

STRATEGY FOR IMPLEMENTING POLICIES ON PREVENTION AND HANDLING OF ONLINE GAMBLING AT THE DIRECTORATE GENERAL OF SEA TRANSPORTATION

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Received: 19/08/2026 | Revised: 03/09/2026 | Accepted: 22/09/2026 | Published: 28/09/2026

Abstract

The rampant practice of online gambling among civil servants has become a serious threat to the integrity, discipline, and ethics of public bureaucracy. Within the Ministry of Transportation, the Directorate General of Sea Transportation was recorded as the work unit with the highest number of indicated employee involvement. Although regulations have been issued, their implementation in the field still faces substantial challenges. This study aims to analyze the contributing factors behind the high prevalence of online gambling cases and formulate an adaptive, standardized policy implementation strategy for the Directorate General of Sea Transportation. This study employs a qualitative approach using a case study method. Data collection was conducted through policy document reviews and in-depth interviews. Data analysis integrates Merilee S. Grindle's policy implementation model and Henry Mintzberg's strategic framework. The findings show that the high rate of online gambling cases is triggered by an interaction between individual factors and structural policy weaknesses. Through grid analysis evaluation, this study recommends the main priority in the form of formulating a Minister of Transportation Regulation on Procedures for the Prevention and Handling of Online Gambling, equipped with operational technical guidelines, valid digital evidentiary mechanisms and surveillance, a tiered prevention approach, geographical risk profiling of work units, as well as budget allocation for rehabilitation services and digital surveillance.

Keywords: Policy Implementation Strategy; Online Gambling; Prevention and Handling; Civil Servants.

INTRODUCTION

Public administration plays a pivotal role in ensuring the delivery of public services characterized by integrity, effectiveness, and professionalism. The paradigm shift toward digital governance enhances service efficiency on one hand, yet acts as a double-edged sword on the other when information and communication technology is exploited for unlawful activities. One of the most severe digital distortions in Indonesia over the past five years is the phenomenon of online gambling. The Indonesian Financial Transaction Reports and Analysis Center (PPATK) recorded an exponential surge in online gambling transactions, reaching IDR 359.81 trillion in 2024 across 209.6 million transactions, involving more than 16.4 million active players nationwide. This cybercrime has not only afflicted the general public but has also permeated the core of the government bureaucracy. State Civil Apparatus (ASN) employees normatively bound by Law Number 20 of 2023 concerning State Civil Apparatus and Government Regulation Number 94 of 2021 concerning Civil Servant Discipline to uphold state dignity and integrity are increasingly implicated as active participants. Within the Ministry of Transportation of the Republic of Indonesia, data from the Task Force for the Eradication of Online Gambling and the Ministry's Bureau of Human Resources and Organization (SDMO) as of November 2024 revealed that 1,379 employees were indicated to be actively involved in online gambling. Of this total, the Directorate General of Sea Transportation (DJPL) ranked highest among Echelon I units, accounting for 545 personnel (39.5%). The destructive ramifications of this phenomenon are evident in the emergence of secondary offenses, notably the abuse of authority and misappropriation of public funds to settle online loan debts accrued from gambling losses. In response to this escalating crisis, the Minister of Transportation issued Circular Letter Number SE-MHB 3/2024 concerning the Prevention and Eradication of Online Gambling within the

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Ministry of Transportation. Nonetheless, this policy intervention has proven insufficient in curbing the prevalence of cases. Prior literature has predominantly examined online gambling through the lens of school-based preventive campaigns (Calado et al., 2020), psychological addiction and depressive disorders among civil servants (Ismail et al., 2021), general cyber law enforcement (Hendarto & Handayani, 2024; Pahrilal et al., 2024), or government public communication strategies (Estriana & Ratu, 2024). A significant research void remains regarding the examination of online gambling among civil servants through the theoretical nexus of public policy implementation and bureaucratic strategic management. The absence of an in-depth empirical inquiry into why formal policy instruments falter at the micro organizational level and how to formulate adaptive preventive strategies within geographically dispersed public entities such as DJPL serves as the primary catalyst for this study. The novelty of this research lies in its theoretical integration of Grindle (1980) policy implementation model, which dissects the *Content of Policy* and *Context of Implementation*, with Mintzberg (1987) strategic framework to bridge the implementation gap among *intended*, *emergent*, and *realized strategies*. Guided by this foundation, this study addresses two fundamental inquiries: (1) Why are personnel within DJPL vulnerable to online gambling involvement when examined through policy content and implementation context? and (2) What constitutes an adaptive, standardized implementation strategy for prevention and handling across operational field units?

