

## Transformation of the Advocate Organisational System in Indonesia: Multi-Bar Implications for Enforcement of Professional Ethics

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### ABSTRACT

*This research analyses the transformation of the Indonesian advocate organisational system from single-bar to multi-bar and its implications for upholding professional ethics. Even though the 2003 Law on Advocates mandates a single bar, internal conflicts and organisational resistance triggered multi-bar legitimisation through KMA Letter No. 73/2015. Using a normative-juridical-empirical qualitative approach, this study integrates analysis of regulatory documents and interviews with practitioners to explore the historical and contemporary dynamics of the advocate organisational system. The research results show that the multi-bar system positively democratises the profession, reduces regulatory monopolies, and increases access to legal services in remote areas. However, significant challenges arise through disparities in organisations to avoid sanctions and standardisation of organisational consistency. Enforcing harmonisation efforts have been made to harmonise the labelling. Harmonisation efforts have been studied, recommending a multi-bar framework, establishing an independent national ethics institute, and strengthening collaboration between organisations through sacrificing specialisations.*

## 1. Introduction

As a rule of law (*rule of law*), Indonesia has adopted the principle of legal supremacy, guaranteed by the constitution through Article 1 Paragraph (3) of the 1945 Constitution. This principle emphasises that all aspects of state life, including law enforcement, must be based on a transparent and impartial legal framework. In this context, advocates play a noble role *in the office*, a profession that maintains the justice system's integrity through legal defence, upholding justice, and protecting human rights.<sup>1</sup> However, the dynamics of Indonesian advocacy organisations after the Reformation gave rise to a paradox: consolidation efforts through Law Number 18 of 2003 concerning Advocates (UU Advocates), which mandates a system of *single bars*, led to internal fragmentation and a crisis of legitimacy.

<sup>1</sup> Auliya Khasanofa, "Creating an Officium Nobile Advocate Profession," fh.unhas.ac.id, 2023, <https://fh.unas.ac.id/berita/mewujudkan-profesi-advokat-yang-officium-nobile/>.

Historically, the development of advocacy organisations in Indonesia reflects the tug-of-war between professional independence and political intervention ideals. From the colonial model *Bar Association of Lawyers*, which is exclusive, this profession evolved through a consolidation phase with the founding of the Indonesian Advocates Association (Peradin) in 1964, until the formation of the Indonesian Advocates Association (PERADI) as a single forum based on the Advocates Law. However, the mandate *single bar* Article 28 of the organisational organisations' conflicts of interest, leading to organisations such as the Indonesian organisations. This fragmentation ignores the principle of *equality before the law* and creates uncertainty in advocates' recruitment and supervision mechanisms.<sup>2</sup>

The turning point for transformation occurred through the Letter of the Chief Justice of the Supreme Court (KMA) Number 73/KMA/HK.01/IX/2015, which shifted the paradigm of the system by expanding the authority of the High Court to swear in advocates from various organizations. This policy, which is supported by Constitutional Court Decisions Number 101/PUU-VII/2009 and 112/PUU-XII/2014, aims to protect citizens' constitutional rights to decent work (Article 28D Paragraph (2) of the 1945 Constitution).<sup>3</sup> However, a system raises a complex dilemma: on the one hand, organisational pluralism increases people's access to legal services; on the other, fragmentation can potentially weaken ethical standards due to disparities in internal regulations and fragmented supervision mechanisms.

This research examines the impact of system transformation, including the *single bar* and the *many bars*, on the effectiveness of enforcing the ethics of the advocate profession. Literature analyses show that although several studies have analysed the legal implications of the Advocates Law, no comprehensive organisational evaluation has been conducted on the relationship between organisational pluralism and consistent enforcement of the code of ethics in the context of *many bars*. This research uses a juridical-empirical approach with a critical analysis of court decisions, Supreme Court policies, and ethical monitoring practices in various advocacy organisations. The study findings will likely provide policy recommendations to revitalise the Advocate Law and strengthen the ethical supervision model that is adaptive to *many bars'* reality, without compromising the principles of accountability and protection of public interests.

