

## Public Participation and Local Government Readiness in Building Function Certificate (SLF) Services: a *Comparative Study of Malang Regency and Batu City*

<sup>1</sup> Bambang Agus Diana, <sup>2</sup> Dwi Putranto Riau <sup>3</sup> Amud Sunarya

<sup>1,2,3</sup> Universitas Terbuka, Indonesia

<sup>1</sup> bambangad@ecampus.ut.ac.id, <sup>2</sup> dwiputranto@ecampus.ut.ac.id, <sup>3</sup> amud@ecampus.ut.ac.id

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### ABSTRACT

This study aims to analyze community participation and local government readiness in the management of Building Functionality Certificates (SLF) through the Building Management Information System (SIMBG), using a comparative multiple-case study approach in Batu City and Malang Regency. The research applies a qualitative method with data collected through in-depth interviews, focus group discussions (FGDs), observation, and documentation. A total of 11 informants were involved, consisting of representatives from local government agencies (DPUPR and DPMPTSP), as well as building owners/applicants and technical consultants to ensure balanced perspectives. The findings reveal that community participation has increased gradually due to digital service expansion and active socialization programs. However, participation remains constrained by limited public literacy, complex technical requirements, and system disruptions in SIMBG. Meanwhile, local government readiness is reflected in adaptive service strategies such as mobile services, technical assistance, and offline alternatives during system failures. The comparative analysis shows that Batu City emphasizes adaptive outreach strategies due to geographical challenges, while Malang Regency focuses on service stability and institutional efficiency. The study highlights that digital public services (SIMBG) simultaneously enhance access but also introduce new administrative challenges. This research contributes to the development of digital public service governance and participatory policy implementation, emphasizing the importance of collaboration between government, communities, and stakeholders in achieving safe and sustainable building management.

## A. INTRODUCTION

The development of buildings and structures in Indonesia has grown rapidly, especially in large cities, ranging from high-rise buildings to housing complexes. The public's need for office space and housing in large cities has continued to increase. This should certainly be a concern for the government, especially the Department of Public Works and Spatial Planning. In constructing buildings, developers must comply with existing regulations in accordance with the latest developments in legislation, namely Law No. 11 of 2020 concerning Job Creation and Government Regulation No. 16 of 2021 concerning Buildings and No. 1 of 2013 concerning Apartment Buildings. Local governments play an important role in reviewing permits for developers, both groups and individuals, in constructing buildings. In addition to assessing whether the geographical location or site of the building is suitable for its intended use, In addition, from the perspective of the establishment of buildings, providing safety and comfort in houses and high-rise buildings requires the implementation of certain conditions for comfort and safety as well as suitability with the geographical location. Through a certificate of function, it will be one of the requirements that the ownership of the building is in accordance with the required spatial planning. Technical requirements for buildings are provisions regarding building layout and building reliability requirements (Hardaningrum et al., 2024). The Building Construction Permit (IMB), now known as the Building Approval (PBG), was changed by Law No. 11 of 2020 on Job Creation, which amended several provisions in Law No. 28 of 2002 on Buildings and regulated in Government Regulation (PP) No. 16 of 2021 concerning the Implementation Regulations of Law Number 28 of 2002 concerning Building Construction (Muhamad & Anadza, 2024). The implementation of building permits is intended to improve good governance in the construction of buildings. It is necessary to improve regional services to encourage, empower, and increase the capacity and involvement of the community in fulfilling the administrative and technical requirements for buildings, and in the provision of building permit services, fees need to be regulated based on the principles of fairness and community needs. (Monita Rahayuningtyas et al., 2023).

The target of PBG is building owners who want to construct, modify, or maintain buildings in accordance with technical standards. The main objective of PBG is to ensure the safety, health, and sustainability of buildings, as well as compliance with applicable regulations (Andini & Zubaidah, 2025). The criteria for the physical reliability of buildings include aspects of comfort, health, safety, convenience, and harmony with the environment. (Kalih Trumansyahjaya, 2012) For example, in the city of Surabaya alone, there are around 2,740 multi-story buildings that are already in operation but do not yet have an SLF. ( <https://jatim.antaranews.com/berita/614789/pemkot-2740-bangunan-gedung-di-surabaya-belum-miliki-slf>, (Abdul Hakim, 2022). Empirical evidence shows that the implementation of SLF in Indonesia is still far from optimal. For example, in Surabaya City, approximately 2,740 operational buildings do not yet have SLF certification. This indicates a low level of compliance and public awareness regarding building safety and regulatory obligations. To address these issues, the government introduced the Building Management Information System (SIMBG) as a digital public service platform aimed at improving efficiency, transparency, and accessibility. However, the digitalization of services also presents new challenges, such as technological barriers, system instability, and varying levels of digital literacy among users.

