Journal of Frontiers in Multidisciplinary Research

Legal Protection for Customers in Delayed Payment Transactions through Qris (Quick Response Code Indonesian Standard) at Bank Bri KC Mataram

Baiq Dara Ginanthy Tunjungsari [1*], Kurniawan [2], Hirsanuddin [3]
[1-3] University of Mataram, Lombok, Indonesia

* Corresponding Author: **Baiq Dara Ginanthy Tunjungsari**

Article Info

E-ISSN: 3050-9726
P-ISSN: 3050-9718
Volume: 06
Issue: 01
January-June 2025
Received: 01-03-2025
Accepted: 02-04-2025
Published: 05-05-2025
Page No: 249-256

Abstract
This study analyzes the legal protection available to customers experiencing delayed payment transactions via the Quick Response Code Indonesian Standard (QRIS) at Bank BRI KC Mataram. It aims to identify the form of protection provided, the challenges encountered by users, and the bank's efforts in dispute resolution. The study employs a normative-empirical legal method, integrating statutory, conceptual, and sociological approaches. Data were collected through interviews with 10 customers and bank personnel, alongside a review of secondary sources, including Law No. 8 of 1999 on Consumer Protection, the Banking Law, and Bank Indonesia regulations on QRIS. Findings show that customer protection is embedded within a regulatory framework guaranteeing the right to safety, access to clear information, and complaint procedures. Nevertheless, significant obstacles remain, including unstable internet connectivity (60%), application failures (40%), phishing threats (20%), and low digital literacy (30%). Dispute resolution mechanisms include non-litigation methods—such as internal complaint services and LAPS SJK—as well as litigation, although the latter often involves lengthy processes. While Bank BRI KC Mataram has adopted a Service Level Agreement (SLA) and a fund restitution mechanism, these measures are hindered by bureaucratic inefficiencies and delayed responses. The study recommends strengthening regulatory frameworks to enforce stricter liability on service providers, enhancing digital infrastructure, and increasing customer education to support a more reliable and equitable digital payment ecosystem.

DOI: https://doi.org/10.54660/.IJFMR.2025.6.1.249-256

Keywords: legal protection, QRIS, delayed payments, banking, consumer rights

1. Introduction

Technological advances in the financial sector have had a major impact on the way people transact. Financial digitalization is now a global trend that not only makes payments easier but also increases efficiency and security. Technology-based payment systems such as *the Quick Response Code Indonesian Standard* are driving this transformation in Indonesia [1]. Introduced in 2019 by Bank Indonesia, *QRIS* unites various electronic payment platforms, allowing users to make transactions more practically through a single *QR code*. This standardization aims to expand the adoption of non-cash payments while encouraging financial inclusion in the community [2]. Bank BRI KC Mataram is one of the banks that actively supports financial digitalization in the West Nusa Tenggara region through the implementation of *QRIS*. With a wide network and solid customer base, Bank BRI

[1] Nisa, S., & Adinugraha , H., " The Effectiveness of the Implementation of the Quick Response Code Indonesia Standard (QRIS) Payment System for MSMEs ," Journal of Economics, Management, Accounting and Computer Applications , vol. 1, no. 1, (June 2024): p. 34-39.
[2] The Grace of Nida & Zainiyah Alfirdaus , " Driving Economic Growth via QRIS Adoption in Indonesia with Trust Moderating Variable ", Conference: 2024 3rd International Conference on Creative Communication and Innovative Technology (ICCIT) , (August 2024): p. 1-6.

plays an important role in introducing and promoting *QRIS* to the community.[3]

Although *QRIS* offers convenience in transactions, this system still faces a number of technical problems that have the potential to have a negative impact on consumers. One of the main problems is the risk of delays in payment transactions (*delayed payments*). System disruptions, limited internet infrastructure, and other technical obstacles often cause transaction failures, resulting in frustration for users. In addition, delays in payment confirmation create uncertainty about transaction status, reduce consumer confidence, and risk causing losses. This is exacerbated by the perception of security risks, such as potential fraud or errors, which makes users reluctant to use digital payments [4].

Consumer protection is a crucial element to ensure fairness and security in digital transactions. In Indonesia, Law No. 8 of 1999 concerning Consumer Protection regulates consumer protection. This regulation protects consumer rights, such as comfort, security, and safety when using goods or services, including QRIS-based digital payment services [5]. Consumer rights include clear information, protection from loss, and legal certainty, while business actors must provide reliable services. In the context of QRIS, these obligations include a reliable system, technical support, and fair dispute resolution. However, there are still gaps in consumer protection, especially regarding the understanding of rights and problem solving, so it is necessary to strengthen regulations and increase consumer awareness [6].

