

## Protection And Legal Accountability On Online Healthcare Application In The Perspective Of Legal Certainty

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### Abstract

*This research aims to analyze legal protection arrangements and legal accountability on online-based health care applications in the perspective of legal certainty. The research approach used is a normative legal research approach with primary, secondary and tertiary sources of data or legal materials. In this research, the analysis carried out used qualitative research methods and generates data that was descriptive or not quantitatively measurable. The results of the research show that legal protection arrangements are subject to and must comply with UU No. 17 of 2023 concerning Health, UU No. 19 of 2016 concerning Amendments to UU No. 11 of 2008 concerning Electronic Information and Transactions, and related laws and regulations. Patients have the right to obtain legal protection when obtaining health services using an online-based health care application. Legal liability for online-based health service applications does not yet have regulations that specifically regulate legal certainty regarding the resolution of problems when the application experiences errors or system failures that result in losses for users, for both doctors and patients.*

**Keywords:** *Healthcare Application, Protection, Accountability*

## INTRODUCTION

Human beings have inherent rights that are obtained not from the gift of others or the state. One of them is the right to healthcare obtained since humans are still in the womb. (Susanti, et al 2023) And every community has the right to get good healthcare. (Wulandari et al, 2023) The form of healthcare is not only the Public Health Center, but also other forms of activity, either directly to improving health and preventing disease, or indirectly affecting health improvement. (Sylvana & Bakhtiar, 2022) Every activity and effort undertaken to improve public health is based on non-discriminatory, participatory, protective, and sustainable principles which are very important for the formation of Indonesian human resources, strengthening resilience, resilience, state competitiveness, and national development. (Bakhtiar, et al, 2021)

Nowadays, technological developments affect various aspects of life, one of which is the use of the internet (online-based) in health care. The development of infrastructure and cheap devices for accessing the internet, such as smartphones, have made people prefer to search for information, especially in the field of health through the internet. (Ruben, 2020) Not only information, but the services that provide online health consultations have also become popular. By using online consultations, the time needed is fast, and the costs are cheap and flexible because it can be accessed anywhere and at any time without having to queue to get an explanation from a doctor. (Trisha, 2016)

According to Health Law No. 17 of 2023, telemedicine is the delivery and facilitation of clinical services through telecommunications and digital communication technology. And based on Minister of Health Regulation 20 of 2019 concerning the Implementation of Telemedicine Services between Healthcare Facilities, the definition of telemedicine is the provision of long-distance health services by health professionals using information and communication technology, including the exchange of information on diagnosis, treatment, disease and injury prevention, research and evaluation, and continuing education of healthcare providers for the benefit of improving individual and community health. Telemedicine can simply be interpreted as the delivery of health services that are carried out remotely. That is, doctors when providing

services to patients are carried out directly, but use technological means to help. Not done face-to-face between doctors and patients. (Maharani, 2023)

Healthcare Facilities in accordance with Article 172 of the Health Law can provide Telehealth and Telemedicine services. Healthcare Facilities can independently provide Telemedicine services or collaborate with registered electronic providers in accordance with the provisions of statutory regulations. Telemedicine services provided by Healthcare Facilities include services between Healthcare Facilities and between Healthcare Facilities and the community. Services between Healthcare Facilities and the community, provided by a Healthcare Facility by Medical Personnel or Health Personnel who have a practice permit.

The healthcare facilities in this online application cannot be compared to conventional healthcare facilities. Thus, the certificate or license must also be different. Then, these differences require different legal regulations. Therefore, it is necessary to establish national standards and guidelines for the use of telemedicine so that the delivery of health services that are responsible, safe, high quality, equitable, and non-discriminatory can be created. (Arman, 2013)

In Indonesia, there have been various applications that support access to healthcare facilities launched by various parties, from start-up companies or what are commonly known as startups, to the Ministry of Health. (Izzati, 2020) The growth in the use of health technology can be seen from the 57% of Indonesian citizens who have used health applications, making it the country with the third largest number of health application users. (Kemenkes RI, 2022)