This is likely due to a lack of understanding and procedures for applying for a Certificate of Functionality, as well as the lengthy process and procedures involving various agencies such as DPMPSTP, DPKPP, DPUPR and DLH. (Wahyudin. M Lutfi, 2024) Many factors hinder the public from applying for certificates of occupancy, resulting in minimal awareness of the need to apply for these certificates. One of the biggest challenges is the lack of understanding among applicants regarding the required administrative documents and technical standards that must be met (Nizar Wiharja et al., 2025). That the level of awareness among the public as building owners is still considered to be lacking.

(Sugiyanto Made Wena, 2019). Other factors that cause the community to be reluctant to apply for a Certificate of Functionality, according to (Suffian, 2013), can be caused by various things, including owners subjectively considering their buildings to be in good condition or limited financial capacity to carry out routine building maintenance.

In accordance with the East Java Regional Regulation ( Perda ) on the functional suitability of buildings, better known as the Certificate of Functionality (SLF), as specified in East Java Regional Regulation Number 1 of 2024 concerning Building Management, every building operator must apply for a certificate of functionality. Therefore, the DPUPR facilitates the community in the application and licensing of Functionality Certificates in order to provide public services to the community. One of the most important needs of the community is public services (Abdul Hamid, 2011). Public services fundamentally encompass a wide range of aspects of life and are also a key factor driving changes in the quality of regional governance . (Sari, 2018). An activity is considered a public service if it meets several indicators as stated by Salim and Woodward (Ratminto & Atik S Winarsih, 2005). Public service extends beyond administrative procedures by emphasizing responsiveness, accessibility, and service quality, but serving with all one's abilities to provide what is required in the service. Public service is a form of government intervention in society in an effort to meet needs (Erland Mouw, 2013). SLF is a licensing instrument whose function is to control building construction so that there is no construction of buildings that do not meet the safety standards set by the government. (Tri Mulyani, 2023). SIMBG is a web-based application used for the implementation of PBG and SLF (Muhamad & Anadza, 2024). Previous studies have primarily focused on regulatory compliance and technical aspects of SLF implementation, with limited attention to community participation and comparative analysis across regions. Moreover, the impact of digital systems such as SIMBG on participation has not been thoroughly examined.

Based on this information regarding building permits in East Java province, we examined developments in two local governments in East Java, namely Batu City and Malang Regency, which are two of the local governments that provide licensing services related to Building Permits (PBG) as regulated in Law Number 11 of 2020 concerning Job Creation, which was amended several provisions in Law Number 28 of 2002 concerning Buildings and regulated in Government Regulation (PP) No. 16 of 2021 concerning the Implementation Regulations of Law Number 28 of 2002 concerning Buildings. Therefore, to see the extent of implementation and community participation, as well as the readiness of the local government, especially the relevant agencies, namely the Public Works and Spatial Planning Agency. The process of issuing Functionality Certificates (SLF) requires effective coordination among relevant government agencies. Batu City and Malang Regency were deliberately chosen as research locations due to their different geographic characteristics, administrative capacities, and service delivery approaches. Batu City is characterized by hilly terrain and a predominance of tourism-related commercial buildings, which require adaptive service strategies. In contrast, Malang Regency has a larger administrative area with a more diverse settlement pattern and a relatively stable service system. These differences provide a relevant basis for comparative analysis to understand variations in community participation and local government readiness in managing SLF.