One of the national banks, BRI (PT Bank Rakyat Indonesia), supports the sophisticated QRIS [7]. *Quick Response Code Indonesian Standard) payment service. By providing this service, Bank BRI makes it easier for people to make payments without using cash directly, which is considered more efficient, faster, and safer*. Bank BRI has also been connected to various digital payment platforms, making QRIS an increasingly popular choice among the public [8]. QRIS is designed to improve transaction efficiency and security, but faces obstacles such as delayed payments. Transactions that fail to be processed automatically can cause delays in refunds and financial losses for consumers, especially in important transactions. This is a challenge to ensure the reliability and satisfaction of QRIS users [9]. BRI KC Mataram was chosen as the research location because the level of *QRIS usage* in the Mataram area is quite high. As of June 2024, there were 459,731 users and 10,567,331 transactions with a total value of 1.08 trillion [10]. As one of the main branches in West Nusa Tenggara, QRIS usage in West Nusa Tenggara is quite significant, with the potential for specific problems that provide in-depth insights into consumer protection in the region.

This study highlights the importance of identifying weaknesses in consumer protection related to transactions using *QRIS*, especially in terms of delayed payments. An in-depth analysis of this issue is expected to provide new insights that are useful for formulating more effective protection strategies. To ensure legal certainty in digital transactions, another major concern is the legal issues related to consumer rights and business actors' responsibilities.

Failure of payment transactions via QRIS can be detrimental to consumers, as happened when a customer paid at a cosmetics store located in Mataram City. Although the balance had been deducted, the funds did not enter the store's account, so the customer was asked to transfer again. After reporting to Bank BRI KC Mataram, the transaction was declared successful, but the store still did not receive the funds. The request for a bank statement as proof was hampered because the store had changed the bank providing QRIS, which indicated a problem in their system. The store also did not help resolve the problem, so the customer had to take care of it themselves with their bank. After almost three months and going through an appeal process, the funds were finally returned. This case shows the need for stricter regulations so that Payment System Service Providers (PJSP) who work with *merchants* are responsible for transaction failures, so that consumers are not harmed.

The formulation of the problem that will be discussed in this study is how is the legal protection for customers in delayed payment transactions through *QRIS* and how are the dispute resolution efforts made by Bank BRI KC Mataram in cases of delayed payment transactions through *QRIS*.

2. Research Methods

This study uses a type of legal research known as empirical normative legal research. Empirical normative legal research is a type of research that focuses on law as a set of rules or norms and how those rules are applied in society.

In supporting this research, it is not enough to just conduct a study of legal norms alone, but it is also necessary to consider and analyze their application in people's lives. In other words, the existence of law must be seen as an inseparable part of social reality and human behavior in society [11].

3. Discussion

A. Legal Protection for Customers in Delayed Payment Transactions Through QRIS at Bank BRI KC Mataram

switching institutions and payment service providers. Article 33 paragraph 1 of Bank Indonesia Regulation Number

[3] Suprapti *et al*., " Determinants of the Use of QRIS Application-Based Non-Cash Transactions for Consumers in Mataram City: An Application of the UTAUT 2 Model ", International Journal of Multidisciplinary Research and Analysis , vol. 7, no. 8, (August 2024): p. 3844-3853.

[4] Vina Rahmadani & Yuniarti, " Liability of Payment Service Providers in the Banking Sector in Transactions Using the Indonesian Standard QR Code (QRIS)", Jurist-Diction, vol. 6, no. 4, (October 2023): pp. 781-802.

[5] Achmad Zulfa Andikatama & Bambang Eko Turisno , " Consumer Protection Law in the Digital Era", International journal of social science and human research , vol. 7, no. 7, (July 2024): pp. 4552-4557.

[6] Mas Herryani, "Enhancing Legal Protection for Digital Transactions: Addressing Fraudulent QRIS System in Indonesia", Rechtsidee , vol. 11, no. 1, (June 2023): p. 1-12.

[7] Bank Rakyat Indonesia, "QRIS (Quick Response Code Indonesian Standard)", (2019), https://bri.co.id/qris. Accessed on December 16, 2024.

[8] Bank Rakyat Indonesia, " QRIS Customer Presented Mode Dynamic ", (2024) https://developers.bri.co.id/en/taxonomy/term/1471. Accessed on December 16, 2024.

[9] Fahrul Rozie, " Competitive Strategy of PT Bank Rakyat Indonesia (Persero) Tbk in the Qris (Quick Response Code Indonesian Standard) Based Payment System Service Business ", (Thesis, Gajah Mada University, 2022), p.61.

[10] ITradeCGSI, "Bank Indonesia: QRIS Usage Continues to Increase in Society" , (August 2024), https://itrade.cgsi.co.id/bank-indonesia-penggunaan-qris-terus-meningkat-di-masyarakat. Accessed on December 16, 2024.

[11] Muhaimin, Legal Research Methods , Mataram University Press , Mataram, 2020, p. 117.