Applications that provide online healthcare are still at the center of attention recently because in conducting their activities it is considered to still not have a definite legal arrangement, while in a transaction it is very possible for a party to be harmed. (Listianingrum, et al, 2019) Here, supervision of telemedicine applications is less effective because there is no authorized authority to impose sanctions. (BPKN RI, 2022)

If in the future the user is harmed by the health services provided by the online health service application, based on the terms and conditions stipulated, the application in the online health service has the basis to absolve itself of responsibility, as stated in the terms and conditions of the application. (Gunawan, 2022) Legal certainty also includes aspects of protection against hacking or data loss that can harm patients or health care providers. (Novianti, 2023) For the purpose of clarifying the position and responsibilities of applications that provide online health services as well as legal protection in application-based healthcare, this is the basis for conducting research.

According to the author, the existing regulations are not yet complete enough as a legal arrangement for online health service applications in Indonesia. Legal protection for patients who use health service applications and the responsibilities of these applications are still not clearly regulated in regulations. Based on this presentation, the author will make a review of "Legal Protection and Accountability in Online-Based Health Service Applications from the Perspective of Legal Certainty"

## RESEARCH METHODS

The research approach used is normative legal research. Normative legal research is legal research carried out by examining library legal materials. (Soekanto & Mamudji, 2003) In this research, the analysis carried out used qualitative research methods and generates data that was descriptive or not quantitatively measurable. This research uses three legal materials namely primary, secondary and tertiary sources. Primary legal material related to telemedicine, such as Law Number 17 of 2023 concerning Health, Minister of Health Regulation 20 of 2019 concerning the Implementation of Telemedicine Services between Healthcare Facilities, Law Number 19 of 2016 concerning Amendments to Law Number 11 of 2008 concerning Electronic

Information and Transactions, and related laws and regulations. Secondary legal materials, namely scientific articles, research journals, books, scientific papers as well as other literature related to telemedicine. Tertiary legal materials consisting of the Kamus Besar Bahasa Indonesia (KBBI), encyclopedias, and mass media that provide explanations of primary and secondary legal materials.

## RESULT AND DISCUSSION

### Legal Protection Arrangements for Online Healthcare Applications

Legal protection is to provide protection for human rights that have been harmed by others and that protection is given to the public so that they can enjoy all the rights granted by law. (Kolib, 2020) In health services, patients have the right to security and safety during the period of their medical treatment. This is because in health science there is a legal principle "*agroti salus lex suprema*" which means patient safety is the highest law. Therefore, the security and safety of patients as users of health applications is something that needs to be questioned considering that in Indonesia there are no specific regulations regarding the practice of health consultations via application. (Yuhan,2023)

As is widely known, the connecting platform between health service facilities and patients has now developed into a digital consultation service application which has the concept of online consultations with doctors. This application is not a health service provider/health service facility, but only an application/platform which is a means to facilitate the search for health services needed by patients. (Hutomo et al, 2020)

In accordance with the 1945 Constitution, Article 1 paragraph (3) states that Indonesia is a rule of law, and legal protection is an essential element and a consequence of a rule of law. The state is responsible for guaranteeing the legal rights of its citizens. In other words, legal protection for providers and recipients of digital-based health services requires recognition of the dignity of citizens as human beings. And the purpose of digital-based health services must be regulated by the Health Law and its derivative regulations. (Lukitawati & Novianto,2023)

Relevant regulations cover various aspects, including patient data protection, medical practitioner licensing, information security, medical ethics, and others. Telemedicine regulations can vary from country to country.