Previous research conducted by Agun Pradika, et al analyzing the role of Building Construction Approval (PBG) and Functionality Certificate (SLF) in investment licensing for the construction of apartments or commercial flats, the study found that overall, PBG and SLF play an important role in investment licensing for the construction of commercial flats or apartments by ensuring that construction is carried out in accordance with applicable standards and regulations, and that the resulting buildings are safe for use, (Pradika et al., 2024). Functional certificates must be an important requirement for other policies in order to motivate the community to apply for functional certificates (SLF). Licensing can be a tool for the government in implementing development to regulate its community. One type of permit that is closely related to the development of an area is a Building Permit

(IMB). A building is a physical manifestation of construction work that is integrated with its location, partly or wholly above and or below ground and or water, which serves as a place for humans to carry out their activities, whether for residential or living purposes, religious activities, business activities, social activities, cultural activities, or special activities (Agus Candra, 2022). The purpose of this permit is urban planning, spatial planning, to ensure the condition of the building, safety, health, comfort of the building owner and the surrounding environment (Syarifah et al., 2022). Differences in population size and living conditions, as well as the geographical location of Malang Regency and Batu City, may lead to distinct differences in issues related to SLF applications. Batu City is located in a slightly higher and hilly area, which certainly has certain implications certain aspects to consider when constructing buildings on hills, unlike Malang Regency, which is located in a lowland area. These differences motivated this study to examine community participation and institutional readiness in implementing SLF services across both regions. Therefore, this study aims to:

- (1) analyze community participation in SLF management through SIMBG;
- (2) examine local government readiness in delivering SLF services; and
- (3) compare the implementation between Batu City and Malang Regency.

This study fills the research gap by adopting participation theory, which emphasizes the active involvement of citizens in public policy processes, not only as service users but also as stakeholders in decision-making and implementation. Participation includes various forms, ranging from passive compliance to active collaboration. SLF can contribute more significantly to urban sustainability and fulfill global sustainability goals (Luis Marina, 2024). This study offers novelty by integrating digital public service analysis with participation theory in a comparative framework, highlighting how SIMBG influences community participation and local government readiness across different regional contexts. Furthermore, research conducted by Farida Hardaningrum, et al., entitled "Analysis of the Implementation of Functionality Certificates (SLF) in Surabaya City" using descriptive statistical methods, with the aim of identifying the parameters that influence the issuance of Building Function Certificates in Surabaya City, concluded that customer satisfaction is a significant variable in the process of issuing Building Function Certificates in Surabaya City (Hardaningrum et al., 2024).

The next study was conducted by Anda Setiawati with the title "The Urgency of Functionality Certificates as Protection of Human Rights for Building Users/Residents," to highlight that every building owner is required to obtain an SLF that proves the reliability of the building while ensuring the safety, comfort, and security of its users/occupants. The study concluded that government implementation in the region, especially in the field of building supervision, must be carried out while continuing to prioritize human rights protection and community service based on the general principles of good governance (Setiawati, 2020). From the above description, the problem formulation is what is the level of community participation in the management of the Certificate of Functionality (SLF) through the Building Management Information System (SIMBG) in Batu City and Malang Regency? What are the main obstacles faced by local governments and communities in implementing the SLF policy, and what public service strategies are being implemented to overcome them?. Despite the availability of SIMBG, community participation in SLF management remains limited. Participation is often restricted to administrative compliance rather than active engagement, while many building owners still lack understanding of technical and regulatory requirements. Participation is not only administrative compliance but also includes levels such as passive, functional, and interactive participation. Accordingly, this study not only compares the implementation of SLF services between Batu City and Malang Regency but also explains how institutional readiness shapes community participation within the context of digital public service implementation. By integrating participation theory with policy implementation perspectives, this study provides a more comprehensive explanation of the dynamics influencing the effectiveness of SIMBG-based public services. Although community participation constitutes the primary focus of this study, understanding participation in

public services cannot be separated from the government's capacity to implement policies effectively. In this regard, the policy implementation perspective proposed by (Mazmanian D. A & Sabatier P. A., 1983) provides a complementary analytical lens for examining local government readiness. This perspective emphasizes that successful policy implementation is influenced not only by statutory regulations but also by institutional capacity, organizational coordination, resource availability, and environmental conditions. Within the context of SIMBG-based SLF services, these factors are reflected in the readiness of local governments to provide digital public services that are accessible, responsive, and capable of encouraging broader community participation. Therefore, this study integrates community participation theory with the policy implementation perspective to explain how institutional readiness supports the effectiveness of SLF service delivery in Batu City and Malang Regency.