## 2. Research Methods

This research uses a normative-juridical-empirical qualitative approach that integrates three methodological aspects in legal studies. A normative approach is carried out through literature studies that analyse legal norms, applicable rules, and principles in statutory regulations. The juridical approach focuses on analysing statutory regulations by building a norm system that concerns the principles, norms, and rules of statutory regulations. Meanwhile, the empirical approach is carried out through interviews to obtain primary data that examines the legal behaviour of individuals or communities about the law, looking at social reality and how the law functions in everyday life. Combining these three approaches allows research to comprehensively analyse the theoretical and practical aspects of the legal problems studied.<sup>4</sup>

Research data sources consist of primary, secondary and tertiary data collected through literature study and interviews. Primary data includes Law Number 18 of 2003 concerning Advocates, Letter from the Chairman of the Supreme Court Number 73/KMA/HK.01/IX/2015, and the results of interviews with practising advocates. Secondary data includes books, journals, scientific articles, and decisions made by the Constitutional Court regarding advocate organisations. Meanwhile, tertiary data is in legal dictionaries and other complementary sources that support research. Data analysis techniques are carried out qualitatively by identifying, classifying and interpreting data to produce comprehensive findings. This qualitative analysis

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<sup>2</sup> Imam Ghozali and Mahfudz Fahrzi, "Transformation of the Indonesian Advocate Organisation from Single Bar to Multi Bar (Implications of Constitutional Court Decision No. 101/PPU -VII/2009 and Letter from the Chief of the Supreme Court No. 73/KMA/HK.01/IX/2015)," *Mizan: Journal of Legal Studies* 8, no. 1 (2018): 72–82, <https://doi.org/10.32503/mizan.v7i1.921>.

<sup>3</sup> Tonic Tangkau, "Single Bar Is a Dream But Multi Bar Is a Fact," *Hukumid.co.id*, 2024, <https://Hukumid.co.id/id/id/id/single-bar-dapat-bisnis-tapi-multi-bar-hadap-cepat/>.

<sup>4</sup> Sidi Ahyar Wiraguna, "Normative and Empirical Methods in Legal Research: Exploratory Study in Indonesia," *Public Sphere: Journal of Social Politics, Government and Law* 3, no. 3 (November 30, 2024), <https://doi.org/10.59818/jps.v3i3.1390>.

is carried out by describing the data in a quality manner in orderly, coherent, logical and non-overlapping sentences, making it easier to interpret the data and understand the analysis results.<sup>5</sup>

### 3. Result and Discussion

#### 3.1 Transformation of Regulations on the Advocate Organisation System in Indonesia

The development of the advocate organisation system in Indonesia reflects complex political, legal and social dynamics. From the pre-independence phase to the reform phase, this system underwent significant transformation, from organisational diversity (multi-bar), unification through the 2003 Law on Advocates (*single bar*), to the return of post-internal conflict fragmentation. This process not only changed the structure of the legal profession but also sparked debate about its legitimacy, the effectiveness of oversight, and the constitutional right to freedom of association. This analysis refers to the theory of responsive legal policy to assess the suitability of regulations to society's needs and current development

Characterised by organisational fragmentation, the advocacy profession in Indonesia was characterised by organisational fragmentation that reflected a diversity of ideologies and political interests. During the colonial period, the *Bar Association of Lawyers* became a forum for Dutch advocates, while the indigenous community depended on the "bamboo pokrol," which was not formally organised. Post-independence, consolidation efforts began with the founding of the Indonesian Advocates Association (PERADIN) in 1964 as the first national advocacy organisation. However, New Order political pressure triggered the formation of new organisations such as the Indonesian Advocates Association (IKADIN) in 1985, which the government initiated to weaken PERADIN. Fragmentation has become increasingly evident post-reformation with the emergence of the Indonesian Advocates Association (AAI), the Indonesian Legal Counsel Association (IPHI), and the Indonesian Advocates and Lawyers Association (HAPI), each of which carries a different agenda.<sup>6</sup>

PERADIN, as a pioneer, focused on professional independence and human rights protection, but went into a hiatus in 1985 after most of its members switched to IKADIN. IKADIN faced internal conflicts, such as at the 1990 National Conference, which triggered the founding of AAI by 200 disappointed members<sup>3</sup>. Meanwhile, IPHI (1987) and the Indonesian Lawyers Union (SPI) (1998) emerged as alternatives for advocates who wanted to specialise in specific organisations. The standardisation of this phase is marked by competition between organisations, lack of standardisation of ethical codes, and political intervention that blurs the profession's autonomy.<sup>7</sup>

The 2003 Law on Advocates mandates the unification of advocate organisations in a single forum (Article 28, Paragraph 1), which was realised through the Indonesian Advocates Association (PERADI) in 2005. PERADI was formed by eight founding organisations, including IKADIN, AAI, and IPHI, through the Indonesian Advocates Working Committee (KKAI). PERADI's legitimacy as a single bar is reflected in its authority to establish a code of ethics, supervise advocate practice, and provide professional education. This system is capable of creating uniform standards and increasing accountability.

