OPTIMIZATION OF THE ROLE OF THE COOPERATIVE AND SMALL-MEDIUM ENTERPRISE AGENCY OF EAST JAVA PROVINCE IN SUPERVISING THE OBLIGATION OF ANNUAL MEMBER MEETING (RAT) IMPLEMENTATION BY COOPERATIVES: A PERSPECTIVE OF POSITIVE LAW AND MASLAHAH

THESIS

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MALANG

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2026

DECLARATION OF THESIS AUTHENTICITY

In the name of Allah,

With full awareness and a sense of responsibility toward the development of knowledge, the author hereby declares that the thesis entitled:

OPTIMIZATION OF THE ROLE OF THE COOPERATIVE AND SMALL-MEDIUM ENTERPRISE AGENCY OF EAST JAVA PROVINCE IN SUPERVISING THE OBLIGATION OF ANNUAL MEMBER MEETING (RAT) IMPLEMENTATION BY COOPERATIVES: A PERSPECTIVE OF POSITIVE LAW AND MASLAHAH

This thesis has been entirely written independently in accordance with the principle of academic writing and is fully accountable. Should it later be proven that this research report constitutes plagiarism, either in part or in whole, of another person's work, then this thesis, submitted as a requirement for obtaining a bachelor's degree, shall be declared null and void by law.

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The advisor hereby declares that the thesis has fulfilled the scientific requirements to be submitted and examined by the Board of Examiners.

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MOTTO

"Maka sesungguhnya bersama kesulitan ada kemudahan. Maka apabila engkau telah selesai (dari suatu urusan), tetaplah bekerja keras (untuk urusan yang lain). Dan hanya kepada Allah lah engkau berharap."

Q.S Al-Insyirah: 6-8

"Let your dreams be bigger than your fears."

"The road may be long, but every turn brings the joy of progress,

keep pedaling!"

PREFACE

بِسْمِ اللّٰهِ الرَّحْمٰنِ الرَّحِيمِ

Alhamdulillahirabbil' alamin All praise is due to Allah, Lord of the worlds, for His mercy and guidance that have enabled the completion of this research entitled "Optimization Of The Role Of The Cooperative And Small-Medium Enterprise Agency Of East Java Province In Supervising The Obligation Of Annual Member Meeting (RAT) Implementation By Cooperatives: A Perspective Of Positive Law And Maslahah" It is hoped that this study will provide benefits both to the researcher and to its readers. Peace and blessings be upon Prophet Muhammad (peace be upon him), who has guided humanity from darkness into the light.

With the invaluable guidance, supervision, and support provided by various parties during the completion of this thesis, the author would like to extend sincere appreciation to:

1. Prof. Dr. Hj. Ilfi Nur Diana, M. Si., as the Rector of Maulana Malik Ibrahim State Islamic University of Malang
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3. Dwi Hidayatul Firdaus, S.HI., M.SI., as the Head of the Department of Sharia Economic Law
4. Aditya Prastian Supriyadi, S.H., M.H. as the author's academic advisor. Thank you for guiding my academic journey since the

beginning of my studies, as well as for your invaluable contributions, insights, and motivation that helped refine this thesis research.

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6. All lecturers of the Faculty of Sharia for their dedication and knowledge which have greatly contributed to the author’s academic
7. All staff and employees of the Faculty of Sharia, Maulana Malik Ibrahim State Islamic University of Malang, for their participation and support
8. My sincere thanks to the Department of Cooperatives and SMEs of East Java Province for the opportunity and support given to the author during the completion of this thesis. This research would not have been possible without your cooperation and willingness to share your insights. The author hopes that this thesis can contribute, even in a small way, and reflect the knowledge gained from this experience.
9. This thesis and this degree are dedicated to the unsung hero of my life: Mama. Thank you, for being my greatest teacher and for all your endless sacrifices, from your hard work and your endless prayers, to being my main support who provided everything. I wouldn't have made it this far without your love and blessings. To Ayah and Adik Riza, thank you for unlimited support in every form, which have continuously strengthened the writer until this final project was

completed with gratitude. This achievement is nothing compared to everything you've done for me, but I hope this can be the start of me making you all proud. Also, a huge thank you to my big family for all the prayers and support along the way.

10. To all those whom the author cannot mention one by one, who have provided support, both moral and material, those who have played a role, struggled, and contributed together from the beginning of this academic journey until the moment these words are written. The author fully realizes that "people come and go," where every individual who appears brings meaning, imparts lessons, and leaves behind memories that may be unseen, yet remain eternal in shaping one's growth. Through all of this, I've learned that every bit of support, no matter how small, is part of something meant to be. Therefore, mere words of gratitude will never be sufficient to repay your sincerity. It is the author's sincere hope that the kindness you have sown will bear blessings and accompany every step you take toward the success you pursue.
11. Lastly, I want to thank myself, the first daughter and her parents' hope. Thank you for being here, for making it this far, and for not giving up through everything life has thrown your way. Thank you for staying, even when things felt heavy, when doubts kept coming, and when the road ahead wasn't clear. Thank you for choosing to keep going, even when you didn't really know where this path would lead. Thank you

for being there for yourself, in the quiet moments, in the exhaustion, and in all the unanswered questions. Thank you for trusting the process, even when things didn’t turn out the way you hoped, through the failures, the confusion, and even the moments when you felt like giving up. Thank you for being honest about your fears without letting them stop you, for understanding that being brave doesn’t mean not being afraid, but choosing to move forward anyway. And most of all, thank you for having the courage to choose, to try, to learn, and to finish what you started. Keep going, there’s nothing more beautiful than witnessing your own process and growth.

The author is fully aware that this thesis still contains shortcomings. It is earnestly hoped that this thesis will provide meaningful contribution to the development of knowledge and insight. Therefore, any constructive feedback and suggestions from readers are warmly welcomed to help improve this work.

Malang, 11th of May 2026
Author

Nabila Eka Amelia
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TRANSLITERATION GUIDELINES

In the writing of scientific papers, the use of foreign terms is often inevitable. According to the General Guidelines for Indonesian Spelling, foreign words are generally written in italics. For Arabic terms, there are specific transliteration guidelines that apply internationally. The following table presents these transliteration guidelines as a reference for academic writing. The Arabic–Indonesian transliteration system used by the Faculty of Sharia at Maulana Malik Ibrahim State Islamic University of Malang follows the Library of Congress (LC) model of the United States, as outlined below:

Arab	Indonesia	Arab	Indonesia
ا	.	ط	T
ب	B	ظ	Z
ت	T	ع	.
ث	Th	غ	Gh
ج	J	ف	F
ح	H	ق	Q
خ	Kh	ك	K
د	D	ل	L
ذ	Dh	م	M
ر	R	ن	N
ز	Z	و	W
س	S	ه	H
ش	Sh	ء	.

Arab	Indonesia	Arab	Indonesia
ص	S	ي	y
ض	D		

To indicate a long vowel sound (madd), a horizontal line is placed above the letter, as in ā, ī, and ū (أ, ي, و). Arabic diphthongs are transliterated by combining the letters “ay” and “aw,” as in layyinah and lawwāmah. Words ending in tā’ marbūṭah that function as adjectives or muḍāf ilayh are transliterated with “ah,” while those functioning as muḍāf are transliterated with “at.

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ABSTRAK

Amelia, Nabila Eka. NIM 220202110181. **Optimalisasi Peran Dinas Koperasi dan Usaha Kecil Menengah Provinsi Jawa Timur Dalam Mengawasi Kewajiban Pelaksanaan Rapat Anggota Tahunan (RAT) Oleh Koperasi Perspektif Hukum Positif dan Maslahah**, Skripsi, Program Studi Hukum Ekonomi Syariah, Fakultas Syariah, Universitas Islam Negeri Maulana Malik Ibrahim Malang, Pembimbing: Ramadhita, M. HI

Kata Kunci: *Optimalisasi, Pengawasan, Rapat Anggota Tahunan (RAT), Koperasi, Hukum Positif, Maslahah*

Koperasi merupakan badan usaha berbasis ekonomi kerakyatan yang wajib melaksanakan Rapat Anggota Tahunan (RAT) sebagai bentuk akuntabilitas dan transparansi pengelolaan kepada anggota, sebagaimana diamanatkan Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian. Namun, data Online Data System (ODS) per 31 Maret 2026 menunjukkan bahwa dari 29.219 koperasi aktif di Jawa Timur, hanya sekitar 43,8% yang telah melaporkan pelaksanaan RAT. Kondisi ini mencerminkan lemahnya kepatuhan koperasi dan menandakan bahwa fungsi pengawasan oleh Dinas Koperasi dan UKM Provinsi Jawa Timur belum berjalan secara optimal.

Penelitian ini bertujuan untuk mengkaji dan menganalisis peran Dinas Koperasi dan UKM Provinsi Jawa Timur dalam mengawasi kewajiban pelaksanaan RAT oleh koperasi berdasarkan perspektif hukum positif, serta menganalisis optimalisasi peran tersebut ditinjau dari konsep maslahah dalam hukum Islam.

Penelitian ini menggunakan metode yuridis empiris dengan pendekatan sosiologis dan pendekatan perundang-undangan (statute approach). Data primer diperoleh melalui wawancara dengan Ketua Tim Kerja Pengawasan dan Akuntabilitas Dinas Koperasi dan UKM Provinsi Jawa Timur, sedangkan data sekunder bersumber dari peraturan perundang-undangan, dokumen resmi, dan Laporan Akuntabilitas Kinerja Instansi Pemerintah (LAKIP) Tahun 2025. Data dianalisis secara deskriptif kualitatif.

Hasil penelitian menunjukkan bahwa Dinas Koperasi dan UKM Provinsi Jawa Timur telah menjalankan fungsi pengawasan RAT melalui mekanisme pemberitahuan, monitoring berkala, pendampingan, verifikasi laporan ODS, dan tindak lanjut, meskipun lebih dominan secara off-site akibat keterbatasan SDM dan anggaran. Kendala utama meliputi rendahnya kesadaran hukum pengurus koperasi, keterbatasan sumber daya, luas wilayah pengawasan, serta belum adanya peraturan gubernur yang secara khusus mengatur mekanisme teknis pengawasan RAT. Ditinjau dari perspektif maslahah Asy-Syatibi, pengawasan RAT termasuk kategori daruriyyat karena berkaitan langsung dengan hifz al-mal (pemeliharaan harta) anggota koperasi. Absennya RAT menimbulkan mafsadah nyata bagi anggota, sehingga optimalisasi pengawasan merupakan kewajiban ulil amri yang mendesak guna melindungi hak-hak anggota koperasi secara berkeadilan.

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ABSTRACT

Amelia, Nabila Eka. SID 220202110181. **Optimization Of The Role Of The Cooperative And Small-Medium Enterprise Agency Of East Java Province In Supervising The Obligation Of Annual Member Meeting (RAT) Implementation By Cooperatives: A Perspective Of Positive Law And Maslahah,** Thesis, Department of Sharia Economic Law, Faculty of Sharia, Maulana Malik Ibrahim State Islamic University Malang, Thesis Advisor: Ramadhita, M.HI.

Keywords: *Optimization, Supervision, Annual Members Meeting (RAT), Cooperative, Positive Law, Maslahah.*

In Indonesia, the Underpayment Tax Assessment Letter (SKPKB) serves as a corrective tool to address errors in taxpayers' declarations identified by the tax authorities. However, in certain cases, SKPKBs have been issued beyond the five-year statute of limitations established under Law No. 28 of 2007 on General Provisions and Tax Procedures. This practice raises significant concerns regarding legal certainty and fairness, as it contravenes administrative law principles that require government actions to have a clear legal basis and adhere to prescribed timelines.

This study examines the legality of issuing SKPKBs beyond the expiration period from the perspective of legal certainty and evaluates this practice using the fiqh principle of *Dar'ul Mafāsid Muqaddamun 'Alā Jalbil Maṣāliḥ*. Employing a normative juridical approach, the research draws on statutory analysis, conceptual review, and fiqh-based interpretation. Data sources include primary legal materials such as legislation and fiqh texts, secondary sources including books and journal articles, and tertiary sources such as court decisions and official government websites.

Findings indicate that issuing SKPKBs after the five-year limit undermines legal certainty by creating unpredictability for taxpayers and diminishing the credibility of the tax authorities. From an Islamic law perspective, this practice contradicts the principle of *Dar'ul Mafāsid Muqaddamun 'Alā Jalbil Maṣāliḥ*, as it generates harm in the form of legal injustice and loss of public trust, while the intended benefits are insufficient to justify the negative consequences. Consequently, tax policy should prioritize legal certainty in accordance with Islamic principles of justice and public welfare to ensure a fair, accountable, and ethically grounded taxation system.

ملخص البحث

أميليا، نبيلة إيكا. رقم القيد: ٢٢٠٢٠٢١١٠١٨١. **تعظيم دور دائرة التعاونيات والمشروعات الصغيرة والمتوسطة في مقاطعة جاوة الشرقية في الرقابة على الالتزام بتنفيذ الاجتماع السنوي للأعضاء (RAT) من قبل التعاونيات من منظور القانون الوضعي والمصلحة،** بحث تخرج في برنامج دراسة قانون الاقتصاد الشرعي، كلية الشريعة، الجامعة الإسلامية الحكومية مولانا مالك إبراهيم مالانج، بإشراف: Ramadhita, M. HI

الكلمات المفتاحية: التعظيم، الرقابة، الاجتماع السنوي للأعضاء(RAT) ، التعاونيات، القانون الوضعي، المصلحة.

تُعَدُّ التعاونيات مؤسساتٍ اقتصاديةً قائمةً على الاقتصاد الشعبي، ويتوجّب عليها عقد الاجتماع السنوي للأعضاء (RAT) بوصفه وسيلةً للمساءلة والشفافية، وفقاً للقانون رقم ٢٥ لسنة ١٩٩٢ بشأن التعاونيات. غير أنّ بيانات نظام البيانات الإلكتروني (ODS) حتى ٣١ مارس ٢٠٢٦ أظهرت أنّ من أصل ٢٩,٢١٩ تعاونية نشطة في جاوة الشرقية، لم تُنفّذ الاجتماع السنوي سوى ٤٣,٨٪ فقط، مما يدلّ على ضعف التزام التعاونيات وعدم فعالية الرقابة من قبل دائرة التعاونيات والمشروعات الصغيرة والمتوسطة في جاوة الشرقية.

يهدف هذا البحث إلى تحليل دور دائرة التعاونيات والمشروعات الصغيرة والمتوسطة في الرقابة على تنفيذ الاجتماع السنوي للأعضاء من منظور القانون الوضعي، وبيان مدى فعالية هذا الدور في ضوء مفهوم المصلحة في الفقه الإسلامي. واعتمد البحث المنهج القانوني التجريبي بالمقاربة السوسيولوجية والتشريعية*(statute approach)* ، مع تحليل البيانات تحليلاً وصفياً نوعياً استناداً إلى المقابلات والوثائق الرسمية وتقرير (LAKIP) لعام ٢٠٢٥.

وأظهرت النتائج أنّ الرقابة على تنفيذ الاجتماع السنوي تتمّ من خلال الإشعار، والمتابعة، والإرشاد، والتحقق من تقارير (ODS)، إلا أنّها لا تزال تواجه عدداً من العقبات، مثل ضعف الوعي القانوني، ومحدودية الموارد، وعدم وجود لائحة خاصة تنظّم آليات الرقابة. ومن منظور الشاطبي، تُعَدّ هذه الرقابة من الضروريات لارتباطها بحفظ المال (حفظ المال)، إذ إنّ غياب الاجتماع السنوي قد يسبّب ضرراً للأعضاء، مما يجعل تعزيز الرقابة أمراً ضرورياً لحماية حقوقهم.

CHAPTER I

INTRODUCTION

A. Background

Cooperatives constitute business entities founded upon the principles of a people-based economy and kinship as mandated under Law Number 25 of 1992 concerning Cooperatives.[1] As legal entities, cooperatives bear an absolute obligation to convene an Annual Members' Meeting (RAT) as a manifestation of the management's accountability to the members. Article 26 of the Cooperative Law expressly stipulates that the RAT holds the highest authority within cooperative governance and must be conducted at least once in every financial year as a form of transparency and accountability in cooperative management.[2]

The urgency of conducting the RAT is not merely administrative in nature, but also substantive. The RAT serves as a forum through which members may obtain information regarding the cooperative's financial condition, business performance, and future policy directions. Failure to conduct the RAT results in members being deprived of their fundamental rights to access information and exercise oversight over the management.[3] Such circumstances may potentially give rise to abuse of authority, legal violations, business failure, lack of clarity in financial management, and declining member confidence in the cooperative.[4]

[1] Undang-Undang Republik Indonesia Nomor 25 Tahun 1992 tentang Perkoperasian, Pasal 1 ayat 1

[2] Undang-Undang Republik Indonesia Nomor 25 Tahun 1992 tentang Perkoperasian, Pasal 22 dan 26

[3] Nurafida, Daspan Maulidin Sukma Putra, Susilawati, "Analisis Penerapan Prinsip Transparansi dalam Pelaporan Keuangan Koperasi: Studi Kasus di Kabupaten Bengkalis," *Jurnal Ilmiah Ekonomi Bisnis dan Akuntansi,* Vol.2, No.1, (2025): 2

[4] Nurafida, Daspan Maulidin Sukma Putra, dan Susilawati, "Analisis Penerapan Prinsip Transparansi dalam Pelaporan Keuangan Koperasi: Studi Kasus di Kabupaten Bengkalis," *Jurnal Ilmiah Ekonomi Bisnis dan Akuntansi* Vol. 2, No. 1 (2025), hlm. 2–4.

