Research Article

Improving Healthcare Patient Data Security: An Integrated Framework Model For Electronic Health Records From A Legal Perspective

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ABSTRACT

This study aims to critically examine the legal responsibilities of healthcare facilities in Indonesia regarding the protection of patient data within Electronic Medical Records (EMR). The research employs a mixed-method approach, combining normative legal analysis with empirical data collection from healthcare facilities to assess the implementation of data protection regulations. The findings reveal significant gaps in the enforcement of Minister of Health Regulation Number 24 of 2022 and Law Number 27 of 2022 concerning Personal Data Protection, particularly in smaller clinics and independent practices. These facilities often lack the technical infrastructure and resources required to meet regulatory standards, resulting in inconsistencies in data protection and a higher incidence of data breaches. The study introduces the Integrated Security and Usability Framework for Electronic Medical Records (ISU-EMR), which combines the principles of the Confidentiality, Integrity, and Availability (CIA) Triad with Human-Computer Interaction (HCI) Theory. This framework addresses both the technical and human factors contributing to data breaches, offering a balanced solution for enhancing data protection while maintaining usability in EMR systems. The implications of this research extend to both theory and practice, providing a new model for data protection in healthcare that can be adapted to various settings.

Keywords: Electronic Medical Records; Data Protection; Healthcare Facilities; CIA Triad; Human-Computer Interaction; Indonesia.

A. INTRODUCTION

The accelerated digitization of healthcare services in Indonesia has led to notable advancements as well as challenges, particularly in the area of patient data protection (Abhishek, Tripathy, & Mishra, 2022; Firmansyah, Mantoro, & Persadha, 2022). The integration of Electronic Medical Records (EMR) was intended to enhance patient care by facilitating access to medical histories, optimizing healthcare delivery efficiency, and reducing the potential for errors associated with paper-based records (Vimalachandran, Wang, & Zhang, 2015). However, the transition to EMR has also exposed significant weaknesses in data security, as demonstrated by numerous high-profile data breaches in recent years (Adamu, Hamzah, & Rosli, 2020). These incidents underscore the urgent need for a thorough examination of the current frameworks and practices governing patient data protection in Indonesia.

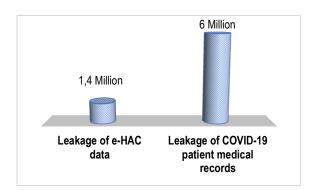


Figure 1. Types and Number of Health Data Leaks in Indonesia (a compilation from various sources by the author)

In 2021, one of the most alarming data breaches occurred when the Electronic Health Alert Card (e-HAC) system was compromised (Kristanto, 2023), leading to the leakage of 1.4 million records (Solehudin & Ruhaeni, 2022). This incident demonstrated the vulnerability of even ostensibly secure systems to unauthorized access. The situation worsened in 2022 when 6 million records of COVID-19-infected patients were illicitly obtained from the Ministry of Health's system and subsequently sold on the online marketplace Raid Forums (Noor & Darmaningrat, 2023). The breach involved the dissemination of highly sensitive information, including medical images, laboratory results, and other personal data, which has profound implications for patient privacy and trust in the healthcare system.

These incidents exposed have considerable shortcomings in the current data protection tools within Indonesia's healthcare system. Although a regulatory framework existssuch Minister of Health Regulation as (PERMENKES) No. 24 of 2022 on Medical Records and Law No. 27 of 2022 on Personal Data Protection, as well as Law No. 17 of 2023 on Health, Government Regulation No. 28 of 2024 on the Implementation of Law No. 17 of 2023, and PERMENKES No. 24 of 2024 on Medical Records—these measures appear inadequate for large-scale The preventing breaches. responsibility for protecting patient data falls primarily on healthcare institutions, which are legally obliged to prevent the loss, damage, or unauthorized access medical to records. However, the recurring data breaches suggest that these institutions may lack the necessary resources, training, or infrastructure to effectively safeguard patient information.

Despite extensive research on EMR and data security in Indonesia, significant gaps remain in understanding the root causes of data breaches and the effectiveness of current protective measures (Januarita, Alamsyah, & Perdana, 2024). Previous studies have primarily focused on the technical aspects of EMR implementation, such as system architecture and data storage solutions, without sufficiently addressing the human factors contributing to security lapses (Larson & Alexander, 2021). Moreover, while there is a growing body of literature on the legal implications of data breaches, there is a paucity of studies critically analyzing the intersection of technological vulnerabilities and regulatory shortcomings in the Indonesian context (Sudarwanto & Kharisma, 2022).

