

*Conceptual Article***Harmonizing the Rules: “A Socio-Legal Analysis of FIFA Stadium Safety and Security Standards and Indonesian Football Regulations – Aftermath Kanjuruhan Tragedy”**

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**ABSTRACT**

The death of over 100 Indonesian football supporters at Kanjuruhan Stadium has raised significant concerns about the legal aspects of security and safety management in Indonesian stadiums. This conceptual article conducts a comparative legal analysis between FIFA's Stadium Safety and Security Regulations and the PSSI Safety and Security Regulation 2021, exploring potential avenues for harmonization. With a focus on ensuring the safety of spectators, players, and officials, the study examines the nuanced differences and commonalities between these regulatory frameworks. By identifying areas of convergence, the article aims to contribute to a more unified approach in addressing critical aspects of stadium safety and security within Indonesian football culture, particularly regarding the presence of police officers. Through this socio-legal approach, the article seeks to stimulate discourse on necessary adjustments and reforms to align domestic regulations with FIFA standards, fostering a safe and standardized environment for football enthusiasts in Indonesia. The findings of the article indicate a shift in principles in the management of football matches within PSSI. Regulations that should serve as a reference for upholding the principles of safety and security for all parties involved in a football match have shifted towards becoming regulations designed to avoid responsibility.

**Keywords:** Harmonizing; Indonesian Football Regulation; FIFA Regulation; Kanjuruhan.

**A. INTRODUCTION**

The Kanjuruhan Tragedy stands as a solemn chapter in the history of Indonesian football, casting a shadow over the sport and its vibrant community. Unfolding on October 1, 2022, this distressing incident marked a significant turning point with far-reaching implications for the Indonesian football landscape. As spectators gathered to celebrate the beautiful game, a series of unfortunate events marred the occasion, leaving an indelible mark on Indonesian football.

Beyond the immediate human toll and the sorrow that accompanied the loss of lives, the Kanjuruhan Tragedy has had profound implications for the sport's governance (Dowling, Leopkey, & Smith, 2018), safety protocols (Elendu, Christian, & Genevari, 2018), and public perception. As the nation grapples with the aftermath, questions surrounding administrative deficiencies, regulatory oversight (Junaedi, Sukmono, & Fuller, 2023), and the broader implications for the Indonesian football community loom large. This article aims to delve into the multifaceted causes of the Kanjuruhan Tragedy in

Indonesian football, examining the challenges it poses, the lessons to be learned, and the necessary steps for healing and reform within the sport.

This article will employ comparative studies to analyze the context of various legal regulations, following Örüçü's assertion that "Context is what counts. We have already seen that macro-comparison must be carried out in context, and legal systems—at present the hallmark of the nation-State—must be approached within their social, cultural, economic, and political environment to lead to a deep understanding of law as it unfolds" (Lukito, 2022). This perspective emphasizes that law cannot be fully understood unless observed from a broader, macro scope that includes the historical, political, socio-economic, and psychological aspects that surround it.

Understanding the differences between FIFA standards on stadium security and safety regulations and the related Indonesian regulations, along with their implementation and background, is crucial for formulating solutions to prevent future tragedies. Numerous articles and studies were published by academics and the media following the tragedy, with one study specifically examining the root causes of violence (Utama et al., 2022a). It proposes that the destructive violence was a direct result of police officers' decision to use tear gas, which caused panic among Arema supporters. Another study (Sokoy et al., 2023) attributes the Kanjuruhan riot to hooliganism, driven by the excessive love and fanaticism of football fans for their club. The

Indonesian Human Rights National Committee, however, pointed to the use of tear gas by the Indonesian police that night as the primary cause of the incident (Anam, 2022).

Both of the aforementioned studies (Utama et al., 2022a; Sokoy et al., 2023) attempt to analyze the Kanjuruhan Tragedy from the supporters' perspective, placing blame on the lack of security, particularly the use of tear gas. This perspective aligns with the Indonesian Police Corps' decision to dismiss ten members of the Malang city police from their positions, as they were considered responsible for handling the riots that night. After a thorough investigation, the number of police officers prosecuted was reduced to three, all of whom were sentenced to three years in prison for negligence that resulted in loss of life (Baihaqi, 2023). At the conclusion of the trial in the Supreme Court, these three officers received prison sentences ranging from one year to two and a half years. The public also demanded that these officers be dismissed from the Indonesian Police Corps.