Furthermore, from the perspective of positive law, cooperatives that fail to conduct the RAT may be subjected to administrative sanctions in the form of warnings, special supervision measures, or even dissolution by the government.[5]

In addition to the obligation to conduct the RAT, cooperatives are likewise required to submit reports on the implementation and outcomes of the RAT to the Office of Cooperatives and Small and Medium Enterprises (Dinas Koperasi dan Usaha Kecil Menengah) as a form of external supervision. Such reporting is essential to ensure that cooperatives operate in accordance with prevailing legal provisions. In the absence of RAT reporting, local governments lose a crucial instrument for monitoring and evaluation. Consequently, potential legal violations and member losses cannot be detected at an early stage, thereby weakening the overall cooperative supervisory system.[6]

The implementation of the Annual Members' Meeting (RAT) constitutes a constitutional obligation for cooperatives. Nevertheless, in practice, many cooperatives in East Java remain non-compliant with this obligation. Based on data from the Online Data System (ODS) as of 31 March 2026, there were 29,219 active cooperatives in the Province of East Java. Of this number, only 12,812 cooperatives had conducted the RAT, while 16,407 cooperatives, or less than 50% of the total active cooperatives, had neither conducted the RAT nor submitted accountability reports,[7] despite East Java being the province with the largest number of

[5] Peraturan Pemerintah Republik Indonesia Nomor 17 Tahun 1994 tentang Pembubaran Koperasi oleh Pemerintah, Pasal 1-4

[6] Ahmad Subagyo, *Pengawasan Koperasi di Indonesia* (Jakarta: Mitra Wacana Media, 2017), hlm. 1–5.

[7] Portal Data Indonesia, "Rapat Anggota Tahunan (RAT) Koperasi," Satu Data Indonesia, diakses dari https://data.go.id/dataset/rapat-anggota-tahunan-rat Diakses pada tanggal 28 Januari 2026

cooperatives nationally. On the other hand, cooperatives in East Java play a highly significant economic role, with a membership of 6.11 million individuals, total assets amounting to IDR 63.38 trillion, business turnover reaching IDR 46.39 trillion, and net surplus (SHU) totaling IDR 1.27 trillion.[8] This low level of compliance has the potential to generate systemic impacts upon public trust and the stability of the cooperative-based economy.

Within this context, the role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises becomes highly significant, as it possesses the authority to provide guidance and supervision over cooperatives at both regency/municipal and provincial levels. In this regard, the supervisory mechanism carried out includes providing guidance, recommendations, input, and evaluations concerning cooperative performance during the Annual Members' Meeting (RAT), as regulated under Article 5 of Regional Regulation of East Java Province Number 1 of 2024 concerning the Authority of the Provincial Government, which serves as the legal basis for the implementation of the agency's functions in protecting and empowering people-based enterprises.[9] Nevertheless, the high level of non-compliance among cooperatives indicates that such supervisory functions have not yet been optimally implemented. Conceptually, supervision constitutes a process of comparing established standards or legal provisions with actual implementation in practice in order,[10] to ensure that activities

[8] Lukman Hakim SM, "Jatim Catat 29.648 Koperasi Aktif, Aset Tembus Rp 63,22 Triliun," ***Surabaya.Suaramerdeka,*** September 25, 2025, https://surabaya.suaramerdeka.com/jawa-timur/106115977710/jatim-catat-29648-koperasi-aktif-aset-tembus-rp-6322-triliun

[9] Peraturan Daerah Provinsi Jawa Timur Nomor 1 Tahun 2024, Pasal 5 Tentang Wewenang Pemerintah Provinsi

[10] Ahmad Subagyo, *Pengawasan Koperasi Di Indonesia,* (Jakarta: Mitra Wacana Media, 2017), 1

are conducted in accordance with prevailing regulations and organizational objectives are achieved effectively and efficiently.[11]

From the perspective of Islamic law, particularly the concept of *maslahah*, supervision over cooperatives possesses substantial importance. *Maslahah* emphasizes efforts to realize public benefit and prevent broader harm (*mafasid*) within society.[12] In the context of cooperatives, the implementation of the RAT and effective supervision are closely associated with the protection of members' property (*hifz al-mal*), which must not be neglected or wasted.[13] If supervision is exercised based upon strong *maslahah* principles, it is expected that cooperatives in East Java will not merely function as administratively lawful business entities, but also as trustworthy economic institutions that bring prosperity and benefit to their members.[14]

Academic studies concerning supervision over the obligation of cooperatives to conduct the RAT from the perspectives of positive law and *maslahah* remain relatively limited. Research conducted by Josua Sinambela (2023) entitled *"The Role of the Office of Cooperatives and MSMEs in Improving Community Economy"*

[11] Tio Rizkiawan. "Model Lembaga Pengawasan Koperasi Sebagai Upaya Perlindungan Hukum Konsumen Simpan Pinjam Koperasi." *Lex Renaissance* 8, no. 2 (2023), https://journal.uii.ac.id/Lex-Renaissance/article/download/30038/16466

[12] Aima Mar'atus Solihah, "Tinjauan Maṣlaḥah Ḥifẓ al-Māl Terhadap Pelaksanaan Akad Kerjasama Bagi Hasil di Desa Sumberdodol Kecamatan Panekan Kabupaten Magetan." (Skripsi, Institut Agama Islam Negeri (IAIN) Ponorogo, 2020), https://etheses.iainponorogo.ac.id/11728/1/APLOUD%20AIMA.pdf

[13] Suci Marhania, "Perbandingan Perlindungan Harta (*Hifdz Al-Mal*) Antara Perbankan Syariah Dan Konvensional," *Journal Of Economics and Business*, Vol.2 No.1, (2024), 4

[14] Maria Ernestina Da Rato, Wilhelmina Mitan, Paulus Libu Lamawitak, "Peran Badan Pengawas Koperasi Dalam Pengelolaan Koperasi Sebagai Upaya Meningkatkan Sistem Pengendalian Internal (Studi Kasus Pada KSP Kopdit Suru Pudi Koting)," *Jurnal Mutiara Ilmu Akuntansi (JUMIA),* Vol.1, No.1 (2023), https://ejurnal.stie-trianandra.ac.id/index.php/jumia/article/download/1149/942

primarily focused on general guidance and supervision at the municipal level without emphasizing the integration of sharia principles or administrative sanctions.[15] Furthermore, the study by Riswandha Sukma Pamungkas (2024) entitled *"The Role of the Office of Cooperatives and Micro Enterprises in MSME Development in Lamongan Regency"* concentrated more on business standardization without specifically analyzing delays in RAT implementation or the role of provincial regulators.[16] Research conducted by Ika Kurniawati (2023) concerning *"The Influence of Perceptions of Sharia Compliance and the Implementation of Good Governance on the Performance of Sharia Cooperatives"* was limited to the internal perceptions of members rather than external supervision by provincial authorities. Meanwhile, Studies specifically addressing the authority of provincial cooperative agencies in supervising the implementation of the RAT, including administrative sanctions for non-compliance, remain limited. A comprehensive understanding of this issue is essential to assess whether such supervision is consistent with both positive legal provisions and *maslahah* principles in protecting the rights of cooperative members.

Accordingly, this research seeks to fill the existing gap in academic literature while contributing practical insights for strengthening cooperative supervisory policies at the provincial level. This study examines the optimization of the role of the East Java Provincial Office of Cooperatives and Small and

[15] Josua Sinambela. "Peran Dinas Koperasi dan UMKM dalam Meningkatkan Perekonomian Masyarakat." *Repository IPDN*, 2023. http://eprints.ipdn.ac.id/16052/1/Repository%20Josua%20Sinambela.pdf.

[16] Riswandha Sukma Pamungkas. "Peran Dinas Koperasi dan Usaha Mikro dalam Pengembangan UMKM di Kabupaten Lamongan." (Skripsi, Universitas Brawijaya, 2024) https://repository.ub.ac.id/189748/6/Riswandha%20Sukma%20Pamungkas.pdf.

Medium Enterprises in supervising the obligation of cooperatives to conduct the RAT through the perspectives of positive law and *maslahah*, in order to evaluate whether such supervision has effectively and equitably protected the interests of cooperative members.

B. Research Question

Based on the background description, the problems to be discussed are formulated as follows:

1. How Does the East Java Provincial Office of Cooperatives and Small and Medium Enterprises Perform Its Role in Supervising the Obligation of Cooperatives to Conduct the Annual Members' Meeting (RAT) from the Perspective of Positive Law?
2. How Is the Optimization of the Role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in Supervising the Obligation of Cooperatives to Conduct the Annual Members' Meeting (RAT) Reviewed from the Perspective of Maslahah?

C. Reseach Objective

Based on the research question above, the objectives of this research are:

1. To identify and analyze the role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in supervising the obligation of cooperatives to conduct the Annual Members' Meeting (RAT) from the perspective of positive law.
2. To identify and analyze the maslahah perspective on the optimization of the role of the East Java Provincial Office of Cooperatives and Small and

Medium Enterprises in supervising the obligation of cooperatives to conduct the Annual Members’ Meeting (RAT).

D. Research Significance

1. Theoretical Significance

   This research is expected to contribute additional references to the study of positive law, particularly with regard to governmental supervision of cooperatives and the implementation of the obligation to conduct the Annual Members’ Meeting (RAT). Furthermore, this research provides an overview of the practical implementation of RAT regulations in practice. This study also contributes to the development of legal scholarship through the utilization of the maslahah perspective in analyzing the optimization of the role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises. Accordingly, this research may serve as a reference for future studies examining the interrelationship between positive law and the principle of public benefit (maslahah).

2. Practical Significance

   This research is expected to serve as evaluative material for the East Java Provincial Office of Cooperatives and SMEs in optimizing its supervisory role regarding the implementation of the obligation to conduct RAT, particularly in light of the fact that there remain cooperatives which have not conducted or properly reported their RAT. The findings of this research may also be taken into consideration in formulating more effective measures for guidance, supervision, and enforcement of applicable regulations. For cooperative management, this research is expected to enhance awareness regarding the importance of RAT as a manifestation of accountability, transparency, and responsibility toward cooperative members. Meanwhile, for cooperative members and the public, this research provides an understanding that the orderly implementation of RAT plays a significant role in maintaining the soundness of cooperatives and in supporting economic welfare in a more equitable manner.

E. Systematics of Discussion

The systematic of discussion of this thesis is as follows:

1. **Chapter I Introduction**, contains a general explanation of the background of the problem, research questions, research objectives, research significance, operational definitions, and systematics of discussion
2. **Chapter II Literature Review,** contains the theoretical foundations and conceptual framework employed to analyze the issues examined in this research, which are aligned with the research focus concerning the optimization of the role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in supervising the obligation to conduct the Annual Members' Meeting (*RAT*) by cooperatives from the perspectives of positive law and *maslahah*. The discussions in this chapter encompass: (1) the Annual Members' Meeting (RAT) of Cooperatives, which elaborates upon the definition, functions, and legal basis of RAT

pursuant to Law Number 25 of 1992 concerning Cooperatives; (2) supervision over the implementation of the Cooperative Annual Members' Meeting (RAT), which is analyzed through the Theory of Supervision as well as the authority of the Office of Cooperatives and SMEs as the representative of the regional government in conducting the guidance and supervision of cooperatives in accordance with the prevailing positive law; and (3) the Theory of *Maslahah*.

3. **Chapter III Research Methodology,** outlines the research methods employed in this study, including the type of research, research approach, research location, data sources, methods of data collection, and methods of data analysis.
4. **Chapter IV Result and Discussion,** presents the findings obtained from field research along with the corresponding analysis. This chapter examines how the East Java Provincial Office of Cooperatives and SMEs performs its role in supervising the obligation of cooperatives to conduct RAT, including whether such supervision has been carried out optimally or whether obstacles remain. Furthermore, the findings are analyzed from the perspective of positive law, particularly in light of statutory regulations governing cooperatives. Subsequently, an analysis is conducted from the perspective of *maslahah* in order to assess the extent to which the optimization of such supervision is capable of providing benefit, justice, and protection for cooperative members. The discussion in this chapter is

specifically directed toward answering the two research problems formulated in Chapter I.

5. **Chapter V Conclusion,** The conclusion chapter contains the conclusions and recommendations derived from the findings of this research)

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CHAPTER II
LITERATURE REVIEW AND THEORETICAL FRAMEWORK

A. Previous Research

Previous research refers to studies conducted by other scholars that are relevant to the topic of this study. This section presents a selection of related studies as a foundation for understanding the development of existing research. It aims to highlight key contributions, findings, and limitations of prior works, thereby clarifying the position and direction of this research. Accordingly, several relevant previous studies are outlined below:

1. Research conducted by Muhammad Khotibul Umam (2021), titled *"Tinjauan Hukum Islam Terhadap Hak-Hak Anggota KSPPS dalam Implementasi Pasal 20 Ayat (2) Huruf (e) Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian (Studi Kasus KSPPS Pringgodani Tangguh Demak)"*, employs an empirical juridical research method with an Islamic law approach. The focus of this study is on the fulfillment of cooperative members' rights, particularly in financing services and participation in the Annual Members Meeting (RAT). This research applies the concept of *maqashid al-shariah* as its analytical framework. The findings indicate that the implementation has not been optimal, as evidenced by discrimination against economically disadvantaged members and

low participation in RAT, which contradicts the principles of justice in Islamic law.[17]

2. Research conducted by Saifuddin Syuhri and Nurul Fadila (2024), titled *"Implementasi Pengawasan Internal pada Koperasi (Studi pada Koperasi BMT Maslahah Jawa Timur)"*, employs a qualitative research method with a participatory observation approach. The study focuses on the internal supervision system of cooperatives in maintaining financial, institutional, and human resource performance. This research utilizes the concept of internal control as part of cooperative governance. The findings reveal that periodic and systematic internal supervision can enhance compliance with the articles of association and prevent operational irregularities within cooperatives.[18]
3. Research conducted by Tedi Sigit Pramono (2024), titled *"Efektivitas Pengawasan Dinas Koperasi, Usaha Kecil Menengah dan Tenaga Kerja Kabupaten Pekalongan terhadap Koperasi Syariah"*, employs an empirical juridical method. The focus of this study is the effectiveness of external supervision carried out by local government agencies toward sharia cooperatives. This research is based on the concepts of legal effectiveness and supervision. The

[17] Muhammad Khotibul Umam, "Tinjauan Hukum Islam Terhadap Hak-Hak Anggota Kspps Dalam Implementasi Pasal 20 Ayat 2 (E) Undang-Undang Nomor 25 Tahun 1992 Tentang Perkoperasian," (Skripsi, Universitas Islam Negeri Walisongo Semarang, 2021)

[18] Saifuddin Syuhri, Nurul Fadila, "Implementasi Pengawasan Internal Pada Koperasi (Studi Pada Koperasi Bmt Maslahah Jawa Timur)," Al-Khidmah: Jurnal Pengabdian Masyarakat 4(2), 2024.

findings indicate that supervision has not been optimal due to weak coordination, lack of regulatory enforcement, and limited resources, which ultimately affect the protection of cooperative members' rights.[19]

4. Research conducted by Putra Yoga (2020), titled *"Pelaksanaan Pengawasan Koperasi oleh Dinas Koperasi Berdasarkan Undang-Undang Nomor 25 Tahun 1992 di Kabupaten Indragiri Hilir Kecamatan Keritang"*, employs a sociological legal research method. The study focuses on the implementation of cooperative supervision by the relevant government agency and the obstacles encountered. This research uses the concept of legal supervision as its analytical basis. The findings show that supervision has not been carried out in accordance with regulations due to several constraints, including the lack of competent human resources, inappropriate staff placement, and weak legal sanctions.[20]
5. Research conducted by Ummi Kalsum et al. (2023), titled *"Penyelenggaraan Rapat Anggota Koperasi bagi Pengurus dan Pengawas Koperasi"*, employs a qualitative method through training and mentoring activities. The study focuses on the understanding of cooperative managers and supervisors regarding

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[19] Tedi Sigit Pramono, "Efektivitas Pengawasan Dinas Koperasi, Usaha Kecil Menengah Dan Tenaga Kerja Kabupaten Pekalongan Terhadap Koperasi Syariah," (Skripsi. Universitas Islam Negeri K.H. Abdurrahman Wahid Pekalongan, 2024)