METHOD

This study employed a qualitative approach utilizing a case study design. A qualitative approach was adopted to explore in depth the subjective perceptions, power dynamics, contextual meanings, and operational impediments encountered by policy implementors in addressing online gambling within the bureaucracy. The empirical field research was conducted across four Technical Operating Units (UPTs) under the Directorate General of Sea Transportation situated within the Special Capital Region of Jakarta, which registered the highest prevalence of implicated personnel: (1) Navigation District Type B Tanjung Priok; (2) Class II Port Authority and Harbor Master Office (KSOP) Marunda; (3) Class III Port Authority and Harbor Master Office (KSOP) Sunda Kelapa; and (4) Class I Sea and Coast Guard Base (PPLP) Tanjung Priok. Informants were selected via non-probability purposive sampling based on their administrative disciplinary authority and direct involvement in policy execution. A total of nine key informants participated in the study.

Table Profile of Key Informants

Code	Informant Position/Title	Role Representation
KI0	Secretary of the Directorate General of Sea Transportation	Central Level Policymaker
KI1	Head of HR and General Affairs Sub-division, Navigation District Type B Tanjung Priok	Technical Implementor / UPT Structural Official
KI2	Head of Administration Sub-division, Class II KSOP Marunda	Technical Implementor / UPT Structural Official
KI3	Head of Administration Sub-division, Class III KSOP Sunda Kelapa	Technical Implementor / UPT Structural Official
KI4	Head of Administration Sub-division, Class I PPLP Tanjung Priok	Technical Implementor / UPT Structural Official
KI5	Civil Servant at Navigation District Type B Tanjung Priok	Policy Target Group
KI6	Civil Servant at Class II KSOP Marunda	Policy Target Group
KI7	Civil Servant at Class III KSOP Sunda Kelapa	Policy Target Group
KI8	Civil Servant at Class I PPLP Tanjung Priok	Policy Target Group

Primary data were gathered through semi-structured in-depth interviews guided by an interview protocol. Secondary data were compiled through comprehensive regulatory and documentary reviews, encompassing Law No. 20/2023, Government Regulation No. 94/2021, Ministry of PAN-RB Circular Letter No. 5/2024, Ministry of Transportation Circular Letter No. SE-MHB 3/2024, PPATK analytical reports, and internal personnel administrative records. Data analysis followed the interactive model of Miles, M. B., Huberman, A. M., Saldana (2014), comprising data condensation, data display, and conclusion drawing/verification. Data validity and trustworthiness were safeguarded through source and methodological triangulation, supplemented by member checking to mitigate researcher bias. To determine the prioritization of policy recommendations, a Multi-Criteria Grid Analysis using a weighted Likert scale was executed (Dunn, 2018; Patton et al., 2016), assessed directly by key structural administrators.

RESULTS

Causal Factor Analysis Based on Grindle's Model (1980)

Grindle's (1980) policy implementation framework posits that implementation performance is governed by two primary dimensions: *Content of Policy* and *Context of Implementation*. The empirical assessment of Circular Letter SE-MHB 3/2024 is elaborated below:

Content of Policy

Interests Affected

The design of SE-MHB 3/2024 is narrowly oriented toward safeguarding the institutional reputation of the Ministry of Transportation, while overlooking the biopsychosocial welfare of affected personnel and their families. Key informants KI1, KI2, and KI3 corroborated that the circular lacks specific clauses detailing psychosocial protection mechanisms for households facing severe financial distress. Furthermore, empirical insights from KI5 highlighted that digital gambling platforms deploy intermittent reinforcement algorithms delivering sporadic, modest wins to trigger dopamine releases and cognitive distortions of an "imminent win". In accordance with Griffiths's (2017) components model of addiction, such conduct constitutes a behavioral addiction that cannot be effectively dismantled solely through statutory disciplinary sanctions.

Type of Benefits

The policy promises collective, diffuse, and long-term benefits in the form of elevated workplace integrity and discipline. Conversely, the costs of compliance are immediate, wherein addicted personnel require rapid, curative-rehabilitative support. Under Wilson's (1980) regulatory politics typology, this asymmetry induces tacit resistance because the personal-rehabilitative benefits sought by operational staff (KI6, KI8) remain entirely absent from the policy text.

