

Religious Freedom and Local Government Regulation in Indonesia: Assessing the Human Rights Impact of Permit Requirements for Houses of Worship

Ridwan Arifin* 

Universitas Negeri Semarang, Semarang, Indonesia
Universitat de Barcelona, Barcelona, Spain
ridwan.arifin@mail.unnes.ac.id

Suhadi Suhadi* 

Universitas Negeri Semarang, Semarang, Indonesia
suhadi@mail.unnes.ac.id

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*Corresponding Author

Abstract

The establishment and operation of houses of worship in Indonesia have periodically generated disputes concerning licensing, local regulations, community objections, and freedom of religion or belief. Although administrative requirements may serve legitimate planning purposes, their implementation can create unequal barriers for religious minorities. This article examines the human rights implications of local regulatory practices governing houses of worship. Using normative juridical and policy analysis, the study evaluates constitutional guarantees, administrative requirements, local government authority, and principles of equality and non-discrimination. The article argues that administrative procedures should not become indirect mechanisms for restricting the exercise of religious freedom. The study proposes a rights-based licensing framework based on objective criteria, transparent procedures, consistent application, and effective judicial or administrative remedies. Local governments should distinguish legitimate regulatory considerations from objections based solely on religious identity or majority preference. The article concludes that protecting freedom of religion requires not only constitutional recognition but also institutional mechanisms capable of preventing discriminatory implementation at the local level.

[Pendirian dan pengoperasian rumah ibadah di Indonesia secara berkala menimbulkan perselisihan mengenai perizinan, peraturan lokal, keberatan masyarakat, dan kebebasan beragama atau berkeyakinan. Meskipun persyaratan administratif dapat berfungsi untuk tujuan perencanaan yang sah, implementasinya dapat menciptakan hambatan yang tidak setara bagi minoritas agama. Artikel ini mengkaji implikasi hak asasi manusia dari praktik

regulasi lokal yang mengatur rumah ibadah. Dengan menggunakan analisis yuridis dan kebijakan normatif, studi ini mengevaluasi jaminan konstitusional, persyaratan administratif, kewenangan pemerintah daerah, dan prinsip kesetaraan dan non-diskriminasi. Artikel ini berpendapat bahwa prosedur administratif tidak boleh menjadi mekanisme tidak langsung untuk membatasi pelaksanaan kebebasan beragama. Studi ini mengusulkan kerangka kerja perizinan berbasis hak berdasarkan kriteria objektif, prosedur transparan, penerapan yang konsisten, dan upaya hukum atau administratif yang efektif. Pemerintah daerah harus membedakan pertimbangan regulasi yang sah dari keberatan yang hanya didasarkan pada identitas agama atau preferensi mayoritas. Artikel ini menyimpulkan bahwa melindungi kebebasan beragama tidak hanya membutuhkan pengakuan konstitusional tetapi juga mekanisme kelembagaan yang mampu mencegah implementasi diskriminatif di tingkat lokal.]

Keywords: Religious freedom, houses of worship, local government, non-discrimination, Indonesia

Introduction

Freedom of religion or belief constitutes a fundamental constitutional and human right in Indonesia. The normative basis for its protection is found principally in Article 28E paragraph (1) of the 1945 Constitution, which guarantees the freedom of every person to embrace a religion and worship according to that religion, and Article 28E paragraph (2), which protects freedom of belief and conscience. Article 29 paragraph (2) further provides that the state guarantees the freedom of every resident to embrace a religion and worship according to that religion or belief. Article 28I paragraph (1) strengthens this constitutional architecture by identifying freedom of thought and conscience as among the fundamental rights that receive particularly strong constitutional protection. Article 28D paragraph (1) additionally guarantees equal treatment and legal certainty. These provisions demonstrate that religious freedom cannot be understood merely as a matter of state tolerance; it is a constitutional entitlement connected to equality and the rule of law. The constitutional text therefore provides a strong normative foundation for assessing whether local regulations and administrative practices concerning houses of worship are compatible with fundamental rights.