[20] Putra Yoga "Pelaksanaan Pengawasan Koperasi Oleh Dinas Koperasi Berdasarkan Undang-Undang Nomor 25 Tahun 1992 Di Kabupaten Indragiri Hilir Kecamatan Keritang," (Skripsi, Universitas Islam Negeri Sultan Syarif Kasim Riau Pekanbaru, 2020)

the importance of the Members Meeting as the highest authority in cooperatives. This research applies the concepts of member participation and cooperative governance. The findings indicate that some cooperatives either do not conduct meetings or only hold them as a formality, highlighting the need to improve the capacity and awareness of cooperative management.[21]

6. Research conducted by Sanata Prayojana (2021), titled *"Peran Pemerintah Provinsi dalam Peningkatan Partisipasi Anggota dalam Prinsip Koperasi"*, employs a descriptive qualitative method. The study focuses on the role of local government in enhancing member participation through the implementation of the Annual Members Meeting (RAT). This research is based on the concept of cooperative democracy. The findings reveal that the implementation rate of RAT remains low, at approximately 24.21% in 2020, indicating weak member participation and the need for stronger government intervention.[22]

7. Research conducted by Amanda Puspita Sari et al. (2024), titled *"Tinjauan Pelaksanaan Rapat Anggota Tahunan (RAT) pada Koperasi di Kecamatan Bondowoso"*, employs a descriptive qualitative method. The study focuses on the level of cooperative

[21] Ummi Kalsum, dkk. "Penyelenggaraan Rapat Anggota Koperasi Bagi Pengurus Dan Pengawas Koperasi," *Suluh Abdi: Jurnal Ilmiah Pengabdian Kepada Masyarakat*, Volume 5 No. 2. (2022)

[22] Sanata Prayojana, "Peran Pemerintah Provinsi Dalam Peningkatan Partisipasi Anggota Dalam Prinsip Koperasi," *Jurnal Pendidikan Mutiara*, (2021) Https://Stkipmutiarabanten.Ac.Id/Wp-Content/Uploads/2021/09/7.-Peran-Pemerintah-Provinsi-Dalam-Peningkatan.Pdf

compliance in conducting RAT and the factors influencing it. This research applies the concepts of accountability and transparency. The findings show that RAT implementation is influenced by the awareness of management, financial conditions of the cooperative, and the level of member participation. [23]

8. Research conducted by Ismail R. Noy et al. (2025), titled *"Peningkatan Profesionalisme Pengurus Koperasi melalui Pelatihan RAT untuk Tata Kelola yang Transparan dan Akuntabel"*, employs a participatory method through training, simulations, and group discussions. The study focuses on improving the capacity of cooperative managers in conducting RAT. This research is grounded in the concept of good governance. The findings indicate a significant increase in participants' understanding, with an average achievement rate of approximately 90% in preparing accountability reports and simulating RAT procedures.[24]
9. Research conducted by Masri Yanti Sahputri et al. (2024), titled *"Peran Dinas Koperasi dan UMKM Provinsi Nusa Tenggara Barat dalam Meningkatkan Partisipasi Anggota pada Rapat Tahunan Koperasi"*, employs a descriptive qualitative method. The study focuses on the role of the Cooperative and MSME Office in

[23] Amanda Puspita Sari, Dkk. "Tinjauan Pelaksanaan Rapat Anggota Tahunan (Rat) Pada Koperasi Di Kecamatan Bondowoso". *Jurnal Pengabdian Kepada Masyarakat,* Vol.3, No.10 (2024)

[24] Ismail R Noy, dkk, "Peningkatan Profesionalisme Pengurus Koperasi Melalui Pelatihan RAT untuk Tata Kelola yang Transparan dan Akuntabel," *Eastasouth Journal of Impactive Community Services,* Vol. 4, No. 01 (2025)

encouraging member participation in RAT. This research uses the concepts of government role and public participation. The findings show that although efforts such as socialization and training have been carried out, challenges remain, including low member awareness and limited resources.[25]

10. Research conducted by Putri Nazeeya A., Gusliana HB, and Separen (2024), titled *"Implementasi Peran Dinas Koperasi, Usaha Kecil dan Menengah dalam Mengawasi Koperasi Produsen Kelapa Sawit Berdasarkan Peraturan Gubernur Nomor 20 Tahun 2015"*, employs a sociological legal research method. The study focuses on the implementation of supervision by the Cooperative and MSME Office over producer cooperatives. This research uses the concepts of administrative supervision and cooperative governance. The findings indicate that although supervision has been carried out in accordance with regulations, its effectiveness remains limited due to technical and operational constraints, and it has not yet fully addressed substantive governance aspects.[26]

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[25] Masri Yanti Sahputr, "Peran Dinas Koprasi Dan Umkm Provinsi Nusa Tenggara Barat Dalam Meningkatkan Partisipasi Anggota Pada Rapat Tahunan Koprasi" *Jurnal Pengabdian Multidisiplin*, Volume.2 Nomor.2 (2024)

[26] Putri Nazeeya A., Gusliana HB, Separen, "Implementasi Peran Dinas Koperasi, Usaha Kecil Dan Menengah Dalam Mengawasi Koperasi Produsen Kelapa Sawit Berdasarkan Peraturan Gubernur Nomor 20 Tahun 2015 Tentang Rincian Tugas, Fungsi, Dan Tata Kerja Dinas Koperasi, Usaha Mikro Kecil Dan Menengah," *INNOVATIVE: Journal Of Social Science Research,* Volume 4 Nomor 5 (2024)

Table 1. Similarities and Differences of Previous Research

No	Author, Research Title, and Method	Research Result	Similarities	Differences
1	Muhammad Khotibul Umam (2021), entitled "Tinjauan Hukum Islam Terhadap Hak-Hak Anggota KSPPS Dalam Implementasi Pasal 20 Ayat 2 (e) UU No. 25/1992". This research employs an empirical juridical method with an Islamic law approach.	The implementation of members' rights has not been optimal due to discrimination against economically disadvantaged members and limited participation in RAT.	Both studies discuss Law No. 25 of 1992 and members' rights in the RAT.	This study focuses on Islamic law (maqashid sharia) and musyarakah financing, while the present research focuses on government supervision and maslahah perspective.
2	Saifuddin Syuhri & Nurul Fadila (2024), entitled "Implementasi Pengawasan Internal pada Koperasi (Studi pada Koperasi BMT Maslahah Jatim)". This research uses a qualitative method.	Internal supervision is effective through intensive monitoring to prevent irregularities in accordance with the articles of association.	Both discuss supervision mechanisms to ensure regulatory compliance.	This study focuses on internal supervision, whereas the present research examines external supervision by the Cooperative Office.
3	Tedi Sigit Pramono (2024), entitled "Efektivitas Pengawasan Dinas Koperasi, UKM dan Tenaga Kerja Kab. Pekalongan Terhadap Koperasi	Weak coordination and regulatory enforcement reduce the effectiveness of supervision and protection	Both examine the supervisory role of the Cooperative Office.	This study focuses on a district-level institution and sharia cooperatives, while the present

No	Author, Research Title, and Method	Research Result	Similarities	Differences
	Syariah". This research uses an empirical juridical method.	of members' rights.		research focuses on the provincial level (East Java) and RAT obligations.
4	Putra Yoga (2020), entitled "Pelaksanaan Pengawasan Koperasi Oleh Dinas Koperasi Berdasarkan UU No. 25/1992 di Kab. Indragiri Hilir". This research uses a sociological legal method.	Supervision is not fully aligned with regulations due to limited human resources, improper staff placement, and weak legal sanctions.	Both use Law No. 25 of 1992 and discuss government supervision.	This study focuses on sociological aspects in a different region, while the present research emphasizes optimization and maslahah perspective.
5	Ummi Kalsum et al. (2023), entitled "Penyelenggaraan Rapat Anggota Koperasi Bagi Pengurus Dan Pengawas Koperasi". This research uses a qualitative method.	RAT is often treated as a formality or not conducted, causing members to become merely objects of profit.	Both discuss the importance of RAT and compliance of cooperative management.	This study focuses on training and education, while the present research focuses on regulatory supervision by the government.
6	Sanata Prayojana (2021), entitled "Peran Pemerintah Provinsi Dalam Peningkatan	RAT participation is very low (24.21%), indicating	Both discuss government roles in improving	This study focuses on participation and democratic

No	Author, Research Title, and Method	Research Result	Similarities	Differences
	Partisipasi Anggota Dalam Prinsip Koperasi”. This research uses a qualitative descriptive method.	weak member involvement and the need for government intervention.	RAT participation.	principles, while the present research focuses on supervision and legal obligations.
7	Amanda Puspita Sari et al. (2024), entitled “Tinjauan Pelaksanaan Rapat Anggota Tahunan (RAT) Pada Koperasi Di Kecamatan Bondowoso”. This research uses a qualitative descriptive method.	Identifies supporting and inhibiting factors affecting cooperative compliance in conducting RAT on time.	Both examine compliance with RAT obligations.	This study focuses on mapping cooperatives at the sub-district level, while the present research focuses on provincial supervision.
8	Ismail R. Noy et al. (2025), entitled “Peningkatan Profesionalisme Pengurus Koperasi Melalui Pelatihan RAT untuk Tata Kelola yang Akuntabel”. This research uses a participatory method.	Training improves managerial capability up to 90% in preparing accountability reports and conducting RAT.	Both discuss governance, accountability, and transparency through RAT.	This study focuses on capacity building, while the present research focuses on regulatory supervision and legal compliance.
9	Masri Yanti Sahputri et al. (2024), entitled “Peran Dinas Koperasi Dan UMKM Prov. NTB	The agency conducts campaigns and training to overcome low awareness and	Both discuss the role of the Cooperative Office in increasing	This study focuses on participation improvement strategies, while the

No	Author, Research Title, and Method	Research Result	Similarities	Differences
	Dalam Meningkatkan Partisipasi Anggota Pada RAT". This research uses a qualitative method.	limited resources among members.	RAT participation.	present research emphasizes supervisory optimization and maslahah perspective.
10	Putri Nazeeya A. et al. (2024), entitled "Implementasi Peran Dinas Koperasi dan UKM Dalam Mengawasi Koperasi Produsen Kelapa Sawit". This research uses a sociological legal method.	Supervision is carried out according to regulations but hindered by technical constraints and has not fully addressed governance substance.	Both examine the implementation of supervisory roles by government agencies.	This study focuses on specific producer cooperatives and regional regulation, while the present research focuses on RAT obligations and broader supervisory optimization.

B. Literature Review

1. Annual Members' Meeting of Cooperatives (RAT)

a. Definition of Cooperative

A cooperative is a business entity consisting of individual members and/or cooperative legal entities, which conducts its activities based on cooperative principles and functions as a people-based economic movement founded upon the principle of kinship.[27] Meanwhile, cooperativism encompasses all matters related to the life and activities of cooperatives.

In carrying out its business activities, a cooperative is guided by the values of *Pancasila* and the 1945 Constitution of the Republic of Indonesia, while upholding the principle of kinship. A cooperative is established as a form of collective enterprise aimed at improving the welfare of its members in particular and society in general. Unlike other financial institutions that primarily emphasize commercial relationships, cooperatives also prioritize the values of solidarity and familial relationships within society.

The principal objectives of cooperatives in conducting their business activities include:[28]

1. To establish and strengthen the national economic order
2. To improve the welfare of members and the community
3. To realize a more advanced, just, and prosperous society.

Accordingly, a cooperative is not merely an ordinary economic entity, but rather an institution that promotes the values of democracy, equality, and mutual cooperation in the management of its business activities. The success of a cooperative largely depends upon the active participation of

[27] Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian, Pasal 1 ayat (1).
28 Novy Rachma Herawati, Syarifah Ratih Kartika Sari, Manajemen Koperasi Jasa Keuangan (Kjk) Berbasis SKKNI, (Klaten: Penerbit Lakeisha, 2021), hal 1

all its members, one of which is manifested through the mechanism of the Annual Members' Meeting (RAT) as the highest decision-making forum.

b. Definition of the Annual Members' Meeting (RAT)

Pursuant to Article 22 of Law Number 25 of 1992 concerning Cooperatives, the Annual Members' Meeting (*Rapat Anggota Tahunan* or RAT) constitutes the highest authority or supreme forum within the organizational structure of a cooperative, serving as a platform for members to make decisions regarding the management of the cooperative.[29] The RAT holds a significant position because, through this forum, members are able to exercise their democratic rights in determining cooperative policies.

During the Annual Members' Meeting, the management of the cooperative is obligated to submit an accountability report concerning the management of the cooperative for one fiscal year, which includes financial statements as well as reports on the implementation of the cooperative's business activities. The RAT must be convened at least once in every fiscal year as stipulated under Regulation of the Minister of Cooperatives and Small and Medium Enterprises of the Republic of Indonesia Number 19 of 2015 concerning the Organization of Cooperative Members' Meetings.[30] Accordingly, the implementation of the RAT serves

29 Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian, Pasal 22.

30 Peraturan Menteri Koperasi dan UKM Republik Indonesia Nomor 19 Tahun 2015 tentang Penyelenggaraan Rapat Anggota Koperasi.

as one of the important indicators in assessing whether a cooperative remains active and properly carries out its institutional activities.

The RAT constitutes the highest democratic forum within a cooperative, in which all members are entitled to attend, express their opinions, and participate in the decision-making process. Through the RAT, the management is required to present an accountability report regarding the management of the cooperative during the current fiscal year.[31]

The RAT also functions as a mechanism for evaluating the performance of the cooperative's management and supervisory board. Through the RAT, members may assess the management of the cooperative and determine the policies to be implemented in the subsequent period. Therefore, the RAT is not merely an administrative formality, but rather an essential component in realizing democratic and transparent cooperative governance.

c. Functions and Objectives of the Annual Members' Meeting (RAT)

Normatively, Article 27 of Law Number 25 of 1992 stipulates that the members' meeting shall determine, inter alia, the cooperative's articles of association, general policies in the fields of organization, management, and cooperative business activities, the election, appointment, and dismissal of the management and supervisory board, work plans, the cooperative's

31Anang Sugeng Cahyono, "Penguatan Kelembagaan Koperasi Melalui Pelaksanaan Rapat Anggota Tahunan," Jurnal Ilmu Administrasi Negara, Vol. 18, No. 2 (2022), hlm. 112, https://doi.org/10.31289/publika.v18i2.6849.

revenue and expenditure budget plan, as well as the ratification of the management's accountability in carrying out its duties.[32]

The RAT has several important functions, namely as a medium for the management's accountability to members, a forum for evaluating the performance of the management and supervisory board, a mechanism for determining work plans and budgets for the following year, and an instrument for protecting members' rights to financial and managerial information concerning the cooperative. In the absence of the implementation of the RAT, the principles of democracy, transparency, and accountability within the cooperative become undermined.[33] Furthermore, failure to convene the RAT may obstruct members' rights to obtain information regarding the condition of the cooperative. In addition, the non-implementation of the RAT may give rise to potential abuse of authority, weak internal supervision, and a decline in members' trust in the cooperative. Therefore, the implementation of the RAT constitutes an obligation that must be fulfilled by every cooperative.

2. Supervision of the Cooperative Annual Members' Meeting

a. Definition of Supervision

In the context of state administrative law, supervision may be defined as a series of activities involving observation, assessment, and comparison between the implementation of an activity and the predetermined standards

32Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian, Pasal 27.
33Rini Setyaningsih, "Peranan Rapat Anggota Tahunan dalam Meningkatkan Partisipasi Anggota Koperasi," Jurnal Ekonomi Koperasi, Vol. 9, No. 1 (2021), hlm. 34.

or regulations, with the aim of ensuring that such activities are carried out in accordance with the intended objectives.[34]

Supervision is not merely an activity aimed at identifying errors, but rather a systematic process encompassing data collection, field verification, compliance assessment, and the provision of corrective recommendations. Effective supervision must be preventive, corrective, and repressive in nature, depending on the level of violation identified.

Within the cooperative context, supervision is necessary to ensure that cooperatives conduct their business and institutional activities in accordance with cooperative principles and the applicable legal provisions. One form of such supervision is the oversight of the obligation of cooperatives to convene the Annual Members' Meeting (RAT).

b. Objectives of Supervision over the Cooperative RAT

Supervision over the implementation of the RAT is intended to ensure that cooperatives fulfill their institutional obligations in an orderly manner and in compliance with statutory regulations.[35] The RAT serves as an important indicator in assessing the level of soundness and activeness of a cooperative, as it provides a comprehensive overview of the cooperative's management condition.

The objectives of supervision over the RAT include:

1. To enhance cooperatives' compliance with legal obligations

34 Sri Wahyuni, *Pengawasan Administrasi Negara* (Yogyakarta: Deepublish, 2020), hlm. 17.
35 Peraturan Menteri Koperasi dan UKM Republik Indonesia Nomor 9 Tahun 2020 tentang Pengawasan Koperasi.

2. To realize transparency and accountability in cooperative management
3. To protect the rights of cooperative members
4. To prevent abuse of authority and irresponsible management of cooperative funds
5. To maintain the sustainability of cooperatives as sound business entities.[36]

c. The Role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in Supervising the RAT

The East Java Provincial Office of Cooperatives and Small and Medium Enterprises possesses the authority to provide guidance and supervision over cooperatives within its jurisdiction. Such authority is exercised to ensure that cooperatives conduct their business and institutional activities in accordance with the prevailing legal provisions.