18/40/PBI/2016 Concerning Payment Transaction Processing Providers stipulates that Bank Indonesia must supervise parties that do the same as payment system service providers in terms of processing *Quick Response Indonesia Standard (QRIS)* transactions. This supervision can include direct or indirect supervision. Indirect supervision Bank Indonesia can request information data, reports, documents, statements, or explanations regarding QRIS transaction processing. Meanwhile, direct supervision Bank Indonesia can conduct on-site inspections, either periodically or as needed [12].

Based on information collected from various BRI Bank customers, there are several cases related to *system errors* in the QRIS payment service provider application. This obstacle is considered very detrimental to consumers, as experienced by one of the following customers:

Based on the case experienced by a BRI Bank customer named PYF:

> *"Failure of payment transactions via QRIS can be detrimental to consumers. This happened when a customer made a payment at a cosmetics store in Mataram City. Although the balance had been deducted, the funds did not enter the store's account, so the customer was asked to transfer again. After reporting to the bank, the transaction was declared successful, but the store still did not receive the funds. The customer's efforts to obtain a bank statement as proof were hampered because the store had changed the bank providing QRIS, which indicated a problem in their system. Unfortunately, the store did not provide assistance in resolving this issue, so the customer had to take care of it themselves at the bank. After almost three months and going through an appeal process, the funds were finally returned."*

The problems in QRIS transactions experienced by BRI Bank customers indicate the existence of risks in the digital payment system that can harm consumers. Based on the Consumer Protection Law, business actors are required to guarantee transaction security and provide compensation for losses that occur. Payment Service Providers (PJP), such as BRI Bank, are responsible for ensuring that their systems function properly, while merchants must maintain the validity of the QRIS codes used. Consumers also play a role in verifying transactions to avoid errors or fraud. Solving problems like this requires strengthening the supervision system, increasing education for users, and a more efficient complaint mechanism so that legal protection for consumers can run optimally [13].

As explained above, it is very clear that customers who face problems with the QRIS system can be categorized as not in accordance with Article 4 letters a, c, and h. This is due to the fact that customers who should use the QRIS payment method quickly, easily, and conveniently instead face system problems that make it difficult. Then, consumers are asked to wait to get compensation because of this system constraint. Finally, users no longer use the QRIS method for payments because users complain that they are too busy to complete it because it is complicated.

On the other hand, the obligations of business actors are part of the fulfillment of consumer rights. Several obligations that must be fulfilled by business actors as regulated in Article 7 of Law Number 8 of 1999 concerning Consumer Protection, include the following: Act in good faith in carrying out its business activities, including in matters of repair and maintenance;

Provide accurate, clear and honest information regarding the condition and guarantee of goods and/or services, and provide an explanation regarding their use;

Serve consumers correctly, honestly and without discrimination;

Ensure the quality of goods and/or services produced or traded in accordance with applicable quality standards;

Providing consumers with the opportunity to test and/or try certain goods and/or services, as well as providing guarantees or warranties for goods produced or traded;

Provide compensation, restitution or replacement for losses experienced by consumers due to the use, consumption or utilization of traded goods and/or services;

Fulfill the obligation to pro compensation, damages or replacement in accordance with applicable provis According to the obligations of business actors as stated in Article 7 letters b and g of the UUPK mentioned above, business actors must ensure that they provide correct, clear, and honest information regarding the condition and guarantee of goods and services; provide explanations, use, repair, and maintenance; and pay compensation or replacement if the goods and services are received or used not in accordance with the agreement [14]. In this case, business actors are responsible for providing clear and correct information about the time of refund from system errors and providing an explanation of how to use, repair, and maintain QRIS Transactions.

Similar cases were also experienced by other consumers who used QRIS through the BRImo application. Quoting from mediakonsum, [15]

> *"It is explained that on October 19, 2024, a consumer user experienced a transaction failure when making a payment using QRIS via the BRImo application. Although the balance had been deducted, the transaction status remained "in process," so that the funds were not received by the recipient. Malik immediately reported the problem via the BRImo application and was asked to wait up to 14 working days, but until November 9, 2024, the problem had not been resolved. Repeatedly contacting BRI customer service via telephone and WhatsApp did not provide certainty regarding the refund, while Malik had to make a repayment to avoid delays. This condition poses a risk of double payment if the initial transaction is finally successful without confirmation, so Malik must independently take care of the refund to the recipient who is in a different location. This case shows the importance of the reliability of the digital payment system, transparency, and speed of handling by the bank in*

[13] Feni Freycinetia Fitriani, "BI: Misuse of QRIS is a Shared Responsibility", FINANCIAL , June 20, 2024, accessed at https://finansial.bisnis.com/read/20240620/563/1775764/bi-penyalahgunaan-qris-tanggung-jawab-bersama March 29, 2025.