Extent of Change Envisioned

The circular demands a fundamental transformation of ASN digital ethics and behavioral norms. However, the mandates remain confined to superficial administrative compliance (formal verbal warnings and official investigation reports/BAP), without providing systematic behavioral intervention modules or mental rehabilitation frameworks.

Site of Decision Making

Although formulated centrally at the ministerial level, implementation authority is delegated across 296 decentralized DJPL field units without standard operating procedures or technical operational guidelines. This absence of standardized protocols grants excessive discretion to head of the work unit (*street-level bureaucrats*), generating substantial enforcement disparities across units: some adopt lenient postures while others enforce stringent scrutiny.

Program Implementors

UPT heads and administrative sub-division heads serve as front-line implementors. Empirical findings reveal a pronounced technical capacity deficit (*capacity gap*); street-level administrators lack training in addiction counseling as well as digital forensic audit techniques to trace illicit financial transactions, thereby reducing corrective actions to perfunctory verbal reprimands.

Resources Committed

This element represents the most vulnerable dimension of the policy. SE-MHB 3/2024 provides no dedicated operational budgetary allocation within the Budget Execution Lists (DIPA), lacks network filtering/firewall monitoring infrastructure, and allocates no certified psychological counseling professionals to regional technical units.

Context of Implementation

Power, Interests, and Strategies of Actors Involved

At the operational level, direct supervisors face psychological burdens and interpersonal dilemmas. Rigid disciplinary crackdowns are perceived as risks that could trigger informal resistance, rupture workplace cohesion, or

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incite relational discord (KI2, KI4). Consequently, implementors opt for compromise strategies, prioritizing informal, familial counseling prior to initiating formal disciplinary proceedings under Government Regulation No. 94/2021.

Institution and Regime Characteristics

DJPL exhibits extreme geographic fragmentation across 296 operational units (commercial port authorities, coastal radio stations, remote lighthouses, and patrol vessel fleets). The findings reveal a geographic paradox: remote outpost stations characterized by extreme telecommunication signal deficits naturally suppress online gambling activity (KI1), whereas mainland port barracks equipped with stable internet access and limited supervisor oversight outside working hours constitute the highest-risk operational clusters (KI2). In addition, a risk-averse bureaucratic culture induces hesitation among implementors to take decisive action without verified digital evidence.

Compliance and Responsiveness

A pervasive pattern of symbolic compliance was identified. While personnel formally sign integrity pledges and exhibit compliance during official working hours, illicit digital transactions persist in private spaces utilizing personal smartphones and cellular data. This behavior is exacerbated by the absence of recognized evidentiary legal standards governing digital disciplinary infractions within civil service administrative jurisprudence.

Strategic Gap Analysis Based on Mintzberg's Model (1987)

Applying Mintzberg's (1987) strategy formation framework demonstrates a pronounced divergence between formal planning and ground-level execution across DJPL units:

Table Matrix of Policy Implementation Gap Analysis

Analytical Dimension	Formal Plan (Intended Strategy)	Operational Reality (Realized Strategy)	Front-line Adaptive Pattern (Emergent Strategy)
Regulation & Sanctions	Graduated statutory disciplinary sanctions via PP 94/2021 and SE Menhub 3/2024.	Predominantly symbolic compliance; enforcement impeded by the absence of valid digital evidence.	Personalized, familial interventions and informal consensus building to mitigate workplace conflict.
Behavioral Intervention	Passive, one-way administrative awareness campaigns and prohibitions.	Perfunctory outreach failing to address cognitive addiction distortions; high risk of relapse.	UPT-initiated diversionary recreational activities (routine sports, collective spiritual sessions).
Oversight Governance	Inherent, autonomous oversight by unit heads.	Oversight constrained by smartphone privacy boundaries; significant inter-unit variance.	Cautious, tiered reporting (<i>street-level discretion</i>) and escalation of complex cases to headquarters.
Resource Support	Counseling provided "as needed" without dedicated financial backing.	Absence of institutional firewall infrastructure and psychological counseling capabilities.	Heavy reliance on the personal commitment and leadership initiative of individual UPT heads.

This strategic divergence demonstrates that the absence of substantive institutional mechanisms within the central intended strategy compels street-level bureaucrats to craft informal emergent strategies. While these bottom-up practices embody humane, context-specific solutions, their lack of institutionalization leaves them fragile and prone to collapse upon leadership transitions.