In supervising the implementation of the RAT, the Office of Cooperatives and SMEs performs several important roles, namely:

1. Conducting data collection on active and inactive cooperatives
2. Monitoring the implementation of the RAT
3. Providing socialization and guidance to cooperatives
4. Issuing administrative warnings to cooperatives that fail to convene the RAT

36 Roslina, "Efektivitas Pengawasan Pemerintah terhadap Koperasi Simpan Pinjam," Skripsi IAIN Parepare, 2024, hlm. 16.

5. Evaluating the level of cooperative compliance

In addition, the Office of Cooperatives and SMEs also plays a role in enhancing the legal awareness of cooperative management regarding the importance of implementing the RAT as a form of accountability to members.

d. Supervision of the RAT from the Perspective of Positive Law

Supervision over the implementation of the cooperative RAT under Indonesian positive law is regulated in several statutory instruments, including Law Number 25 of 1992 concerning Cooperatives and Regulation of the Minister of Cooperatives and Small and Medium Enterprises of the Republic of Indonesia Number 9 of 2020 concerning Cooperative Supervision.[37]

These provisions stipulate that the government possesses the authority to supervise the institutional and business activities of cooperatives, including ensuring the implementation of the RAT by cooperatives. Such supervision is conducted through inspection, monitoring, evaluation, and follow-up measures against cooperatives that fail to fulfill their obligations.[38]

Cooperatives that fail to convene the RAT within a certain period may be categorized as inactive cooperatives and may be subject to administrative sanctions. Such sanctions may include written warnings, special guidance

37 Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian

38 Peraturan Menteri Koperasi dan UKM Republik Indonesia Nomor 9 Tahun 2020 tentang Pengawasan Koperasi.

measures, and even proposals for dissolution where the cooperative no longer conducts activities in accordance with the applicable legal provisions.

3. *Maslahah* Theory

a. Definition *Maslahah*

Maslahah is defined as anything that contains benefit for humankind, either by obtaining advantages and goodness or by preventing and eliminating harm *(mafsadah)*.[39]

Imam Al-Ghazali defines *maslahah* as an effort to attain benefit or prevent harm. However, he further emphasizes that *maslahah* within the context of *ushul fiqh* is not merely benefit according to human perception alone, but rather benefit that is in harmony with the objectives of Islamic law (*maqashid al-shariah*), namely the protection of religion, life, intellect, lineage, and property.[40]

Within the context of cooperatives, the concept of *maslahah* is related to efforts to establish cooperative management that is honest, transparent, and accountable for the welfare and benefit of cooperative members.

b. Legal Basis and Position of *Maslahah*

Imam Al-Syatibi in his work *Al-Muwafaqat fi Ushul al-Shariah*, emphasized that the primary objective of the establishment of Islamic law is to realize benefit (*maslahah*) for humankind, both in this world and in the hereafter. Every legal provision is enacted with the purpose of

39Abdul Helim, Maqasid Al-Syariah versus Usul Al-Fiqh (Konsep dan Posisinya dalam Metodologi Hukum Islam), (Yogyakarta: Pustaka Pelajar, 2019), hlm. 21-22.
40Imam Al-Ghazali, Al-Mustashfa min Ilm al-Ushul, (Beirut: Dar al-Kutub al-Ilmiyyah, t.t.)

safeguarding human interests, and where a rule instead gives rise to harm, such a rule is deemed contrary to the principles of the Sharia itself.[41]

Similarly, Ibn Qayyim al-Jawziyyah asserted that Islamic law is founded upon the principles of justice, mercy, and benefit for all humankind. Accordingly, where a regulation results in injustice, loss, or damage, such a regulation is inconsistent with the spirit and objectives of the Sharia.[42]

c. Classification of *Maslahah*

Scholars of *ushul fiqh* classify *maslahah* into several categories. From the perspective of its recognition under the Sharia, *maslahah* is divided into: (1) *maslahah mu'tabarah*, namely benefit that is expressly supported by textual evidence (*dalil syara'*); (2) *maslahah mulghah*, namely benefit that is rejected because it contradicts the Sharia evidence; and (3) *maslahah mursalah*, namely benefit that is neither explicitly recognized nor rejected by the Sharia, but remains consistent with the general objectives of Islamic law.

From the perspective of the degree of necessity, Wahbah al-Zuhayli classifies *maslahah* into three levels, namely: (1) *maslahah daruriyyah* (primary necessities that are absolute and indispensable); (2) *maslahah hajiyyah* (secondary necessities intended to eliminate hardship); and (3)

41Imam Al-Syatibi, Al-Muwafaqat fi Ushul al-Syariah, Jilid II, (Beirut: Dar Ibn Affan, 1997)
42 Abdul Helim, *Maqashid Al-Syariah versus Ushul Fikih* (Yogyakarta: Pustaka Pelajar, 2020), hlm. 21.

maslahah tahsiniyyah (complementary benefits that serve as refinements or enhancements).[43]

In this research, the concept of *maslahah mursalah* is particularly relevant because it relates to efforts to realize public benefit through the supervision of cooperatives.

d. The Relevance of *Maslahah* to the Supervision of the Cooperative *RAT*

The concept of *maslahah* is highly relevant in the context of managing Islamic economic institutions, as *maslahah* requires management that is honest, transparent, and accountable in order to realize the welfare and benefit of all parties involved.[44] This is consistent with the values embodied in cooperatives as business entities founded upon the principles of kinship and mutual cooperation.

Within the context of this research, the obligation of cooperatives to convene the Annual Members' Meeting (RAT) may be understood through the perspective of maslahah as an effort to protect the rights of members, particularly in relation to hifzh al-mal (the protection of property). Yusuf al-Qaradawi emphasized that property must be managed in a trustworthy and transparent manner, and that every mechanism supporting

43 Wahbah Az-Zuhaili, *Ushul Fikih Islam* (Jakarta: Gema Insani, 2021), hlm. 1020.

44 Moh. Syarifudin, "Maslahah Sebagai Alternatif Istinbath Hukum dalam Ekonomi Syariah," *Jurnal Lentera*, Vol. 21 No. 2, 2021, hlm. 51.

transparency and accountability in the management of property constitutes part of the realization of maslahah.[45]

Where the RAT is not implemented, at least three conditions potentially giving rise to mafsadah (harm or damage) may occur. First, the members' rights to obtain information regarding the condition and financial reports of the cooperative may be neglected. Second, the potential for misuse of cooperative funds may increase significantly. Third, members' trust in the cooperative institution may substantially decline. Therefore, the supervision conducted by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises over the obligation to implement the RAT may be regarded as an effort to realize collective benefit (*maslahah*) and to prevent broader harm in the management of cooperatives.

45 Yusuf al-Qaradawi, Fiqh al-Awwaliyyat: Dirasah Jadidah fi Daw al-Quran wa al-Sunnah, (Kairo: Maktabah Wahbah, 2009), hlm. 22.

CHAPTER III

RESEARCH METHOD

A. Type of Research

The type of research employed in this study is empirical juridical research. Empirical juridical research constitutes a legal research method that examines law not merely as written norms contained within statutory regulations, but also as a social reality implemented within society.[46] This approach is frequently referred to as socio-legal research,[47] as it focuses on empirical facts in the field, as well as the behavior and interactions of society in relation to the law. Accordingly, this research examines the applicable legal provisions while simultaneously analyzing their implementation in practice.

Within the context of this research, the author examines the positive legal framework governing the obligation of cooperatives to conduct the Annual Members' Meeting (*RAT*) and further investigates the role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in supervising such obligation, including the factual condition that there remain cooperatives which have failed to conduct RAT in accordance with the prevailing provisions. Such examination serves as the basis for analyzing the optimization of the role performed by the aforementioned Office.

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46 Muhaimin, Metode Penelitian Hukum, Cetakan 1, (Mataram: Mataram University Press, 2020). hal 80

47 Ario Prio Agus Santoso, Pengantar Metodologi Penelitian Hukum (Yogyakarta: Pustaka Baru Press, 2022).

B. Research Approach

This research employs both a sociological (empirical juridical) approach and a statute approach.

The sociological (empirical juridical) approach is a method that examines law as it operates in society, not merely as written norms but as a social reality implemented by legal subjects and authorities.[48] Through this approach, the research analyzes the factual conditions of how the Cooperatives and MSMEs Office of East Java Province carries out its supervisory role over the obligation of Annual Members Meetings (RAT) by cooperatives, including the level of compliance, forms of supervision undertaken, and obstacles encountered in practice.

Meanwhile, the statute approach is a method that focuses on examining laws and regulations as the primary legal basis in addressing the issues under study.[49] This approach involves analyzing relevant statutory provisions and other legal instruments related to cooperatives, particularly those governing the obligation to conduct RAT and the authority of the Cooperatives Office. The primary legal reference used in this research is Law Number 25 of 1992 concerning Cooperatives[3], along with its implementing regulations. Through this approach, the study aims to assess the extent to which the supervisory role of the Cooperatives and MSMEs Office has been carried out in accordance with

48 Zainuddin Ali, Metode Penelitian Hukum, Cetakan 1, (Jakarta: Sinar Grafika, 2022), hlm. 105.
49 Peter Mahmud Marzuki, *Penelitian Hukum*, Cetakan 13, (Jakarta: Kencana, 2017), hlm. 136.

applicable positive law, as well as to analyze it from the perspective of *maslahah* in Islamic law

C. Research Location

The research location is the place where data collection activities are carried out in accordance with the needs of the study. This research was conducted at the Office of Cooperatives and Small and Medium Enterprises of East Java Province, located at Jl. Raya Juanda No. 22, Sedati, Sidoarjo, East Java.

The selection of this location is based on the role of the Cooperatives and MSMEs Office of East Java Province as the authority responsible for providing guidance and supervision over cooperatives, including the implementation of the obligation to conduct Annual Members Meetings (RAT). Considering that data indicate many cooperatives have not yet carried out RAT, this institution is a relevant site for obtaining information regarding supervisory mechanisms, forms of guidance, as well as optimization efforts that have been and will be undertaken

D. Data Sources

Data constitute all information utilized as the basis for conducting research. In this study, the sources of data are classified into two categories, namely primary data and secondary data.

1. Primary Data Sources

Primary data refer to information obtained directly from the object or parties being studied through direct data collection techniques. [50] Primary

50 Muhaimin, Metode Penelitian Hukum. hal 89

data are data acquired firsthand from the principal source through field research. In this study, the primary data were obtained through interviews with representatives of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises, namely Mr. Syamsul Hidayat, serving as the Head of the Supervision and Accountability Working Team.

2. Secondary Data Sources

Secondary data were obtained through library research,[51] which includes primary legal materials in the form of:

a. Law Number 25 of 1992 concerning Cooperatives
b. Regulation of the Minister of Cooperatives and SMEs Number 19/Per/M.KUKM/IX/2015 concerning Procedures for the Organization of Cooperative Members' Meetings (*RA*)
c. Regulation of the Minister of Cooperatives and SMEs Number 9 of 2020 concerning Cooperative Supervision
d. Government Agency Performance Accountability Report (*Laporan Akuntabilitas Kinerja Instansi Pemerintah*) of 2025.

E. Data Collection Methods

Data collection methods refer to the techniques employed by the researcher to obtain the data necessary to address the research problem. The data collection techniques used in this study are as follows:

51 Achmad Irwan Hamzani, Tiyas Vika Widyastuti, Metodologi Penelitian Dan Penulisan Bidang Ilmu Hukum.

1. Interview

Interview is a meeting between two individuals to exchange information and ideas through questions and answers, thereby constructing meaning on a particular research topic. In this study, interviews were conducted with Mr. Syamsul Hidayat, as the Head of the Supervision and Accountability Working Team, served as the key informant who possesses an in-depth understanding of the implementation of supervisory functions over cooperatives, particularly concerning the obligation to convene the Annual Members’ Meeting (RAT), including the supervisory mechanisms and the forms of guidance provided.

2. Documentation

The documentation technique is a method of collecting data through the examination of written sources, such as books, reports, meeting minutes, personal notes, and other documents containing data or information required by the researcher. The documentation in this research was obtained from various statutory regulations and official documents serving as the legal basis for the implementation and supervision of the obligation of cooperatives to convene the Annual Members’ Meeting (RAT), namely Law Number 25 of 1992 concerning Cooperatives, Regulation of the Minister of Cooperatives and SMEs Number 19/Per/M.KUKM/IX/2015 concerning Procedures for Conducting Cooperative Members’ Meetings, and Regulation of the

Minister of Cooperatives and SMEs Number 9 of 2020 concerning Cooperative Supervision. In addition, this research also utilizes the 2025 Government Agency Performance Accountability Report (*Laporan Akuntabilitas Kinerja Instansi Pemerintah* / LAKIP) to examine the supervisory performance and functions carried out by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises.

F. Data Processing Methods

After the data were collected, the researcher carried out data processing through systematic stages. The stages of qualitative data processing include:

1. Editing

   Re-examining the clarity and completeness of the interview data obtained from informants, as well as the validity of documents relatedto the supervision of the implementation of RAT by cooperatives

2. Classifying

   Grouping the data based on the research problems, particularly regarding forms of supervision carried out by the Cooperatives Office, levels of cooperative compliance in conducting RAT, and the obstacles faced in the supervision.

3. Verifying

   Re-checking the consistency between information obtained from informants and documentary data, as well as aligning them with the relevant legal provisions and theories used in this research.

4. Analyzing

   The data were analyzed using a descriptive qualitative method by referring to applicable laws and regulations on cooperatives and supervision, as well as the concept of *maslahah* in Islamic law, in order to formulate conclusions regarding the optimization of the supervisory role of the Cooperatives and MSMEs Office.

CHAPTER IV
RESULT AND DISCUSSION

A. Research Location Profile

1. Brief Profile

The East Java Provincial Office of Cooperatives and Small and Medium Enterprises is a regional governmental agency vested with the authority and responsibility for administering governmental affairs in the field of cooperatives and small and medium enterprises within the Province of East Java. In carrying out its duties, the Office plays a role in the guidance, development, supervision, and empowerment of cooperatives in order to establish cooperatives that are sound, independent, and competitive. One form of such supervision is the oversight of the obligation of cooperatives to convene the Annual Members' Meeting (RAT) as a manifestation of the principles of economic democracy and accountability in cooperative management in accordance with prevailing laws and regulations.

In addition to providing guidance to cooperatives, the Office also holds a strategic role in improving the institutional quality of cooperatives through administrative assistance, evaluation of cooperative health, strengthening of cooperative human resources, and supervision of cooperatives' compliance with their legal obligations. Supervision over the implementation of the RAT is essential because the RAT constitutes the highest forum within a cooperative, serving as a mechanism for the management's accountability to members regarding the management of the cooperative during one fiscal year. Accordingly, the successful implementation of the RAT serves as one of the indicators of whether a cooperative remains active.

Institutionally, the existence of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises forms part of the implementation of regional autonomy in the field of cooperative and small and medium enterprise empowerment, as regulated under statutory provisions concerning regional governance and cooperatives. In carrying out its supervisory functions, the Office is guided by various regulations, including Law Number 25 of 1992 concerning Cooperatives, Regulation of the Minister of Cooperatives and SMEs Number 19/Per/M.KUKM/IX/2015 concerning Procedures for Conducting Cooperative Members' Meetings, and Regulation of the Minister of Cooperatives and SMEs Number 9 of 2020 concerning Cooperative Supervision. These regulations constitute the legal basis for regional governments in conducting guidance and supervision over cooperatives, including ensuring the orderly and continuous implementation of the RAT

2. Main Duties Functions

The East Java Provincial Office of Cooperatives and Small and Medium Enterprises has the principal duty of assisting the Governor in carrying out regional governmental affairs in the field of cooperatives and small and medium enterprises that fall within the authority of the provincial government. In performing such duties, the Office carries out various functions, including the formulation of technical policies in the field of cooperatives and SMEs, the implementation of cooperative guidance and empowerment, the supervision of cooperative institutions, as well as evaluation and reporting in the field of cooperatives and SMEs.

In relation to the supervision of the obligation to convene the Annual Members' Meeting (RAT), the Office has the function of conducting monitoring and evaluation of cooperatives' compliance in organizing the RAT during each fiscal year. Such supervision is carried out through the collection of data on active cooperatives, examination of cooperative administration, guidance for cooperative management, and the issuance of warnings and recommendations for guidance to cooperatives that fail to convene the RAT in accordance with applicable regulations. This supervision aims to realize cooperative governance that is transparent, accountable, and consistent with cooperative principles.[52]

In addition, the Office also performs a guidance function in enhancing the legal awareness and capacity of cooperative management regarding the importance of implementing the RAT. Such guidance is conducted through the dissemination of cooperative regulations, cooperative management training, institutional administrative assistance, and facilitation in resolving cooperative-related issues. Through such

52 Dinas Koperasi dan UKM, "Tugas Pokok dan Fungsi," Accessed May 11, 2026 https://diskopukm.jatimprov.go.id/en/konten/tugas-pokok-dan-fungsi

supervision and guidance, cooperatives are expected to fulfill their obligations optimally and strengthen the trust of members and the public in the sustainability of cooperatives as the backbone of the national economy.

