

Notary Public Liability for Errors in Authentic Deeds from the Perspective of Article 16 of the Notary Office Act

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This study examines notarial liability for errors in authentic deeds from the perspective of Article 16 of the Notary Office Act within the Indonesian civil law system. Employing a normative juridical research method, the study integrates statutory analysis, doctrinal review, and a purposive examination of Supreme Court decisions to analyze the configuration of notarial liability and its practical implications. The findings demonstrate that notarial liability operates within a tiered and progressive framework encompassing civil, administrative, and criminal liability, with civil liability emerging as the dominant form of accountability, particularly in cases involving substantive errors. The study further classifies notarial errors into formal errors, substantive errors, and negligence in digital verification, revealing that digitalization has expanded the scope and complexity of the professional duty of due care. Although the normative framework governing notarial responsibility is conceptually coherent, its implementation remains uneven due to weaknesses in supervision, digital competence, and risk mitigation mechanisms. Accordingly, the study underscores the need for a systemic and preventive approach to the application of Article 16, aimed at strengthening legal certainty, professional integrity, and public trust in the notarial profession in the digital era.

Keywords: Notarial Liability; Authentic Deeds; Article 16 of the Notary Office Act; E-Notary; Tiered Sanctions

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1. Introduction

In the Indonesian civil law system, authentic deeds drawn up by notaries occupy a strategic position as primary evidentiary instruments with perfect evidentiary force. This absolute evidentiary value positions notaries as gatekeepers of the integrity of civil legal transactions. However, practical realities indicate that errors in the preparation of authentic deeds, whether formal or substantive, frequently become sources of disputes leading to the annulment of deeds and prolonged civil litigation [1].

The phenomenon of errors in authentic deeds has become increasingly complex in line with digital transformation in notarial services following the COVID-19 pandemic. The integration of notarial services with electronic systems, including electronic drafting and electronic signature practices, has introduced new risks related to identity verification, signature validity, and procedural negligence in the electronic environment [2], [3].

The urgency of this research stems from the dual position of notaries as public officials and private professionals who are strictly regulated. Professional obligations require notaries to act honestly, carefully, independently, and to bear civil liability for negligence [4]. These professional duties and the practical consequences of errors imply that notarial liability must be examined not only on a traditional doctrinal basis but also in the context of evolving electronic practices and case law that interpret liability and remedies for aggrieved parties [5]

The scope of this research is explicitly focused on a juridical analysis of notarial liability in relation to civil obligations and the configuration of graduated sanctions, namely civil, administrative, and criminal sanctions. The discussion is limited to errors in authentic deeds and graduated sanctions and does not address procedural law or perform an in-depth international comparison. Several recent case studies and academic analyses highlight recurring categories of errors (formal such as incorrect identification and numbering; and substantive such as errors in the content or terms of agreements) and their practical consequences for aggrieved parties and professional accountability [6]

The objectives of the research are formulated as follows: first, to identify classifications of errors in notarial authentic deeds based on doctrinal and academic analyses; second, to analyze the tiered structure of notarial legal liability as reflected in scholarly literature and judicial practice; and third, to formulate recommendations for regulatory and normative reform grounded in a review of academic findings and relevant court decisions [7]. Based on the foregoing background, the research questions are formulated as follows: How are the types of errors in notarial authentic deeds classified, and what forms of legal liability arise from them, from the perspective of Article 16 of the Notary Office Act?. What are the practical implications of the application of Article 16 of the Notary Office Act for strengthening the integrity and accountability of the notarial profession in addressing the challenges of digitalization?

2. Literature Review and Problem Statement

Research on notarial liability in Indonesia has developed along three principal strands. The first strand is the classical doctrinal approach, which emphasizes the responsibility of notaries as public officials whose deeds function as authentic evidence. Doctrinal studies underline that defects in authentic deeds, whether formal or substantive, directly affect their probative value and may expose notaries to civil liability when the deed no longer fulfills its evidentiary function [1], [8]. Within this framework, the principle of due care is positioned as a minimum professional standard that must be fulfilled to ensure legal certainty and protection for the parties [9].

The second strand is the contemporary empirical approach, which focuses on litigation patterns in disputes involving notarial deeds. Empirical analyses of court cases demonstrate that substantive negligence, particularly errors related to identity verification and the comprehension of contractual clauses, constitutes the dominant cause of civil lawsuits against notaries [10], [11]. These studies consistently show that aggrieved parties primarily pursue civil compensation claims, reflecting the tangible private-law consequences of notarial negligence.

The third strand is the regulatory critique approach, which questions the effectiveness of the current framework governing notarial liability. Scholarly critiques identify an implementation gap in the regulation of notarial responsibility, particularly concerning the absence of clear parameters for assessing losses and determining compensation in cases of professional negligence [12]. This regulatory ambiguity is considered to undermine legal certainty and result in inconsistent judicial outcomes.