The constitutional framework is reinforced by Law No. 39 of 1999 concerning Human Rights and Law No. 12 of 2005 concerning the ratification of the International Covenant on Civil and Political Rights. Article 22 of Law No. 39 of 1999 recognizes the freedom of every person to embrace religion and worship according to that religion or belief, while the ICCPR protects freedom of thought, conscience, religion, and belief under Article 18. Because Indonesia ratified the Covenant through Law No. 12 of 2005, domestic legal interpretation should

consider international human rights standards concerning the permissible limitation of religious freedom. These standards recognize that the internal freedom to hold a religion or belief is inviolable, while limitations on the external manifestation of religion must satisfy strict requirements of legality, legitimate purpose, necessity, and proportionality. The legal relevance of these principles becomes particularly clear when governments regulate access to houses of worship because restrictions on physical space may directly affect the collective manifestation of religious belief. Indonesia's international commitments therefore require administrative authorities to justify restrictions according to objective legal standards rather than religious identity or social popularity.

Despite these constitutional and statutory guarantees, the practical exercise of religious freedom remains vulnerable to administrative barriers, community opposition, and unequal local implementation. The establishment of houses of worship frequently involves questions concerning permits, land use, local government authority, and recommendations from religious institutions. Crouch (2010) demonstrates that the implementation of regulations governing houses of worship generated new legal and political conflicts rather than resolving existing tensions. Makin (2012) similarly argues that the Indonesian state continues to exercise an extensive administrative role in defining and managing religious life. The resulting challenge is therefore not simply whether the legal system recognizes religious freedom in principle, but whether administrative procedures enable all religious communities to exercise that freedom equally. Where minority communities encounter additional procedural obstacles that are not imposed equally upon majority groups, formally neutral regulations may produce substantively discriminatory consequences. The central issue of this article is consequently the relationship between administrative authority and the constitutional duty to protect religious freedom without discrimination.

This article adopts normative juridical and policy analysis to examine the human rights implications of permit requirements for houses of worship in Indonesia. The analysis focuses on the interaction between constitutional guarantees, national human rights legislation, administrative law, local government authority, and the 2006 Joint Regulation of the Minister of Religious Affairs and the Minister of Home Affairs. It argues that the legitimacy of administrative regulation depends not merely on whether authorities possess formal legal power, but also on how that power is exercised. Government action affecting religious freedom must remain consistent with the principles of legality, equality, proportionality, transparency, and procedural fairness. This requirement is particularly important under Law No. 30 of 2014 concerning Government Administration, which establishes a legal framework for governmental decisions and actions. A decision formally issued by a competent authority cannot automatically be considered legitimate if its substance or implementation produces discrimination, exceeds legal authority, or violates general principles of good governance.

Constitutional and Legal Protection of Religious Freedom

The constitutional protection of religious freedom must be interpreted as part of Indonesia's broader constitutional commitment to human dignity and equality. Article 28E paragraph (1) protects the freedom to embrace religion and worship, while Article 28E paragraph (2) explicitly recognizes freedom of belief and conscience. Article 28I paragraph (2) further guarantees the right of every person to be free from discriminatory treatment, while Article 29 paragraph (2) establishes a direct obligation for the state to guarantee religious freedom. These provisions collectively reject an interpretation in which access to religious practice depends exclusively on demographic majority or local political preference. The protection of religious freedom should therefore extend to minority communities even when their presence generates social disagreement. Sihombing (2019) demonstrates the continuing constitutional debate concerning the meaning of religion and belief, particularly following Constitutional Court Decision No. 97/PUU-XIV/2016. The decision strengthened the constitutional recognition of followers of indigenous beliefs by holding that statutory provisions excluding "belief" from the legal meaning of religion could not be maintained.

Law No. 39 of 1999 concerning Human Rights provides an additional statutory foundation for protecting religious freedom. Article 22 affirms that every person is free to embrace religion and worship according to that religion or belief, while the law also incorporates principles of equality and protection from discrimination. This statutory framework is important because disputes concerning houses of worship often arise through administrative decisions rather than direct criminal prohibitions. A human rights violation may therefore occur when local authorities fail to provide equal administrative access, tolerate discriminatory opposition, or refuse to protect minority communities from intimidation. The state's obligations should consequently be understood as containing both negative and positive dimensions. Negatively, public authorities must refrain from arbitrary interference with religious practice. Positively, they must protect individuals and communities when private actors obstruct the exercise of lawful rights. Tobroni (2020) argues that restrictions on religious activity require careful constitutional scrutiny and cannot be justified through broad references to public order alone. This principle should apply equally to administrative decisions concerning houses of worship.