Currently the regulation that accommodates the implementation of telemedicine in Indonesia is Minister of Health Regulation no. 20 of 2019 and Law No 17 of 2023 concerning Health only regulate telemedicine carried out by health service facilities. And with regard to applications, regulations regarding information technology cannot be separated from Law No 19 of 2016 concerning Amendments to Law Number 11 of 2008 concerning Information and Electronic Transactions. However, these regulations do not yet regulate the implementation of medical practice via telemedicine between doctors and patients personally through health application intermediaries, which is currently widely used by the public. This health application is not actually a health service facility, so health applications should not be able to provide health services. (Dewayanti & Suryono, 2023)

There are several regulations relating to legal protection for patients, doctors and healthcare facilities in general in Indonesia:

#### 1. Legal protection arrangements in Law No. 17 of 2023 concerning Health

Patients as people who receive health services and medical personnel as providers of health services for their profession have rights and are protected by both statutory regulations and the Code of Ethics for the Medical Profession. These rights can be reviewed in several articles in the Legislative Regulations. Invitation, the Indonesian

Government regulates legal protection in health services through Law Number 17 of 2023 concerning Health

In article 3 regarding health administration, the aim is to provide legal protection and certainty for patients, health human resources and the community. In this article it is clearly written that health administration, in this case all forms of health services, either directly or through applications, has been stipulated in terms of guaranteed protection and legal certainty so that users of health service applications also get protection from legal certainty if they experience something that could harm their users.

It is also stated in Article 12 that the Central Government and Regional Governments are responsible for protecting Patients and Health Human Resources. And in Article 112 the Central Government and Regional Governments guarantee legal protection for every person and health service facility that provides health services during a disaster. Furthermore, in article 191, hospitals have the right to: obtain legal protection in carrying out health services. This article clearly explains that central and regional beautification officials take responsibility and ensure that patients, human resources, health care facilities, one of which is hospitals, receive protection while carrying out their duties in carrying out health care.

Based on article 273, it is written that medical personnel and health workers have the right to obtain legal protection as long as they carry out their duties in accordance with professional standards, professional service standards, standard operational procedures and professional ethics, as well as patient health needs, receive salaries/wages, service rewards and performance allowances. which is appropriate in accordance with the provisions of laws and regulations, and obtains protection for occupational health and safety and security.

From this research, several articles regarding legal protection in the health law mentioned above, there are no specific regulations governing legal protection for the use of online-based health service applications which are currently widely used by the wider community. So, this requires forms of legal protection and responsibility for the parties that need to be considered considering the forms of default and losses that can occur.

## 2. Legal protection arrangements in Law No 1 of 2024 concerning Second Amendments to Law Number 11 of 2008 concerning Information and Electronic Transactions

The Ministry of Communication and Information has regulations related to the use of information and communication technology, which can have an impact on online-based healthcare applications. An application or platform is an electronic system, so the platform organizer is an electronic system organizer as regulated in Government Regulation No. 71 of 2019 concerning the Implementation of Electronic Systems and Transactions, what is meant by electronic system is: "A series of electronic devices and procedures that function to prepare, collect, process, analyze, store, display, announce, transmit and/or disseminate electronic information"

Healthcare applications are electronic system providers that provide electronic information in the form of electronic information, namely the content comes from health applications, chat services for consultations with doctors, assistance in purchasing medicines, make direct consultation appointments with specialist doctors, and support for

laboratory tests. All electronic information on the application can be accessed by the public after registering by entering the e-mail address or telephone number of the electronic system user. So, telemedicine services can be provided through healthcare applications. (Azhar & Handayani, 2023)

As we know, platforms that connect health services are now developing into digital consultation service platforms that allow patients to consult with doctors online. However, research shows that digital platforms are not health service providers; rather, it is a means to make it easier for people to seek health services. According to the article on health services and advances in digital technology on the website of the Ministry of Communication and Information, companies operating in the e-health sector must be registered as electronic system. (Hutomo, et al, 2020)

In the law of Information and Electronic Transactions related to general protection it is only stated in article 40 paragraph 2 "The government protects the public interest from all types of disturbances as a result of misuse of Electronic Information and Electronic Transactions which disturb public order, in accordance with the provisions of Legislative Regulations"

From the explanation above the Law of Information and Electronic Transactions does not yet have legal protection regulations in the operation of electronic systems. Legal protection regulations, especially legal protection regulations in online health service applications, are still not regulated. So, when a health service application which is an electronic system operator which is also required to comply with the Law of Information and Electronic Transactions experiences an error or system failure, the law does not have legal protection arrangements that specifically protect users from electronic system operators, especially in the health sector.