This aims to address study these shortcomings by providing a comprehensive analysis of patient data protection in the context of EMR implementation in Indonesia. Unlike previous research, which often treats data breaches as isolated incidents, this study will examine the systemic issues that contribute to these breaches, including both technological vulnerabilities and the adequacy of legal protections. The objective is to offer a more holistic understanding of the challenges healthcare providers face in protecting patient data.

In addition to examining the technological and legal aspects of EMR-related data breaches, this research will explore the human factors that play a critical role in data security. It is well documented that human error significantly contributes to data breaches. However, this aspect has been underexplored in the context of Indonesian healthcare. By investigating the role of training, awareness, and institutional culture in preventing data breaches, this study aims to offer practical recommendations for mitigating these risks.

Moreover, this study will critically examine the existing legal frameworks governing the protection of patient data in Indonesia. Although regulations such as the Personal Data Protection Law No. 27 of 2022 provide a legal foundation for data security, their implementation and enforcement remain inconsistent. This research will evaluate the efficacy of these regulations in practice and identify any regulatory gaps that contribute to the persistence of data breaches.

The value of this research lies in its potential to inform policy and practice regarding the protection of patient data in Indonesia. By providing a comprehensive examination of the technological and human factors that contribute to data breaches, this study will offer valuable insights for healthcare providers, policymakers, and regulators. It is anticipated that the findings will help in formulating more robust and effective data protection strategies, ensuring that the benefits of EMR are not realized at the expense of patient privacy and trust.

While the adoption of EMR represents significant progress in Indonesia's healthcare system, it also introduces new challenges related to data security that require urgent attention. This research aims to bridge the gap between technological innovation and data protection, offering comprehensive recommendations to strengthen the security of patient information in the digital age. Through a thorough examination of current practices, legal frameworks, and human factors, this study seeks to contribute to the development of a more secure and reliable healthcare system in Indonesia.

Information security is a critical component in the management of EMR. Its theoretical foundations are essential for understanding the complexities of data protection in healthcare (Kapila & Pillai, 2023; Mahfuth, Dillon, & Drus, 2016; Sharma, Bir, & Prakash, 2024; Sher et al., 2017; Yeng et al., 2021). The Confidentiality, Integrity, and Availability (CIA) Triad is a widely accepted framework in information security (Al-Far, Qusef, & Almajali, 2018; Azadi, Zare, & Zare, 2018; Cybenko & Hughes, 2014; Howard et al., 2023; Wang et al., 2023). It ensures that data is protected against unauthorized access (confidentiality), remains accurate and unaltered (integrity), and is accessible when needed by authorized personnel (availability). In the healthcare sector, these principles are particularly important due to the sensitive nature of patient data (Chakraborty & Rathi, 2021). The CIA Triad provides a foundation for assessing the security protocols implemented within EMR systems, guiding the development of strategies to mitigate the risks associated with data breaches (Kang, Fahd, & Venkatraman, 2018).

In addition to the technical aspects, the human element plays a significant role in information security, particularly within the healthcare environment, where the interaction between healthcare professionals and technology is frequent and complex. Human-Computer Interaction (HCI) Theory examines how users interact with EMR systems, highlighting the importance of user-friendly designs that reduce the likelihood of errors and enhance security (Helou et al., 2019; Price et al., 2015). This theory posits that poorly designed interfaces can lead to user errors, which are a major cause of data breaches (Ardito et al., 2019; Naqvi & Seffah, 2019; Winckler et al., 2017). Applying HCI principles enables healthcare institutions to better understand the relationship between user behavior and data security (Fischer-Hübner, & Angulo, 2015: Pettersson. Humaidi. Balakrishnan, & Shahrom, 2014; Shahri & Mohanna, 2016). This, in turn, facilitates the development of more effective training programs and system designs that can reduce the likelihood of human error contributing to data breaches.