Another study by Laras Astuti et al. highlighted the lack of awareness among police officers and military personnel regarding FIFA's Stadium Safety Regulations, suggesting that larger factors contributed to the tragedy (Astuti et al., 2024). Similarly, a study by Amin, Putri, and Hadrian emphasized the consequences of the riots and the lack of proper security measures at football matches, underscoring the need for collaborative procedures and safety measures essential for fair competition and upholding sportsmanship (Amin, Putri, & Hadrian, 2024).

Despite the convictions of the three police officers, the victims' families remained dissatisfied with the sentences, and some viewed the convictions as a final closure to the Kanjuruhan tragedy. However, this raises the question: will punishing these officers be enough to prevent a similar tragedy from happening again? It is easy to place blame on the police, especially regarding safety and security. By holding the police officers accountable, the pressure from the community, particularly the victims' families and other stakeholders, may decrease, or at least the media coverage might lessen (Safitringati et al., 2023). The notion that football match safety depends solely on the abilities or failures of one or two police officers is troubling for long-term security and risk management.

Therefore, the objective of this article is to analyze the Kanjuruhan Tragedy from a police and/or military perspective—not to assign all responsibility to them, but to better understand why they were unable to act in accordance with FIFA standards. Internationally, regulations concerning security and safety in football stadiums are governed by FIFA, the World Football Organization. It is crucial to examine whether these FIFA regulations have been effectively implemented by all football federations in each member nation, particularly in Indonesia. Unlike previous studies that focus primarily on identifying who is to blame for the Kanjuruhan Tragedy, this article will conduct a comparative analysis between FIFA Stadium Safety and Security Regulations and the PSSI Safety and

Security Regulation 2021. The goal is to identify the root causes of confusion in the security management of football matches in Indonesia from a legal perspective.

## **B. DISCUSSION**

### **1. Kanjuruhan Tragedy in Chronological Order**

Modern and aesthetically designed sports facilities attract and inspire sports participants. However, when the safety and security of these facilities, such as stadiums, are ignored or compromised, numerous management, legal, and social issues can arise (Elendu, Christian, & Genevari, 2018). The Kanjuruhan Stadium, located on Jalan Trunojoyo, Krajan, Kedungpedaringan, Kepanjen District, Malang, East Java, with a seating capacity of 35,000-38,000, is no exception.

This stadium became a major public concern due to the tragic riot that occurred on October 1, 2022, following Arema's defeat to Persebaya Surabaya with a score of 2-3, resulting in the deaths of 135 fans and two police officers. This event is widely regarded as the darkest moment in Indonesian football history and the worst stadium disaster since the Port Said incident in Egypt, which resulted in 74 deaths (Junaedi, Sukmono, & Fuller, 2023).

On that ill-fated night, one of the most highly anticipated derbies between Arema Malang and their rivals Persebaya Surabaya took place. Due to the intense rivalry and violent history between the two teams, Persebaya supporters

were not allowed to attend the match, leaving only Arema supporters to fill the entire stadium with their blue shirts.

To better understand the sequence of events, we must go back to September 12, 2022, 19 days before the tragedy. The organizing committee of Arema FC sent a letter to the Malang City Police regarding their plan to start the match at 8:00 PM. The Malang Police responded by suggesting the match start at 3:30 PM for safety reasons. The Chief of Police of Malang City advised the organizing committee to send a letter to PT LIB requesting a schedule change, considering the higher risks associated with nighttime matches. However, PT LIB's CEO rejected the police's request and insisted that Arema FC's management adhere to the original schedule for the Liga 1 2022/2023 match between Arema FC and Persebaya (Junaedi, Sukmono, & Fuller, 2023).

Facing this rejection, the Malang Police Chief requested additional assistance from the Police Security Forces (PAM) and the military. The number of security personnel was increased from 1,700 to 2,034. According to the police, security preparations for the Arema FC vs. Persebaya match were ongoing from September 20-30, 2022 (10 days). For seven consecutive days, the Malang Police conducted surveys at Kanjuruhan Stadium, removing any stones or breakable items that could be used as weapons. They also conducted crowd control training for various scenarios, simulating different situations at Kanjuruhan Stadium. Due to heavy rain in

Malang City on the day of the match, the security briefing for the police in the stands was conducted at 3:45 PM, which added to the risk of potential disturbances.