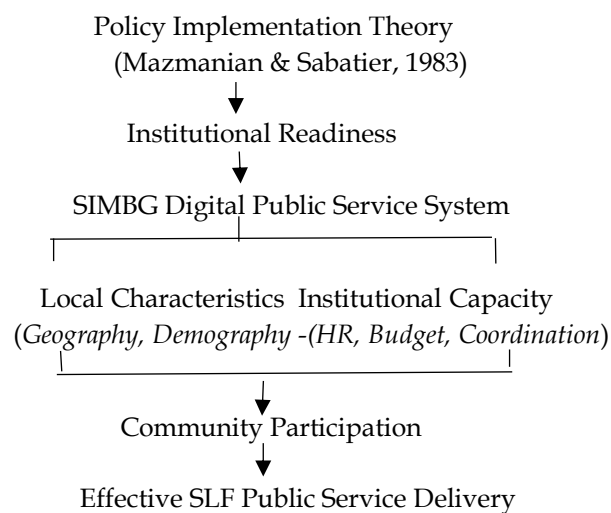


Figure 1. Research Framework

Source: Research results 2025

Figure 1 illustrates the research framework developed in this study. The framework integrates the policy implementation perspective of Mazmanian and Sabatier with the concepts of institutional readiness and community participation in digital public services. The framework assumes that the effectiveness of SIMBG implementation is influenced by local characteristics and institutional supporting factors, which subsequently affect community participation and the quality of SLF public service delivery

## B. METHOD

This study employs a qualitative method grounded in the philosophy of postpositivism, which is used as an approach to studying natural phenomena (as opposed to experimental research), where the researcher serves as the primary instrument; data collection techniques involve triangulation (a combination of methods); data analysis is inductive or qualitative; and the research results emphasize meaning over general conclusions regarding an event, (Sugiyono, 2019). Primary data was collected through discussions with representatives from the Public Works and People's Housing Agency (DPKP) and Cipta Karya in Batu City and Malang Regency, while secondary data was gathered from online news, documents, and websites relevant to the study. For data analysis, interactive analysis, (Miles,

2020). Was used, consisting of three stages: data reduction, presentation, and drawing conclusions. Data reduction is the process of selecting, harmonizing, emphasizing, abstracting, and transferring raw data from the field. The data generated through interviews and documentation remains complex and raw; Therefore, researchers must select important and significant data by identifying fundamental data, specifically, data that poses challenges for researchers in implementing and disseminating the SIMBG flagship policy. Second, data presentation, where qualitative data often takes the form of narrative text. The third stage involves drawing conclusions and verifying findings by explaining the theoretical and practical implications of the issues and providing suggestions and recommendations.

Focus Group Discussions (FGDs) were conducted as a supplementary data collection technique to explore collective perspectives, validate the findings of individual interviews, and identify common challenges faced by stakeholders. The FGD involved representatives from technical agencies and was structured using a series of guiding questions, as presented in the research instrument. The informants in this study were coordinators from the DPUPR and DPMPTSP, Office Secretaries, and section heads in Batu City, Informants also include service users (building owners/applicants) to capture community perspectives.

The total number of informants was 11 (7 from Batu City and 4 from Malang Regency). Informants were selected purposively based on their institutional roles, practical experience, and direct involvement in SLF administration, ensuring that the collected data adequately represented both policy implementers and service users.

To ensure data validity, this study applied a triangulation technique consisting of:

1. Informant sources, by comparing information obtained from different informants, namely the DPUPR and DPMPTSP of Batu City and Malang Regency
2. Methods, by cross-checking data from interviews, FGDs, observations, and documentation;
3. Time, by collecting data at different times to ensure the consistency of the information .