B. The Role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in Supervising the Obligation to Conduct the Annual Members' Meeting (RAT) by Cooperatives from the Perspective of Positive

1. Legal Basis for the Supervision of the Obligation to Conduct the RAT

The Annual Members' Meeting (Rapat Anggota Tahunan/RAT) constitutes one of the most fundamental institutional instruments within the governance system of cooperatives in Indonesia. Under positive law, the obligation to conduct the RAT derives from Law Number 25 of 1992 concerning Cooperatives, particularly Article 26, which stipulates that the members' meeting serves as the highest authority within a cooperative and must be convened at least once every fiscal year.

Based on the interview results with Mr. Syamsul Hidayat, Head of the Supervision and Accountability Working Team at the Institutional and Supervisory Division of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises, the legal basis for RAT supervision employed by the Office consists of several hierarchically structured regulations. As stated by him:

> *"Kalau berbicara pengawasan, landasannya itu adalah Peraturan Menteri Koperasi Nomor 9 Tahun 2020 terkait dengan pengawasan koperasi. Nah, untuk pengawasan koperasi itu bisa dilakukan secara on-site dan off-site. Contoh, tadi pelaksanaan RAT itu memang ada di Undang-Undang Nomor 25 Tahun 1992 bahwa koperasi wajib melaksanakan RAT, wajib melaksanakan rapat anggota minimal 1 kali dalam 1 tahun. Plan pelaksanaannya adalah 6 bulan setelah tutup buku. Nah, petunjuk teknisnya terkait dengan pelaksanaan rapat anggota itu ada di Peraturan Menteri Nomor 19 Tahun 2015."*[53]

The foregoing statement demonstrates that the legal basis for RAT supervision is hierarchical and multi-layered in nature. At the highest normative level, Law Number 25 of 1992 concerning Cooperatives mandates the implementation of members' meetings as a forum for accountability of the cooperative management and supervisory board to all cooperative members. At the technical level, Regulation of the Minister of Cooperatives and Small and Medium Enterprises Number 19 of 2015 provides technical guidelines for the implementation of the RAT, including procedures for convening the meeting, meeting agendas, and reporting obligations. Meanwhile, Regulation of the Minister of Cooperatives and Small and Medium Enterprises Number 9 of 2020 serves as the legal foundation for the supervisory functions exercised by the relevant governmental agencies, both through on-site and off-site supervisory mechanisms.

In addition to the three principal regulations above, the supervision of the RAT is further grounded in Article 5 of East Java Provincial

53 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

Regulation Number 1 of 2024, which expressly governs the authority of the Provincial Government to protect and empower community-based economic enterprises, including cooperatives. This regional regulation reinforces the position of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises as the state's representative at the regional level, vested with the authority to provide guidance and supervision over inter-regency/municipal cooperatives.

According to the theory of supervision developed by Victor M. Situmorang and Jusuf Juhir, effective supervision requires the fulfillment of three essential elements simultaneously: first, the existence of clear standards or norms as benchmarks for compliance; second, the existence of a systematic monitoring mechanism; and third, the implementation of firm follow-up measures against any violations identified.54 In the context of RAT supervision, the first element has been fulfilled through the layered regulatory framework described above. However, the second and third elements continue to encounter various challenges, which will be further elaborated in the following subsection.[55]

2. Procedures and Mechanisms for RAT Supervision

The East Java Provincial Office of Cooperatives and Small and Medium Enterprises has established supervisory procedures for the

54 Victor M. Situmorang dan Jusuf Juhir, Aspek Hukum Pengawasan Melekat dalam Lingkungan Aparatur Pemerintah (Jakarta: Rineka Cipta, 2020), hlm. 22.

55 Dadang Suhendi, "Pelaksanaan Pengawasan Koperasi Aktif Yang Kurang Sehat di Kabupaten Sumedang," *Journal of Education, Humaniora and Social Sciences (JEHSS)*, Vol. 8, No. 1, Agustus 2025, hlm. 226. DOI: https://doi.org/10.34007/jehss.v8i1.2648

implementation of the Annual Members’ Meeting (RAT), which are carried out through several sequential stages. This supervisory mechanism has been incorporated into the Standard Operating Procedures (SOP) for cooperative supervision, serving as the formal guideline for the implementation of supervisory functions by the Institutional and Supervisory Division. Based on the explanation provided by Mr. Syamsul Hidayat, the supervisory mechanism for the RAT may be described as follows.

First, the notification or initial warning stage. Prior to the RAT implementation period, usually during October, November, or December, the Office sends notification letters to all cooperatives under its supervision. The letters remind cooperatives of their obligation to conduct the RAT for the relevant fiscal year. As stated by the informant:

> *"Di bulan Oktober, November, atau Desember, kami membuat surat pemberitahuan kepada koperasi bahwa ada kewajiban yang harus dilakukan oleh koperasi, yaitu rapat anggota tahunan. Di situ ya fungsi pengawasan yang pertama. Jadi kami melakukan tahapan pemberitahuan."*[56]

This notification letter constitutes a form of preventive supervision, namely an effort to prevent violations before they occur by reminding cooperatives of their legal obligations. Victor M. Situmorang and Jusuf Juhir explain that preventive supervision refers to supervision conducted prior to the implementation of an activity, with the objective of preventing errors from occurring at the outset. The notification letters

56 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

issued by the Office are consistent with this principle, as they are intended to precede and prevent violations rather than merely respond to existing non-compliance.

Second, the monitoring stage. During the period from January to June, which constitutes the six-month deadline for conducting the RAT following the closing of the fiscal year, the Office carries out periodic monitoring. Such monitoring is conducted both through direct attendance at cooperatives that invite the Office to participate and through the periodic review of submitted reports. The Office monitors the progress of RAT implementation on a weekly and monthly basis to determine the cumulative number of cooperatives that have conducted the RAT. The informant explained:

> *"Kita monitoring tiap minggu, tiap bulan, berapa koperasi yang sudah RAT. Jadi ada monitoring berkala yang kita lakukan untuk melihat perkembangannya."*[57]

This monitoring stage falls within the category of corrective supervision according to Victor M. Situmorang and Jusuf Juhir, namely supervision conducted while an activity is ongoing, with the aim of ensuring that the actions taken are consistent with the established plans and standards. If deviations are identified during this process, the Office may immediately undertake corrective measures before the issue escalates further.

57 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

Third, the assistance and guidance stage. For cooperatives that invite the Office to attend the RAT, the Office provides assistance in the form of technical guidance, dissemination of updated regulations, and cooperative education for members. This assistance aims to ensure that the RAT is conducted in accordance with the prevailing legal provisions while simultaneously improving cooperative literacy among members. The informant stated:

> *"Kita hadir di RAT koperasi kalau diundang. Di sana kita kasih arahan, sosialisasi regulasi terbaru, dan juga memberikan pendidikan perkoperasian kepada anggota. Kehadiran kita itu juga sebagai sinyal positif bahwa koperasi ini diperhatikan pemerintah, sehingga anggota semakin percaya dan mau berpartisipasi."*[58]

Fourth, the reporting and verification stage. After conducting the RAT, cooperatives are required to submit reports to the Office. Such reporting may be conducted through the Cooperative Online Data System (ODS) developed by the Ministry of Cooperatives and Small and Medium Enterprises of the Republic of Indonesia, or manually for cooperatives that do not yet possess digital access. The Office subsequently verifies the submitted reports to ensure the completeness and accuracy of the reported data. The informant explained:

> *"Setelah RAT, koperasi wajib melaporkan. Bisa melalui ODS secara online, bisa juga manual. Kita verifikasi laporan yang masuk, kita cek apakah datanya lengkap dan sesuai."*

58 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

Fifth, the follow-up stage. For cooperatives that fail to conduct the RAT after the prescribed deadline has elapsed, the Office sends additional advisory letters and communicates via telephone to remind and encourage cooperatives to promptly conduct the RAT. If a cooperative fails to conduct the RAT for three consecutive years, it will automatically be deactivated from the ODS system. The informant stated:

> *"Kita surati, kita telepon, belum RAT, kenapa, dan gitu. Dan kadang-kadang memang justru kita tidak bisa menghubungi mereka. Karena faktor misalnya pengurusnya mengundurkan diri, atau banyak faktor. Sehingga pada intinya bahwa koperasi-koperasi yang tidak RAT itu kecenderungannya koperasi yang tidak aktif."*

This follow-up mechanism is consistent with the concept of repressive supervision as formulated by Victor M. Situmorang and Jusuf Juhir, namely supervision conducted after an activity or violation has occurred, with the objective of correcting and imposing sanctions upon established non-compliance. The combination of preventive, corrective, and repressive supervision therefore constitutes a comprehensive approach in supervising the obligation of cooperatives to conduct the RAT.

3. Forms of Supervision: On-Site dan Off-Site

Based on Regulation of the Minister of Cooperatives and Small and Medium Enterprises Number 9 of 2020, cooperative supervision may be carried out through two principal approaches, namely on-site and off-site supervision. On-site supervision refers to direct visits conducted by the relevant agency to cooperative premises in order to examine the institutional and business conditions of the cooperative factually and directly. Meanwhile, off-site supervision is conducted based on reports submitted by cooperatives to the relevant agency, including reports concerning the implementation of the Annual Members' Meeting (RAT).

In practice, the supervision of the RAT by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises is predominantly conducted through off-site or report-based supervision. This condition is primarily caused by significant budgetary constraints, resulting in the inability to optimally conduct direct on-site visits to cooperatives. The informant explained:

> *"Mohon maaf, keterbatasan anggaran juga yang mungkin terkait dengan pengawasan. Sampai dengan saat ini kita belum, kunjungan ke koperasi itu kan belum kita lakukan karena ya itu keterbatasan anggaran, minimnya anggaran yang ada terkait dengan pengawasan koperasi."*[59]

This condition gives rise to serious consequences for the quality of supervision. Passive supervision that depends primarily on cooperative reports (off-site supervision) is vulnerable to various weaknesses, since the Office is unable to directly verify the accuracy of the information reported. Inactive cooperatives or cooperatives intentionally avoiding the obligation to conduct the RAT tend not to report their actual conditions to the Office, resulting in their non-compliance only being discovered after a considerable period of time.[60]

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59 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

60 Teguh Rizkiawan, "Model Lembaga Pengawasan Koperasi Sebagai Upaya Perlindungan Hukum Bagi Masyarakat," *Lex Renaissance*, Vol. 8, No. 2, 2023, hlm. 357. https://journal.uii.ac.id/Lex-Renaissance/article/view/30038

Within the supervisory theory developed by Victor M. Situmorang and Jusuf Juhir, effective supervision requires a balance between direct and indirect supervision. Direct supervision is conducted when supervisors are personally present at the location where the supervised activities take place. In contrast, indirect supervision is conducted through written reports received from the supervised entities. Excessive dependence on one approach, particularly indirect supervision, may reduce the accuracy and responsiveness of supervisory agencies in detecting and responding to violations.

Furthermore, Victor M. Situmorang and Jusuf Juhir also emphasize that effective supervision must possess several essential characteristics: it must be economical, meaning that the benefits derived from supervision should exceed the costs incurred; it must be easily understood by all parties involved; and it must be capable of identifying problems at an early stage before they develop into crises that are difficult to address. Under the current condition, where supervision relies predominantly on off-site mechanisms, these ideal characteristics are difficult to fully achieve, particularly with respect to the early detection of problems.

4. Cooperative Data Management System through the Online Data System (ODS)

As part of efforts to modernize supervision, the Ministry of Cooperatives and Small and Medium Enterprises of the Republic of

Indonesia has developed the Cooperative Online Data System (ODS) as a digital platform for the nationwide collection and reporting of cooperative data. Through the ODS, cooperatives may report the implementation results of the RAT electronically, which may subsequently be accessed and verified by cooperative agencies at both the provincial and regency/municipal levels. The integration of this data system enables more comprehensive monitoring of RAT implementation achievements.

Based on ODS data as of 31 December 2025, out of approximately 29,987 active cooperatives recorded in East Java, only around 12,375 cooperatives had conducted and reported their RAT. This figure reflects a compliance rate of only approximately 41 percent. Data as of 31 March 2026 show a relatively similar situation: out of 29,219 active cooperatives, only 12,812 cooperatives, or approximately 43.8 percent, had reported the implementation of the RAT, while 16,407 cooperatives, or more than 56 percent, had not yet submitted RAT reports. These figures are highly concerning considering that the implementation of the RAT constitutes a fundamental legal obligation for every cooperative.[61]

The informant explained that these conditions do not entirely reflect the inactivity of all cooperatives that failed to submit reports. According to the informant, some cooperatives had in fact conducted the RAT but

61 Dinas Koperasi dan UKM Jawa Timur, Laporan Akuntabilitas Kinerja Instansi Pemerintah Tahun 2025, https://diskopukm.jatimprov.go.id/public/storage/upload/dokumen/1772696018_LAKIP%20Th.%202025%20Finall%202_compressed-1.pdf

failed to report it through the ODS due to various technical limitations. The informant stated:

> *"Bisa jadi koperasi yang tidak melaksanakan RAT itu dikarenakan banyak faktor. Bisa jadi ternyata koperasi ini sudah melaksanakan RAT tapi tidak melaporkan. Masih ada, banyak juga yang seperti itu."*[62]

This phenomenon demonstrates that the issue of RAT compliance is not limited solely to the implementation aspect, but also extends to the reporting dimension. Many cooperatives may have substantively fulfilled their obligation to conduct the RAT, yet have not integrated the ODS digital reporting system into their administrative governance practices. This condition is further aggravated by limited access to information technology among cooperatives located in rural areas or managed by administrators possessing low levels of digital literacy.

From the perspective of Victor M. Situmorang and Jusuf Juhir, inaccurate data systems constitute a serious obstacle to effective supervision. Effective supervision must be based upon valid and verifiable information. If the data available within the ODS do not accurately reflect actual field conditions, any follow-up actions undertaken by the supervisory agency may consequently fail to achieve their intended objectives.

As a comparison, the 2025 Government Agency Performance Accountability Report (LAKIP) of the East Java Provincial Office of

62 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

Cooperatives and Small and Medium Enterprises indicates that the total number of cooperatives supervised at the provincial level as of 31 December 2025 was 1,218 cooperatives. Of this number, the Office bears direct responsibility for ensuring RAT compliance. However, given the existing limitations in human resources and budgetary capacity, comprehensive supervision over all 1,218 cooperatives remains far from ideal.

5. Coordination between Provincial and Regency/Municipal Agencies

Within the framework of regional autonomy established under Law Number 23 of 2014 concerning Regional Government, supervisory authority over cooperatives is divided between provincial governments and regency/municipal governments based on the scope of cooperative membership. The East Java Provincial Office of Cooperatives and Small and Medium Enterprises possesses supervisory authority over cooperatives whose membership extends across multiple regencies/municipalities, whereas cooperatives whose membership is confined within a single regency or municipality fall under the supervisory responsibility of the respective regency/municipal cooperative agency.

The informant explained this division of authority as follows:

> *"Pengawasan itu hanya kepada koperasi binaannya masing-masing. Kabupaten/kota punya peran fungsi pengawasan kepada siapa? Koperasi binaan kabupaten/kota. Provinsi, ya fungsi pengawasan kepada koperasi yang binaannya provinsi. Yang binaan provinsi seperti apa? Yang anggotanya adalah lintas kabupaten/kota. Kalau koperasi yang*

> *anggotanya dalam daerah kabupaten/kota, itu adalah koperasi binaan kabupaten/kota."*[63]

Regarding coordination between provincial and regency/municipal agencies, the informant stated that the relationship between these agencies is primarily coordinative in nature. This arrangement constitutes a consequence of the implementation of regional autonomy, which grants independent authority to regency and municipal governments in managing their own governmental affairs, including cooperative guidance and supervision. Coordination is conducted through forums, data sharing, and program synchronization, but does not constitute a hierarchical command relationship. The informant further explained:

> *"Koordinasi kita dengan dinas kabupaten/kota itu bukan hubungan atasan bawahan. Kita lebih ke koordinasi, sharing data, sinkronisasi program. Masing-masing punya kewenangan sendiri sesuai otonomi daerah."*[64]

In the context of RAT supervision, this division of authority carries important implications. The Provincial Cooperative Office of East Java bears direct responsibility only for supervising the 1,218 provincially supervised cooperatives recorded as of 31 December 2025. The remaining cooperatives fall under the supervision of regency and municipal cooperative agencies throughout East Java. The capacity and commitment of each regency or municipal agency in carrying out RAT supervisory

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63 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)
64 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

functions naturally vary, resulting in differing levels of cooperative compliance across regions.

This condition underscores the importance of establishing a strong coordination framework between provincial and regency/municipal agencies. According to Victor M. Situmorang and Jusuf Juhir, synchronization among supervisory units constitutes one of the prerequisites for comprehensive and effective supervision. The absence of structured and measurable coordination mechanisms may lead to data fragmentation, overlapping programs, or even supervisory gaps affecting certain cooperatives.