[14] Hilman Panjaitan, Consumer Protection Law , Jala Permata Aksara, Jakarta, 2021, p. 85.

[15] Malik Arisony, "BRImo QRIS Transactions Are Problematic, Handling Takes a Very Long Time", November 11, accessed at https://mediakonsumen.com/2024/11/11/surat-pembaca/transaksi-qris-brimo-bermasalah-penanganannya-sangat-lama February 13, 2025.

resolving transaction disputes in order to maintain customer trust in digital banking services."

Consumer losses can be categorized into two, namely material and immaterial losses. Material losses occur due to failures or technical problems in the QRIS system, such as transactions that fail to be processed but funds are debited, double payments, or unrecorded transactions. Consumers also often have difficulty in submitting refunds due to complicated procedures or lack of responsiveness from service providers. [16]On the other hand, immaterial losses include time wasted while waiting for the refund process from the QRIS service provider. The uncertainty of the duration of complaint resolution and the lack of transparency from service providers increase consumer discomfort and dissatisfaction. In addition, consumers often experience stress and anxiety due to this uncertainty, which negatively impacts their overall experience in using QRIS services [17].
Based on an interview with the Head of BRI Mataram Branch, Mr. Felix:

"Bank BRI KC Mataram has ensured legal protection for customers in QRIS transactions by complying with regulations such as the Consumer Protection Law and Bank Indonesia regulations, covering material and immaterial aspects. This bank has a special internal team that handles customer complaints, including cases of delayed transactions or not accepted by merchants, by implementing a Service Level Agreement (SLA) to ensure fast and transparent problem resolution. In addition, BRI provides easily accessible complaint channels, such as call centers and mobile banking, to ensure customers can report problems and get timely responses. Although the complaint handling mechanism is structured, it is important to increase customer education regarding complaint rights and procedures so that legal protection can be felt more optimally. "

The statement of the Head of the BRI Mataram Branch, Mr. Felix, strengthens the argument that legal protection for customers in QRIS transactions has been clearly regulated through applicable regulations, including the Consumer Protection Law and Bank Indonesia regulations. The existence of a special internal team and the implementation of *the Service Level Agreement* (SLA) demonstrate the bank's commitment to handling complaints quickly and transparently, so as to provide legal certainty for customers. In addition, the provision of various complaint channels, such as call centers and mobile banking, reflects the bank's efforts to provide easier access for customers to submit complaints. However, even though the protection mechanism is available, its effectiveness depends on the customer's understanding of the rights and complaint procedures. Therefore, increasing education is an important aspect so that customers can be more proactive in protecting their rights, as well as ensuring that the legal protection that has been provided can truly be accessed and its benefits felt to the maximum.
The main factor causing the losses felt by consumers is the system problem in QRIS technology, which can cause consumer money to be stuck or even lost. Because this technology is internet-based and may experience problems or disruptions, service providers must consider this issue from the start. Another factor is the lack of supervision by Bank Indonesia. As the central bank, Bank Indonesia should be responsible for the stability of the banking sector and the country's overall financial system [18].
In order for users who make online transactions using the QRIS method not to be disadvantaged, there needs to be legal certainty regarding the constraints of this QRIS system. One of the requirements for law enforcement is legal certainty, according to Sudikno Mertokusumo: [19]

"*Legal certainty is very important to prevent arbitrary actions, which means that in certain situations someone can get something that is expected. To create public order, society expects legal certainty*."

Currently, Indonesia does not have a specific law that regulates legal certainty related to QRIS transactions. Law Number 11 of 2008 concerning Information and Electronic Transactions also cannot be used as an adequate legal basis to resolve problems related to QRIS constraints in online transactions. As an alternative, Law Number 8 of 1999 concerning Consumer Protection (UUPK) can be used as a reference because it aims to create a consumer protection system that includes elements of legal certainty, information transparency, and ease of access to obtain information when there is a system disruption, such as an error, when making transactions using QRIS [20].
In the implementation of mobile banking, other principles are also needed to support service regulations in accordance with the principle of customer trust to ensure safety and reliability, including the following: [21]

1) Principle of Legal Certainty

Provide a legal basis so that the use of mobile banking and everything that supports its operations is protected and legally recognized inside and outside the court.

2) Principle of Benefit

It is attempted to support the information process so that it can benefit the community through the use of information technology and electronic transactions.

3) Principle of Precaution

Responsible parties must fully understand the aspects that can cause harm to themselves and others when using information technology and conducting electronic transactions via *mobile banking applications*.

4) Principle of Good Faith

The parties carrying out the transaction do not intend to cause losses to the other party without the other party's knowledge.