Two days before the match, the PSSI match commissioner inspected the stadium's condition but did not review the security plan. On September 30, 2022, a technical meeting was held, during which the security officer only explained the number of security personnel without providing detailed information about their placement, the evacuation plan, or the security mechanisms by the police and army. The police were responsible for preparing the security plan.

Based on these initial pre-game preparations, it can be deduced that the police and military took proactive measures to manage the risks by increasing personnel and thoroughly inspecting the stadium. However, the organizing committee of Arema FC failed to comply with the precautionary measures suggested by the Malang Chief Officer.

**1st October 20:00 GMT+7:** The Arema FC vs. Persebaya match began peacefully, with 42,000 tickets sold out and Arema FC supporters filling Kanjuruhan Stadium. Despite a few minor commotions in stands 12 and 13 during the first half, the security forces successfully managed these disturbances. The first half ended with both teams scoring two goals.

In the second half, Persebaya scored a third goal, and Arema FC intensified their attacks but could not score again. The final whistle marked a historic victory for Persebaya, their first

win over Arema FC at Kanjuruhan Stadium in 23 years.

This was when the tragedy began to unfold. After the final whistle, Arema players bowed their heads in disappointment, while the Arema coach and team manager approached the east tribune to apologize to the supporters. Suddenly, two supporters from the south tribune approached Arema FC players Sergio Silva and Adilson Maringa.

According to various videos circulating on social media, two Aremania supporters initially entered the field from the east stand. There is confusion regarding their motives for entering the field. Some supporters claimed that they entered to motivate the players and officials after the first home loss to Persebaya in 23 years, while police reports suggested that the supporters carried blunt weapons and other hard objects.

This difference in perspective regarding the supporters entering the field was one of the primary causes of the Kanjuruhan Tragedy. On one hand, the supporters intended to show sympathy for their team, while the police and military officers perceived it as a threat that needed immediate neutralization.

Eyewitnesses from among the supporters claimed that the police escalated the situation by beating those who entered the field (Wahyudiyanto, 2022). Seeing their fellow supporters being beaten, others became enraged. Supporters from the north side of the stadium then entered the field to help those on the south side who were being beaten by the police.

Based on eyewitness accounts and videos, the initial entry of spectators into the field did not cause a riot. However, as more spectators entered, the police and military decided to use physical force to disperse the crowd.

The police's decision to use physical force was influenced by inadequate training in dealing with the unique characteristics of football supporters (Utama et al., 2022b). The idea that spectators entering the field could be a form of support for the team was not considered by the police or military officers.

As more supporters entered the field, the situation escalated, leading to aggressive behavior from the police, who felt threatened. Aggressive behavior typically occurs as a combination of intense frustration and external stimuli, which trigger a reflex response to a perceived threat. In this case, the reflex response was aggressive behavior, exacerbated by the lack of proper understanding and training (Ceschi et al, 2022).

In Indonesia, there are few studies on the police's perception of the dynamics of football supporters, with most existing studies focusing on the supporters' perspective. However, international studies have shown that police understanding of football fans is crucial. For example, Stott (2003) showed that the Belgian police had a stereotypical view of English fans during Euro 2000. O'Neill (2004) used qualitative methods to observe Scottish football matches, revealing that police actions were heterogeneous. From a Goffman perspective, it could be said that

the police consist of small individual teams with different roles, insights, and approaches. Poutvaara and Priks (2009) documented the importance of intelligence units and the targeted, discriminate use of force in reducing violence.

The police's understanding of the dynamics of football supporters significantly influenced their decision-making on the night of the tragedy. In "Understanding and Managing Risk," Clifford Stott and Otto Adang emphasized the importance of police acquiring a thorough knowledge of football supporters to more effectively deploy a balanced approach that is perceived as valid by supporters (Havelund, Joern, & Rasmussen, 2015). This was also the experience of the Dutch police as hosts for the European Championship in 2000, where they subsequently requested the inclusion of specific guidelines in the EU handbook for managing football matches with an international dimension. The quote is supported by research, as it has been repeatedly documented that the police's lack of knowledge about the supporters they are dealing with can contribute to their overreaction in certain situations, where greater knowledge and dialogue could have prevented incidents (Reicher et al., 2004).