Indonesia's ratification of the ICCPR through Law No. 12 of 2005 further strengthens the human rights framework applicable to domestic regulation. Article 18 of the ICCPR protects the freedom to have or adopt a religion or belief and the freedom to manifest religion or belief through worship, observance, practice, and teaching. General Comment No. 22 of the United Nations Human Rights Committee emphasizes that the freedom to manifest religion may be exercised individually or collectively, in public or private. The construction and use of houses of worship are therefore closely connected to the collective dimension of religious

freedom. States may impose restrictions only where such measures are prescribed by law and are necessary to protect specified legitimate interests. Administrative convenience, generalized social opposition, or majority discomfort should not automatically satisfy this test. The state must instead demonstrate a genuine and sufficiently compelling legal justification for restrictions. Indonesia's ratification of the Covenant therefore requires domestic authorities to interpret permit requirements consistently with international standards of legality, necessity, proportionality, and non-discrimination.

Constitutional Court Decision No. 97/PUU-XIV/2016 also provides broader guidance concerning equal constitutional protection. Although the case concerned the legal recognition of followers of indigenous beliefs in population administration, the Constitutional Court held that statutory exclusion of "belief" from relevant legal provisions was constitutionally impermissible. The decision is significant because it rejects discriminatory distinctions in the treatment of citizens based on their religious or belief identity. The Constitutional Court's ruling therefore supports an interpretation of religious freedom that extends beyond formal recognition of major religions. Jufri (2020) describes the decision as a progressive development in efforts to address discriminatory state policies toward indigenous belief communities. In the context of houses of worship, this constitutional development reinforces the principle that administrative procedures must not be designed or implemented on the assumption that only socially dominant religious groups are entitled to effective institutional protection.

Local Government Authority and Permit Requirements for Houses of Worship

The legal regulation of houses of worship in Indonesia is strongly influenced by the 2006 Joint Regulation of the Minister of Religious Affairs and the Minister of Home Affairs concerning guidelines for regional heads in maintaining religious harmony, empowering the Religious Harmony Forum, and establishing houses of worship. The regulation establishes several requirements, including a list of prospective worshippers, support from local residents, and recommendations from relevant local institutions. The normative purpose of these provisions is to promote harmony and prevent conflict. However, the existence of a legitimate policy objective does not guarantee that every procedural mechanism adopted to achieve that objective is compatible with constitutional rights. Crouch (2010) demonstrates that the implementation of the regulation has produced substantial legal and political problems, particularly where local authorities and communities interpret permit requirements in a manner that disadvantages minority groups. The principal concern is that procedures designed as instruments of consultation may become instruments through which local majorities exercise practical control over minority religious rights.

The requirement of support from surrounding residents is particularly problematic from the perspective of equality and non-discrimination. Administrative procedures should normally assess whether an applicant satisfies objective legal requirements relating to land, building safety, zoning, and public infrastructure. Community consultation may assist authorities in identifying practical concerns, but the support of neighboring residents should not become a substantive condition capable of determining whether a constitutional right may be exercised. When a minority religious community must obtain approval from members of a majority religious group, the administrative process may effectively transform a fundamental right into a privilege dependent upon social acceptance. Recent scholarship continues to identify this requirement as a central source of tension in disputes concerning the establishment of houses of worship (Tamba 2024; Saragih and Erliyana 2024). A rights-based legal framework should therefore distinguish between participation designed to facilitate practical coordination and participation that functions as a majoritarian veto.

Local governments possess important authority under Law No. 23 of 2014 concerning Regional Government to administer governmental affairs and provide public services within the framework of decentralization. However, regional autonomy does not permit local governments to disregard constitutional rights or national human rights obligations. Local regulations and administrative decisions must remain consistent with the hierarchy of legislation and constitutional principles. This is particularly important because local governments may face political pressure to accommodate dominant religious groups or avoid social controversy. Crouch (2010) argues that local political dynamics have played an important role in disputes over houses of worship, illustrating the difficulty of maintaining constitutional neutrality within decentralized governance. The appropriate response is not to eliminate local authority but to clarify its legal limits. Local governments may regulate technical and administrative aspects of buildings, but they may not use decentralization as a basis for restricting religious freedom beyond the limitations permitted by the Constitution and applicable legislation.