Triangulation is also defined as the process of verifying data through various sources, techniques, and time frames,(Mekarisce, 2020)

## C. RESEARCH FINDING AND DISCUSSION

### A. Development of SIMBG and Community Participation in Batu City and Malang Regency

The issue of licensing and building function certificates (SLF) for buildings in East Java illustrates the importance of licensing and building occupancy certificates for both developers and private individuals in accordance with government regulations on Job Creation and Government Regulation No. 16 of 2021 on Buildings and No. 1 of 2013 on Apartment Buildings. Building occupancy permits are very important in providing a sense of security and comfort regarding the condition of our buildings because SLF is a government control instrument for evaluating completed buildings against their fulfillment of various administrative and technical requirements to ensure that buildings are safe, reliable, healthy, and comfortable for the people who occupy them. (Prajnaparamitha & Ridwanul Ghoni, 2020). From the data collected from Batu City and Malang, several things can be seen. Public participation in SLF applications is related to community participation in Malang Regency and Batu City, according to the information obtained, where since its initial implementation, the Building Management Information System (SIMBG) in Malang Regency and Batu City has experienced significant development. *According to interviews with the heads of the sub- divisions of the DPMPTSP and Cipta Karya offices in Batu City and Malang Regency, "Since its initial implementation , the Building Management Information System (SIMBG) in Malang Regency has experienced significant development. Initially , many consultants and applicants did not yet understand the system. The primary challenges include*

*a lack of understanding of the Standard Operating Procedures ( SOPs ) based on Government Regulation No. 16 of 2021 ( Appendix 3), limited human resources (HR), and the failure to obtain the required basic permits , which are mandatory prerequisites for submitting a SIMBG application.” This indicates that although access to services has improved through SIMBG, participation remains largely administrative and has not yet reached higher levels such as interactive or collaborative participation.*

Initially, many consultants and applicants did not understand this system and still used the old paradigm in processing permits. Licensing can be a tool for the government in implementing development to regulate its community. One type of permit that is closely related to the development of an area is the Building Construction Permit (IMB), which is now called the Building Approval (PBG, (Melliana et al., 2025). The purpose of this permit is urban planning, spatial planning, to ensure the condition of buildings, safety, health, and comfort of building owners and the surrounding environment. The main issues faced include a lack of understanding of the SOP based on Government Regulation No. 16 of 2021 (Appendix 3), limited human resources, and the failure to obtain the basic permits that are mandatory requirements for applying for a SIMBG. Based on the results of "interviews with representatives from the Batu City Office, on the technical side, the implementation of SIMBG focuses on three main aspects: safety, security, and environmental sustainability, with the main priority being the protection of human life. Results of interviews with other Deputy Heads of the DPMPSTP regarding community participation: “That Community participation in licensing through SIMBG has continued to increase from year to year, and Community members are encouraged to be more proactive. The agency is always available to provide consultation and assist businesses and individuals throughout the application process. ”Here, limited resources for socialization are an obstacle, as are the resources of the DPUPR and DPMPSTP agencies in Batu City, but despite all limitations, they continue to provide the best service to the community. Anyone who is an Indonesian citizen is entitled to convenience, especially services from the government related to bureaucracy and (Suntoro, 2021),public administration (Riau et al., 2023) model (Mazmanian.,D. A & Sabatier., P. A 1983), it is argued that implementation is an effort to carry out policy decisions. Mazmania and Sabatier introduced the Policy Implementation Model with a framework for implementation analysis as one of the appropriate and operational policy implementation models, namely by identifying, analyzing, and evaluating policies. The advantage of this implementation model is its ability to identify and explain the policy implementation process, from policy output to policy impact, with the latter serving as a dependent variable influenced by identified independent variables. Its weakness is that this implementation model is relatively complex, not only in terms of the bureaucracy as the implementer, but also factors outside the bureaucracy (Ombudsman RI, 2020). The model proposed by (Mazmanian., D. A & Sabatier.,P. A 1983), refers to three variables that can influence the success of policy implementation, namely problem characteristics (Tractability of the problem), policy characteristics (Ability of statute to structure implementation) and the policy environment (Non-statutory variables affecting implementation). This means that the success of SIMBG-SLF implementation can be seen from the above factors and can explain the obstacles that occur in the SIMBG process. The Building Management Information System (SIMBG) is a national digital instrument that aims to improve transparency, efficiency, and accountability in the building permit process (Suffian, 2013).