The uniformity of PERADI's code of ethics reduces variations in the interpretation of the principles of professionalism, while the monitoring mechanism through the Honorary Council strengthens professional discipline. However, resistance emerged from organisations such as AAI and IPHI, which refused to disband themselves, maintaining a parallel existence. PERADI's internal conflicts, such as at the 2015 National Conference II in Makassar, which was chaotic due to differences in chairman election methods,

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<sup>5</sup> Wiraguna.

<sup>6</sup> Ghozali and Fahrzi, "Transformation of the Indonesian Advocate Organisation from Single Bar to Multi Bar (Implications of Constitutional Court Decision No. 101/PPU -VII/2009 and Letter from the Chief of the Supreme Court No. 73/KMA/HK.01/IX/2015)."

<sup>7</sup> Ghozali and Fahrzi.

exacerbated member dissatisfaction. The main criticism is focused on the centralisation of power, which can potentially trigger corruption and marginalisation of members' voices.<sup>8</sup>

The PERADI rift peaked in 2015 when the Supreme Court issued KMA Letter Number 73/KMA/HK.01/IX/2015. This letter cancels the previous regulation, which limited the swearing in of advocates only through PERADI, thereby allowing other organisations such as AAI and IPHI to nominate prospective advocates. This decision indirectly recognises multi-bars, contrary to the spirit of the 2003 Law on Advocates.

KMA Letter 73/2015 creates a dualism system: on the one hand, the Law on Advocates still mandates a single bar; on the other hand, multi-bar practice is unavoidable. This condition gives rise to legal uncertainty, especially regarding the legitimacy of non-PERADI organisations in regulating their members. For example, advocates appointed through AAI or IPHI have the potential to face competency disputes because they are not registered with PERADI.<sup>9</sup>

Responsive legal policy theory emphasises the function of law as an instrument of social change that is adaptive to community needs. In the context of advocacy organisations, the 2003 Law on Advocates was initially considered responsive because it attempted to resolve the fragmentation problem through a single bar. However, its implementation failed to fulfil the principles of "substantive justice" and "public participation" because it ignored the constitutional right to freedom of association (Article 28E of the 1945 Constitution). KMA Letter 73/2015, although controversial, actually reflects responsiveness by accommodating the diversity of advocates' aspirations.<sup>10</sup>

The transformation of the advocate organisation system in Indonesia shows the tension between the idealism of a single bar and the reality of a multi-bar system that is difficult to avoid. PERADI, despite having a strong legal foundation, failed to consolidate all elements of the profession due to internal conflicts and historical resistance to centralisation. In the future, revision of the Advocate Law is needed to find a common ground between professional standardisation and respect for freedom of association, perhaps through a "flexible single bar" model that recognises specialisation without ignoring the principle of equality.

### 3.2 Implications of Adopting the Multi-Bar System for the Advocate Profession

System adoption *in many bars* in Indonesian advocacy organisations creates complex dynamics that include positive and negative impacts, requiring an in-depth analysis of its relevance in the country's geographical and socio-cultural context. From a positive perspective, this system encourages equal distribution of the number of advocates and legal services throughout Indonesia, considering the structure *of many bars* enables the formation of advocate organisations oriented to local needs. Field studies show that the diversity of advocate organisations, such as those promoted by the Indonesian Advocates Congress (KAI), can accommodate the different aspirations of professional groups, thereby reducing the centralisation of power often criticised in the system.<sup>11</sup> This democratisation of the profession is also reflected in the reduced risk of regulatory monopoly by a single organisation, which is considered vulnerable to non-transparent political and bureaucratic intervention. In addition, increasing the accessibility of legal services is one of the system's advantages, as *many bars* provide easier access for people in remote areas to reach advocates who are members of local organisations.