The increasing number of supporters entering the field, coupled with the police's inability to restrain themselves, was exacerbated by their lack of understanding regarding the unique characteristics of football supporters, which differ from the characteristics of the mass demonstrations they typically face. These factors caused the police officers on duty that night to

lose their sense of proportion and fire tear gas indiscriminately in all directions, including into the spectator stands, where there were many women and children.

The fire in the twelfth stand created a sea of smoke, and even though there were mothers and small children, tear gas was also directed at the eleventh and thirteenth stands and even expanded from the 10th to the 14th. The shots created mass panic, many supporters said they could not see and it was hard to breathe which made the supporters confused. However, the supporters are still headed for the exit. At that time, it was no longer hundreds of supporters but thousands of supporters jostling, and some were even trampled on, the screams and cries of small children, some female supporters were hysterical and screaming in such conditions, the men were helpless, with many testimonials, many could not breathe and were trampled on. Even the supporters did not know that the person who stepped on it or the floor was due to the smoke from the tear gas, from which the victims began to fall. Moreover, going down to the 13th tribune door, the supporters locked the door more and more erratically and there was pressure, which the supporters knew was a way out. At that time what was open was the door of stand 14 but only one door, while the others in stands seven and eight, even though they were not shot with tear gas, could also feel the effect. Many people panicked and there was even a mother hugging her unconscious child.

It was also seen that many other male supporters were also not aware. Not to mention what happened to the doors of the twelfth, thirteenth, or fourteenth stands where the smoke was the thickest and some of the doors were locked (Utama et al, 2022a). The locking of the stadium doors shows that it is not appropriate to blame all the responsibility on the police and military, because in a football match under FIFA regulations, the main security officers are the stewards, whereas the police and military act as a backup. With many factors that need to be considered above, a preliminary conclusion can be drawn that there has been a system failure, rather than a mere failure in implementing match security in the Kanjuruhan tragedy, resulting in 794 people casualties, this number, 695 people were injured and 135 people were deceased.

## **2. Fact-Finding Team: Between PSSI and FIFA Safety and Security Standards**

After the Kanjuruhan incident, the Indonesian government, through the Coordinating Minister for Political, Legal, and Security Affairs (MENKOPOLHUKAM) Mahfud MD, coordinated with all Indonesian football stakeholders and announced several positions and decisions regarding the tragedy. One of these decisions was to create a Joint Independent Fact-Finding Team (TGIPF) (Wiryono & Yahya, 2022).

Led by the Minister himself, TGIPF unveiled its final report on October 14, 2022, less than two weeks after the incident. In this section, we will analyze TGIPF's findings and link them to FIFA regulations, which should serve as a guideline for

every official football match. The purpose is to examine the causes of the failure in the football match security system during the Kanjuruhan tragedy, considering aspects such as legal regulations, human resources involved, and other social factors.

The author will present not the entirety of the TGIPF report but only those parts relating to the FIFA Stadium Safety and Security Regulations, including safety and security management, the authority of stewards and police officers, crowd management, and structural and technical measures. First, let's discuss safety and security management. According to Chapter II, Article 5 of the FIFA Stadium Safety and Security Regulations, "Every member association shall appoint a national security officer. This person must have experience working with public authorities and police services, as well as prior knowledge of event organization issues, spectator supervision, and event safety and security matters." Based on TGIPF's findings, there was no mention of a national security officer; instead, the term "Club Security Officer" was used as a representative of the national security officer, who was found to have failed in providing competent stewards (Kemenkopolhukam, 2022).

Even more surprising is the fact that PSSI, the Indonesian football federation, did not have a national security officer. The only person in Indonesia who had the competence to fulfill this role had been dismissed by PSSI four years before the Kanjuruhan tragedy occurred. Shockingly, the PSSI safety and security

regulations issued in 2021 did not require the appointment of a national security officer at all, instead relying on local security and safety personnel at each club. This is a direct violation of Article 4, Section 1 of the FIFA Stadium Safety and Security Regulations, which obliges associations like PSSI to appoint an occupationally competent national security officer.