Despite the breadth of existing scholarship, a significant research gap remains. Previous studies have generally examined notarial liability from either a doctrinal or an empirical perspective, without sufficiently integrating these analyses with the challenges posed by digital transformation in notarial practice. Research on electronic deeds and digital verification mechanisms has not been systematically linked to the interpretation of due care and negligence in notarial liability [13]. Moreover, inconsistencies in judicial reasoning concerning digital verification errors and their implications for regulatory reform in the e-notary era remain underexplored [14]

Accordingly, this article seeks to fill that gap by providing an integrated analysis combining doctrinal interpretation, empirical judicial analysis, and policy evaluation. The study focuses on reconstructing the meaning of due care and negligence in notarial liability within the context of digitalized notarial services, with the aim of contributing to a more coherent framework of professional accountability and legal certainty.

3. Method

This study employs a normative juridical research method, which is commonly used in legal scholarship to analyze legal norms, principles, and doctrines as they are formulated and interpreted within the legal system [15], [16]. The primary analytical framework applied in this research is the statutory approach, understood not merely as an examination of positive legal texts, but as a systematic analysis of normative structures governing notarial responsibility and civil liability, as conceptualized in Indonesian legal methodology literature [15]. In addition, this study applies a conceptual approach to examine the principle of due care as a professional standard in notarial practice in relation to fundamental principles of private law governing contractual obligations. This approach aims to identify potential normative tensions between professional responsibility and the autonomy of contracting parties, as discussed in doctrinal writings on legal principles and normative interpretation [17].

The third approach employed is the case approach, utilizing a purposive selection of Supreme Court decisions issued between 2023 and 2025. The selected cases meet three criteria: first, they explicitly base their legal reasoning on notarial professional obligations; second, they represent a variety of errors, including formal defects, substantive negligence, and errors related to digital verification; and third, they have obtained final and binding legal force. The use of Supreme Court decisions as primary case material is justified on the basis that cassation judgments reflect authoritative and up-to-date interpretations of legal norms [18].

Secondary data were collected through documentary research, including academic journals indexed in national and international databases, as well as relevant dissertations and theses. Data analysis was conducted using a qualitative descriptive-analytical method, integrating normative legal analysis with judicial reasoning derived from case law. Methodological validity was ensured through source triangulation, consisting of normative legal materials, scholarly literature, and judicial decisions, in order to enhance the reliability and coherence of the analytical findings [16], [18].

4. Results and Discussion

Findings: The Configuration of Tiered Notarial Liability under Article 16 of the Notary Office Act

Based on normative and empirical analysis, notarial liability for errors in authentic deeds demonstrates a multidimensional and tiered configuration, with professional standards of conduct functioning as its central axis. Academic studies emphasize that the obligation of due care constitutes the primary benchmark for assessing notarial responsibility, while liability for losses arises when a breach of this standard results in legal harm to the parties [19].

The first layer of liability identified in this study is civil liability. Scholarly literature consistently classifies negligence in notarial practice as a form of unlawful conduct when it causes material losses and undermines legal certainty for the parties [20]. Empirical analyses of notarial disputes indicate that civil compensation claims represent the dominant form of accountability pursued by injured parties, reflecting the compensatory orientation of private law remedies [20], [21].

The second layer is administrative liability, which operates as an internal mechanism of professional discipline. Academic discussions describe administrative sanctions as corrective and preventive instruments aimed at ensuring compliance with professional standards, rather than as punitive measures [19]. This form of liability is typically triggered by procedural or formal deficiencies that compromise professional integrity, even where direct material losses have not yet occurred.

The third layer is criminal liability, which is applied restrictively and only in cases involving intent or conscious manipulation of legal facts. Scholarly consensus stresses that criminal sanctions against notaries are conceptually distinct from negligence based liability and should be limited to exceptional circumstances in order to avoid the criminalization of professional error [22]. This distinction reinforces the hierarchical nature of notarial liability, in which negligence primarily activates civil and administrative consequences, while intentional misconduct may escalate to criminal accountability.