6. Functions and Significance of RAT Reporting to the Agency

The obligation to report RAT outcomes to the relevant agency is not merely an administrative formality, but possesses highly significant substantive functions within the broader framework of supervision and regional economic development. Based on the informant's explanation, RAT reports contain various strategic data concerning cooperative performance that may be utilized for planning and evaluation purposes. The informant explained the functions of RAT reporting as follows:

> *"Terkait dengan laporan RAT, di dalam laporan RAT itu kan ada bicara masalah kinerja koperasi. Nah, kinerja koperasi itu dari situ kan ada angka-angkanya terkait dengan laporan keuangan. Tujuannya, jadi bisa melihat seberapa besar sih kontribusi koperasi terhadap PDRB. Berapa besar sih kebermanfaatan koperasi terhadap masyarakat sekitar dari mana? Dari dana sosial yang dihimpun oleh koperasi. Terus, kebermanfaatan terkait dengan laporan RAT, jadi di situ ada data-data yang terkumpul: jumlah karyawannya, jumlah SHU*

yang diperoleh oleh koperasi, jumlah perputaran uangnya, dan banyak sekali."[65]

The foregoing statement reveals at least four principal functions of RAT reporting to the supervisory agency. First, the accountability function, namely ensuring that cooperative management and supervisory boards remain accountable both to cooperative members and to the state. Second, the statistical function, namely providing accurate empirical data regarding cooperative conditions and performance as the basis for policy formulation. Third, the economic function, namely measuring the contribution of the cooperative sector to the Gross Regional Domestic Product (GRDP) and employment absorption. Fourth, the social function, namely monitoring the role of cooperatives in improving the welfare of members and communities through the distribution of Surplus Proceeds (SHU) and social funds.

The data collected through RAT reporting also possess strategic value for regional governments. East Java, as the province with the largest number of cooperatives nationally and with total cooperative assets amounting to IDR 63.38 trillion, business volume reaching IDR 46.39 trillion, and SHU amounting to IDR 1.27 trillion, requires accurate and up-to-date data to formulate targeted cooperative empowerment policies. The contribution of Micro, Small, and Medium Enterprises (MSMEs) to the East Java economy in 2025 was recorded at 60.094 percent, equivalent to IDR 2,045.12 trillion at current prices, representing an increase of 7.43 percent compared to 2024.

65 Syamsul Hidayat, Wawancara, (Sidoarjo, 2 April 2026)

Meanwhile, the added value of cooperatives and assisted MSMEs at current prices reached IDR 9.413 trillion, growing by 8.95 percent from IDR 8.64 trillion in 2024. The ratio of cooperative business volume to East Java's GRDP in 2025 reached 1.36 percent, exceeding the target range of 1.28–1.32%.[66] Incomplete RAT reporting data directly affect the quality of such policy planning.

In the view of Victor M. Situmorang and Jusuf Juhir, supervision functions not only to detect irregularities, but also to provide useful information for managerial decision-making. In other words, RAT reports received by the supervisory agency function not merely as instruments of control, but also as strategic sources of information for planning the overall development of the cooperative sector.

C. Optimization Efforts in Supervising the RAT Obligation by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises

1. Cooperative Socialization and Education Program

One of the primary efforts undertaken by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in optimizing cooperative compliance with the RAT obligation is through a socialization and education program conducted on a regular basis. This socialization is

66 Dinas Koperasi dan UKM Jawa Timur, Laporan Akuntabilitas Kinerja Instansi Pemerintah Tahun 2025, hal 47 https://diskopukm.jatimprov.go.id/public/storage/upload/dokumen/1772696018_LAKIP%20Th.%202025%20Finall%202_compressed-1.pdf

directed at enhancing the understanding of cooperative management boards and supervisory boards regarding the obligations, procedures, and benefits of conducting the RAT. The informant described the various forms of socialization carried out:

> *"Webinar kita lakukan. Webinar terkait dengan sosialisasi-sosialisasi kita lakukan. Bagaimana sih pentingnya RAT itu, terus bagaimana pelaksanaan RAT-nya, terus juga kebermanfaatan atau manfaat dari RAT itu seperti apa. Itu kita lakukan. Artinya, kita mensosialisasikan, memberikan edukasi lewat pelatihan-pelatihan, baik lewat media offline maupun online, itu kita lakukan."*[67]

With regard to the schedule of socialization activities, the informant noted that the socialization and notification of RAT obligations are conducted at two principal junctures: first, at the end of the year (October–December) ahead of the RAT implementation period; and second, at the beginning of the year (first quarter, January–March) during the period in which the RAT is actively being conducted. Nevertheless, the frequency and scope of existing socialization activities have not been optimal given the large number of cooperatives that constitute the target audience.

Viewed through the lens of the supervisory theory developed by Victor M. Situmorang and Jusuf Juhir, this socialization program falls within the category of preventive supervision, as it is conducted prior to the RAT obligation falling due, with the aim of ensuring that cooperatives understand and are prepared to fulfill their obligations. Effective socialization constitutes a critical first step in cultivating a culture of legal compliance among cooperative management boards.

67Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

The utilization of digital platforms such as webinars represents an appropriate approach for reaching cooperatives dispersed across various parts of East Java with greater cost efficiency compared to in-person meetings. However, the effectiveness of webinars is highly dependent upon the technological accessibility and digital readiness of the participants. In regions with limited digital infrastructure, socialization approaches through offline media and direct face-to-face meetings remain indispensable.

2. Active Assistance in RAT Implementation

In addition to socialization, the East Java Provincial Office of Cooperatives and Small and Medium Enterprises also provides active assistance to cooperatives that invite the Office to attend the RAT. Such assistance constitutes a tangible manifestation of the guidance function entrusted to the Office as mandated by prevailing laws and regulations.

In RAT assistance sessions, the Office provides several forms of support: guidance on the procedures for conducting the RAT in accordance with applicable regulations, dissemination of the most recent cooperative legislation, and cooperative education for members. The informant explained:

> *"Kita hadir di RAT koperasi kalau diundang. Di sana kita kasih arahan, sosialisasi regulasi terbaru, dan juga memberikan pendidikan perkoperasian kepada anggota. Kehadiran kita itu juga sebagai sinyal positif bahwa koperasi ini diperhatikan pemerintah, sehingga anggota semakin percaya dan mau berpartisipasi."*[68]

68Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

It should be noted, however, that not all cooperatives invite the Office to attend the RAT. The prevailing regulations do not require cooperatives to invite the Office, and cooperatives therefore retain the right to conduct the RAT independently. The informant confirmed this by stating that cooperatives conducting the RAT independently are permitted to do so, provided they remain obligated to report the results following the conclusion of the meeting. This condition means that the scope of active assistance by the Office extends only to those cooperatives that voluntarily invite its participation.

From the perspective of Victor M. Situmorang and Jusuf Juhir's supervisory theory, the attendance of the Office at a cooperative's RAT may be understood as a form of facilitative corrective supervision. The Office does not merely monitor implementation, but also actively provides guidance whenever deviations from applicable regulations are identified. This facilitative approach is generally more effective in building a long-term culture of compliance compared to an approach that relies solely on the threat of sanctions.

3. Periodic Monitoring and Follow-Up

The East Java Provincial Office of Cooperatives and Small and Medium Enterprises conducts periodic monitoring of RAT implementation progress throughout the January to June period each year. Monitoring is conducted on a regular basis, both weekly and monthly, to determine the number of cooperatives that have implemented and reported the RAT within each time period. This monitoring data serves as the basis for the Office to identify which cooperatives require more intensive attention and follow-up measures.

For cooperatives that have not conducted the RAT after the prescribed deadline has elapsed, the Office issues advisory letters and communicates by telephone. The informant acknowledged that these communication efforts are not always successful:

> *"Kita surati, kita telepon, belum RAT, kenapa, dan gitu. Dan kadang-kadang memang justru kita tidak bisa menghubungi mereka. Karena faktor misalnya pengurusnya mengundurkan diri, atau banyak faktor. Sehingga pada intinya bahwa koperasi-koperasi yang tidak RAT itu kecenderungannya koperasi yang tidak aktif."*[69]

The existing follow-up mechanism currently relies predominantly on a communication and advisory approach, the effectiveness of which is highly dependent upon the responsiveness and good faith of the cooperative management board. When cooperatives are unresponsive or deliberately evasive, the Office has few options other than to await the accumulation of violations over three consecutive years before administrative measures in the form of deactivation from the ODS system may be taken.

According to Victor M. Situmorang and Jusuf Juhir, firm follow-up measures constitute a key element of effective repressive supervision. Without tangible and felt consequences in the short term, non-compliant

69Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

cooperatives will tend to continue disregarding their obligations, as there is no significant risk to bear in the near term.

4. Administrative Sanction Mechanisms

Within the framework of applicable positive law, several administrative sanctions may be imposed upon cooperatives that fail to fulfill the RAT obligation. Based on Law Number 25 of 1992 and Regulation of the Minister of Cooperatives and Small and Medium Enterprises Number 9 of 2020, sanctions that may be applied include written reprimands, suspension of business activities, and revocation of cooperative legal entity status for cooperatives proven to have failed to meet the minimum institutional requirements.

In greater detail, sanctions applicable to cooperatives that fail to convene the RAT include written warnings, written notices, non-issuance of the Cooperative Registration Number (NIK) certificate, and dissolution in the event that a cooperative fails to conduct the RAT for more than three consecutive years as regulated under the Ministerial Regulation on Cooperatives and Small and Medium Enterprises.70

Nonetheless, in practice, the progressive application of such administrative sanctions continues to face various obstacles. The informant acknowledged that the administrative sanctions in the form of written reprimands and advisory letters currently employed have not been

70 "RAT Koperasi Diselenggarakan Asal-asalan, Adakah Hukumnya?", *Klinik Hukumonline*, 11 September 2023. https://www.hukumonline.com/klinik/a/rat-koperasi-diselenggarakan-asal-asalan-adakah-hukumnya-lt64fae95e1d736/

sufficiently effective in encouraging compliance among inactive cooperatives. The sole automatic mechanism currently operational is the deactivation of a cooperative from the ODS system after three consecutive years of failing to conduct the RAT. The informant expressed the following view:

> *"Ya memang sanksinya ada di situ, tapi nanti kan ada sanksinya. Tapi kalau mereka tidak melaksanakan secara berturut-turut, ya sudah, mereka tidak muncul di sistem data ODS."*[71]

The weakness of this sanction mechanism is closely related to the fundamental factor raised by the informant: the unwillingness of cooperative management boards to account for their management of the cooperative to its members.

The informant explicitly noted that for cooperatives that are genuinely unwilling to be transparent, no sanction can compel them to conduct the RAT in the short term:

> *"Nah, kita kan kembali lagi pada koperasinya. Apakah koperasinya itu mau? Apakah koperasinya siap melaksanakan RAT atau tidak? Semua kembali lagi pada koperasinya. Dan kembali lagi pada transparansi pengurus-pengawas. Mau nggak mempertanggungjawabkan? Kalau mereka nggak siap mempertanggungjawabkan, nggak bakalan mau dia, dipaksa apapun, melaksanakan RAT. Ayo laksanakan RAT, ayo laksanakan RAT, dan kalau dia nggak mau mempertanggungjawabkan, kita nggak punya kuasa."*[72]

This reflects the prevalence of a low accountability culture among certain cooperative management boards. Within the supervisory theory of

71Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)
72Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

Victor M. Situmorang and Jusuf Juhir, the weakness of repressive sanction enforcement constitutes a structural problem that cannot be resolved merely by increasing the severity of the threatened sanctions. What is required is a synergy among robust preventive supervision, responsive corrective supervision, and consistent repressive supervision in order for the supervisory system to be genuinely effective in promoting cooperative compliance.

5. Institutional Strengthening Activities by the Institutional and Supervisory Division

In addition to socialization programs and RAT assistance, the Office of Cooperatives and Small and Medium Enterprises, through its Institutional and Supervisory Division, also carries out a number of concrete activities to improve the institutional quality of cooperatives. The realization of each institutional strengthening activity for Cooperatives and SMEs in 2025 exceeded the established targets, as recorded in the Government Agency Performance Accountability Report (LAKIP) of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises for the Year 2025. The following activities were conducted.

First, the SERGAP (Joint Guidance Attack) Activity. This activity aims to conduct comprehensive joint guidance in accordance with Regulation of the Minister of Cooperatives and Small and Medium Enterprises of the Republic of Indonesia Number 9 of 2018. In 2025, SERGAP was conducted in 7 Regencies/Cities, namely Jombang, Gresik, Jember, Tuban, Lumajang, Bangkalan, and Magetan. Through this activity, legal counseling for Cooperatives and SMEs was provided to 450 Cooperative and SME units, and Business Identification Numbers (NIB) were issued to 262 business actors.

Second, the Cooperative Health Assessment Activity. Based on Regulation of the Minister of Cooperatives and Small and Medium Enterprises Number 9 of 2020, the Office conducted health assessments of cooperatives, particularly those possessing savings and loan business units (USP). In 2025, against a target of 400 cooperatives to be assessed, actual realization reached 499 cooperatives through off-site and on-site supervisory systems. Of the 81 cooperatives that underwent health assessments, the results were distributed across the following ratings: Healthy (30), Sufficiently Healthy (41), Under Supervision (7), Under Special Supervision (2), and Not Yet Rated (1).

Third, the Fit and Proper Test. This activity constitutes an assessment process to ensure that the management board members, supervisory board members, or managers of a cooperative possess the competence, integrity, and morality necessary to manage the cooperative in a sound and responsible manner. In 2025, of the 76 cooperatives that applied, 60 cooperatives were successfully facilitated, with the following outcomes: 37 passed, 10 passed with notes, 4 passed re-testing with notes, 4 passed re-testing, and 5 did not pass. This facilitation is directly relevant to the RAT obligation, as the fit and proper test constitutes one of the requirements for the issuance of the Savings and Loan Business License (IUSP) and the replacement of cooperative management boards.

Fourth, the Red and White Village/Kelurahan Cooperative Program (KDKMP). As part of the national priority program, 8,494 KDKMPs (100%) have been established throughout East Java, distributed across all villages and sub-districts. As of the end of December 2025, 997 KDKMPs (11.74%) were already operational. The Office facilitated the costs of establishment deeds for 1,660 KDKMPs, conducted socialization and legal legality assistance, and provided training to 16,167 KDKMP management board members. This program also contributed to a significant increase in the number of active cooperatives to 29,987 units in 2025.

Fifth, the Aspect of Human Resource Quality Improvement. The improvement of human resource quality for Cooperative and SME personnel was carried out through various training activities to enhance the capacity of cooperative and SME management. In 2025, the Office organized 10 training activities for 656 cooperative management board members/managers, and 24 training activities for 2,330 SME actors. In addition, competency certification training based on the National Work Competency Standards (SKKNI) was attended by 750 participants from the cooperative and MSME communities. Through the SIJAWARA platform, 21 online training sessions were conducted with a total of 2,872 participants. Mentoring activities were also carried out by 182 business capacity mentors distributed across 38 Regencies/Cities, with a total of 26,820 cooperative and SME units receiving mentoring throughout 2025.

D. Challenges in Supervising the RAT Obligation in East Java Province

1. Human Resource and Budgetary Constraints

One of the most fundamental challenges faced by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in carrying out the RAT supervisory function is the limitation of human resources and budgetary capacity. This condition directly restricts the ability of the Office to conduct comprehensive supervision over all cooperatives under its oversight. The informant stated:

> *"Koperasi binaan provinsi itu 1.218 per 31 Desember. Kalau kita harus mengawasi 1.218 koperasi, mengidentifikasi 1.218 koperasi, SDM kita berapa orang, waktu efektif kita cuma berapa."*[73]

The foregoing statement implicitly reveals the highly disproportionate relationship between the supervisory workload and the available human resource capacity. If a single supervisor must simultaneously oversee dozens of cooperatives, each with varying degrees of complexity and conditions, the depth of supervision that can be effectively conducted is necessarily very limited.

Budgetary constraints also constitute a serious impediment. The Office does not possess adequate funding to conduct regular on-site field visits to all cooperatives under its supervision. As a result, supervision is compelled

73Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

to rely more heavily on the reporting mechanism (off-site supervision), which, as previously elaborated, has inherent weaknesses in terms of the accuracy and completeness of information. The informant directly stated:

> *"Mohon maaf, keterbatasan anggaran juga yang mungkin terkait dengan pengawasan. Sampai dengan saat ini kita belum, kunjungan ke koperasi itu kan belum kita lakukan karena ya itu keterbatasan anggaran, minimnya anggaran yang ada terkait dengan pengawasan koperasi."*[74]

Within the perspective of Victor M. Situmorang and Jusuf Juhir, the imbalance between workload and resource capacity constitutes one of the principal factors that diminishes the effectiveness of supervisory performance. Optimal supervision requires resource support that is proportional to the workload it bears. Without adequate budgetary and human resource support, optimal supervision will remain nothing more than an aspiration without realization.

This human resource constraint also affects the ability of the Office to conduct supervision of a comprehensive nature, covering not only whether the RAT has been conducted, but also examining the quality of its implementation, its conformity with regulations, and its impact upon members. Supervision that is limited to the quantitative aspect (whether or not the RAT has been conducted) without addressing the qualitative dimension (how the RAT is conducted and what its impact is) remains insufficient to fulfill the ideal objectives of RAT supervision.