The existence of a National Security Officer is paramount because he has responsibility for compiling and ensuring that the stadium safety and security management team is aware (Ekizoğlu, 2023) of and fully understands the obligations placed upon them, including: a) the requirements of the stadium safety certificate issued by the relevant authority; b) the requirements for a safety certificate for any temporary demountable structures; c) the host nation/confederation/association's stadium safety and security regulations; d) the FIFA Stadium Safety and Security Regulations; e) the FIFA publication "Football Stadiums – Technical Recommendations and Requirements"; f) the FIFA Medical Assessment and Research Center (F-MARC) "Football Emergency Medicine Manual"; g) the host nation's fire safety legislation; h) the host nation's health and safety at work legislation; i) the host nation's legislation relating to people with disabilities; j) the host nation's civil contingencies legislation and/or guidelines; k) insurance requirements, where applicable; and l) any other specific laws of the

host nation that may have relevant safety or security implications.

In comparison, the duties and responsibilities of the PSSI's version of safety and security officers are limited to match security and are purely practical. A National Security Officer is needed to develop policies and security systems for football matches on a national scale in a comprehensive manner, as outlined in Article 5 of the FIFA Stadium Safety and Security Regulations. The National Security Officer is responsible for developing, coordinating, and delivering the safety and security concept for a FIFA event, including at training sites, official hotels, transport hubs, etc. The National Security Officer is also tasked with the ongoing education and training of all stadium security officers employed during events, conducting briefings, and providing guidance and advice to all stadium security officers.

PSSI made a fatal mistake in equating the role of the National Security Officer with that of the Stadium Security Officer. This decision has implications for the quality of security at football matches in Indonesia, as it now varies significantly depending on the competence of each Stadium Security Officer, who lacks guidance and support from a National Security Officer. The absence of a National Security Officer is evident in the TGIPF report, which found that the league operator, PT LIB, conducted the verification of safety and security factors. They verified all aspects of each club's participation in League 1 as a requirement for competition.



However, in practice, this verification was often a mere formality, as evidenced by frequent encounters with event committees and security personnel who were mostly incompetent and worked in stadiums that did not comply with security standards. It was discovered that in the match between Arema and Persebaya on October 1, 2022, the Organizing Committee (including the Security Officer) performed their duties without legal authority, as their appointments were not based on an official letter containing a legally binding employment agreement (only provided with a form filled out for reporting to PT LIB). This led to the Organizing Committee being unable to ensure that the match was conducted as it should have been (Kemenkopohukam, 2022).

Furthermore, PSSI's hands-off approach to national safety and security issues is evident in the regulations they issued, particularly in Article 3, Section 1(d) regarding Responsibility, which stipulates: "The Organizing Committee, including the security officer, agrees to guarantee, release, and exclude PSSI (and its officers) from all claims by any party and declares that the Organizing Committee is fully responsible for accidents, damage, and other losses that may arise in connection with the implementation of this regulation." This clause clearly shows PSSI's intention to disclaim responsibility for any incidents that may occur during matches. PSSI's irresponsible attitude and its transfer of authority for verification from the Federation to the League Operator have resulted in the security element no

longer being a priority, overshadowed by business interests. This issue highlights the poor quality of PSSI policies and the competence of its human resources in drafting laws as public actors who exercise public authority.

Based on Talcott Parsons' cybernetic theory, when the economic subsystem meets the social subsystem, the economic subsystem, with its higher energy, will influence or "corrupt" the social subsystem, including the law (Toby, 1972). He demonstrated that analytically distinguishable economic activity is always embedded within a structure of social institutions organized according to specific value patterns. Economic theory developed as a highly specialized science in societies where structural differentiation resulted in a relatively autonomous sphere of economic activity, in which collectivities and roles sustain instrumental action orientations (Scott, 2020).

Action is considered economic when it contributes to the adaptive function of the social system through technological transformations of environmental resources that produce goods and services available to society. Economic activity produces objects with a definite use value or utility and involves assessing and comparing the utility possible through alternative courses of action. Instrumental actions are those that maximize or optimize utility. When transactions are mediated by money, calculations of utility, benefits, and costs can be made in monetary terms.

