or organization that works in the monetary area. The meaning of a bank as per Regulation Number 10 of 1998 concerning Changes to Regulation Number 7 of 1992 concerning Banking, expresses that a bank is a business substance that gathers assets from general society as reserve funds and conveys them to people in general as credit or potentially other structure to work on the way of life of many individuals. For a nation,

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banks can be supposed to be the blood of a nation's economy. The job of banking significantly impacts a country's monetary exercises.

The increasingly widespread development of financial services recently cannot be separated from the emergence of various kinds of transactions carried out by financial institutions, especially bank financial services, such as saving funds, borrowing funds, and various other banking transactions. Banks are business substances that gather assets from general society as reserve funds and circulate them to people in general in credit or potentially different structures to upgrade the way of life of numerous.[1]

In Regulation No. 10 of 1998, Article 4 concerning Banking makes sense of that "Indonesian financial intends to help the execution of monetary turn of events and public soundness towards working on the government assistance of individuals at large." The significant job and methodology of banking establishments are evidence that financial foundations are one of the principal support points for monetary turn of events and specialists of advancement in supporting the execution of public turn of events. Focusing on the essential job of banking organizations in accomplishing public improvement objectives, banking establishments need to constantly have powerful direction and management, in light of a strong groundwork so that financial foundations in Indonesia can work effectively, steadily, and decently, and face rivalry which is global, fit for safeguarding great and entrusting assets to useful fields for accomplishing improvement focuses, as depends on the contemplations of Regulation Number 10 of 1998 concerning Banking.[2]

There are two sorts of banks, in light of Article 5 section (1) of Regulation Number 7 of 1992 concerning Banking as altered by Law of the Republic of Indonesia Number 10 of 1998 concerning Banking (hereinafter alluded to as the Financial Regulation) states two kinds of banks, in particular: Business Banks and Country Banks. Rural Credit Bank (hereinafter referred to as BPR) is a financial institution that aims to serve the needs of banking services for economically weak communities and small businesses in Indonesia.[3]

Rural Credit Bank (BPR) is a type of bank known to serve micro, small, and medium entrepreneurs. BPR is also an official banking institution regulated based on Regulation No.7 of 1992 as changed by Regulation No.10 of 1998 concerning Banking. Connected with customer security, BPR outsider assets of investment funds and stores are ensured by the Store Protection Enterprise or LPS, equivalent to business banks.

BPR is currently quite popular among the public. People who are bank consumers (BPR) are parties who place their funds to feel safe and/or utilize the services available at Financial Services Institutions, including customers (parties who use bank services[1]) in banking.[4]

Provisions regarding licensing are regulated in Article 16 of the Banking Law, namely as follows:

(1) Every party completing exercises to gather assets from the general population as investment funds should initially get a permit to operate as a Business Bank or Individuals' Credit Bank from the Administration of Bank Indonesia except if the action of gathering assets from general society is directed by a different regulation.
(2) To get a permit to operate for Business Banks and Country Banks as planned in section (1), the accompanying prerequisites should be met as a base: a. authoritative construction and the board; b. capital; c. possession; d. mastery in banking; e. achievability of work plan.
(3) The requirements and procedures for bank licensing as referred to in paragraph (2) are determined by Bank Indonesia.

In the pillars of consumer protection and education, OJK continues to strive to improve the quality and quantity of services to the public. Regarding this matter, OJK has rebranded the OJK 157 contact service and added a financial information service system (Slik), previously the debtor information system (SID) was known as BI checking, this Slik is for Commercial Banks and BPR.

One of the roles and functions of BPR is as an investment manager. In carrying out its role as investment manager, BPR distributes financing from funds obtained by BPR to MSMEs from lecturers. Most of BPB's operational funds will be transferred in the form of credit or financing as is usually done by banks. The level of financing can be expressed from the FDR (financing to deposit ratio) level or the LDR (loan to deposit ratio) figure for conventional banks.

Based on the background described above, the author formulates this research problem as follows: "Is the implementation of consumer protection by BPR by existing regulations?"; and "What are the obstacles faced in implementing it?"

2 Methodology

The exploration utilized recorded as a hard copy is standardizing juridical. The wellsprings of legitimate materials utilized in this examination are essential lawful materials and auxiliary lawful materials. The essential materials utilized are legitimate science books.[5] The types of approaches used in this research are the statutory regulation approach and the legal concept analysis approach. The data processing method used is an analytical method which is then outlined in descriptive analytical writing.