Multi Criteria Strategy Prioritization (Grid Analysis)

To transform empirical findings into actionable policy reforms, four alternative implementation strategies were formulated and evaluated using Multi-Criteria Grid Analysis across five weighted criteria: Problem Urgency (15%), Policy & Legal Feasibility (25%), Technical & Operational Capacity (20%), Resource & Budgetary Viability (15%), and Long-term Transformative Impact (25%) (Dunn, 2018; Patton et al., 2016). Weighted evaluations were completed by key administrative officials (KI0 through KI4) using a 1–5 Likert scale.

Table Multi-Criteria Evaluation Matrix (Grid Analysis)

Code	Alternative Implementation Strategy	Total Weighted Score	Priority Rank
R1	Formulation of a Minister of Transportation Regulation on Online Gambling Prevention and Handling (incorporating Digital Evidence Forensics SOPs)	23.70	I (Top Priority)
R2	Development of a Tiered Prevention Approach and Surveillance System Based on Geographical Risk Profiles	22.05	II
R3	Technical Capacity Building in Early Addiction Detection and Basic Counseling for Unit Administrators	21.50	IV
R4	Dedicated Budget Allocation for Psychosocial Rehabilitation and Cyber/Network Infrastructure (Firewall) Upgrades	21.65	III

The multi-criteria evaluation established alternative **R1** as the highest-ranking strategic priority (**23.70**). This outcome demonstrates that resolving the online gambling crisis fundamentally hinges on rectifying weaknesses in policy content (*content of policy*) through legally binding, enforceable statutory mandates. The integrated strategic roadmap encompasses four mutually reinforcing pillars:

Standardized Regulatory Institutionalization (R1)

The Ministry of Transportation must elevate the policy instrument from a non-binding Circular Letter to a comprehensive Ministerial Regulation (Permenhub). This regulation must institutionalize operational technical guidelines, standard operating procedures for electronic disciplinary evidence acquisition compliant with the Personal Data Protection Law, and formalized psychosocial protections for personnel families, aligning with Al-heilat & Alomran's (2025) thesis regarding electronic disciplinary legal frameworks.

Tiered Prevention Grounded in Risk Zoning (R2)

Adopting Marionneau et al., (2023) framework, DJPL should deploy a three-tier intervention model: *universal* (regular financial literacy and institutional ethics campaigns led by central headquarters), *selective* (targeted mentorship for high-risk demographics and recreational management in port housing), and *indicated* (mandatory psychiatric referral for confirmed cases). Surveillance allocation must be calibrated according to geographical unit risk profiles.

Dedicated Fiscal and Digital Security Provisioning (R4)

Mitigate the critical resource deficit (*resources committed*) by establishing specific DIPA budget lines dedicated to retain professional clinical psychologists and install robust enterprise network filtering/firewall systems across all regional UPT networks.

Institutional Counseling Capacity Building (R3)

Eliminate front-line implementation competency gaps through accredited training programs focused on early pathological gambling detection and foundational counseling techniques (*street-level psychological support*).

CONCLUSION

This study concludes that the high prevalence of online gambling among personnel within the Directorate General of Sea Transportation is the product of a dialectical interaction between individual vulnerabilities (intermittent reinforcement mechanisms, acute economic pressures, and horizontal peer influence) and structural policy deficiencies. Circular Letter SE-MHB 3/2024 possesses acute weaknesses across both the *content of policy* and *context of implementation* dimensions evidenced by the absence of technical guidelines, non-existent budgetary allocations and digital infrastructure, and a mismatch between formalistic legal sanctions and the realities of a geographically fragmented maritime bureaucracy. Consequently, an implementation gap persists between a rigid *intended strategy* and a ground-level *realized strategy* characterized by symbolic compliance.

Theoretically, this research demonstrates that resolving behavioral addictions within public bureaucracies requires the synthesis of Grindle's (1980) implementation model with Mintzberg's (1987) strategic adaptability framework. Practically, the foremost imperative for the Ministry of Transportation is to replace the existing circular

with an enforceable Ministerial Regulation equipped with digital forensics standards, a tiered prevention architecture, and dedicated biopsychosocial rehabilitation funding. The empirical scope of this study was limited to regional operational units within Jakarta. Future research should examine the longitudinal efficacy of these strategic interventions and expand comparative evaluations to remote island outposts in eastern Indonesia using mixed-methods approaches.

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