5) Technology Neutrality Principle

[16] Bintari Rahmahwani Putri, "Consumer Protection for QRIS (Quick Response Code Indonesian Standard) Users for Students of the 2019 Class of the Faculty of Law, University of Jambi." Dissertation, Faculty of Law, University of Jambi, 2023, p.77.

[17] Muhammad Reivanut Tajuddin, "Consumer Protection for Users of the Quick Response Indonesian Standard (QRIS) Service Who Experience System Constraints." Dissertation , State Islamic University of Maulana Malik Ibrahim, 2023, p.48.

[18] Rachman, *et al*., "Challenges and Opportunities for QRIS Implementation as a Digital Payment System in Indonesia ", EkBis: Jurnal Ekonomi Dan Bisnis, vol. 8 no. 1 (June 2024): pp. 1-13.

[19] Fence M. Wantu, Introduction to Legal Science , UNG Press, Gorontalo, 2015, p. 5.

[20] Fitriah, "Legal Protection for Consumers in Buying and Selling Transactions Through Social Media", Solusi, vol. 18 no. 3 (September 2020), pp. 371-382.

[21] M. Djumnaha, Principles of Indonesian Banking Law, Citra Aditya, Bandung, 2008, p. 287.

Electronic transactions and the use of information technology do not focus on the use of certain technologies in order to keep up with future technological developments.

Legislation is needed to integrate and coordinate interests that may conflict with each other related to the principle of legal certainty. As a manifestation of providing trust to customers, the law can be present to provide preventive protection for customers in using banking services, especially mobile banking services. There is a need to provide legal protection to banking customers, who store their funds in banks, to prevent them from losing the benefits of banking services. The author argues that providing legal protection to customers is to protect customers and their savings from losses, and to maintain and preserve customer trust. Therefore, banking institutions must provide and guarantee legal protection to customers [22].

In relation to the results of the interview conducted by the author with the informant of the BRImo application user regarding the problem of failure to make payments at *merchants* using QRIS, then based on the principle of legal certainty, customers have the right to receive preventive legal protection to prevent violations from occurring. In Article 4 of Law No. 8 of 1999 concerning Consumer Protection, letter a states that consumer rights, including the right to comfort, security, and safety when consuming goods or services, and letter d states that consumers have the right to have their opinions and complaints heard about matters related to the goods or services used. In addition, letter e of the Consumer Protection Law states that consumers have the right to be represented. So in relation to the problems experienced by BRI Bank customers who use BRImo who experience failure when making payments using the QRIS feature at merchants, customers have the right to receive comfort from the services used when making payment transactions, to be heard by BRI Bank as a mobile banking provider.

Article 5 of Law Number 8 of 1999 concerning Consumer Protection stipulates consumer obligations as follows:

1) Read or follow the information instructions and procedures for using or utilizing goods or services for safety and security.
2) Have good intentions in carrying out transactions to purchase goods or services.
3) Pay according to the agreed exchange rate.
4) Following legal efforts to resolve consumer protection disputes.

Thus, after the customer has fulfilled his obligations, he is entitled to obtain the rights he has as a consumer of banking services.

In POJK Number 6/POJK.07/2022 concerning Consumer and Community Protection in the Financial Services Sector, the Financial Services Authority specifically regulates the protection of banking customers. Article 1 number 3 of POJK explains the definition of consumer protection which includes consumer protection against the behavior of financial service business actors, and Article 2 of POJK regulates the principles of implementing consumer protection such as: [23]

1) Transparency

Customer information about products and services is clear, complete, and uses language that is easy for all customers to understand.

2) Fair treatment

Treat consumers fairly and do not discriminate based on ethnicity, race, or religion.

3) Reliability

Providing appropriate services through reliable infrastructure, systems, procedures and human resources in their fields.

4) Confidentiality

Providing protection and maintaining the confidentiality and security of customer data and using it in accordance with the interests and objectives agreed upon by the customer.

Consumer protection will be successful if these principles are applied consistently and implemented with good intentions by business actors and consumers in the financial services sector. In general, efforts made to protect consumers are to increase customer trust and provide opportunities for banking business actors to develop. The problem of transaction failure experienced by BRI bank customers when making payments to merchants using the QRIS application is entitled to transparency on the problems faced and to be provided with complaint services that can then be followed up by the bank. In 12/POJK.03/2018 concerning the Implementation of Digital Banking Services in Article 21 paragraph 1 states that:

> *"Banks providing digital banking services are required to implement consumer protection principles as referred to in laws and regulations regarding consumer protection in the financial services sector."*

Banking customers have the right to receive legal protection in accordance with the losses experienced by being given a resolution to the problem until it is resolved or compensation is given. In order to resolve disputes or problems experienced by customers, there is repressive legal protection implemented through:

1) Customer Complaints Service

The Financial Services Authority provides specific regulations regarding customer complaint services as a step to provide repressive legal protection in POJK No. 18/POJK.07/2018 concerning Consumer Complaint Services in the Financial Sector. The scope of complaint services includes receiving, handling, and resolving complaints. BRI as a banking business actor provides complaint services to its customers both directly through BRI bank customer service and can be accessed through the BRImo mobile banking application.