The protection of patient data within electronic medical records is not merely a technical challenge; it is also a legal obligation governed by multiple regulatory frameworks (Bhardwaj & Kumar, 2021; Patel, Patel, & Parikh, 2020; Vaishnavi, Sam Nithish, & Parvathi, 2024; Xiang, Cao, & Fan, 2022). Compliance theory is understanding how crucial for healthcare institutions adhere to the legal and regulatory frameworks that mandate the protection of patient data (Almuwail et al., 2023; Essefi et al., 2021; Marotta & Madnick, 2022; Obeng & Paul, 2019). This theory suggests that compliance is driven by the need to align with legal requirements, institutional policies, and societal expectations (Kuiper et al., 2023; Peat, Fikfak, & Van Der Zee, 2022). In Indonesia, regulations such as PERMENKES No. 24 of 2022 and the Personal

Data Protection Law No. 27 of 2022 outline the specific responsibilities of healthcare providers concerning the safeguarding of patient data. However, the effectiveness of these regulations depends on their comprehension, implementation, and enforcement within healthcare institutions.

addition to the aforementioned In regulatory frameworks, the Theory of Planned Behavior provides insights into the psychological factors that influence healthcare professionals' compliance with data protection regulations (Foth, 2016; Zoghlami, Ayeb, & Rached, 2021). This theory posits that a healthcare provider's behavior is influenced by three key factors: their attitudes toward the regulations, perceived social pressures (subjective norms), and perceived control over compliance-related actions (Bastani, Javanbakht, & Ravangard, 2019; Widianto et al., 2021; Zielińska-Tomczak et al., 2021). For instance, if healthcare providers believe that following data protection protocols is crucial and that their colleagues also adhere to these standards, they are more likely to comply & (Georgiou Lambrinoudakis, 2021). Understanding these psychological factors is essential for developing targeted interventions that promote compliance, such as modifying institutional policies to make adherence more achievable and straightforward (Lawelai, Iswanto, & Raharja, 2023). This approach helps bridge the gap between legal mandates and actual practice, ensuring that regulatory frameworks effectively protect patient data in real-world settings.

This research differs from previous studies, such as those that focus on the situation and problems surrounding health data breaches in government-owned applications in Indonesia (Gunawan et al., 2022), or those that examine the judicial review of the increase in BPJS premiums based on the principle of justice in healthcare and social security policies (Syahputra & Munandar, 2021). Other research analyzes personal data protection regulations in the health sector from a comparative legal perspective between Indonesia, Singapore, and the European Union (Kharisma & Diakanza, 2024). Additionally, some studies explore the interplay between information and communication technologies (ICTs) and the right to informational privacy in healthcare, examining the legal and ethical aspects of maintaining confidentiality and the security of personal health information (Jose, 2023). Another line of research focuses on designing and testing systems that allow the sharing of patient data while addressing privacy concerns, such as a digital information system that restricts access to patient data unless approved by the patient's mobile device (Zalloum, Mutaz, Alamleh, & Hosam, 2020).

B. RESEARCH METHODS

1. Types of Research

This research employs a combination of normative and empirical legal research (Hamzani et al., 2024; van Boom, Desmet, & Mascini, 2018) to explore the protection of patient data in the context of EMR implementation in Indonesia. Normative legal research involves the analysis of legal norms, principles, and standards derived from various sources, including legislation, regulatory frameworks, judicial decisions, contractual agreements, and legal doctrines (Mukhachev, Gondarenko, & Gryaznov, 2022). This examination focuses on how these legal frameworks regulate the protection of patient data and the responsibilities of healthcare institutions. On the other hand, empirical legal research involves the collection and analysis of primary data obtained directly from the field, offering insights into the practical application of legal norms within healthcare settings. This dual provides approach а comprehensive understanding of both the theoretical foundations and practical implications of patient data protection in the context of digital healthcare.

2. Data Sources

The data sources for this study include both secondary and primary data. Secondary data are derived from a comprehensive literature review (Cole, Friedlander, & Trinh, 2018; Santos, Santos, & De Mendonça, 2015), including primary legal materials such as legislation and regulations directly related to the protection of patient data. The study examines key regulations, including Law Number 27 of 2022 concerning Personal Data Protection, Law Number 29 of 2004 concerning Medical Practice, and Minister of Health Regulation Number 24 of 2022 regarding Medical Records. Additionally, secondary legal materials, such as books, journal articles, and research reports on the management of EMR, are analyzed. Tertiary materials, such as legal dictionaries and non-legal resources (e.g., books and research on medical records management from non-legal perspectives), provide supplementary context. Primary data are collected through direct interviews with key informants involved in EMR management, including healthcare professionals and administrators from Firdaus 24 Hours Clinic in Yogyakarta.