PT LIB's refusal to change the match schedule, despite requests from the police—an

institution competent in carrying out security risk assessments—demonstrates the significant influence of economic motives behind the decision. It also shows that FIFA's legal regulations are not always implemented by member country football federations due to various factors. PT LIB refused to change the match schedule due to a television broadcasting rights agreement with the Indosiar TV Channel. PT LIB, as an operator, clearly prioritizes economic factors, completely disregarding risk management in determining match schedules, and prioritizing commercial profit (business orientation) over broadcast hours in the media (Kemenkopolhukam, 2022).

TGIPF also noted the failure of PSSI and Club Security Officers to provide competent stewards as one of the main factors behind the Kanjuruhan tragedy. The TGIPF investigation revealed that on the night of the incident, the security arrangements on duty were as follows:

**Table 1. Stadium Safety and Security Personnel Guidelines**

Units	Number of Personnel
Malang Police Sector	624 Personnel
Escape Team	4 Personnel
Field Medic Team	3 Personnel
Armored Water Canon	2 Personnel
Mobile Infantry	300 Personnel
3 Armored Personnel Carrier Units	12 Personnel
2 Anti-Anarchy Squad	20 Personnel
7 K9 Team Malang	8 Personnel

15 Command Control Assist	375 Personnel
Military Command Regiment	15 Personnel
Army Military Police Centre	21 Personnel
District Military Commando 0818	125 Personnel
Combat Engineer 5 Kepanjen	200 Personnel
Department of Transportation	20 Personnel
Civil Service Police Unit	20 Personnel
Medic	15 Personnel
PMK	5 Personnel
Disaster Response Unit	10 Personnel
Health Department	3 Personnel
Match Stewards	250 Personnel

According to the FIFA Stadium Safety and Security Regulations, it is imperative for the Federation and Organizing Committee to provide professional stewards. Article 13, Section 1, defines a steward as any person employed, hired, contracted, or volunteering at the stadium to assist in managing the safety and security of spectators, VIPs/VVIPs, players, officials, and any other person at the stadium, excluding those solely responsible for the security of designated individuals and members of the police services responsible for maintaining law and order.

If any person can become a steward, can police officers or military personnel be deemed

stewards? Article 13, Section 2, clearly states that police or military personnel may be employed as stewards as defined above. In such circumstances, those personnel identified to perform the duties of stewards must apply the principles contained in these regulations when performing said duties. Does this mean that 1,709 police officers and military personnel automatically become stewards?

The answer is no, because, according to Article 13, Section 5, to become a steward, one must undergo formal training in their roles and responsibilities prior to the start of any FIFA event. Steward training, qualification, and certification must meet the standards set by the host nation or association, which clearly do not apply to the police officers and military personnel on duty on the night of the tragedy. Moreover, Article 13, Section 2, implies that the main force responsible for securing a football match should be stewards, not police officers or military personnel, who serve more as an auxiliary or backup force.

Different training and cultural differences make police officers unsuitable as the main force in securing a football match, which has more diversity in the crowd than ordinary mass riots (Laursen, 2019). Military personnel, trained for warfare, are even less appropriate for this role. The FIFA Stadium Safety and Security Regulations assume that every host country has an adequate number of professional stewards; however, this assumption is clearly not applicable in the case of Indonesian football culture. Legal

culture is an essential factor in realizing law enforcement and achieving awareness and compliance with the law. Legal culture in society is a value that affects the operation of law both functionally and substantially (Rahayu et al., 2020).

In Indonesia, due to the lack of professional stewards, police officers and military personnel often act as the main security force at football matches, rather than professional stewards. The lack of training and understanding of football supporter dynamics among police officers and military personnel has led to confrontational behavior in every attempt to manage insubordination by supporters, regardless of their intentions (Glynn, 2017).