2) Alternative Institution for Financial Services Sector Dispute Resolution (LAPS SJK)

OJK builds a basis and procedure for dispute resolution for the financial services sector, which can be accommodated by the Alternative Institution for Dispute Resolution in the Financial Services Sector (LAPS SJK) to realize fast, fair, and inexpensive dispute resolution. By providing services such as mediation, adjudication, and arbitration, this institution helps business actors and customers in resolving banking problems. In mediation services, LAPS SJK helps banks and customers to reach a peace agreement assisted by

[22] Taurus, *et al*., "Legal Protection for Customers in the Use of Personal Data by Banks for Commercial Purposes to Third Parties", Jurnal Ilmiah Indonesia , vol. 8 no. 10, (October 2023): p. 5745.

[23] Hermansyah, Indonesian National Banking Law , Kencana, Jakarta, 2005, p.125.

a mediator. Adjudication services can also be used to resolve disputes outside of arbitration and court so that they can be accepted and binding on the parties. In addition, arbitration services provide civil settlement in the banking sector based on an arbitration agreement made by the disputing parties in writing.

3) Dispute Resolution through Court

If the internal resolution by the financial services institution does not satisfy the customer, the customer can take other resolution efforts through litigation. If the customer chooses to litigate, they can file a civil lawsuit in the district court. In this repressive protection, if the claim filed by the customer is proven to be detrimental to the customer, the bank can be subject to sanctions in the form of compensation to the customer.

B. Form of Legal Accountability in Settlement of Delayed QRIS Transaction Disputes at BRI Bank KC Mataram

As a form of primary accountability in resolving disputes over delayed QRIS transactions, Bank BRI KC Mataram has implemented a direct fund reimbursement mechanism for merchants. This mechanism uses special reserve funds that have been prepared by the bank to anticipate various possible system failures, including unprocessed QRIS transactions. However, in practice, the standard procedure that should apply, namely through an escalation process to the head office for authorization of refunds, actually creates time inefficiency. In fact, this procedure has been stated in Bank BRI's *Standard Operating Procedure* (SOP). Facts on the ground show that this standard mechanism is rarely applied due to the length of the bureaucratic process, so banks prefer a quick solution through the use of reserve funds [24].

Based on the results of the interview conducted with Mr. Bagus as BRI Mataram staff, he stated that:

> *"If the loss stated by the customer in the complaint report is due to an error on the part of the bank as the organizer of the mobile banking application, BRI Bank is willing to take responsibility in the form of a refund in accordance with the transaction nominal of the customer's transaction failure loss"* [25].

The compensation will be given if in the problem solving process it is discovered that the cause of the transaction failure was due to a bank system error so that the transaction was declared a failure but the balance had been debited, because basically based on Article 19 of the Consumer Protection Law and Article 15 of the Information and Electronic Transactions Law, the principle of implementing the responsibility to provide compensation can be given if the error due to the bank is proven.

Based on research findings, Bank BRI KC Mataram has implemented a dispute resolution mechanism related to delayed payment transactions via QRIS with a preventive and repressive legal protection approach. Preventive protection is realized through the fulfillment of customer rights based on the provisions of Law No. 8 of 1999 concerning Consumer Protection, which guarantees customer security and comfort in making transactions. In addition, Bank BRI is also guided by POJK No. 6/POJK.07/2022 concerning Consumer Protection in the Financial Services Sector, which requires financial institutions to provide transparent information and an easily accessible complaint mechanism. On the other hand, repressive protection is provided through two resolution channels, namely non-litigation and litigation. The non-litigation channel is taken through the customer complaint service available on the BRImo application or through the bank's customer service. If internal resolution does not reach an agreement, customers can submit a dispute resolution to the SJK Alternative Dispute Resolution Institution (LAPS), as regulated in POJK No. 1/POJK.07/2014. Meanwhile, litigation can be carried out through a civil lawsuit in court if non-litigation efforts do not produce results.

This study also revealed that Bank BRI KC Mataram is willing to provide compensation to customers who experience losses due to failed QRIS transactions as a form of accountability. The restitution process is generally carried out after the bank's internal investigation confirms that there is a technical error or negligence on the part of the bank. However, in some cases, the length of the verification process is an obstacle that is often complained about by customers, so improvements to the complaint response system are needed to minimize customer dissatisfaction.