3. Data Collection Techniques

This study employs a two-pronged approach to data collection, combining a literature review with fieldwork (Costa et al., 2023). Secondary data are obtained through an extensive literature review, systematically collecting and analyzing relevant laws. regulations, legal documents, books. and research papers (Cairo, Olivares, & Peralta, 2024; Solihin et al., 2021; Williams, 2020). The primary objective is to identify and extract legal norms and rules related to the protection of patient data within EMR systems. Secondary legal materials, including academic publications and previous research, are also examined to extract relevant theories and findings that inform the research. Concurrently, primary data are gathered through with healthcare structured interviews professionals who have direct experience implementing EMR. These interviews provide practical insights into the challenges and realities of managing patient data within digital systems,

offering valuable context to the theoretical analysis of legal frameworks.

4. Data Analysis

The data analysis uses a descriptiveanalytical approach, methodically organizing and presenting data obtained from both secondary and primary sources (Avila-Barrientos, 2020). The begins with analysis а comprehensive examination of the legal frameworks governing medical records in Indonesia, with a focus on how these regulations are applied in the context of EMR. The study then compares the practical implementation of EMR at Firdaus 24 Hours Clinic with the standards set forth in Minister of Health Regulation Number 24 of 2022. This comparison assesses whether the clinic's practices align with or exceed legal requirements. The analysis aims to identify discrepancies between regulatory intent and practical application, providing a basis for recommendations to enhance the protection of patient data in Indonesia's healthcare system.

C. RESULTS AND DISCUSSION

1. Legal Responsibility of Healthcare Facilities in Protecting Patient Medical Records

The safeguarding of patient data, particularly within electronic medical records (EMR), is a pivotal aspect of healthcare service delivery that has garnered heightened attention in recent years (Keshta & Odeh, 2021). The rapid digitization of healthcare services in Indonesia has introduced several significant challenges

the confidentiality, regarding integrity, and availability of patient data (Fuad et al., 2019). According to the stipulations set forth in Law Number 36 of 2009 concerning Health, healthcare facilities in Indonesia are legally bound to provide safe, comprehensive, and non-discriminatory services. This legislation explicitly delineates the government's obligation to ensure the availability and accessibility of healthcare services, which inherently encompasses the protection of patient 2018). However, the data (Njotini, legal responsibility of healthcare facilities extends beyond the mere provision of services to include the safeguarding of sensitive patient information. The Regulation of the Minister of Health Number 24 of 2022 concerning Medical Records categorizes electronic medical records as a critical subsystem within the broader healthcare information system. This regulation mandates the implementation of EMR across all healthcare facilities, including hospitals, clinics, and independent practices. Therefore, these facilities must develop and adhere to rigorous operational procedures aimed at safeguarding patient data, underscoring the paramount importance of maintaining data security at all levels of healthcare delivery (Mbonihankuye et al., 2019). Nevertheless, the prevalence of data breaches in healthcare sector indicates substantial the deficiencies in implementing and enforcing these regulations. Such breaches not only compromise patients' privacy but also erode public trust in the healthcare system.

The responsibility for ensuring the security of electronic medical records (EMR) falls primarily on healthcare facilities, which are obligated to guarantee the integrity of their electronic systems, enforce rigorous operational procedures, and address any breaches promptly and effectively (Hwang & Lin, 2020). The regulations stipulate that healthcare facilities must implement comprehensive data protection measures. including developing secure electronic systems, conducting regular audits, and providing training for healthcare workers. However, the efficacy of these measures is often constrained by insufficient resources, a lack of awareness, and the complexity of managing vast quantities of sensitive data. This section critically examines the extent to which healthcare facilities are meeting their legal responsibilities and identifies the key challenges they face in doing so.

One of the most significant challenges identified is the inadequate technical infrastructure and expertise within healthcare facilities, particularly in smaller clinics and independent practices (Kesale & Swai, 2023). Many of these facilities encounter difficulties in implementing the sophisticated security measures necessary to ensure the effective protection of EMR. The absence of a unified, standardized approach to data protection across diverse healthcare facilities further complicates the issue, resulting in inconsistencies in the management and protection of patient data. Furthermore, the accelerated rate of technological advancement necessitates that healthcare facilities regularly update their systems and procedures to remain aligned with evolving security threats. This requires sustained investment in technology and training, which can prove burdensome for smaller facilities.