However, this system is not free from structural challenges. Differences in ethical standards and monitoring mechanisms between organisations are a crucial problem, as warned by the Indonesian Advocates Association (PERADI), which states that fragmentation of regulators can create non-uniformity in enforcing ethical codes. Phenomenon *forum shopping*- namely, the movement of advocates between

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<sup>8</sup> Sudarmono, "The Meaning of a Single Forum for the Professional Organization of Advocates Judging from Law Number 18 of 2003 concerning Advocates," *Essence of Law 2*, no. 1 (August 10, 2020): 64–76, <https://doi.org/10.35586/esensihukum.v2i1.27>.

<sup>9</sup> Sudarmono.

<sup>10</sup> Sudarmono.

<sup>11</sup> Fatahuddin, "KAI Offers the 'Multi Bar' Concept as a Solution to Advocate Problems," [parepos.fajar.co.id](https://parepos.fajar.co.id/2022/06/kai-tawarkan-kon-multi-bar-as-pengelusaian-problem-advokat/), 2022, <https://parepos.fajar.co.id/2022/06/kai-tawarkan-kon-multi-bar-as-pengelusaian-problem-advokat/>.

organisations, organisations to avoid sanctions for violations - also emerged as a negative impact, damaging the integrity of the profession and opening up opportunities for maladministrative practices. Furthermore, efforts to standardise the quality of advocates become challenging when each organisation has different educational, examination, and certification criteria, as seen in the case of the mass transfer of advocates from Peradi RBA to Peradi Hasibuan without an integrated quality assurance mechanism.<sup>12</sup>

From a stakeholder perspective, comparisons with other countries provide valuable insights. In the United States and England, *many bars* like *the American Bar Association* (ABA) and the *Bar Council* succeeded in creating a dynamic advocacy ecosystem. However, it was acknowledged that the fragmentation of authority between states often triggered jurisdictional conflicts. Meanwhile, Australia adopted a federation model with *Legal Profession Uniform Law* that combines local autonomy and national standards, an approach proposed by academics as a potential solution for Indonesia. System relevance, with *many bars* in the context of Indonesia as an archipelagic and multicultural country, is also worth considering. The diversity of cultures and legal needs in each region, such as in West Sulawesi and Papua, demands regulatory flexibility that can only be met through an adequately decentralised organisational structure. However, without strengthening the national legal framework, such as revising the Law on Advocates to regulate coordination mechanisms between organisations, this system risks worsening the profession's disintegration and weakening the advocates' position as pillars of law enforcement. Thus, the successful implementation of *many bars* relies on balancing organisational autonomy, harmonising ethical standards, and a collective commitment to upholding the profession's independence.<sup>13</sup>

### 3.3. Application of the Multi-Bar System in the Enforcement of Advocate Professional Ethics

Implementing *many bars* in Indonesian advocacy organisations, which accommodate more than one professional organisation, faces complex challenges in enforcing professional ethics. Even though this system is in line with the guarantee of freedom of association in Article 28E paragraph (3) of the 1945 Constitution, disparities in monitoring mechanisms between institutions can potentially create inconsistencies in handling code of ethics violations. For example, advocates sanctioned by one organisation may move to another without clear consequences, weakening the effectiveness of sanctions. This condition is exacerbated by the absence of national minimum ethical standards that bind all organisations. However, harmonisation efforts such as forming the Joint Central Honorary Board (DKPB) in 2025 have been carried out to create the highest ethical forum across organisations.<sup>14</sup>

Theory of *Maslahah Mursalah* Islamic law emphasises the importance of policies that bring public benefit. In this context, *many bars* could be a solution if accompanied by establishing an independent national ethics institution with the authority to develop competency standards, supervise the implementation of the code of ethics, and impose sanctions in an integrated manner. Revision of the Law on Advocates is a crucial step to strengthen the system's legal framework, as *many bars*, including separating the implementation of Special Education for the Advocate Profession (PKPA) from the interests of specific organisations. Besides that, collaboration between organisations through DKPB needs to be strengthened with mechanisms for a *single identity number* and integrated databases to prevent organisation hopping practices and ensure accountability. Thus, although the system has *many bars* at risk of ethical fragmentation, strengthening regulations and

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<sup>12</sup> Hukumonline, "Regarding Members Moving Organizations, Peradi RBA: That's Normal," Hukumonline.com, 2022, <https://www.hukumonline.com/berita/a/soal-member-moving-organization--peradi-rba--itu-usual-lt5f5b4f1f3702e/?page=all>.