In Malang Regency and Batu City, the implementation of SIMBG shows complex dynamics, influenced by geographical factors, institutional capacity, and the level of public literacy regarding regulations and developing technology. Furthermore, the development of SIMBG in Batu City and Malang Regency based on interview results is summarized in the following thematic table:

Table 1; Systematic comparison of public services and community participation in Malang Regency and Batu City based on FGD interview results, 2025

Theme	Batu City	Malang Regency
Community Participation	Overall socialization, participation has increased since SIMBG was implemented.	Socialization is active, but the long SIMBG process causes reluctance.
Technical Administrative Constraints & Service Strategy	Limited human resources, budget, data rollback, incomplete documents  Offline submission when the system has problems, technical assistance is carried out.	Technical requirements are not met, human resources and means are limited.  Mobile services and IT Assistance for problematic applicants.
SIMBG effectiveness & efficiency	Service quality is maintained despite budget efficiency	SIMBG is not optimal, digitization education is needed
Characteristics Of The Territory	Hilly region, remain tight in the issuance of SLF even although the location is difficult to reach.	intensive coordination with RT / RW, mobile services for community education.

Source: Research results 2025

Table 1 shows the differences in public service characteristics and community participation levels between Malang Regency and Batu City. Malang Regency tends to be more stable in maintaining service quality despite budget constraints, while Batu City emphasizes mobile service strategies to overcome geographical barriers. Technical constraints such as limited human resources and SIMBG system disruptions are dominant issues in both regions, but active socialization and technical assistance approaches have been proven to increase community involvement. The comparative analysis between Batu City and Malang Regency shows that differences in SLF implementation are shaped not only by geography but also by institutional dynamics. Batu City demonstrates adaptive strategies due to geographical constraints, while Malang Regency relies more on institutional stability but faces higher service demand. The comparison demonstrates that differences in service performance are not solely determined by geographical characteristics but are also influenced by institutional capacity, organizational adaptability, and continuous interaction with service users. Although both local governments operate under the same national regulatory framework, differences in administrative strategies contribute to variations in community participation and service effectiveness. These findings reinforce the argument that successful digital public service implementation requires organizational readiness alongside technological innovation.

Table 2: Summary of general data on public services in Malang Regency and Batu City

Aspects	Status and Results
Community Participation	Improving, but ongoing education and support from the agency are needed.
Technical Challenges	System outages, data rollbacks, and network limitations.
Role of the Agency	Active in outreach, consultation, and maintaining service quality.
Service Efficiency	Maintained despite a reduction in the operational budget.

Source: Research results 2025

Table 2 summarizes the general conditions of public services related to SLF administration. Community participation shows a positive trend, although it still requires ongoing education. Technical disruptions and network limitations are major challenges, while the active role of agencies in socialization and consultation contributes to the effectiveness of services. Efficiency is maintained despite budget cuts, indicating the local government's commitment to providing quality services. These findings further indicate that improving digital public services requires continuous institutional learning rather than merely adopting new technologies. Public participation becomes more meaningful when accompanied by effective communication, technical assistance, and responsive administrative support from local government institutions.

Public participation between Malang Regency and Batu City is not much different. In Malang Regency, SIMBG has experienced significant development since its initial implementation. Initial obstacles included a low level of understanding among the public and consultants regarding the digital system and SOPs based on Government Regulation No. 16 of 2021. Participation is the involvement of an individual or a group of people in actively contributing to development by contributing their ideas, labor, expertise, and available resources, (Kusmanto, 2014). Community participation has gradually increased, driven by socialization and assistance from technical agencies. Meanwhile, Batu City faces geographical challenges due to the large number of commercial buildings in hilly areas. *According to an interview with the Head of the Batu City DPMPTSP, "The community is beginning to understand the importance of SLE, but there is still resistance due to the process being considered complicated. And in overcome obstacles faced by agencies providing mobile services and regular education to change the community's paradigm towards SIMBG.* Community participation in the development process refers to involving the community in the development process and enabling them to benefit from the results of that development so that they can derive value from it, (Hafrida et al., 2023).

## **B. Challenges and strategies in the services provided by the Public Works and Public Housing Agency**

Furthermore , the results of interviews with the Head of the Subdivision of the DPMPTSP of Batu City and the Head of the PUPR of Batu City essentially show that both share the following commonality : *"There are several challenges in public services in general in Batu City and Malang Regency, including limited human resources and operational budgets, technical disruptions to the SIMBG system (data rollbacks, network errors), low public understanding of spatial planning regulations, and frequent failure to meet technical building requirements (eg, distance of buildings from land boundaries).* Based on the policy implementation framework of Mazmanian and Sabatier, these challenges reflect a combination of problem complexity and environmental constraints. Limited human resources and technical disruptions indicate weaknesses in institutional capacity, while low public understanding reflects socio-cultural factors influencing policy implementation. This suggests that successful implementation requires alignment between policy design, institutional readiness, and community capacity.