Another critical issue is the role of human error in the occurrence of data breaches. Despite the implementation of optimal technical safeguards, the actions of healthcare workers, whether intentional or unintentional, can lead to substantial data breaches (Yeo & Banfield, 2022). The Minister of Health's regulation underscores the necessity of training healthcare professionals in data protection; however, in practice, this is often overlooked or inadequate. A significant number of healthcare workers lack the requisite training in data protection, resulting in errors such as the improper handling of patient information, inadequate utilization of security features, and non-compliance with established protocols. These human factors represent a significant vulnerability in the protection of patient data and require immediate attention.

2. Global and Comparative Perspectives on Patient Data Protection

The protection of patient data is not an isolated issue confined to Indonesia; rather, it is a global concern that has garnered significant attention in the international community. The growing digitization of healthcare services worldwide has prompted the implementation of rigorous data protection regulations in numerous countries, with the objective of safeguarding patient information and preventing data breaches (Jones, 2022). The European Union's General Data Protection Regulation (GDPR) represents one of the most comprehensive legal frameworks in this regard. The GDPR establishes rigorous standards for data protection, including the necessity for explicit consent from patients for the utilization of their data, the implementation of robust technical and organizational measures to safeguard data (Padrão, Ribeiro, & Lopes, 2024), and the provision of transparent guidelines for reporting and handling data breaches.

In comparison, the Indonesian legal framework for data protection, while evolving, still exhibits significant deficiencies. The Regulation of the Minister of Health Number 24 of 2022 concerning Medical Records and Law Number 27 of 2022 concerning Personal Data Protection represent significant advancements; yet, they lack the comprehensive rigor and robust enforcement mechanisms observed in the GDPR. For example, the GDPR stipulates that any data breach must be reported within 72 hours, with severe penalties for non-compliance. In contrast, the enforcement of data protection regulations in Indonesia is often inconsistent, with numerous healthcare facilities failing to report breaches or implement the requisite safeguards to prevent them.

A comparative analysis with other countries that have successfully implemented robust data protection measures can provide valuable insights for Indonesia. The United States has implemented the Health Insurance Portability and Accountability Act (HIPAA), which includes specific provisions for the security and privacy of health data (Schulman, 2006). HIPAA mandates that healthcare providers implement physical, technical, and administrative safeguards to protect patient information (Cheng & Hung, 2006). Furthermore, HIPAA imposes significant penalties for breaches of these requirements. Adopting comparable standards in Indonesia would be advantageous, particularly regarding the enforcement of compliance and the provision of more explicit directives to healthcare facilities on the safeguarding of patient data.

Furthermore, the incorporation of global best practices into Indonesia's data protection framework could assist in addressing some of the challenges currently faced by healthcare facilities. For example, the GDPR places significant emphasis on data minimization, which requires that only the minimum necessary amount of be collected and processed patient data (Shanmugam et al., 2022). This principle could prove valuable in the context of Indonesian regulations, as it mitigates the risk of data breaches by limiting the amount of sensitive information that could be compromised. Additionally, the GDPR's stipulation that regular data protection impact assessments be conducted could be adopted in Indonesia to assist healthcare facilities in identifying and mitigating potential risks before they result in breaches.

Nevertheless, implementing these global best practices in Indonesia necessitates a meticulous examination of the local context. The diversity of healthcare facilities in Indonesia, which ranges from large, well-resourced hospitals to small, rural clinics, indicates that a one-sizefits-all approach is ineffective (Diana, Hollingworth, & Marks, 2015). Instead, Indonesia must develop a flexible, scalable framework that can be adapted to the specific needs and capabilities of various types of healthcare facilities (Suwantika et al., 2023). This will require collaboration between the government, healthcare providers, and other stakeholders to develop guidelines and support mechanisms that can assist all healthcare facilities, regardless of size or location, in effectively protecting patient data.