Despite the failure of the Club Security Officer, who was only able to recruit 250 stewards—a number far from ideal, considering that the FIFA Stadium Safety and Security Regulations Article 14, Steward Deployment Plan, Section 1, clearly states that for low-risk matches, the ratio should be one steward per 250 supporters, and for high-risk matches like the Arema vs. Persebaya rivalry, it should be increased to one steward per 100 supporters. With 45,000 supporters attending, as reported by TGIPF (Kemenkopolhukam, 2022), the minimum requirement to completely secure the match was 450 stewards. The lack of competent human resources in law enforcement is one of the main sources of problems in establishing equality and fairness (Rofingi, Rozah, & Asga, 2022).

The quality of the stewards recruited by the Club Security Officer was also far from ideal. TGIPF found numerous errors and instances of insubordination by the stewards (Kemenkopolkam, 2022):

- a. Stewards were unable to prevent spectators from throwing objects at officers. At the end of the match, many stewards abandoned their duties, leaving no one to direct the audience out of the stadium exits.
- b. In CCTV footage at the Kanjuruhan Stadium, Steward Officers were seen at the exits/entrances of the spectator stands only during normal conditions; during emergencies, some stewards left their posts.
- c. Stewards failed to carry out security duties in the areas assigned, allowing several spectators to jump onto the field in areas not guarded by stewards.

The negligence of the Club Security Officer, who acts as an extension of PSSI's National Security Officer according to the 2012 FIFA Safety and Security Regulations, in carrying out their duties—especially in providing competent internal security (stewards)—resulted in the tragic deaths of victims at the Arema vs. Persebaya match on October 1, 2022. PSSI's regulations regarding Stadium Security and Safety in 2021 did not adopt Article 4 of the 2012 FIFA Safety and Security Regulations, which states that the Association (PSSI), through the National Security Officer and the Stadium Safety and Security team, is responsible for ensuring the security and safety of all spectators, players,

officials, VIPs/VVIPs, and everyone in the stadium.

When drafting regulations, PSSI should have referred to FIFA's regulatory guidelines, considering that PSSI is a member of FIFA. These regulations should have been adapted to the needs of Indonesian football, which is still not a stable industry. Currently, only 30% of FIFA's Safety and Security Regulations have been adopted by PSSI, and instead of fulfilling the requirements, PSSI has added unnecessary articles that do not align with FIFA's regulations. Clearly, there is a significant gap between FIFA regulations and PSSI regulations, highlighting the need for harmonization to prevent overlaps and ensure that the principles of organizing safe sports activities for all parties are upheld.

### **3. Harmonizing FIFA Stadium Safety and Security Standards with Indonesian Football Regulations.**

FIFA's Safety and Security standards heavily rely on professional stewards recruited by the Federation and directly supervised by the National Security Officer. However, this approach cannot be fully implemented in Indonesia, where the league is economically unsustainable due to an imbalance between income and expenditure (Fadhilah, 2023). Simply put, PSSI, as a Federation, and PT LIB, as an operator, are not yet capable of managing the Indonesian football league as an industry similar to those in Europe or South America (Sulistiyono, 2011).

Being a professional steward in Indonesia is more of a secondary job due to its financial

instability, which results in a lack of interest among Indonesians in becoming professional stewards. This situation led to hazardous behavior by PT LIB and the Club Security Officer in recruiting and providing stewards before the Kanjuruhan tragedy. There was no consideration of the track record, reputation, or competency of officers or the chairperson of the executive committee within PT LIB. In appointing security officers, they failed to conduct proper competency checks (debriefing was only conducted via a two-hour Zoom meeting, and certification was granted merely due to the investigation on October 3, 2022). Personnel tasked with field supervision did not effectively carry out their duties. These are clear examples of failures to comply with crowd management principles according to psychology, as inadequate preparation can lead to panic among police and military personnel. Decision-making and social behavior are closely related to crowd dynamics since it's easier to model people as homogeneous objects than to interact with individual and group decision-makers (Sime, 1995).

Negligence and sheer incompetence have caused significant damage, yet efforts to address the chaotic conditions and the culture of blame among Federations, League Operators, and Clubs continue. Before the Kanjuruhan tragedy, attempts by the Indonesian government to modernize PSSI were always met with resistance from PSSI, which sought refuge under FIFA's exclusive rights against government intervention in domestic football-related events. However, in

light of the revelations following the Kanjuruhan tragedy, government intervention against PSSI is warranted.