Law No. 30 of 2014 concerning Government Administration provides an important framework for evaluating local government decisions and actions. Governmental decisions must be based on lawful authority and comply with the General Principles of Good Governance, including legal certainty, proportionality, impartiality, transparency, public interest, and accountability. These principles are directly relevant to decisions concerning houses of worship. A permit refusal based on vague concerns regarding “harmony,” without clear evidence of a legally relevant threat, may violate the requirement of legal certainty and objective decision-making. Likewise, an authority that treats majority opposition as determinative without independently examining the rights of the applicant risks violating impartiality and proportionality. The legitimacy of administrative discretion therefore depends on the quality of legal reasoning. Government officials

must be able to explain why a particular restriction is necessary and why less restrictive alternatives cannot adequately address the identified concern.

Administrative Justice, Non-Discrimination, and Access to Remedies

The right to freedom of religion cannot be effectively protected without accessible mechanisms for challenging unlawful administrative decisions. Disputes concerning permits for houses of worship may be reviewed through administrative mechanisms and, where appropriate, the State Administrative Court system under the legal framework governing administrative adjudication. The availability of judicial review is important because local governments may interpret regulations inconsistently or delay decisions without adequate legal justification. Saragih and Erliyana (2024) emphasize the importance of administrative adjudication in disputes concerning permits for houses of worship. However, access to judicial review alone is insufficient if final decisions cannot be effectively implemented. A rights-based remedy requires not only a formal opportunity to challenge government action but also institutional mechanisms capable of ensuring compliance with legally binding decisions. Otherwise, minority communities may win judicial recognition while continuing to experience practical denial of their rights.

Law No. 30 of 2014 reinforces the principle that administrative action must remain legally accountable. The law recognizes that citizens affected by governmental decisions may seek administrative remedies and judicial protection in accordance with applicable procedures. This framework should be interpreted in conjunction with the constitutional guarantee of legal certainty under Article 28D paragraph (1). Where local governments delay permit decisions indefinitely, repeatedly request unnecessary documents, or refuse to act after applicants satisfy the stated requirements, administrative inaction itself may undermine constitutional rights. The lawfulness of administrative government therefore cannot be assessed solely by examining formal refusals. Procedural delay can produce a similar human rights effect by preventing communities from obtaining meaningful access to religious practice. A rights-based approach should consequently establish clear time limits, written reasons for decisions, and review mechanisms capable of addressing both unlawful action and unjustified inaction.

The principle of non-discrimination should also govern the substance of permit procedures. Article 28I paragraph (2) of the Constitution and Law No. 39 of 1999 prohibit discriminatory treatment, while the ICCPR requires states to guarantee rights without discrimination. The legal analysis must therefore examine not only whether the same regulation applies formally to all groups but also whether particular requirements impose disproportionate burdens on religious minorities. A community-support requirement may appear neutral because every applicant is subject to it, yet its practical consequences may differ substantially depending on the demographic composition of a locality. Minority communities may have

difficulty obtaining support precisely because they are minorities. The application of formally identical requirements can therefore reinforce existing inequalities. Makin (2012) and Crouch (2018) demonstrate that Indonesian religious governance continues to involve significant ambiguity regarding the relationship between state regulation and equal freedom. Administrative equality should consequently be interpreted substantively rather than mechanically.

Effective remedies must also address intimidation and private interference. A minority community may formally possess a valid permit but remain unable to use its house of worship because of threats, protests, or violence. In such circumstances, the state cannot satisfy its human rights obligations merely by issuing administrative documents. Government authorities and law-enforcement institutions have a positive obligation to protect lawful religious activity. Tobroni (2020) argues that governmental restrictions on religious activity require a strict legal basis, while the same logic implies that authorities cannot lawfully accommodate unlawful private pressure by restricting the rights of its victims. If threats from opposing groups lead authorities to suspend religious activity, the practical result is to reward coercion. A rights-based response should instead address the threatening conduct and protect those exercising lawful rights.

Toward a Rights-Based Regulatory Framework

A reformed regulatory framework should distinguish clearly between legitimate technical regulation and unconstitutional religious approval. Governments may require compliance with land ownership rules, spatial planning, construction standards, accessibility requirements, fire safety, environmental protections, and public infrastructure obligations. These criteria are objective and capable of being applied equally to comparable buildings. However, the state should not require minority religious communities to demonstrate that the majority population approves of their religious presence. The exercise of constitutional rights cannot depend on a popularity test. The existing framework should therefore be revised so that consultation with local communities remains possible for addressing practical concerns without functioning as a substantive veto over religious freedom. Crouch (2010) and Tamba (2024) demonstrate why this distinction is necessary: procedures intended to preserve harmony can instead generate exclusion when social approval becomes intertwined with formal administrative authority.