2. Geographical Challenges and the Dispersion of Cooperatives

74Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

East Java is a province with a vast territory comprising 38 regencies/cities. This diverse geographical condition adds to the complexity of cooperative supervision, as cooperatives requiring oversight are dispersed across various parts of the territory with varying degrees of accessibility.

The combination of expansive territory, the large number of cooperatives, and the limited number of supervisory personnel creates significant logistical challenges for the conduct of on-site supervision. Even for the 1,218 provincially supervised cooperatives alone, the Office faces difficulties in conducting regular direct visits.

These geographical challenges also affect efforts to communicate and coordinate between the Office and cooperatives. The informant noted that certain cooperatives located in remote areas or whose management boards are no longer active are difficult to contact:

> *"Kadang-kadang memang justru kita tidak bisa menghubungi mereka. Karena faktor misalnya pengurusnya mengundurkan diri, atau banyak faktor."*[75]

Within the supervisory theory framework of Victor M. Situmorang and Jusuf Juhir, geographical challenges of this nature are generally addressed through effective decentralization of supervisory functions or the intensive use of information technology. The digital supervisory system such as the ODS constitutes a fundamental response to these geographical

75Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

challenges. However, its effectiveness still requires improvement, particularly with respect to the scope and reliability of the available data.

3. Low Legal Awareness Among Cooperative Management Boards

Legal awareness constitutes one of the primary root causes of the low compliance of cooperatives with the RAT obligation. Based on the informant's account, the non-compliance of cooperatives with the RAT obligation is not always attributable to ignorance, but frequently to the unwillingness of management boards to account for their cooperative management to members. The informant offered a particularly incisive assessment regarding this matter:

> *"Nah, kita kan kembali lagi pada koperasinya. Apakah koperasinya itu mau? Apakah koperasinya siap melaksanakan RAT atau tidak? Semua kembali lagi pada koperasinya. Dan kembali lagi pada transparansi pengurus-pengawas. Mau nggak mempertanggungjawabkan? Kalau mereka nggak siap mempertanggungjawabkan, nggak bakalan mau dia, dipaksa apapun, melaksanakan RAT. Ayo laksanakan RAT, ayo laksanakan RAT, dan kalau dia nggak mau mempertanggungjawabkan, kita nggak punya kuasa."*[76]

This statement reveals a cultural problem in the governance of certain cooperatives in East Java. The tendency of management boards to avoid accountability reflects a low culture of accountability and transparency in cooperative management. This condition also indicates the possibility of cooperative management that is inconsistent with cooperative principles,

76Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

including the potential for abuse of authority or non-transparent financial management.

Within the perspective of the supervisory theory of Victor M. Situmorang and Jusuf Juhir, low legal awareness among those subject to supervision constitutes a serious impediment to the effectiveness of supervision. Genuinely effective supervision does not merely depend on the capacity of the supervisory institution, but also on the willingness and ability of the supervised parties to comply with the rules. Accordingly, efforts to increase the legal awareness of cooperative management boards must be made a priority within a comprehensive RAT supervisory strategy, proceeding in tandem with the strengthening of firm sanction mechanisms.

4. Dualism of Cooperative Activity

The challenge of RAT supervision is further complicated by the phenomenon of dualism of cooperative activity, namely the condition in which a cooperative may be active in terms of its business operations but inactive in terms of its institutional standing, or vice versa. The informant described this condition with considerable clarity:

> *"Bisa jadi yang 18.000 itu koperasi aktif-aktif, tapi ada yang aktifnya dari sisi usaha, ada yang aktifnya dari sisi kelembagaan. Jadi kalau kita melihat koperasi itu harusnya dari dua sisi: sisi usaha dan sisi kelembagaan. Ini dua-dua mata uang, seperti apa, dua sisi mata uang yang tidak boleh dipisahkan."*[77]

77Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

This dualism of activity makes it more difficult to identify and prioritize cooperatives that require supervisory intervention. A cooperative that is active in its business operations but fails to conduct the RAT represents precisely the most dangerous case, since business activity proceeding without member oversight through the RAT mechanism potentially creates opportunities for the misuse of funds and authority.

Conversely, cooperatives that are not actively engaged in business but remain formally registered as legal entities create their own set of problems in terms of data recording and the allocation of supervisory resources. Without a clear mechanism for distinguishing between genuinely active, semi-active, and inactive cooperatives, statistical data regarding RAT compliance becomes difficult to interpret accurately.

Victor M. Situmorang and Jusuf Juhir emphasize the importance of appropriate classification in the conduct of supervision. Supervisory policy should be capable of distinguishing among cooperatives requiring intensive guidance, cooperatives that need to be encouraged to conduct the RAT, and cooperatives whose legal entity status is no longer viable for preservation

E. Summary of Challenges in RAT Supervision

The challenges in supervising the RAT obligation are twofold in nature, originating from both internal and external factors. On the internal side, the limitation of supervisory personnel constitutes the primary impediment. The East Java Provincial Office of Cooperatives and Small and Medium Enterprises is required to supervise 1,218 provincially supervised cooperatives as of 31 December 2025; however, the number of available personnel is not proportional to this workload. Budgetary constraints have also resulted in the failure to conduct regular on-site supervision, causing supervision to rely more heavily on the reporting mechanism (off-site), which has inherent limitations with respect to data accuracy. Additionally, the uneven distribution of digital infrastructure and facilities among cooperatives further hampers the completeness of reporting through the ODS system.

On the external side, the primary challenge is the low awareness and compliance of cooperative management boards in implementing the RAT. The role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises is to supervise cooperatives; however, in practice, many cooperatives exist that are fictitious or were established as mere formalities. This condition necessitates ongoing mitigation through the work programs of Cooperative Health Assessment and Fit and Proper Tests covering the entire management and supervisory structure of cooperatives. Without consistent mitigation mechanisms, such cooperatives have the potential to cause harm to members without being detected by external supervisors. Other factors that contribute to external challenges include budgetary efficiency measures that narrow the scope of field supervision, as well as regulatory changes that require rapid adaptation from both cooperative management boards and agency personnel.

F. Maslahah Analysis According to Imam Asy-Syatibi on the Optimization of the Role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in Supervising the RAT Implementation Obligation

1. The Theoretical Framework of Maslahah by Imam Asy-Syatibi as an Analytical Framework

Before analyzing RAT supervision through the lens of maslahah, it is first necessary to understand the conceptual framework of maslahah as constructed by Asy-Syatibi in his monumental work, Al-Muwafaqat fi Ushul al-Syariah. Asy-Syatibi argued that the entirety of Islamic law is established with one primary objective: the realization of benefit (maslahah) for humanity, both in this world and in the hereafter. In other words, no rule of Islamic law is established without a wisdom or purpose of benefit constituting its underlying rationale.

Asy-Syatibi classified the objectives of Islamic law (maqashid al-syariah) into five fundamental elements known as al-kulliyyat al-khams or al-daruriyyat al-khams, namely: the preservation of religion (hifz al-din), the preservation of life (hifz al-nafs), the preservation of intellect (hifz al-aql), the preservation of lineage (hifz al-nasl), and the preservation of property (hifz al-mal). These five elements constitute the fundamental human needs, the disruption of any of which would render human life abnormal, potentially leading to destruction and ruin.

Furthermore, Asy-Syatibi divided the levels of maslahah into three: daruriyyat (primary), hajiyyat (secondary), and tahsiniyyat (tertiary). Daruriyyat maslahah represents the most fundamental form of benefit, which cannot be disregarded under any circumstances, as it concerns the very existence and continuity of human life. Hajiyyat represents the benefits required to remove hardship and facilitate affairs, though not to the extent of threatening the continuity of life if disregarded. Tahsiniyyat, meanwhile, constitutes benefits that serve to perfect and embellish life.

The theoretical framework of maslahah by Asy-Syatibi is highly relevant to the analysis of the RAT supervisory function in cooperatives, as RAT supervision essentially constitutes an effort to ensure the realization of several forms of benefit simultaneously, particularly those relating to hifz al-mal (the preservation of property) and hifz al-nafs (the preservation of life in a broader sense, including the welfare of the living) for cooperative members.

2. The Concrete Impact of RAT Non-Compliance on Cooperative Members: Analysis of Hifz al-Mal

From the perspective of Asy-Syatibi's maslahah, cooperative non-compliance with the RAT obligation constitutes a genuine threat to hifz al-mal (the preservation of property) of cooperative members. The property of cooperative members, invested in the form of principal savings, mandatory savings, and voluntary savings, constitutes an amanah (trust) that must be managed transparently and responsibly by the management board.

In Al-Muwafaqat, Asy-Syatibi affirmed that the preservation of property is one of the five fundamental human needs that must be protected by every individual and community. The preservation of property does not merely mean guarding property from theft or physical destruction, but also encompasses protection from dishonest management, manipulation, and misappropriation.[78] In the context of cooperatives, the RAT constitutes the primary mechanism ensuring that the management of members' property is conducted in accordance with cooperative principles and applicable legal provisions.

When the RAT is not conducted, at least three conditions potentially giving rise to mafsadah (harm) may arise. First, members lose their right to transparent information regarding the financial condition and performance of the cooperative. This constitutes a violation of the fundamental rights of members guaranteed by Article 20 of Law Number 25 of 1992. The informant explicitly highlighted this issue of transparency:

> *"Kembali lagi pada transparansi pengurus-pengawas. Mau nggak mempertanggungjawabkan?"*[79]

Second, members have no opportunity to demand accountability from the management and supervisory boards, thereby rendering the

78Asmawi, Teori Maslahat dan Relevansinya dengan Perundang-Undangan Pidana Khusus di Indonesia (Jakarta: Badan Litbang dan Diklat Kemenag RI, 2022), hlm. 64.
79 Syamsul Hidayat, Interview, (Sidoarjo, 2 April 2026)

potential for misappropriation of cooperative funds uncontrolled.80 This represents a tangible manifestation of the threat to hifz al-mal that must be prevented. Third, members are unable to participate in strategic decision-making regarding the direction and policies of the cooperative, which constitutes, in essence, the very spirit of the economic democracy that forms the philosophical foundation of cooperatives.

Asy-Syatibi, in his concept of maslahah mursalah, affirmed that any effort aimed at preventing mafsadah and bringing about maslahah for the community, even where not explicitly mentioned in the scriptural texts, may be legally justified provided it does not conflict with the fundamental principles of Islamic law.81 Based on this principle, the supervision conducted by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises over the RAT obligation constitutes an effort fully consistent with the principle of maslahah of Asy-Syatibi, as it is directed at preventing the mafsadah of misappropriation of cooperative members' property.

3. Analysis of the Levels of Maslahah in RAT Supervision

Employing Asy-Syatibi's three-tiered maslahah framework (daruriyyat, hajiyyat, and tahsiniyyat), it may be analyzed that cooperative RAT

80 Magdalena Femilia Nean, Andreas Rengga, Wihelmina M. Yulia Jaeng, "Analisis Pengawasan Tata Kelola Koperasi dalam Meningkatkan Akuntabilitas pada KSP Kopdit Pintu Air Cabang Kewapante," PROJEMEN, Vol. 12, No. 3, September 2025, hlm. 374. https://ejournal-nipamof.id/index.php/Projemen/article/download/1071/1130

81 Wahbah Az-Zuhaili, Ushul Fikih Islam (Jakarta: Gema Insani, 2021), hlm. 1020.

supervision occupies different levels depending on the dimension under examination.

At the level of daruriyyat (primary benefit), RAT supervision constitutes an essential form of maslahah because it directly relates to the protection of property (hifz al-mal) of millions of cooperative members. Without effective supervision of the RAT obligation, the property of members is potentially subject to misappropriation without adequate accountability mechanisms. This constitutes a threat at the daruriyyat level that cannot be disregarded.

At the level of hajiyyat (secondary benefit), RAT supervision contributes to the realization of sound cooperative governance, which in turn supports the sustainability of cooperatives as economic entities that are beneficial to members and the wider community. Without adequate supervision, an unhealthy cooperative may not immediately dissolve or cause harm to its members in the short term; however, in the long term, it has the potential to generate various difficulties.

At the level of tahsiniyyat (tertiary benefit), good RAT supervision can promote the realization of cooperatives that are high-quality, innovative, and make significant contributions to the broader economic empowerment of society. Cooperatives that comply with the RAT requirement tend to exhibit better governance, which in turn positively correlates with their business performance and socio-economic contributions.

Based on the analysis of Asy-Syatibi's levels of maslahah above, it is clear that RAT supervision constitutes a need that begins at the level of daruriyyat and extends upward to hajiyyat and tahsiniyyat. This means that such supervision is not merely an option or an additional measure, but rather an imperative that cannot be disregarded if the benefit of the community is to be preserved.[82]

4. Evaluation of the Effectiveness of RAT Supervision from the Perspective of Asy-Syatibi's Maslahah

With reference to Asy-Syatibi's maslahah framework, truly effective supervision is that which is genuinely capable of realizing maslahah and preventing mafsadah. In Al-Muwafaqat, Asy-Syatibi affirmed that every legal policy or action must be evaluated in terms of its actual impact on the benefit of the community, not merely in terms of its formality or its conformity with applicable regulatory texts.

Based on this standard, the RAT supervision currently conducted by the East Java Provincial Office of Cooperatives and Small and Medium Enterprises still exhibits a considerable gap between its normative objectives and the realities observed in the field. Although formally there is already an adequate regulatory framework and organized supervisory procedures, their effectiveness in realizing genuine maslahah for cooperative members remains far from ideal.

82 Abdul Helim, Maqashid Al-Syariah versus Ushul Fikih (Yogyakarta: Pustaka Pelajar, 2020), hlm. 55.

First, in terms of achievement, more than 56 percent of active cooperatives in East Java have still not reported the implementation of the RAT, meaning that more than half of cooperative members potentially do not receive the hifz al-mal protection that ought to constitute a guarantee for them. This represents a failure to realize maslahah at the level of daruriyyat.

Second, in terms of enforcement mechanisms, the existing sanction mechanism has not been sufficiently effective in promoting compliance among inactive cooperatives. When cooperative management boards refuse to account for their management, the Office has no effective means of compelling them in the short term. From Asy-Syatibi's perspective, this condition contradicts the principle that the benefit of the community must not be left exposed to threat merely because of the unwillingness of a handful of parties to comply with the rules.

Third, in terms of supervisory orientation. Current supervision is more focused on the quantitative aspect (the number of cooperatives conducting the RAT) than the qualitative dimension (whether the conduct of the RAT genuinely realizes maslahah for members). This is consistent with Asy-Syatibi's critique of legal formalism, which attends only to outward compliance without regard for the substantive impact upon the welfare of the community.

5. An Ideal Model of RAT Supervision from the Perspective of Asy-Syatibi's Maslahah Mursalah

In the context of maslahah mursalah that is, public benefit not explicitly mentioned in the scriptural texts but not contrary to them, and grounded in considerations of public interest Asy-Syatibi provides guidance that every policy enacted by the government (ulil amri) must always be oriented toward the realization of genuine maslahah for the people it governs. This principle is highly relevant to the formulation of an ideal model of RAT supervision.

An ideal model of RAT supervision from the perspective of Asy-Syatibi's maslahah must possess at least several characteristics. First, it must be proactive and preventive in nature. Supervision must not merely await incoming reports, but must actively encourage and facilitate the conduct of the RAT by cooperatives. Within Asy-Syatibi's framework, preventing mafsadah (dar al-mafasid) is accorded greater priority than merely addressing mafsadah that has already occurred (jalb al-mashalih). The notification letters, socialization activities, and assistance conducted by the Office are consistent with this principle; however, the frequency and intensity of such activities require enhancement.

Second, it must be based on accurate and integrated data. The digital data collection system (ODS) must be optimized so that the Office possesses an accurate, real-time picture of cooperative conditions. Asy-Syatibi emphasized that the establishment of law and policy must be grounded in a deep understanding of existing reality, not merely in assumptions. Accurate

ODS data constitutes the foundation for the formulation of targeted and well-directed supervisory policy.

Third, it must possess a proportional and effective sanction enforcement mechanism. Asy-Syatibi affirmed that law unaccompanied by an adequate enforcement mechanism will be incapable of realizing the maslahah it is intended to achieve. In this context, a graduated and consistent sanctioning mechanism is required — from written reprimands, suspension of administrative services, to revocation of legal entity status for repeatedly non-compliant cooperatives — in order for deterrence to be effectuated.

Fourth, it must be oriented toward the genuine impact upon members. The evaluation of supervision must not merely measure the quantitative RAT implementation compliance rate, but must also measure the impact upon improvements in transparency, trust, and the welfare of members in qualitative terms. This is consistent with Asy-Syatibi's principle that the measure of success of law and policy lies in its actual impact upon the welfare of the community, not merely in its conformity with regulatory texts.