### Legal Responsibility for Online Healthcare Applications

Telemedicine services are a new form of health service that doctors can use to apply their knowledge to treat patients. By using an application as a platform that provides technology does not necessarily relieve oneself of responsibility, indeed when a patient consults a doctor, this has become the doctor's personal responsibility on behalf of the patient. However, all technical matters related to the network during the consultation remain the responsibility of the application or platform. Doctors cannot provide optimal consultations to their patients if they are not well connected to the existing network. Moreover, doctors in providing medical consultation services to patients are limited to a short time period. (Azhar & Handayani, 2023)

The digital health application does not employ doctors and is not responsible for the actions or negligence of doctors. This program is a tool to improve medical services in Indonesia. This application offers advantages, namely that it can be used anytime and anywhere, and can save time because there are no queues and medicine is delivered via the application. And with the hope that the application can help people who are far from health facilities. (Putri & Mangesti, 2023)

In the implementation of online health consultation services there must be a party who is responsible if an error occurs and this can be detrimental to the patient. These things also affect the relationship between health workers and patients which is based on therapeutic transactions. Patients who receive health services such as consultations either online or in person must receive legal protection. (Eni, 2016)

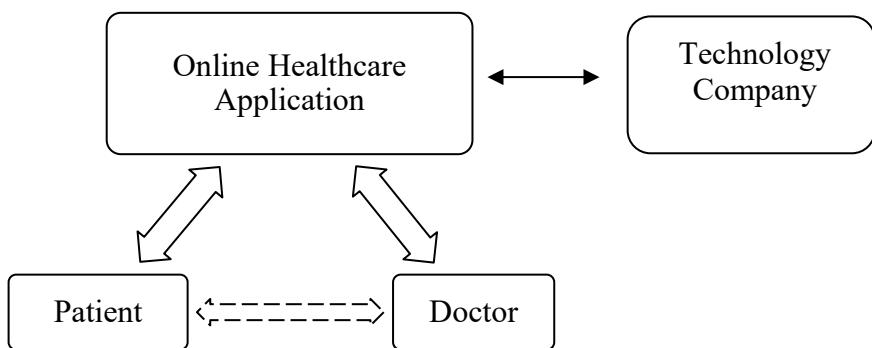


Figure 1. Relationship between application users, application and technology company

From figure 1, the healthcare application functions as a means or link that facilitates doctors and patients to interact with each other. The presence of applications/platforms that provide telemedicine services has changed the relationship between doctors and patients, which were initially carried out directly, to become indirect. This means that there is another party who acts as a liaison in telemedicine services using the application. Thus, the application/platform as an online-based healthcare provider is a party that cannot be separated from the responsibility for providing the telemedicine services it provides.

The provisions regarding users in the terms and conditions of use of one of the online health service applications in Indonesia state that users are individuals who are solely responsible for their use. So, it can be concluded that the legal relationship between the application service provider (company) and the user (patient) is an individual relationship. Where it can be seen that the application user (patient) is responsible for whatever happens to the use of the application used. (Ayu, et al 2022)

In application terms of use, it is explained that the application is not a health service provider and does not employ service providers (health workers). The application owner only acts as an intermediary between service providers (health workers) and service recipients (patients). The company as an application service provider, in providing online-based health services, has the status of a liaison. The legal relationship between application service providers (companies) and service providers (health workers) is limited to a partnership relationship. (Alodokter,2023) The application also has an obligation to protect personal data and the confidentiality of information provided by patients to doctors using media provided by the application and stored in cloud computing. (Prasetyo & Prananingrum, 2022)

It is necessary to pay attention when using the application patients may experience losses due to errors made by the application/platform. We need to be aware that interactions and transactions carried out virtually using the internet are not free from viruses or the presence of irresponsible people such as hackers. System errors or failures in the application may also occur. If something similar happens to the service recipient (patient), it would be wrong if doctors who are actually health workers, held the responsibility. (Mulyadi 2022)