The principle of proportionality should become a central test in every restriction imposed on the establishment or use of a house of worship. Authorities should first identify a legitimate objective recognized by law. They should then demonstrate that the proposed restriction is suitable for achieving that objective, necessary because less restrictive alternatives are unavailable, and proportionate when weighed against the impact on religious freedom. This approach would prevent vague references to social harmony from becoming unlimited grounds for permit refusal. Tobroni (2020) similarly emphasizes that restrictions on religious

freedom must be subject to rigorous constitutional evaluation. If an authority identifies traffic congestion as a concern, the appropriate response may involve traffic management rather than prohibition. If a building does not satisfy safety requirements, the applicant should generally be given an opportunity to comply. Administrative refusal should therefore be based on demonstrable legal deficiencies rather than generalized social opposition.

Local governments should also adopt stronger procedural safeguards under the principles established by Law No. 30 of 2014. Decisions should be made within clear time limits, supported by written reasons, and based on verifiable evidence. Applicants should have access to relevant information concerning the status of their applications and should be informed of available administrative and judicial remedies. These safeguards would strengthen transparency and reduce the possibility that informal political pressure influences administrative outcomes. The principles of impartiality and legal certainty are particularly important because permit disputes often involve highly unequal relationships between minority communities and dominant local groups. Government institutions should therefore act as neutral guarantors of constitutional rights rather than as negotiators who seek the least politically controversial outcome. Administrative neutrality requires authorities to apply the law consistently even when protecting an unpopular minority generates public disagreement.

The role of participation should likewise be redesigned. Interreligious dialogue and community consultation can contribute significantly to conflict prevention, but participation must be directed toward solving practical problems rather than determining whether a minority possesses the right to worship. Forums for religious harmony can facilitate communication, mediation, and information-sharing, yet their involvement should not displace objective legal standards or judicial authority. Mubarok (2014) identifies the strategic importance of interreligious institutions while also recognizing challenges in their institutional effectiveness. A rights-based model should preserve these institutions as mechanisms of dialogue rather than permit them to become gatekeepers of constitutional rights. Democratic participation is valuable, but constitutional democracy requires limits on majority power where fundamental rights are concerned.

Conclusion

The regulation of houses of worship in Indonesia demonstrates the continuing tension between constitutional guarantees of religious freedom and administrative practices that may produce discriminatory consequences. The 1945 Constitution, particularly Articles 28D, 28E, 28I, and 29, provides a strong foundation for protecting religious freedom, equality, legal certainty, and non-discrimination. These protections are reinforced by Law No. 39 of 1999 concerning Human Rights and Law No. 12 of 2005 ratifying the ICCPR. However, the practical realization of

these rights may be weakened when administrative requirements permit majority preferences or social opposition to influence whether minority communities can establish places of worship. The 2006 Joint Regulation concerning houses of worship therefore requires critical reassessment, particularly where requirements concerning community support operate as indirect mechanisms for restricting constitutional rights.

A human rights-based approach should distinguish legitimate technical regulation from requirements that effectively subject religious freedom to social approval. Local governments retain legitimate authority over zoning, construction, safety, and public services under Indonesia's decentralized system, but such authority must be exercised consistently with constitutional rights and the principles of good governance established by Law No. 30 of 2014. Administrative decisions should satisfy legality, necessity, proportionality, impartiality, transparency, and accountability. Applicants must have access to effective administrative and judicial remedies, while authorities must protect communities against intimidation and ensure the implementation of legally binding decisions. The principle of non-discrimination requires particular attention to the disproportionate burden that apparently neutral procedures may impose on religious minorities.

Ultimately, sustainable religious harmony cannot be built by restricting minority rights whenever public opposition emerges. Such an approach merely converts coercive social pressure into administrative power. Indonesia should instead develop a regulatory system in which houses of worship are evaluated according to objective legal and technical standards, while religious identity and majority preference are excluded from considerations that determine fundamental rights. The constitutional role of local government should be understood not as preserving social calm at any cost, but as guaranteeing that every religious community receives equal protection under the law. Reform in this direction would strengthen constitutional democracy, administrative justice, and Indonesia's commitment to universal human rights.