3 Results and Discussion

The era of digital innovation has changed the financial sector landscape significantly. BPR, as an integral part of this sector, has also adapted to developments in information and communication technology which allows BPR to provide digital services and customer service.

Protection for consumers is needed to provide certainty to consumers regarding the safety and quality of the products they obtain on the market. Therefore, a law that contains clear and definite regulations regarding what both business actors and consumers should or should not do to minimize debate over losses arising for either party must be created. In this case, Indonesia has Law Number 8 of 1999 concerning Consumer Protection as a legal umbrella for consumer rights.

BPR develops an internal control structure, management considers the reliability of financial reports, encourages operational efficiency and effectiveness, as well as compliance with laws and regulations. Management and monitoring of loans given to prospective customers is carried out through the loan application process and the credit analysis process of the proposed loans. If the requirements set by the bank are met, the bank can analyze loan applications from prospective customers.

There is an agreement that must be fulfilled by debtors and creditors. The agreement contains the rights and obligations of the debtor and creditor which must be signed. This agreement contains credit terms, credit amount, and credit repayment period. Providing loans to creditors carries risks, such as the risk of bad credit.[6]

Credit guarantees can be an issue that debtors must pay attention to. This is because the credit element has risks. However, this problem can be avoided by operating good internal control and management control. A good management control system is needed to support credit effectiveness.

Credit is given in view of an arrangement or understanding between the bank and the borrower client. Subekti communicated that in anything that development the credit was given, fundamentally, what happened was an advance and getting understanding as controlled in Articles 1754 to Article 1769 of the Common Code.[7]

The arrangements in Article 8 passage (1) of the Financial Regulation express that in giving credit, banks are expected to have certainty in light of a top to bottom examination of the account holder client's expectations and capacities and capacity to take care of their obligations by what was concurred. In the Clarification part of Article 8 section (1) of the Financial Regulation above, it is expressed that giving credit contains gambles, so in its execution banks should constantly focus on sound credit standards. In the continuation of the Clarification to Article 8 section (1) of the Financial Regulation, it is likewise expressed that to get this certainty, prior to giving credit, banks should do a cautious evaluation of the person, capacities, capital, security, and business possibilities of the borrower client. The clarification of Article 8 passage (1) of the Financial Regulation in the writing is called an appraisal of the 5 C's, to be specific person, limit, capital, guarantee, and state of the economy.[8] Thusly. Assuming that somebody gets a credit office from a bank, there can be no question that the individual concerned has acquired the trust of the bank or monetary establishment being referred to.[9]

BPRs are required to comply with Law Number 10 of 1998 concerning Consumer Protection. The law provides important rights to consumers, such as the right to clear information, the right to privacy, and the right to file a complaint. The findings show that consumers dealing with BPRs are generally aware of their rights. Most consumers who interact with BPR feel they receive sufficient information about the products and services they receive. However, there are still several shortcomings in information transparency that can be improved.

Handling consumer complaints is an area that needs improvement. Some consumers report that the complaint-handling process is not always efficient and fair. BPR still has room for improvement in several aspects, especially in terms of increasing transparency and efficiency in handling complaints. BPRs need to ensure that information regarding products, costs, and transaction terms is conveyed to consumers. This will help increase consumer confidence and ensure that they make the right decisions. OJK requires all BPRs to budget for human resource development in the form of banking training.

The process for handling consumer complaints must be improved. BPRs can consider a more proactive approach to resolving consumer issues and ensuring that the process is transparent and fair. In addition to efforts from BPR, the government and related institutions must work together to increase consumer awareness about their rights and obligations in banking transactions.

It is important to remember that consumer protection is not only a legal obligation but is also a crucial aspect of maintaining customer trust, preserving a company's reputation, and creating good relationships between companies and consumers. By taking suitable steps, BPRs can ensure that they not only comply with the law but also provide better service to customers.

CEO of TRAS N CO Indonesia, Tri Raharjo stated that BPR must be able to adapt to changing times in the current digital era. In this way, BPR is expected to continue to survive and manage its business well. Currently, BPRs are faced with various challenges that require BPRs to continue to survive and manage their business well, especially in terms of asset management, revenue, branding, and company profits.[10]

Arief Munajad as General Leader of the Suara Pemerintah conveyed that BPRs need to be appreciated because they have made a big contribution in supporting the economy, especially communities in the regions, even though they are faced with various challenges such as pandemics, digitalization, and competition, but many BPRs continue to survive and have become one of the supporters of economic development, specifically in the regions, and BPR is now starting to adapt to various digital-based innovations, both products, services, and programs to improve branding.[10]

3.1 Legal Protection for BPR Consumers

Consumer protection is a matter of human interest, therefore all nations in the world hope to make it happen.[11] It is important that the right to obtain protection be placed in a primary position, [12] especially at this time when development and economic development are running rapidly. The development of the national economy, which continues to move rapidly, encourages various aspects, including encouraging bank functions. Previously, banking services were not well known and used, but now people are starting to use bank services more.