3. Proposed Model: Integrated Security and Usability Framework for Electronic Medical Records

The previous theoretical frameworks in the realm of EMR often focused heavily on either security or usability but rarely on the integration of

both (Hausawi & Allen, 2015; Horcher & Tejay, 2013; Kumar et al., 2020; Naqvi, Clarke, & Porras, 2020). The CIA Triad is a cornerstone of information security, emphasizing the need for data confidentiality, integrity, and availability (Cybenko & Hughes, 2014; Howard et al., 2023; Sumra, Hasbullah, & AbManan, 2015; Wang et al., 2023). However, it tends to overlook the human factors that can undermine these security principles, particularly in complex environments like healthcare. On the other hand, HCI Theory primarily addresses the usability of systems but often underestimates the importance of embedding robust security measures within user interfaces (Al-Jawarneh & Mohammed, 2022; Ardito et al., 2019; Gamundani, 2023; Winckler et al., 2017; Zhang & Luximon, 2021). These limitations highlight a gap in existing models, where the interplay between security and usability not adequately addressed, leading is to vulnerabilities in EMR that can result in data breaches and operational inefficiencies.

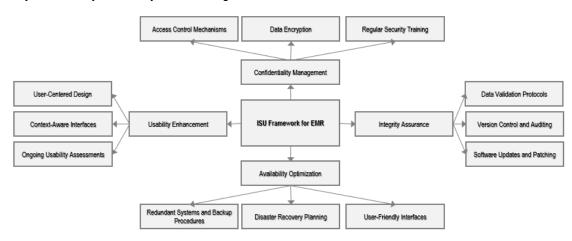


Figure 2. New Model of Framework to Integrated Security and Usability for Electronic Medical Records (a compilation from various sources by the author)

To bridge this gap, there is a pressing need for a comprehensive framework that not only secures patient data but also ensures that the systems are user-friendly and aligned with the workflows of healthcare professionals. The proposed model, the Integrated Security and Usability Framework for Electronic Medical Records (ISU-EMR), addresses this need by integrating the key elements of the CIA Triad with Human-Computer Interaction (HCI) principles. This holistic approach ensures that the protection of patient data is not compromised by poor usability and vice versa, thus providing a balanced solution to the challenges faced by healthcare facilities in managing EMR.

The ISU-EMR Framework, depicted in the diagram, is a strategic model designed to enhance both the security and usability of electronic medical records. The central element of the framework is the ISU Framework for EMR, which integrates four main components: Confidentiality Management, Integrity Assurance, Availability Optimization, Usability and Enhancement. These components are interconnected, ensuring that the EMR system is robust, secure, and user-friendly.

Each component of the framework branches out into specific actions or elements that contribute to the overall effectiveness of the system. For example, Confidentiality Management involves access control mechanisms, data encryption, and regular security training to ensure that patient data is

protected from unauthorized access. Integrity Assurance focuses on maintaining the accuracy and consistency of data through data validation protocols, version control and auditing, and software updates and patching (Kalaiselvi & Sumathi, 2023). Availability Optimization ensures that the system remains operational and accessible through redundant systems and backup procedures, disaster recovery planning, and user-friendly interfaces. Lastly, Usability Enhancement incorporates user-centered design, context-aware interfaces, and ongoing usability assessments to ensure that the system meets the needs of healthcare professionals, thereby reducing the likelihood of errors that could compromise security.

This model is novel in its approach as it not only addresses the technical aspects of EMR security but also emphasizes the importance of user interaction with the system. By balancing these elements, the ISU-EMR Framework ensures that healthcare facilities can protect patient data effectively while also improving the efficiency and effectiveness of their EMR systems. This integration of security and usability is critical for modern healthcare environments, where both elements are essential for delivering high-quality care.

4. Challenges and Recommendations for Strengthening Data Protection in Indonesia

The recurrent occurrence of data breaches in Indonesian healthcare facilities (Kharisma & Diakanza, 2024) underscores the necessity of addressing several pivotal challenges to reinforce the protection of patient data. These challenges include the lack of enforcement of existing regulations, inadequate training for healthcare workers, and the need for enhanced technical infrastructure to safeguard electronic medical records. Furthermore, the growing complexity of cyber threats necessitates that healthcare facilities maintain a dynamic approach to updating security protocols to effectively mitigate the risk of potential breaches.