The use of information technology that causes harm when viewed from the doctor's responsibility as an electronic system operator is limited to responsibilities related to duties or responsibilities in providing online health services with applications. If the application or website is related to or owned by a particular health service facility, then for the provision of health services by doctors on the application or website, the health service facility is also responsible. (Gunawan & Reza, 2022)

In carrying out an electronic-based service, the application developed by the service provider company is a product of an Information and Technology (IT) company which is an expert in its field. When a system failure or error occurs. being attacked by a virus or hacker that interferes with the use of services which can harm users, this is a risk for an application. This

means that even if the IT company that develops the platform experiences a system failure or error, is attacked by a virus or hacker, the application should also be held responsible for this incident. (Mulyadi, 2022)

Application users, patients and doctors, have a legal relationship based on a standard agreement made by the health application. If it turns out that in the future the system on the health platform experiences a system error, is attacked by a virus, or is hacked by an irresponsible party, resulting in a data leak, or results in data being lost, which should be stored, then the application must be responsible for the losses experienced by the party. users, whether doctors or patients.

In this research if an application user experiences a loss, the user only has a legal relationship with the application, so that when the application experiences an error or system failure, this is an error or negligence on the part of the IT company that created it. It is impossible for application users themselves to sue for compensation from the IT company because the user and the IT company do not have any legal relationship (Figure 1). Application users (doctors and patients) agree to the agreement made by the application. So, the legal relationship is an agreement resulting from an agreement between the application user and the application, not with the IT company that created the application.

For patients, in the terms and conditions made by the application, the application states that as standard agreements are made, in the terms and conditions for using the application there is an exoneration clause which states that the legal entity or person transfers its responsibilities to another party. This technology system is the responsibility of the application as a technology service provider. Therefore, the application should also be charged with private responsibility, namely responsibility that originates from the legal relationship between the application and the patient due to an agreement. Because there are many problems that can arise with online health services, which may occur outside of the doctor's fault. Thus, not all errors that occur in online health services can immediately be delegated to doctors. Such as if an error or system failure occurs in an online health service which causes the system to not work as it should.

The implementation of telemedicine services that are in contact with communication and information technology means that it is related to the Law of Information and Electronic Transactions. There are problems that give rise to the potential for legal violations, including that doctors providing services may practice without being under the auspices of a health facility, employing doctors without a practice license (Article 173 of the Health Law) by application managers, negligence or treatment errors causing disability/death (Article 440 of the Health Law), negligence (culpa) due to not applying the highest standards, thereby causing harm to patients in the form of disability or death (Articles 359 and 360 of the Criminal Code), confidentiality violations (Article 322 of the Criminal Code), and civil lawsuits due to breach of contract (Article 1243 of the Civil Code) or acts against the law (Article 1365 of the Civil Code). (Mahesa, 2020) Legal regulations and certainty governing the provision of telemedicine services in Indonesia still require more detailed regulations that are in line with current developments.

## CONCLUSION

Based on the description of the discussion above, it can be concluded that legal protection arrangements for online-based healthcare applications in Indonesia are subject to and must comply with Law No. 17 of 2023 concerning Health, Law No. 19 of 2016 concerning Amendments to Law No. 11 of 2008 concerning Electronic Information and Transactions, Minister of Health Regulation No. 20 of 2019 concerning the Implementation of Telemedicine Services Between Health Service Facilities and other related regulations.

Legal liability for online-based healthcare applications does not have regulations that specifically regulate legal certainty regarding the resolution of problems when the application experiences errors or system failures that result in losses for both doctors and patients.

From the conclusions, the suggestions that can be given are the need for special regulations equivalent to the Law (*lex specialis*) relating to telemedicine services, legal protection of telemedicine users, application liability, and supervision of online-based health service applications, considering that application is not healthcare facilities but is a tool between health service providers and application users.

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