Overall, this study concludes that the dispute resolution efforts by Bank BRI KC Mataram have met the applicable legal aspects, but there is still room for improving the quality of complaint services and efficiency of resolution time. Recommendations that can be given include optimizing the complaint handling system, employee training in handling disputes, and collaboration with Bank Indonesia and OJK to ensure that customer protection standards are consistently applied. Thus, it is hoped that customer trust in QRIS-based digital transactions can continue to increase.

Bank BRI KC Mataram has designed a number of dispute resolution mechanisms for customers who experience obstacles, especially related to delayed payment transactions via QRIS. This resolution effort aims to provide justice and legal protection for customers in accordance with the provisions of Law No. 8 of 1999 concerning Consumer Protection and other banking regulations.

First, Bank BRI has a complaint service unit that is tasked with receiving and handling customer complaints. Complaints can be submitted directly at the branch office, via telephone, email, or the BRImo application. In the case of pending transactions, customers are asked to show proof of balance deductions and a chronology of events. This complaint service operates with the principles of openness and accountability, and has a target of completion within a maximum of 20 working days.

Second, the bank conducts an internal investigation to verify the transaction status. This process includes checking the QRIS transaction system, confirming to the merchant, and synchronizing with the switching service provider. The bank also coordinates with QRIS provider partners such as Artajasa or other switching providers to ensure the validity of the transaction data. If there is evidence of interference, the bank will issue a failed transaction certificate as a basis for a refund.

Third, if necessary, the bank will contact the relevant merchant to request cooperation in completing the transaction. In many cases, obstacles arise due to merchants

[24] Karenina Maheswari Wihita , Op., cit., p. 870.

[25] Interview Results with Mr. Bagus, Staff of Bank BRI Mataram, March 4, 2025.

who have not updated the backend system or do not understand the QRIS SOP. Therefore, BRI KC Mataram is also actively approaching merchants through regular education and socialization. The bank emphasizes that merchants also have a responsibility to ensure that their digital payment systems function properly.

Fourth, for customers who are not satisfied with the settlement results from the bank, an escalation path is provided to external institutions such as the Alternative Dispute Resolution Institution for the Financial Services Sector (LAPS SJK) or even Bank Indonesia. Bank BRI KC Mataram provides guidance to customers to access mediation or arbitration services through LAPS SJK if needed. This shows the bank's commitment to transparency and fairness in handling disputes.

Fifth, in order to prevent future disputes, Bank BRI KC Mataram strengthens the transaction monitoring system and early warning system for potential errors in QRIS transactions. The bank also increases training for staff related to customer service standards, and expands access to information to customers through brochures, social media, and digital education.

Based on these various efforts, Bank BRI KC Mataram shows that they are not only responsible in providing digital financial services, but also have a reliable mechanism in protecting customer rights. Fast, fair, and transparent dispute resolution is an important indicator in maintaining public trust in the QRIS-based payment system.

4. Conclusion

Based on the discussion above, it can be concluded that legal protection for customers in delayed payment transactions via QRIS at Bank BRI KC Mataram is carried out through two approaches, namely preventive and repressive. Preventively, customers are protected by their rights in accordance with Law No. 8 of 1999 concerning Consumer Protection, POJK No. 6 / POJK.07 / 2022, and POJK No. 12 / POJK.03 / 2018, which include the right to comfort, security, submission of complaints, and advocacy and dispute resolution. Repressive protection is carried out through non-litigation channels (such as customer complaint services and LAPS SJK) and litigation (civil lawsuits to court). Dispute resolution carried out by Bank BRI KC Mataram in cases of delayed payment transactions via QRIS by providing a problem-solving mechanism related to failed QRIS transactions in several ways: (1) customer service that follows the bank's standard work procedures, (2) an integrated complaint feature in the BRImo application as a one-stop solution, and (3) compliance with regulations such as POJK No. 18/POJK.07/2018, PBI No. 10/10/2008, and SE OJK No. 2/SEOJK.07/2014 which regulates the complaint resolution deadline of 20 working days. Based on Article 1365 of the Civil Code and Law No. 8 of 1999, BRI is required to provide compensation if the transaction failure is caused by a bank system error, while customers are not entitled to sue if the error is on their own part. The implementation of risk management in accordance with POJK No. 38/POJK.03/2016 is also carried out to anticipate technical problems in mobile services banking.