<sup>13</sup> Mochamad Mansur, "The Role of Advocates in Indonesian Legal Development," *Widya Yuridika* 2, no. 2 (November 23, 2019), <https://doi.org/10.31328/wy.v2i2.1067>.

<sup>14</sup> Yolanda Veronika De La Bethionore, "Implementation of the Single Bar System in the Draft Law on Advocates After the Constitutional Court Decision," *JOURNAL EQUITABLE* 8, no. 2 (June 30, 2023): 311–36, <https://doi.org/10.37859/jeq.v8i2.4950>.

synergy between stakeholders can make it an effective instrument in safeguarding *the noble* advocacy profession.<sup>15</sup>

### 3.4. Comparison of Single Bar and Multi Bar Systems from the Perspective of Qadhaiyyah Politics

The concept of a single bar - one organisation that regulates all lawyers - aligns with the principle of unity and centralisation of internal power, *siyasah qadhaiyyah*, which emphasises the submission of public affairs to a unified authority to maintain legal stability. This centralisation reflects principles of *al-hukm al-wahid* (single government) in Islamic politics, where coordination of judicial policies must be centralised to prevent fragmentation of authority. Efficiency in law enforcement is the main advantage of this system because standardised codes of ethics, monitoring mechanisms, and professional education can be applied uniformly. For example, Article 28 of the Indonesian Advocate Law mandates PERADI as *a single bar* to ensure the accountability of advocates through a centralised Honorary Council.<sup>16</sup>

However, centralisation risks triggering abuse of power, contrary to the principle of *siyasah qadhaiyyah*, which prohibits monopolistic authority without checks and balances. In the Indonesian context, criticism of PERADI arises due to the lack of transparency in the ethical sanctions process, where dismissed advocates can join other organisations without clear consequences. This risk is reminiscent of the hadith of the Prophet Muhammad SAW regarding the prohibition of handing over affairs to incompetent parties (*la yuh* *He will come to the family of Al-Khibrah*), emphasising that centralisation must be balanced with independent monitoring mechanisms.<sup>17</sup>

The multi-bar system- the existence of several bar organisations- reflects the principle of *siyasah qadhaiyyah* on public participation and diversity, in line with the doctrine of *Shura* (deliberation), which rejects absolute authority. This model allows for healthy competition between groups of advocates, encouraging innovation in professionalism standards, as seen in the United States with the American Bar Association (ABA) and State Bar Associations. This diversity is also in line with the principles of *deviation* (differences of opinion) in Islamic law, as long as it adheres to the corridor of public benefit.<sup>18</sup>

However, the main challenge of multi-bar systems lies in the difficulty of standardisation. Differences in graduation criteria for Special Education for the Advocate Profession (PKPA) between organisations, such as variations in minimum scores, can create gaps in competence, contrary to the principle *al-musawah* (equality) in *siyasah qadhaiyyah*. In addition, the fragmentation of supervision risks weakening enforcement of the code of ethics, as criticised by Indonesian advocates who changed organisations to avoid sanctions. The Qur'an emphasises the importance of consistency in justice: "*O believers, uphold justice...*" (QS. An-Nisa: 135).<sup>19</sup>

Considering *maslahah mursalah* (benefits without an explicit textual basis) is key in assessing both systems. A single bar is considered to better guarantee the public benefit through efficiency and legal certainty, in line with the objectives of *siyasah qadhaiyyah* to prevent *mafsadat* (damage) due to irregularities. However, this

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<sup>15</sup> Ghozali and Fahrzi, "Transformation of the Indonesian Advocate Organisation from Single Bar to Multi Bar (Implications of Constitutional Court Decision No. 101/PPU -VII/2009 and Letter from the Chief of the Supreme Court No. 73/KMA/HK.01/IX/2015)."

<sup>16</sup> Arma Agusti, "Siyasah Qadhaiyyah's Views on the Legal Certainty of Constitutional Complaint Authority," *JLEB: Journal of Law, Education and Business* 2, no. 1 (2024): 1–7, <https://doi.org/10.57235/jleb.v2i1.1401>.

<sup>17</sup> Aan Afandi, Beni Ahmad Saebani, and Nas Nasrudin, "Siyasah Qadhaiyyah Review of Constitutional Court Decision Number 90 / PUU-XXI / 2023 Regarding Additional Provisions for Experience as Regional Head and Minimum Age Requirements for Presidential Candidates and Vice Presidential Candidates," *UNES Law Review* 7, no. 1 (2024): 297–306, <https://doi.org/10.31933/unesrev.v7i1.2275>.