Table 1. Synthesis of Research Findings

Aspect	Description
Key Findings	The key findings of this study indicate that notarial liability operates within a tiered framework. Notaries, as public officials, produce authentic deeds endowed with strong evidentiary value; however, both formal and substantive errors frequently result in annulment of deeds and legal liability. The analysis confirms that civil liability constitutes the primary mechanism of accountability, administrative liability functions as a disciplinary safeguard, and criminal liability remains residual and exceptional in nature [19], [21], [22]
Comparison with Previous Research	These findings are consistent with previous empirical studies that identify the dominance of civil claims in disputes involving notarial negligence [21]. Earlier research has similarly emphasized that substantive negligence represents the most common basis for compensation claims. However, this study diverges from scholarship that views criminal sanctions as largely symbolic by demonstrating that criminal liability retains practical relevance in cases involving intentional misconduct, albeit within narrowly defined boundaries [22]. The novelty of this research lies in its integrative analysis of professional negligence through a tiered liability framework, highlighting how civil, administrative, and criminal interact rather than operate in isolation.
Phenomena and Explanations	The predominance of civil liability may be explained by several structural factors. First, the absence of a mandatory professional insurance scheme places financial risk directly on individual notaries, incentivizing parties to pursue compensation through civil litigation [21]. Second, operational pressures in notarial practice increase the likelihood of negligence, particularly in high volume transactions. Third, weaknesses in supervision mechanisms limit the preventive effectiveness of administrative sanctions, allowing errors to escalate into disputes [19]. These phenomena suggest that the current liability framework, while normatively coherent, is unevenly implemented in practice.
Preliminary Conclusions	The findings of 4.1 indicate that the tiered configuration of notarial liability is conceptually sound but operationally fragile. Civil, administrative, and criminal liabilities form a hierarchical structure that responds to varying degrees of fault and harm. However, weaknesses in supervision and risk distribution mechanisms reduce the preventive effectiveness of this framework. Strengthening professional discipline and risk management is therefore essential to ensure that notarial liability functions

Aspect	Description
	not only as a reactive sanctioning system but also as a preventive safeguard for legal certainty.

Classification of Types of Errors in Notarial Authentic Deeds and Their Forms of Liability within the Framework of Article 16 of the Notary Office Act

Errors in notarial authentic deeds may be analytically classified into three main categories: formal errors, substantive errors, and negligence in digital verification. This classification reflects varying degrees of deviation from the professional duty of due care and corresponds to different configurations of legal liability. Scholarly literature emphasizes that such differentiation is essential to determine the appropriate form and intensity of legal responsibility borne by notaries [23].

- a. **Formal Errors: Violations of the Duty of Due Care:** Formal errors constitute defects in the external or procedural aspects of authentic deeds. Academic studies describe these errors as including inaccuracies in the identification of parties, deviations from prescribed drafting formats, or chronological inconsistencies that indicate insufficient prudence in the notarial process [23]. Although formal errors may appear minor in nature, they can undermine legal certainty and weaken the evidentiary reliability of authentic deeds. From the perspective of liability, formal errors primarily engage administrative responsibility, as they reflect shortcomings in professional discipline rather than intentional misconduct. Supervisory mechanisms are generally designed to address such deficiencies through corrective sanctions. Nevertheless, when formal errors result in demonstrable losses to the parties, they may escalate into civil liability, illustrating the progressive nature of notarial accountability.
- b. **Substantive Errors: The Basis for Compensation Claims:** Substantive errors refer to defects in the content of authentic deeds that directly affect the substance of the legal relationship between the parties. Scholarly literature identifies such errors as arising from the inclusion of clauses not fully understood by the parties, inaccuracies in the designation of contractual objects, or provisions that disproportionately disadvantage one party. Unlike formal errors, substantive defects directly interfere with the balance of rights and obligations agreed upon by the parties. Academic analyses consistently identify substantive errors as the principal basis for civil compensation claims against notaries [24]. In addition to civil liability, substantive errors may also trigger severe administrative sanctions. Where intent or collusion with one of the parties is established, substantive errors may further give rise to criminal liability, reflecting their more serious impact on legal certainty and fairness [25].
- c. **Negligence in Digital Verification, Testing the Meaning of Due Care in a New Era:** Negligence in digital verification represents an emerging category of notarial error associated with the increasing reliance on electronic systems. Academic discussions highlight risks related to the acceptance of fictitious electronic documents, insufficient scrutiny of digital identities, and excessive dependence on technological systems without adequate professional judgment [26]. Scholars argue that digitalization does not reduce notarial responsibility but instead necessitates a reinterpretation of the duty of due care. In the digital context, due care encompasses multilayered verification obligations that go beyond the mere examination of electronic documents [26], [27]. Consequently, liability arising from verification negligence is multidimensional, potentially encompassing administrative sanctions, civil compensation, and, in cases of gross negligence or recklessness, criminal liability.

Hierarchically, these three categories of errors illustrate the operational logic of professional responsibility under Article 16 of the Notary Office Act. The standard of due care functions as the normative baseline, while different forms of liability are activated depending on the nature of the error and the degree of fault involved. Scholarly synthesis supports a model of progressive liability, in which responsibility escalates from

administrative to civil and, in exceptional cases, criminal domains [27]. Nevertheless, divergent interpretations of due care, particularly in the digital context, indicate the persistence of an implementation gap that requires further normative clarification.