One of the most urgent issues is the lack of uniformity in the enforcement of data protection regulations across diverse types of healthcare facilities (Natamiharja & Setiawan, 2024). While larger hospitals may possess the resources to implement comprehensive data protection smaller clinics and measures, independent practices often lack the financial and technical capacity to do so. This discrepancy gives rise to considerable vulnerabilities in the broader healthcare system, as data breaches in smaller still facilities have far-reaching can consequences, particularly when patient data is shared across networks or integrated into larger systems. To address this challenge, it is imperative that the government provides targeted support (Lawelai, 2023) to smaller healthcare facilities. This support should include funding for technical upgrades, training programs, and access to centralized resources that can help them meet regulatory requirements.

Another significant challenge the is insufficient training and awareness among healthcare professionals regarding data 2021). protection (Dhamanti et al., Notwithstanding the existence of regulations mandating data security practices, the actual implementation of these practices often falls short due to a lack of understanding or awareness among staff. For example, healthcare workers unintentionally disseminate mav patient information via insecure channels. use inadequate passwords, or neglect to log out of systems after use. Such human errors can be as, if not more, dangerous than technological vulnerabilities, given that they are often more difficult to detect and prevent (Stark et al., 2021). To mitigate this risk, healthcare facilities must implement regular, mandatory training programs that educate staff on the importance of data protection, the specific risks involved, and the best practices they should follow.

The growing complexity and sophistication of cyber threats also present a considerable challenge to data protection in healthcare (Mahajan et al., 2022). The ever-changing landscape of cybercrime poses a significant challenge for healthcare facilities. as cybercriminals continually develop new methods to bypass security systems. To effectively mitigate these risks, healthcare facilities must prioritize continuous monitoring, regular updates to security protocols, and investment in advanced cybersecurity tools. However, many healthcare

facilities, particularly those in rural or underresourced areas, may lack the necessary expertise or budget to implement these measures effectively (Assan et al., 2009). This creates a gap in the healthcare system's overall cybersecurity defense, as attackers may exploit the weakest links.

D. CONCLUSION

The findings of this research reveal significant gaps in the legal responsibilities of healthcare facilities in Indonesia regarding the protection of patient data within electronic medical records (EMR). While the legal framework, particularly the Regulation of the Minister of Health Number 24 of 2022 and Law Number 27 of 2022 concerning Personal Data Protection, sets forth clear mandates for safeguarding patient information. the implementation of these regulations remains inconsistent across various healthcare settings. Smaller clinics and independent practices, in particular, face challenges in meeting stringent requirements due to inadequate technical infrastructure and limited resources. Furthermore, the persistent occurrence of data breaches highlights the critical role of human error, which remains a significant vulnerability in data protection efforts.

The implications of this study extend both theoretically and practically. Theoretically, this research contributes to the ongoing discourse on the integration of security and usability in healthcare systems by proposing the Integrated Security and Usability Framework for Electronic Medical Records (ISU-EMR). This framework effectively bridges the gap between the technical aspects of data protection, as emphasized by the CIA Triad, and the user-centered focus of Human-Computer Interaction (HCI) Theory. The ISU-EMR model provides a balanced approach that addresses the dual challenges of safeguarding patient data while ensuring that EMR systems are accessible and user-friendly for healthcare professionals.

Practically, the ISU-EMR framework offers a strategic guide for healthcare facilities in Indonesia to enhance their data protection measures. By adopting this model, healthcare providers can implement comprehensive data security protocols that are integrated with userfriendly interfaces, thereby reducing the risk of data breaches caused by both technological vulnerabilities and human errors. The model also underscores the importance of continuous training for healthcare workers, regular system audits, and the implementation of advanced cybersecurity tools to address the evolving nature of cyber threats. For policymakers, this research provides insights into the need for targeted support for smaller healthcare facilities, including financial assistance and access to centralized resources, to ensure uniform compliance with data protection regulations.

However, this study is not without its limitations. The primary limitation lies in the scope of the research, which focuses predominantly on the Indonesian healthcare context. While the findings and proposed framework are relevant to the challenges faced by Indonesian healthcare facilities, further research is needed to validate the applicability of the ISU-EMR model in other regions with different healthcare systems and regulatory environments. Additionally, the study's reliance on existing literature and theoretical frameworks may limit the generalizability of the findings, as real-world implementation could present unforeseen challenges. Future research should explore the practical application of the ISU-EMR framework in diverse healthcare settings and examine the long-term effectiveness of the proposed strategies in enhancing data protection.

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