Legal protection in banking activities is something that needs attention so that the interests of the parties in these activities are not neglected. The form of legal protection is an effort to enforce the law itself.[13] Like legal protection for society in general, legal protection for debtors in banking transactions must pay attention to certainty, expediency, and fairness. The main focus, in this case, is legal protection for debtor customers because in many cases the debtor customer's position with the bank is unequal and unbalanced, where the bargaining position of the debtor customer is in a weak position compared to the bank.

The law must consider interests carefully and must create a balance between these various interests. Van Dijk, as quoted by Peter Mahmud Marzuki stated that the law must be able to function in achieving the goal of peace and prosperity, where the goal of achieving peace can be realized if the law provides as many fair arrangements as possible.[14] There are two kinds of lawful security as per Hadjon (2011), specifically preventive legitimate insurance and severe legitimate security. Preventive lawful insurance is legitimate security given by the public authority to forestall infringement before they happen. This should be visible parents in law and guidelines which give signs or limits in doing a commitment. Then again, abusive legitimate insurance safeguards basic freedoms that are hurt by different gatherings, and this security is given to the local area so they can satisfy every one of their privileges given by regulation.[15]

Provisions for legal protection for bank debtor customers in Indonesia at the statutory level can be seen in the Banking Law. If you pay close attention, the substance of the Banking Law places more emphasis on protecting deposit customers, not debtor customers. In the Explanation Section of Article 11 of the Banking Law, it states, among other things, that considering that credit or financing originates from public funds deposited with banks, the risks faced by banks can affect the security of public funds, a clause that implicitly protects saving customers. Likewise, the bank's obligation to ensure the feasibility of the debtor's business that obtains credit by applying the precautionary principle functions more to protect the bank's interests. It is necessary to consider that the application of the precautionary principle which is strict and tends to be excessive, actually puts prospective bank debtors into uncertainty and can consequences in the credit analysis process taking longer, which is unprofitable for debtors who need to immediately obtain financing to run their business smoothly.

Legal protection for debtor customers is more appropriate if it is linked to Law No. 21 of 2011 concerning the Financial Services Authority (UU OJK). Article 28 of the OJK Law states that to protect the public, the OJK has the authority to take action to prevent harm to the public as consumers, which includes:

a. Providing data and schooling to general society with respect to the qualities of monetary administrations, administrations, and items.
b. Requesting monetary help foundations to stop their exercises in the event that these exercises can possibly hurt society, and
c. Other activities considered significant by the arrangements of regulations and guidelines in the monetary administrations area.

To accomplish the security of indebted person clients as commanded by the OJK Regulation above, OJK will serve grumblings which incorporates getting ready sufficient gear to support grievances for the people who have been hurt by culprits at monetary administrations foundations. This is acknowledged by making a grumbling system for the people who have been hurt by monetary help establishments and working with the goal of grievances from clients who have been hurt by monetary administrations foundations.

Apart from the Banking Law, there is also the Consumer Protection Law. Purchaser security is the entirety of guidelines and regulations that manage the privileges and commitments of buyers and makers that emerge in their endeavors to address their issues and control endeavors to guarantee the acknowledgment of lawful assurance for customer interests.[16]

Consumer Protection Law No. 8 of 1999 aims to protect the rights of consumers, including BPR customers.[17] In an era where personal information is a valuable asset, consumer protection has become increasingly important. This law provides basic rights to consumers, such as the right to correct information, protection against unethical business practices, and the right to compensation if they become victims of harmful practices.

Normatively, the above statutory provisions have provided legal protection for bank debtor customers, so that debtors are expected to be able to obtain their rights. However, customer complaints still occur frequently against both large-scale commercial banks and small-scale banks. Legal protection for consumers is not only the Banking Law but is also regulated in the Consumer Protection Law.

Talking about digitalization, in this case, there is something that needs to be discussed regarding the prohibition of mobile banking in the Banking Law which regulates various aspects of bank operations in Indonesia, including BPR. One aspect that is restricted by BPRs from carrying out mobile banking was imposed to maintain the stability of the banking sector and control risks that may arise from the use of new technology by BPRs.