Practical Implications of the Application of Article 16 of the Notary Office Act for Strengthening the Integrity of the Notarial Profession

The application of professional responsibility standards in notarial practice carries significant financial implications, particularly through compensation mechanisms arising from professional negligence. Academic studies highlight that substantial compensation awards may threaten the financial sustainability of individual notarial practices, especially in the absence of structured risk-sharing mechanisms [28]. This condition positions civil liability not only as a remedial instrument but also as a latent financial risk that may affect professional independence.

In response to this vulnerability, scholarly discourse increasingly advocates the adoption of mandatory professional liability insurance for notaries as a balanced mechanism to protect both injured parties and professionals. Such insurance schemes are considered capable of distributing risk more equitably, ensuring the availability of compensation while preventing disproportionate financial burdens on individual notaries [29]. From a systemic perspective, professional insurance functions as a preventive tool by incentivizing compliance with professional standards and due care obligations. From an administrative standpoint, academic analyses identify persistent weaknesses in supervisory mechanisms governing notarial practice. Studies indicate that supervisory bodies often operate in a reactive manner, addressing violations only after disputes arise, rather than preventing them at an early stage. To strengthen preventive supervision, scholars propose the implementation of periodic digital audits, particularly for electronically supported notarial services. Digital audit mechanisms utilizing data analytics are viewed as effective tools for identifying early patterns of non-compliance and mitigating systemic risks [30].

The increasing reliance on electronic systems in notarial practice further necessitates the enhancement of professional competence in digital environments. Academic literature emphasizes that digitalization amplifies verification risks when professional judgment is subordinated to technological convenience. Consequently, mandatory digital competency certification is proposed as a preventive measure to ensure that notaries possess the skills required to exercise due care in technologically mediated transactions. Finally, the integration of advanced technologies in notarial services requires the establishment of clear technical standards to guide professional conduct. Scholarly discussions underscore the importance of standardized verification mechanisms and secure system integration to prevent identity manipulation and document falsification. Without such standards, technological innovation risks weakening rather than strengthening professional integrity [26].

Overall, the practical implementation of professional responsibility standards in notarial practice must be grounded in a systemic and preventive framework. Academic consensus suggests that insurance, supervision, certification, and technological safeguards should function as interconnected pillars of professional accountability. Through such an integrated approach, the application of Article 16 of the Notary Office Act may effectively enhance the integrity, sustainability, and public trust of the notarial profession in the digital era.

Research Limitations

This study is subject to several limitations that should be acknowledged. First, as a normative legal research, the analysis is predominantly prescriptive and doctrinal in nature. It relies on statutory interpretation, legal doctrine, and judicial reasoning, and therefore does not directly incorporate empirical perspectives from

notarial practitioners or service users. As a result, the findings primarily reflect normative coherence rather than lived professional experiences. Second, the case analysis is limited to a purposive selection of Supreme Court decisions. Although these decisions provide authoritative insight into the interpretation of notarial liability, they may not fully capture the diversity of jurisprudential developments related to the application of Article 16 of the Notary Office Act across different factual contexts. Consequently, the generalizability of the findings to all notarial disputes remains limited. Third, the policy recommendations proposed in this study, including preventive and systemic measures, are derived from doctrinal analysis and comparative academic literature. While conceptually relevant, these recommendations require further empirical assessment to evaluate their technical feasibility, institutional readiness, and compatibility with Indonesia's legal-political framework prior to implementation. Future research incorporating socio-legal or empirical approaches is therefore necessary to complement the normative findings of this study.

5. Conclusion

This study concludes that notarial liability for errors in authentic deeds operates within a tiered and progressive framework centered on the professional duty of due care under Article 16 of the Notary Office Act. Civil liability emerges as the dominant form of accountability, particularly in cases of substantive errors that directly affect the rights and obligations of the parties, while administrative liability functions as a corrective mechanism and criminal liability remains exceptional, limited to intentional misconduct. The classification of errors into formal errors, substantive errors, and negligence in digital verification demonstrates that technological developments have expanded the scope and complexity of notarial responsibility, necessitating a reinterpretation of due care in the digital context. Although the normative framework is conceptually adequate, its implementation remains uneven due to weaknesses in supervision, digital competence, and risk mitigation mechanisms. Accordingly, the effective strengthening of notarial integrity requires a systemic and preventive approach, whereby Article 16 functions not merely as a basis for post-factum liability but as an integrated instrument for ensuring legal certainty, professional accountability, and public trust in the notarial profession.

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