The implementation of the SIMBG application is not without its problems. Previous research conducted by Jalaludin Muhamad, et al, entitled "Implementation of Building Management Information Systems in Building Permit Services at the Malang City PUPRPKP Office" shows that the implementation of SIMBG still faces obstacles at the Malang City PUPRPKP Office, namely a lack of technological understanding among applicants in using the SIMBG application, applicant negligence, complex regulations, and system issues within the SIMBG application that prolong the SIMBG issuance process(Muhamad & Anadza, 2024) .

Based on interviews conducted in a discussion group regarding strategies for implementing services in the face of challenges, the Head of The DPMPSTP of Batu City and Malang Regency stated that , in this case, applications are submitted offline to expedited the process. The staff handling these matters are divided into two groups : the secretariat and the technical team. Human resources are vital to the service delivery process; therefore, the PUPR Agency must emphasize and prioritize the importance of human resources in public service. Furthermore, the strategies and roles of the PUPR Agency in optimizing services to the public as implemented in addressing the challenges faced by the community in both the Malang Regency and Batu City share the following similarities namely: (1). Socialization through social media, leaflets, radio, and face-to-face meetings. (2). A massive outreach campaign was conducted, including weekly mobile services to subdistricts and villages. (3). Technical and IT assistance for applicants experiencing difficulties. (4). Coordination with third parties (consultants, universities) to expedite the process. These service strategies indicate a shift toward more adaptive and citizen-oriented public service delivery. However, their effectiveness depends on consistency and sustainability, particularly in addressing structural problems such as limited human resources and budget constraints

From the results of the data collection interviews, it can be concluded that the procedures for applying for a Certificate of Functionality carried out by the Department are related to issues such as:

- a. Administrative issues such as proof of land ownership, building permits , and land agreements .
- b. Technical issues regarding building functionality, intensity, architecture, environmental impact , and building reliability based on the 4K principles ( safety, health, comfort, convenience ).

A common obstacle in applying for an SLF is the failure to meet technical requirements, such as building intensity that does not comply with regulations. For example, a building that should be 5 meters from the land boundary, but is only 3 meters away. Community participation is considered quite good, but the lengthy process in the SIMBG system discourages people from submitting applications. The agency hopes that the community will comply more with spatial planning regulations without the need for continuous socialization. The findings demonstrate that SIMBG, as a digital public service platform, has a dual impact. On one hand, it improves transparency and accessibility, enabling broader participation. On the other hand, it introduces new challenges such as system instability and disparities in digital literacy. This indicates that digital transformation does not automatically improve service effectiveness without adequate institutional and user readiness

### Data Requirements and Realization

The following is a summary of general data obtained during interviews with sources in Batu City and Malang Regency:

Table 3; Data and status

Data Requirements	Status and Conditions
<b>Number of buildings</b>	Data is currently being compiled by the Public Works and Housing Departments of Malang Regency and Batu City
<b>Number of PBG and SLF applications</b>	In 2022, there were approximately 6,000 applications recorded in Malang Regency.
<b>Number of issued PBG and SLF permits</b>	In 2022, approximately 6,000 applications were recorded in Malang Regency
<b>Human resource capacity and funding</b>	Not yet fully available, but the ideal issuance process is 14–28 working days

Limited human resources; no dedicated PBG units yet; a proposal to add staff has been submitted

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Source: *Research results 2025*

Table 3 illustrates the data requirements and status of SLF processing. The number of PBG and SLF applications in Malang Regency is quite high, but the issuance data is incomplete. Limited human resources and funds are structural obstacles that require policy intervention, such as adding staff and strengthening the PBG special unit. These findings emphasize the need for a collaborative strategy between local government and the community to accelerate the certification process. These findings suggest that effective implementation of digital public services requires context-sensitive approaches. A uniform policy implementation strategy may not be suitable for regions with different socio-geographical characteristics. Due to data limitations, some indicators are still being compiled by the relevant local agencies. Overall, the findings suggest that strengthening institutional readiness remains a critical prerequisite for improving the effectiveness of SLF implementation. Consequently, policy efforts should focus not only on expanding digital platforms but also on enhancing organizational capacity and public awareness simultaneously.