<sup>18</sup> Sulaiman Lebbe Rifai, "The Concept of Public Interest in Islamic Law (Maslaha) and Its Modern Implications," *SSRN Electronic Journal*, 2021, <https://doi.org/10.2139/ssrn.3788222>.

<sup>19</sup> Afandi, Saebani, and Nasrudin, "Siyasah Qadhaiyyah's Review of the Constitutional Court Decision Number 90 / PUU-XXI / 2023 Regarding Additional Provisions for Experience as Regional Head and Minimum Age Requirements for Presidential Candidates and Vice Presidential Candidates."

system lacks flexibility in responding to local dynamics, contrary to the principle of *al-'urf* (local customs) recognised in Islamic law.<sup>20</sup>

In contrast, multi-bar offers flexibility by adapting standards to regional needs, in accordance with the doctrine *al-taysir* (ease) in Islam.<sup>21</sup> However, without centralised coordination, this system risks ignoring principles *shadd al-zarā'i'* (closing the gap), because differences in standards can damage the profession's integrity. *Maslahah mursalah* suggests a hybrid solution: establishing an independent oversight body that coordinates advocacy organisations without eliminating diversity, as proposed in the ICJR study.

Principles of justice and deep democratisation *siyasah qadhaiyyah* also demand balance. A single bar must guarantee transparency of organisational leadership—according to the hadith, "*The best leader is the one you love and loves you*" (HR. Muslim)—while multi-bars need to harmonise standards through intergroup deliberation forums.<sup>22</sup> The two systems are not absolute dichotomies but rather instruments for achieving *youshid al-syarī'ah* (Sharia objectives) in fair and participatory law enforcement.<sup>23</sup> Thus, this comparison shows that *siyasah qadhaiyyah* assesses organisational structure while emphasising the substantive values of justice, accountability, and benefit as the main benchmarks.

#### 4. Conclusion

This study analyses the transformation of the Indonesian advocate organisation from a normative-judicial-empirical perspective, integrating regulatory analysis, legal principles and empirical phenomena. The historical transformation shows a paradigm shift from the pre-2003 multi-bar system, single-bar consolidation efforts through PERADI, to the return of multi-bars post-KMA Letter No. 73/2015. Even though the 2003 Law on Advocates mandated a single bar, internal conflicts and organisational resistance triggered multi-bar legitimisation through Supreme Court policy. Responsive legal policy theory reveals the failure of the single bar to fulfil substantive justice and public participation, especially regarding the right to freedom of association.

The multi-bar system provides positive impacts such as democratising the profession, reducing regulatory monopolies, and increasing access to legal services in remote areas. However, significant challenges include disparities in ethical standards between organisations, a phenomenon *known as forum shopping* that advocates for avoiding sanctions, and difficulties in standardising the quality of education and certification. Comparative analysis with models in the United States, the United Kingdom, and Australia emphasises balancing organisational autonomy and harmonising national standards.

Organisational fragmentation has implications for inconsistency in enforcing the code of ethics, even though efforts to harmonise it through the Joint Central Honorary Council (DKPB) have been carried out. The approach of *Maslahah Mursalah* suggests the establishment of an independent national ethics institution to bridge freedom of association and certainty of ethical enforcement. Perspective *Qadhaiyyah politics* uncovering the tension between single-bar efficiency (*al-hukm al-wahid*) and multi-bar participation (*Shura*), with recommendations for a hybrid model that integrates the advantages of both systems through an independent regulatory body.

Policy recommendations include: (1) revision of the Law on Advocates to strengthen the multi-bar framework and separate Special Education for the Advocate Profession (PKPA) from the interests of certain organizations; (2) establishment of a national ethics institution with the authority to prepare integrated competency standards; (3) strengthening inter-organizational collaboration through a single identification system and integrated database; and (4) model development *single bar flexible* that accommodates specialization without sacrificing the principle of equality.

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<sup>20</sup> Agusti, "Siyasah Qadhaiyyah's View of the Legal Certainty of Constitutional Complaint Authority."

<sup>21</sup> Rifai, "The Concept of Public Interest in Islamic Law (Maslaha) and Its Modern Implications."