However, this ban creates a paradoxical situation where BPRs must comply with regulations that prevent them from innovating and competing in an ever-changing digital era. This raises questions about the extent to which BPRs can provide competitive services and meet their customers' expectations, especially in rural areas that are often difficult for large banks to reach.

3.1.1 Impact of Mobile Banking Ban on BPR and Consumers

The ban on mobile banking in the Basic Banking Law has a real impact on BPRs and their consumers:

a) Impact on BPR:

1. Not Competing Effectively: The ban on mobile banking makes it difficult for BPRs to compete effectively in an increasingly competitive banking environment. Large banks and fintechs that have access to mobile banking technology can offer more sophisticated services, resulting in BPRs losing potential customers.
2. Efficiency Limitations: Without access to mobile banking, BPRs may be stuck in slower manual processes. This can reduce their operational efficiency, slow down service to customers, and increase operational costs.
3. Difficulty Reaching Rural Areas: BPR often plays an important role in serving people in rural areas that are difficult to reach by large banks. A ban on mobile banking could hinder BPR's ability to reach and serve customers in these areas.
4. Losing Customers: Customers who are becoming accustomed to the convenience of mobile banking may decide to switch to banks that offer the service. This has the potential to result in the loss of customers which can affect the BPR's income and profitability.
5. Limited Innovation: BPRs may be limited in adopting the latest scientific innovations that can improve their customer experience and operational efficiency. This means they fail to keep up with technological developments and take advantage of growth opportunities.

b) Impact on Consumers:

1. Limited Access: Consumers who are BPR customers may have limited access to digital banking services, especially if they live in rural areas. This may hinder their ability to access their accounts or perform banking transactions easily.
2. Lack of Convenience: BPR customers may feel that they do not get the same convenience provided by banks that have mobile banking services. They may have to come to a physical BPR office to carry out transactions, which requires more time and effort.
3. Unequal Levels of Service: BPR customers may experience unequal levels of service compared to customers of large banks. This can create dissatisfaction if they feel the service they receive is less than modern or efficient.
4. Security Uncertainty: Customers may feel concerned about the security of their transactions due to the limited security technology that the BPR may have. This may result in concerns about security risks and data theft.
5. Limited Product Choices: BPRs may have limitations in providing the variety of banking products and services that large banks can offer. It means BPR customers may miss out on opportunities to

access certain products or services that could help them achieve their financial goals.

In overcoming this negative impact, BPRs and regulators need to find solutions that enable BPRs to adopt mobile banking technology safely while maintaining consumer protection. Collaboration between stakeholders, consumer education, and thoughtful regulatory updates are some of the steps that can be taken to strike a balance between technological innovation and consumer protection in the banking sector.

3.1.2 Consumer Protection Efforts in the Mobile Banking Context

The question that arises is how consumer protection can be maintained while allowing BPRs to innovate in mobile banking. Some steps that can be taken are:

a) Regulatory Alignment

One important step in maintaining consumer protection while enabling BPRs to innovate in mobile banking is regulatory harmonization. Regulators need to consider regulatory adjustments that allow BPRs to adopt mobile banking with certain conditions that maintain banking sector stability and consumer protection.

Security Requirements: Regulators can set strict requirements regarding system and data security for BPRs that wish to adopt mobile banking. This includes protecting customers' data, strong encryption, and effective cybersecurity measures.

In terms of transparency, regulators could require BPRs to provide clear and transparent information to their customers about the risks associated with the use of mobile banking. This includes the risk of losing access, security risks, and how to report problems.

Thus, regarding handling complaints, the regulator can set up an effective complaint-handling mechanism so that BPR customers who use mobile banking can easily report their problems or complaints and get a fast response.

b) Consumer Education

Consumer education about the risks and benefits of mobile banking is critical in maintaining their protection. BPRs can play a leading role in providing training to their customers on how to use these services safely. Some aspects that need to be emphasized in consumer education are:

1. Login Security: Customers need to understand the importance of keeping their login information, such as passwords and PINs, confidential. They should be taught not to reveal this information to anyone and not to use passwords that are easy to guess.b
2. Secure Transactions: Consumers need to know how to carry out secure banking transactions using mobile applications. This includes checking that their connection is secure, avoiding clicking on suspicious links, and carefully verifying transactions.