Furthermore, this study also found that community participation in the issuance of Functionality Certificates (SLF) in Batu City and Malang Regency has increased, although it still faces various obstacles such as limited human resources, technical disruptions to the SIMBG system, and a low level of understanding of building regulations and technical requirements. Service strategies implemented by the PUPR Office, such as active socialization, mobile services, and technical assistance, have been proven to help encourage community involvement. These findings are in line with research (Hardaningrum et al., 2024), which shows that customer satisfaction influences the issuance of SLF in Surabaya City. Your research also reinforces the findings (Setiawati, 2020), which emphasize the importance of SLF as a protection of human rights for building occupants, as well as the need for local government supervision oriented towards public services. In addition, the results of this study complement the analysis of (Pradika et al., 2024), which emphasizes that SLF and PBG play an important role in ensuring the safety and compliance of buildings with property investment regulations. Thus, this study contributes to the understanding of SLF policy implementation at the local level and highlights the importance of a collaborative approach between the government and the community in realizing safe and sustainable building management. Additionally, it offers a new perspective by comparing community participation in SLF management between two regions with different geographical characteristics (the relatively flat Malang Regency and the hilly Batu City). Previous studies have generally focused on a single region or technical aspects of SLF. The impact of SIMBG implementation on increasing community participation and the effectiveness of public services is a new contribution, as most previous studies have only highlighted SLF regulations or procedures without linking them to digital transformation.

#### D. CONCLUSION AND RECOMMENDATION

##### Conclusion

This study shows that community participation in the management of Building Function Certificates (SLF) in Batu City and Malang Regency has increased with the implementation of the Building Management Information System (SIMBG) and the socialization strategies carried out by the local government. However, the implementation process still faces obstacles in the form of limited human resources, technical disruptions to the system, and low public literacy regarding spatial

planning regulations and technical building requirements. The different geographical characteristics of the two regions also influence the service approach, with Batu City requiring a mobile service strategy and intensive assistance, while Malang Regency focuses more on strengthening service quality despite budget constraints. These findings confirm that the successful implementation of the SLF policy is highly dependent on the synergy between institutional capacity, public service innovation, and community involvement. The policy implications of this study are the need to strengthen institutional capacity, optimize technology based socialization, integrate data between agencies, and provide incentives for applicants who comply with regulations. A collaborative approach involving consultants, academics, and professional associations is also key to accelerating the issuance of SLF and realizing safe, reliable, and sustainable building governance. From a theoretical perspective, this study confirms that community participation in digital public services is closely associated with institutional readiness rather than technological availability alone. Therefore, successful implementation of SIMBG depends on the interaction between organizational capacity, adaptive governance, and continuous community engagement.

### Recommendation

Based on the results of the analysis of public participation in the management of Functionality Certificates (SLF) in Batu City and Malang Regency, there are several strategic recommendations:

1. Strengthening Institutional Capacity; Local governments need to increase the number of human resources specifically for SIMBG and SLF management, as well as providing regular technical training. Budget allocations should be directed towards developing digital infrastructure and maintaining the SIMBG system to minimize technical disruptions.
2. Optimizing Public Outreach and Literacy; Conduct ongoing education through social media, radio, and face-to-face meetings to improve public understanding of spatial planning regulations and SLF technical requirements. Establish technical assistance programs for applicants, especially in areas with geographical barriers such as Batu City.
3. Public Service Innovation; Implement mobile services and digital helpdesks to accelerate the SLF application process. Develop data integration between agencies (DPUPR, DPMPTSP, DLH) to make the verification process more efficient.
4. Regulatory Enforcement and Incentives; Strengthen supervision of SLF compliance through periodic audits. Provide incentives (eg, reduction of levies) for building owners who proactively apply for SLF.
5. Multi-Stakeholder Collaboration; Involve consultants, universities, and professional associations to support the acceleration of SLF issuance and evidence-based policy development.

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