<sup>22</sup> Afandi, Saebani, and Nasrudin, "Siyasah Qadhaiyyah's Review of the Constitutional Court Decision Number 90 / PUU-XXI / 2023 Regarding Additional Provisions for Experience as Regional Head and Minimum Age Requirements for Presidential Candidates and Vice Presidential Candidates."

<sup>23</sup> Agusti, "Siyasah Qadhaiyyah's View of the Legal Certainty of Constitutional Complaint Authority."

The transformation of the Indonesian advocate organisation system reflects the dialectic between single-bar idealism and multi-bar reality. A comprehensive and adaptive approach is needed to ensure optimal enforcement of professional ethics and fair legal services for the community.

## 5. Reference

- Afandi, Aan, Beni Ahmad Saebani, and Nas Nasrudin. "Siyasah Qadhaiyyah's Review of Constitutional Court Decision Number 90 / PUU-XXI / 2023 Regarding Additional Provisions for Experience as Regional Head and Minimum Age Requirements for Presidential Candidates and Vice Presidential Candidates." *UNES Law Review* 7, no. 1 (2024): 297–306. <https://doi.org/10.31933/unesrev.v7i1.2275>.
- Agusti, Arma. "Siyasah Qadhaiyyah's View on the Legal Certainty of Constitutional Complaint Authority." *JLEB: Journal of Law, Education and Business* 2, no. 1 (2024): 1–7. <https://doi.org/10.57235/jleb.v2i1.1401>.
- Fatahuddin. "KAI Offers 'Multi Bar' Concept to Solve Advocate Problems." [parepos.fajar.co.id](https://parepos.fajar.co.id), 2022. <https://parepos.fajar.co.id/2022/06/kai-tawarkan-komp-multi-bar-as-pengelesaian-problem-advokat/>.
- Ghozali, Imam, and Mahfudz Fahrizi. "Transformation of the Indonesian Advocate Organization from Single Bar to Multi Bar (Implications of Constitutional Court Decision No. 101/PPU -VII/2009 and Letter from the Chief of the Supreme Court No. 73/KMA/HK.01/IX/2015)." *Mizan: Journal of Legal Studies* 8, no. 1 (2018): 72–82. <https://doi.org/10.32503/mizan.v7i1.921>.
- lawonline. "Regarding Members Changing Organizations, Peradi RBA: That's Normal." [Hukumonline.com](https://www.hukumonline.com), 2022. <https://www.hukumonline.com/berita/a/soal-member-besar-organization--peradi-rba--itu-masa-lt5f5b4f1f3702e/?page=all>.
- Khasanofa, Auliya. "Creating a Profession of Advocates that is Officium Nobile." [fh.unhas.ac.id](https://fh.unhas.ac.id), 2023. <https://fh.unas.ac.id/berita/mewujudkan-profesi-advokat-yang-officium-nobile/>.
- Mansur, Mochamad. "The Role of Advocates in Indonesian Legal Development." *Widya Yuridika* 2, no. 2 (November 23, 2019). <https://doi.org/10.31328/wy.v2i2.1067>.
- Rifai, Sulaiman Lebbe. "The Concept of Public Interest in Islamic Law (Maslaha) and Its Modern Implications." *SSRN Electronic Journal*, 2021. <https://doi.org/10.2139/ssrn.3788222>.
- Sudarmono. "The meaning of a single forum for the professional organization of advocates in view of Law Number 18 of 2003 concerning Advocates." *Essence of Law* 2, no. 1 (August 10, 2020): 64–76. <https://doi.org/10.35586/esensihukum.v2i1.27>.
- Tangkau, Tonic. "Single Bar Is A Dream But Multi Bar Is A Fact." [Hukumid.co.id](https://hukumid.co.id), 2024. <https://hukumid.co.id/single-bar-dapat-bisnis-tapi-multi-bar-hadap-cepat/>.
- Wiraguna, Sidi Ahyar. "Normative and Empirical Methods in Legal Research: An Exploratory Study in Indonesia." *Public Sphere: Journal of Social Politics, Government and Law* 3, no. 3 (November 30, 2024). <https://doi.org/10.59818/jps.v3i3.1390>.
- Yolanda Veronika De La Bethionore. "Implementation of the Single Bar System in the Draft Law on Advocates After the Constitutional Court Decision." *JOURNAL EQUITABLE* 8, no. 2 (June 30, 2023): 311–36. <https://doi.org/10.37859/jeq.v8i2.4950>.