5. References

1. Wantu FM. Introduction to Legal Science. Gorontalo: UNG Press; 2015.
2. Hermansyah. Indonesian National Banking Law. Jakarta: Kencana; 2005.
3. Panjaitan H. Consumer Protection Law. Jakarta: Jala Permata Aksara; 2021.
4. Djumnaha M. Principles of Indonesian Banking Law. Bandung: Citra Aditya; 2008.
5. Muhaimin. Legal Research Methods. Mataram: Mataram University Press; 2020.
6. Andikatama AZ, Turisno BE. Consumer Protection Law in the Digital Era. Int J Soc Sci Human Res. 2024;7(7).
7. Fitriah. Legal Protection for Consumers in Buying and Selling Transactions Through Social Media. Solusi. 2020;18(3).
8. Herryani M. Enhancing Legal Protection for Digital Transactions: Addressing Fraudulent QRIS System in Indonesia. Rechtsidee. 2023;11(1).
9. Nisa S, Adinugraha H. The Effectiveness of the Implementation of the Quick Response Code Indonesia Standard (QRIS) Payment System for MSMEs. J Econ Manag Account Comput Appl. 2024;1(1).
10. Rachman, *et al*. Challenges and Opportunities for QRIS Implementation as a Digital Payment System in Indonesia. EkBis: J Ekon Dan Bisnis. 2024;8(1).
11. Nida R, Alfirdaus Z. Driving Economic Growth via QRIS Adoption in Indonesia with Trust Moderating Variable. In: Proc 3rd Int Conf Creative Commun Innov Technol (ICCIT); 2024 Aug.
12. Suprapti, *et al*. Determinants of the Use of QRIS Application-Based Non-Cash Transactions for Consumers in Mataram City: An Application of the UTAUT 2 Model. Int J Multidiscip Res Anal. 2024;7(8).
13. Taurus, *et al*. Legal Protection for Customers in the Use of Personal Data by Banks for Commercial Purposes to Third Parties. J Ilm Indones. 2023;8(10).
14. Rahmadani V, Yuniarti. Liability of Payment Service Providers in the Banking Sector in Transactions Using the Indonesian Standard QR Code (QRIS). Jurist-Diction. 2023;6(4).
15. Putri BR. Consumer Protection for QRIS (Quick Response Code Indonesian Standard) Users for Students of the 2019 Class of the Faculty of Law, University of Jambi [dissertation]. Jambi: University of Jambi; 2023.
16. Rozie F. Competitive Strategy of PT Bank Rakyat Indonesia (Persero) Tbk in the Qris (Quick Response Code Indonesian Standard) Based Payment System Service Business [thesis]. Yogyakarta: Gajah Mada University; 2022.
17. Tajuddin MR. Consumer Protection for Users of Quick Response Indonesian Standard (QRIS) Services Who Experience System Constraints [dissertation]. Malang: State Islamic University of Maulana Malik Ibrahim; 2023.
18. Bank Rakyat Indonesia. QRIS (Quick Response Code Indonesian Standard). 2019 [cited 2024 Dec 16]. Available from: https://bri.co.id/qris
19. Bank Rakyat Indonesia. QRIS Customer Presented Mode Dynamic. 2024 [cited 2024 Dec 16]. Available from: https://developers.bri.co.id/en/taxonomy/term/1471
20. Fitriani FF. BI: Misuse of QRIS is a Shared Responsibility. Financial. 2024 Jun 20 [cited 2025 Mar 29]. Available from: https://finansial.bisnis.com/read/20240620/563/1775764/bi-penyalahgunaan-qris-tanggung-jawab-bersama
21. ITrade CGSI. Bank Indonesia: QRIS Usage Continues to Increase in Society. 2024 Aug [cited 2024 Dec 16].

Available from: https://itrade.cgsi.co.id/bank-indonesia-penggunaan-qris-terus-meningkat-di-masyarakat
22. Arisony M. BRImo QRIS Transactions Are Problematic, Handling Takes a Very Long Time. 2024 Nov 11 [cited 2025 Feb 13]. Available from: https://mediakonsumen.com/2024/11/11/surat-pembaca/transaksi-qris-brimo-bermasalah-penanganannya-sangat-lama
23. The 1945 Constitution of the Republic of Indonesia.
24. Law Number 8 of 1999 concerning Consumer Protection. LN No.42 of 1999, TLN No.3821.
25. Law Number 10 of 1998 concerning Banking. LN No.18 of 1998, TLN No.3251.
26. Regulation of the Members of the Board of Governors Number 24/1/PADG/2022 concerning the Second Amendment to Regulation Number 21/18/PADG/2019 on the Implementation of the National Standard Quick Response Code for Payments.
27. Bank Indonesia Regulation Number 22/20/PBI/2020 concerning QRIS Standards.
28. Regulation of the Member of the Board of Governors Number 21/18 of 2019 concerning the Implementation of the National Standard Quick Response Code for Payments.
29. Regulation of the Member of the Board of Governors Number 21/18 of 2019 concerning the Implementation of the National Standard Quick Response Code for Payments.
30. Financial Services Authority (OJK) Regulation No.01/POJK.07/2013 concerning Consumer Protection in the Financial Services Sector.
31. Interview with Mr. Felix, Head of BRI Mataram Branch Office; 2025 Mar 3.
32. Interview with Mr. Bagus, Staff of Bank BRI Mataram; 2025 Mar 4.