References

- Banjaransari, Putri Agustina. 2025. "Religious Freedom vs. Political Control: Legal Challenges of Religious Minorities in Indonesia, Focusing on Ahmadiyya." *Indonesian Minority Justice Review*.
- Crouch, Melissa. 2010. "Implementing the Regulation on Places of Worship in Indonesia: New Problems, Local Politics and Court Action." *Asian Studies Review* 34 (4): 403–19. <https://doi.org/10.1080/10357823.2010.527921>.
- Crouch, Melissa. 2018. "The Ambiguities of Religious Freedom in Indonesia." *The Review of Faith & International Affairs* 16 (1): 85–96. <https://doi.org/10.1080/15570274.2018.1433588>.
- Farihah, Rindang. 2020. "Putusan MK Nomor 97/PUU-XIV/2016 dan Pengaruhnya terhadap Perubahan Identitas Perempuan Penghayat." *STAATSRECHT*:

- Indonesian Constitutional Law Journal* 4 (1). <https://doi.org/10.15408/siclj.v4i1.16126>.
- Jufri, Muwaffiq. 2020. "Potensi Penyetaraan Agama dengan Aliran Kepercayaan di Indonesia." *Jurnal Yudisial* 13 (1). <https://doi.org/10.29123/jy.v13i1.360>.
- Makin, Al. 2012. "Defining 'Religious' in Indonesia: Toward Neither an Islamic nor a Secular State." *Citizenship Studies* 16 (8): 975–90. <https://doi.org/10.1080/13621025.2012.735028>.
- Mubarok, Husni. 2014. "Memperkuat Forum Kerukunan Umat Beragama." *Dialog* 37 (2): 195–206. <https://doi.org/10.47655/dialog.v37i2.66>.
- Mujahidin, et al. 2025. "Acceptance of 'the Others' in Religious Tolerance: Policies and Implementation Strategies in the Inclusive City of Salatiga, Indonesia." *Heliyon* 11 (2): e41826. <https://doi.org/10.1016/j.heliyon.2025.e41826>.
- Saragih, Yessi Nadia Giatma, and Anna Erliyana. 2024. "The Role and Function of the Administrative Court in Resolving Disputes over Permits for Places of Worship." *Journal of Humanities and Social Studies*.
- Sihombing, Uli Parulian. 2019. "Penafsiran atas Makna Agama di dalam Undang-Undang Dasar 1945 Menurut Putusan Mahkamah Konstitusi Nomor 97/PUU-XIV/2016 dan Nomor 140/PUU-VII/2009." *Jurnal Konstitusi* 16 (4). <https://doi.org/10.31078/jk1641>.
- Tamba, Wahyu Pratama. 2024. "Dinamika Kebebasan Beragama dan Pendirian Rumah Ibadah di Indonesia." *Journal of Religious Policy* 3 (2).
- Tobroni, Faiq. 2020. "Pelarangan Aktivitas Kelompok Keagamaan Tanpa Komentar Umum KIHSP." *Jurnal Yudisial* 13 (2). <https://doi.org/10.29123/jy.v13i2.438>.
- United Nations Human Rights Committee. 1993. *General Comment No. 22: Article 18—Freedom of Thought, Conscience and Religion*. CCPR/C/21/Rev.1/Add.4.

Legal Sources

- Indonesia. 1945. *The 1945 Constitution of the Republic of Indonesia*.
- Indonesia. 1999. *Law No. 39 of 1999 concerning Human Rights*.
- Indonesia. 2004. *Law No. 9 of 2004 concerning the Amendment to Law No. 5 of 1986 concerning the State Administrative Court*.
- Indonesia. 2005. *Law No. 12 of 2005 concerning the Ratification of the International Covenant on Civil and Political Rights*.
- Indonesia. 2014a. *Law No. 23 of 2014 concerning Regional Government*.
- Indonesia. 2014b. *Law No. 30 of 2014 concerning Government Administration*.
- Indonesia. 2006. *Joint Regulation of the Minister of Religious Affairs and the Minister of Home Affairs No. 9 and No. 8 of 2006 concerning Guidelines for Regional Heads in Maintaining Religious Harmony and Establishing Houses of Worship*.
- Indonesia. Constitutional Court. 2017. *Decision No. 97/PUU-XIV/2016*.
- United Nations. 1966. *International Covenant on Civil and Political Rights*.

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