3. Loss Report: Customers should be informed about the steps to take if they lose their mobile device or if they suspect unauthorized activity in their account.
4. The Importance of Reporting Problems: Consumers need to know how to report problems or irregularities immediately to their BPR. They should know that quick action can help protect their accounts.

c) Security Development

Banks, including BPRs, must continue to invest in cyber security to protect customer data. In the context of mobile banking, this is more important than ever. Some security measures that can be taken are:

1. Activity Monitoring: Banks must have a sophisticated monitoring system to detect suspicious activities in mobile banking applications. This may involve monitoring unusual transactions or logging in from unusual locations.
2. Strong Encryption: Data sent and received by the mobile banking application must be strongly encrypted to protect customer information.
3. Employee Training: BPR employees must also be thoroughly trained in cyber security so that they can identify and respond to threats quickly.
4. Regular Updates: Mobile banking applications should be updated regularly to address newly emerging security vulnerabilities. Banks must be ready to respond quickly to cyber threats.

By taking these steps, BPRs can defend consumer protection while enabling scientific innovation in mobile banking. This will create an environment where customers feel safe using digital banking services, while BPRs can utilize technology to increase efficiency and provide better services to the public Top Form.

3.2 Obstacles in Implementing Consumer Protection for BPR

Consumer Protection against BPR covers various factors and obstacles that can arise when trying to protect consumers who interact with Rural Banks (BPR). Several obstacles may be faced:

1) Consumer Lack of Understanding: One of the main obstacles in consumer protection is consumers' lack of understanding of their rights and obligations. Consumers may not know how to access available protections or may not even be aware that they have certain protection rights.
2) Limited Resources: BPRs may have limited resources, both in terms of personnel and budget, to implement effective consumer protection programs. This may impact their ability to provide consumer education, handle complaints, or implement other protective measures.
3) Regulatory Ambiguity: Ambiguity or changes in consumer protection regulations can be an obstacle to their implementation. BPRs need to continue

to monitor changes in laws and regulations related to consumer protection and ensure that they always comply with applicable regulations.

4) Power Inequality: BPRs often have greater power in transactions than individual consumers. This can make it difficult for consumers to fight back against practices that may harm them.
5) Non-transparency of Information: Non-transparency in information regarding products and services offered by BPRs can be a problem. Consumers should have clear and easy-to-understand access to information about the costs, terms, and risks associated with the products or services they use.
6) Lack of Consumer Awareness of Financial Risks: Some consumers may not understand the financial risks associated with the banking products they use, such as loans or investments. This lack of awareness can cause consumers to make decisions that do not suit their needs and financial capabilities.
7) Lack of Law Enforcement: Obstacles in law enforcement against practices that harm consumers can also be a problem. BPRs need to cooperate with the competent authorities to ensure that violations of consumer protection are dealt with firmly.
8) Financial Product Complexity: Complex financial products can make it difficult for consumers to understand how the product functions and what the risks are. This may increase risks for consumers.
9) Resistance from BPRs: BPRs may face resistance or reluctance in implementing consumer protection due to costs or required internal process changes.

To overcome these obstacles, it is important to improve consumer education, increase transparency in financial services, and ensure compliance with applicable consumer protection regulations. In addition, cooperation between BPRs, supervisory authorities, and consumer organizations is also critical in creating a safer environment for consumers.

4 Conclusions and Suggestions

4.1 Conclusion

In the context of consumer protection, it is important to assess the extent to which BPRs comply with the provisions of the law. This compliance involves providing adequate information to consumers, protecting personal data, handling complaints quickly and fairly, and complying with applicable banking regulations. In some cases, there may be consumer dissatisfaction with BPR. This could be related to non-transparency in fees and requirements, unsatisfactory service quality, or other issues. This kind of dissatisfaction can result in violations of consumer rights.

In the ever-growing digital era, consumer protection in the banking sector, including BPR, is very important. Although Consumer Protection Law No. 8 of 1999 provides the legal basis for protecting consumer rights, the prohibition on mobile banking in the Basic Banking Law limits the ability of BPRs to innovate and compete. It is important to find the right balance between consumer protection and technological advances in the BPR context. Collaboration between regulators, BPRs, and customers is the key to creating a balanced and sustainable banking environment in this digital era. Consumer protection must remain a top priority while providing opportunities for BPRs to adopt the scientific innovations necessary to compete in an increasingly competitive market.

4.2 Suggestions

BPRs need to increase education to consumers about their rights and obligations by the Consumer Protection Law. It can be done through information campaigns, publishing leaflets, or training for bank employees who better understand consumer protection regulations.

BPR must have clear and efficient procedures for handling consumer complaints. Good complaint handling can avoid more serious disputes and maintain consumer trust. It is hoped that the suggestions above can help BPRs to ensure better protection for consumers by applicable regulations and increase consumer confidence in services.

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