#### **a. Legal Substance**

Firstly, the Indonesian government should mandate that PSSI harmonize its security and safety regulations for football matches with FIFA regulations, particularly concerning the release of responsibility, which exists only in PSSI's regulations but not in FIFA's. By removing this article, PSSI would be obliged to take responsibility for any incidents occurring during the organization of football in Indonesia, preventing them from evading accountability by blaming other parties involved. Reinstating a sense of responsibility within PSSI should compel the federation to reactivate the National Security Officer and begin preparing a security and safety framework according to FIFA standards for all regions of Indonesia.

#### **b. Legal Structure**

Secondly, PSSI must recruit and train professional stewards with due consideration for their welfare. However, training large numbers of professional stewards requires significant time, necessitating a short-term solution involving the police and military as trained human resources. Therefore, a supplementary article should be added to PSSI regulations, allowing for the involvement of police and military personnel, who would receive professional training on the security and safety aspects of football matches. Lack of training results in anxiety (Rachman & Rachman, 2020). Anxiety can be defined as a "tense,

unsettling anticipation of a threatening but vague event; a feeling of uneasy suspense.” It differs from fear, which occurs in response to a specific, identifiable threat, while anxiety may arise from an imagined or exaggerated threat (Sheppard et al., 2006). Both concepts are distinct from “panic,” which involves fear or anxiety about a real or imagined threat, accompanied by irrational behavior. The difference in perception regarding the intentions of spectators entering the field between supporters and security forces indicates a lack of training for police and military personnel, increasing anxiety and leading to the deployment of tear gas as a defensive measure.

### c. Legal Culture

Thirdly, safety and security must be the primary factors in determining the match schedule. Therefore, an additional article in the agreement between the league operator and the television station, stipulating that if there are security risk factors, the match schedule should be altered at any time without legal repercussions, is needed. Safety must be prioritized over economic considerations in decision-making regarding football matches. The principle of zero tolerance towards holding high-risk football matches should be emphasized more than economic factors. Calling the Kanjuruhan tragedy a disaster in football match organization should be followed by awareness of legal culture in the form of enforcing disaster mitigation. Mitigation is a series of efforts to reduce disaster risks through physical development, awareness, and improved coping skills against threats.

Mitigation activities, according to the Indonesian Mitigation Disaster Act Number 24 of 2007, include:

- a. Implementation of spatial planning;
- b. Development regulation, infrastructure development, and building layout; and
- c. Organizing education, counseling, and training, both conventional and modern.

Although PSSI and FIFA standards may be aligned at the normative level, the legal cultures are not equivalent. To establish law in Indonesia, it must be based on the nation’s beliefs and principles, rather than blindly following foreign laws, such as those of the Netherlands or FIFA standards. To be harmonious with the country’s culture, the study of Indonesian law should give ample space to the study of legal culture (Pudjosewojo, 1976), in addition to the study of the meaning and comprehension of law. It is clearly stated that, alongside the concept of legal feeling (*rechtsgevoel*), there are also the concepts of *rechtsbegrip* (legal understanding) and *rechtsverstand* (legal reasoning). These last two concepts result from a rational study of law and can be compared with the concept of legal awareness (*rechtsbewustzijn*). The neglect of legal awareness in the Kanjuruhan tragedy is evident in the failure to disseminate FIFA Stadium and Safety Regulations to all law enforcement officers on duty.

### C. CONCLUSION

There has been a shift in the principles governing the management of football matches

within PSSI. Regulations that should serve as a foundation for upholding the safety and security of all parties involved in a football match have instead evolved into regulations designed to abdicate responsibility. The broken chain of safety and security policies—from the federation, shamelessly delegated without accountability to the local organizing committee—is reflected in the lack of standardization among stewards on duty. The solution to these complex issues lies in the comprehensive harmonization of FIFA regulations with the management of football in Indonesia. This harmonization must thoroughly address the legal substance, including the removal of the release of responsibility clause in Article 3, Section 1(d). Regarding the legal structure, PSSI must establish a professional approach and a legal culture that prioritizes accountability. Blaming the police and military, who clearly act as an auxiliary force and lack sufficient training in football security, will not prevent another tragedy in the future.

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