Fifth, it requires the strengthening of specific regional regulations. The vacuum of gubernatorial or regional regulations specifically governing the mechanism for RAT supervision at the level of East Java Province must be urgently filled. From the perspective of Asy-Syatibi's maslahah, filling a legal vacuum that has the potential to obstruct the realization of maslahah constitutes an obligation of ulil amri that cannot be deferred.

CHAPTER V
CONCLUSION

A. Conclusion

Based on the findings and discussion presented in the preceding chapters, the following conclusions may be drawn:

1. The role of the East Java Provincial Office of Cooperatives and Small and Medium Enterprises in supervising the obligation to conduct the Annual Members' Meeting (Rapat Anggota Tahunan/RAT) has been supported by a clear legal basis and implemented through several stages, namely notification, monitoring, assistance, verification of ODS reports, and follow-up measures for cooperatives that have failed to conduct the RAT. Such supervision is carried out through both on-site and off-site approaches; however, the supervisory mechanism remains predominantly off-site due to limitations in human resources and budget allocation. Although the internal supervisory targets of the Office have formally been achieved, the level of cooperative compliance remains relatively low. This is evidenced by ODS data as of 31 March 2026, indicating that only approximately 43.8% of active cooperatives had reported the implementation of their RAT. This condition demonstrates that supervisory measures still require further optimization, particularly in light of constraints relating to limited resources, the extensive territorial scope of supervision, the low level of legal awareness among cooperative management, the dualism regarding the status of active

cooperatives, as well as the absence of a Governor Regulation specifically governing the technical mechanism for RAT supervision at the provincial level.

2. The supervision of RAT implementation by the East Java Provincial Office of Cooperatives and SMEs is consistent with the principle of *maslahah* as formulated by Asy-Syatibi, particularly the concept of *hifz al-mal* (protection of property), since cooperative members' assets in the form of principal savings, mandatory savings, and voluntary savings must be managed transparently and accountably through the RAT mechanism. The absence of RAT implementation gives rise to a tangible *mafsadah* (harm), namely the deprivation of members' rights to information, managerial accountability, and participation in decision-making processes. Within the hierarchy of *maslahah*, RAT supervision constitutes a *daruriyyat* (essential necessity), while also encompassing aspects of *hajiyyat* and *tahsiniyyat* in promoting sound cooperative governance. Nevertheless, such public benefit has not yet been optimally realized, considering that more than half of active cooperatives have not submitted RAT reports, repressive sanctions have not been effectively enforced, and the orientation of supervision remains predominantly quantitative in nature. Accordingly, based on the doctrine of *maslahah mursalah*, the optimization of RAT supervision constitutes an urgent obligation of the *ulil amri* in order to prevent *mafsadah* that may threaten the property interests of cooperative members throughout East Java.

B. Recommendations

Based on the foregoing conclusions, this research proposes the following recommendations:

1. To the East Java Provincial Office of Cooperatives and Small and Medium Enterprises, it is recommended to encourage the enactment of a Governor Regulation specifically governing the technical mechanism for supervising the obligation to conduct RAT at the provincial level, in order to address the existing regulatory vacuum which has thus far hindered the optimization of supervisory functions. In addition, the Office should advocate for a more adequate budget allocation for on-site supervisory activities, so that supervision does not rely entirely upon passive reporting mechanisms. Increasing both the capacity and the number of cooperative supervisory personnel should also become a priority, considering that the target of examining 400 cooperatives out of a total of 1,218 provincially supervised cooperatives has not yet covered all cooperatives that should be supervised within a single fiscal year. Furthermore, the ODS system should be optimized, particularly through more intensive socialization and simplification of reporting procedures, so that cooperatives which have already conducted RAT are not hindered in digitally reporting the results thereof. The Office should also develop a more gradual and consistent sanctioning mechanism, ranging from written warnings, restriction of access to administrative services, to proposals for dissolution against cooperatives that repeatedly fail to

fulfill their RAT obligations, thereby ensuring the existence of concrete legal consequences rather than mere administrative appeals.

2. To the Provincial Government of East Java and the relevant legislative authorities, it is recommended that a medium-term roadmap for optimizing RAT supervision be immediately established and incorporated into the Regional Medium-Term Development Plan (*Rencana Pembangunan Jangka Menengah Daerah/RPJMD*), accompanied by proportional budget allocations to ensure that supervision may be conducted systematically and measurably. Coordination among cooperative agencies at both the provincial and regency/municipal levels should likewise be strengthened through scheduled coordination forums and more structured data-sharing mechanisms, so as to prevent fragmentation in supervisory practices which may result in certain cooperatives escaping effective monitoring.
3. To cooperative managers and supervisory boards throughout East Java, it is recommended that greater awareness be cultivated regarding the fact that the implementation of RAT does not merely constitute a formal legal obligation that may be neglected, but rather represents a fiduciary mandate owed to all members whose rights must be fulfilled. From the perspective of *maslahah* as formulated by Asy-Syatibi, openness and transparency in the accountability of cooperative management form an integral part of the protection of members' property (*hifz al-mal*), which cannot be compromised. Cooperative management is further encouraged

to utilize the assistance provided by the Office of Cooperatives and SMEs, whether in the form of socialization programs, webinars, or direct facilitation during RAT implementation, in order to ensure that RAT is conducted in accordance with the prevailing legal provisions.

4. Future researchers interested in examining similar issues are encouraged to broaden the scope of research by incorporating the perspectives of cooperative members as the parties most directly affected by the presence or absence of optimal RAT supervision, as well as by conducting comparative studies regarding the role of cooperative agencies across different regions within East Java. Such an approach would provide a more comprehensive understanding of the factors influencing the level of cooperative compliance with RAT obligations.

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REFERENCES

Laws Regulations

Undang-Undang Republik Indonesia Nomor 25 Tahun 1992 tentang Perkoperasian.

Peraturan Pemerintah Republik Indonesia Nomor 17 Tahun 1994 tentang Pembubaran Koperasi oleh Pemerintah

Peraturan Daerah Provinsi Jawa Timur Nomor 1 Tahun 2024, Pasal 5 Tentang Wewenang Pemerintah Provinsi

Peraturan Menteri Koperasi dan UKM Republik Indonesia Nomor 19 Tahun 2015 tentang Penyelenggaraan Rapat Anggota Koperasi.

Peraturan Menteri Koperasi dan UKM Republik Indonesia Nomor 9 Tahun 2020 tentang Pengawasan Koperasi.

Classical Islamic Books and Book

Ali, Zainuddin. Metode Penelitian Hukum, Cetakan 1, (Jakarta: Sinar Grafika, 2022), hlm. 105.

Al-Ghazali, Imam. Al-Mustashfa min Ilm al-Ushul, (Beirut: Dar al-Kutub al-Ilmiyyah, t.t.)

Al-Qaradawi, Yusuf. Fiqh al-Awwaliyyat: Dirasah Jadidah fi Daw al-Quran wa al-Sunnah, (Kairo: Maktabah Wahbah, 2009), hlm. 22.

Al-Syatibi, Imam. Al-Muwafaqat fi Ushul al-Syariah, Jilid II, (Beirut: Dar Ibn Affan, 1997)

Asmawi, Teori Maslahat dan Relevansinya dengan Perundang-Undangan Pidana Khusus di Indonesia (Jakarta: Badan Litbang dan Diklat Kemenag RI, 2022), hlm. 64.

Az-Zuhaili, wahbah. Ushul Fikih *Islam* (Jakarta: Gema Insani, 2021), hlm. 1020.

Helim, Abdul. Maqasid Al-Syariah versus Usul Al-Fiqh (Konsep dan Posisinya dalam Metodologi Hukum Islam), (Yogyakarta: Pustaka Pelajar, 2019), hlm. 21-22.

Irwan Hamzani, Achmad. Tiyas Vika Widyastuti, Metodologi Penelitian Dan Penulisan Bidang Ilmu Hukum.

M. Situmorang, Victor. dan Jusuf Juhir, Aspek Hukum Pengawasan Melekat dalam Lingkungan Aparatur Pemerintah (Jakarta: Rineka Cipta, 2020), hlm. 22.

Mahmud Marzuki, Peter. *Penelitian Hukum*, Cetakan 13, (Jakarta: Kencana, 2017), hlm. 136.

Muhaimin, Metode Penelitian Hukum, Cetakan 1, (Mataram: Mataram University Press, 2020). hal 80

Prio Agus Santoso, Ario. Pengantar Metodologi Penelitian Hukum (Yogyakarta: Pustaka Baru Press, 2022).

Rachma Herawati, Novi. Syarifah Ratih Kartika Sari, Manajemen Koperasi Jasa Keuangan (Kjk) Berbasis SKKNI, (Klaten: Penerbit Lakeisha, 2021), hal 1

Subagyo, Ahmad. *Pengawasan Koperasi di Indonesia* (Jakarta: Mitra Wacana Media, 2017), hlm. 1–5.

Wahyuni, Sri. *Pengawasan Administrasi Negara* (Yogyakarta: Deepublish, 2020), hlm. 17.

Journal Articles

Ernestina Da Rato, Maria. Wilhelmina Mitan, Paulus Libu Lamawitak, “Peran Badan Pengawas Koperasi Dalam Pengelolaan Koperasi Sebagai Upaya Meningkatkan Sistem Pengendalian Internal (Studi Kasus Pada KSP Kopdit Suru Pudi Koting),” *Jurnal Mutiara Ilmu Akuntansi (JUMIA),* Vol.1, No.1 (2023), https://ejurnal.stie-trianandra.ac.id/index.php/jumia/article/download/1149/942

Femilia Nean, Magdalena. Andreas Rengga, Wihelmina M. Yulia Jaeng, "Analisis Pengawasan Tata Kelola Koperasi dalam Meningkatkan Akuntabilitas pada KSP Kopdit Pintu Air Cabang Kewapante," PROJEMEN, Vol. 12, No. 3, September 2025, hlm. 374. https://ejournal-nipamof.id/index.php/Projemen/article/download/1071/1130

Kalsum, Ummi. dkk. “Penyelenggaraan Rapat Anggota Koperasi Bagi Pengurus Dan Pengawas Koperasi,” *Suluh Abdi: Jurnal Ilmiah Pengabdian Kepada Masyarakat*, Volume 5 No. 2. (2022)

Khotibul Umam, Muhammad. “Tinjauan Hukum Islam Terhadap Hak-Hak Anggota Kspps Dalam Implementasi Pasal 20 Ayat 2 (E) Undang-Undang Nomor 25 Tahun 1992 Tentang Perkoperasian,” (Skripsi, Universitas Islam Negeri Walisongo Semarang, 2021)

Mar’atus Solihah, Aima. “Tinjauan Maṣlaḥah Ḥifẓ al-Māl Terhadap Pelaksanaan Akad Kerjasama Bagi Hasil di Desa Sumberdodol Kecamatan Panekan Kabupaten Magetan.” (Skripsi, Institut Agama Islam Negeri (IAIN)

Ponorogo, 2020), https://etheses.iainponorogo.ac.id/11728/1/APLOUD%20AIMA.pdf

Marhania, Suci. "Perbandingan Perlindungan Harta (*Hifdz Al-Mal*) Antara Perbankan Syariah Dan Konvensional," *Journal Of Economics and Business*, Vol.2 No.1, (2024), 4

Nazeeya A, Putri. Gusliana HB, Separen, "Implementasi Peran Dinas Koperasi, Usaha Kecil Dan Menengah Dalam Mengawasi Koperasi Produsen Kelapa Sawit Berdasarkan Peraturan Gubernur Nomor 20 Tahun 2015 Tentang Rincian Tugas, Fungsi, Dan Tata Kerja Dinas Koperasi, Usaha Mikro Kecil Dan Menengah," *INNOVATIVE: Journal Of Social Science Research,* Volume 4 Nomor 5 (2024)

Nurafida, Daspan Maulidin Sukma Putra, Susilawati, "Analisis Penerapan Prinsip Transparansi dalam Pelaporan Keuangan Koperasi: Studi Kasus di Kabupaten Bengkalis*," Jurnal Ilmiah Ekonomi Bisnis dan Akuntansi,* Vol.2, No.1, (2025): 2

Prayojana, Sanata. "Peran Pemerintah Provinsi Dalam Peningkatan Partisipasi Anggota Dalam Prinsip Koperasi," *Jurnal Pendidikan Mutiara*, (2021) Https://Stkipmutiarabanten.Ac.Id/Wp-Content/Uploads/2021/09/7.-Peran-Pemerintah-Provinsi-Dalam-Peningkatan.Pdf

Puspita Sari, Amanda. Dkk. "Tinjauan Pelaksanaan Rapat Anggota Tahunan (Rat) Pada Koperasi Di Kecamatan Bondowoso". *Jurnal Pengabdian Kepada Masyarakat,* Vol.3, No.10 (2024)

R Noy, Ismail. dkk, "Peningkatan Profesionalisme Pengurus Koperasi Melalui

Pelatihan RAT untuk Tata Kelola yang Transparan dan Akuntabel," *Eastasouth Journal of Impactive Community Services,* Vol. 4, No. 01 (2025).

Rizkiawan, Teguh. "Model Lembaga Pengawasan Koperasi Sebagai Upaya Perlindungan Hukum Bagi Masyarakat," *Lex Renaissance*, Vol. 8, No. 2, 2023, hlm. 357. https://journal.uii.ac.id/Lex-Renaissance/article/view/30038

Rizkiawan, Tio. "Model Lembaga Pengawasan Koperasi Sebagai Upaya Perlindungan Hukum Konsumen Simpan Pinjam Koperasi." *Lex Renaissance* 8, no. 2 (2023), https://journal.uii.ac.id/Lex-Renaissance/article/download/30038/16466

Roslina, "Efektivitas Pengawasan Pemerintah terhadap Koperasi Simpan Pinjam," Skripsi IAIN Parepare, 2024, hlm. 16.

Setyaningsih, Rini. "Peranan Rapat Anggota Tahunan dalam Meningkatkan Partisipasi Anggota Koperasi," Jurnal Ekonomi Koperasi, Vol. 9, No. 1 (2021), hlm. 34.

Sigit Pramono, Tedi. "Efektivitas Pengawasan Dinas Koperasi, Usaha Kecil Menengah Dan Tenaga Kerja Kabupaten Pekalongan Terhadap Koperasi Syariah," (Skripsi. Universitas Islam Negeri K.H. Abdurrahman Wahid Pekalongan, 2024)

Sinambela, Josua. "Peran Dinas Koperasi dan UMKM dalam Meningkatkan Perekonomian Masyarakat." *Repository IPDN*, 2023. http://eprints.ipdn.ac.id/16052/1/Repository%20Josua%20Sinambela.pdf.

Sugeng Cahyono, Sugeng "Penguatan Kelembagaan Koperasi Melalui Pelaksanaan Rapat Anggota Tahunan," Jurnal Ilmu Administrasi Negara, Vol. 18, No. 2 (2022), hlm. 112, https://doi.org/10.31289/publika.v18i2.6849.

Suhendi, Dadang. "Pelaksanaan Pengawasan Koperasi Aktif Yang Kurang Sehat di Kabupaten Sumedang," *Journal of Education, Humaniora and Social Sciences (JEHSS)*, Vol. 8, No. 1, Agustus 2025, hlm. 226. DOI: https://doi.org/10.34007/jehss.v8i1.2648.

Sukma Pamungkas, Riswandha "Peran Dinas Koperasi dan Usaha Mikro dalam Pengembangan UMKM di Kabupaten Lamongan." (Skripsi, Universitas Brawijaya, 2024)
https://repository.ub.ac.id/189748/6/Riswandha%20Sukma%20Pamungkas.pdf.

Syarifudin, Moh "Maslahah Sebagai Alternatif Istinbath Hukum dalam Ekonomi Syariah," *Jurnal Lentera*, Vol. 21 No. 2, 2021, hlm. 51.

Syuhri, Saifuddin. Nurul Fadila, "Implementasi Pengawasan Internal Pada Koperasi (Studi Pada Koperasi Bmt Maslahah Jawa Timur)," *Al-Khidmah: Jurnal Pengabdian Masyarakat 4*(2), 2024.

Yanti Sahputra, Masri. "Peran Dinas Koprasi Dan Umkm Provinsi Nusa Tenggara Barat Dalam Meningkatkan Partisipasi Anggota Pada Rapat Tahunan Koprasi" *Jurnal Pengabdian Multidisiplin*, Volume.2 Nomor.2 (2024)

Yoga, Putra. "Pelaksanaan Pengawasan Koperasi Oleh Dinas Koperasi Berdasarkan Undang-Undang Nomor 25 Tahun 1992 Di Kabupaten Indragiri Hilir Kecamatan Keritang," (Skripsi, Universitas Islam Negeri Sultan Syarif Kasim Riau Pekanbaru, 2020)

Web Sources

Dinas Koperasi dan UKM Jawa Timur, Laporan Akuntabilitas Kinerja Instansi Pemerintah Tahun 2025, https://diskopukm.jatimprov.go.id/public/storage/upload/dokumen/1772696018_LAKIP%20Th.%202025%20Finall%202_compressed-1.pdf

Dinas Koperasi dan UKM, “Tugas Pokok dan Fungsi,” Accessed May 11, 2026 https://diskopukm.jatimprov.go.id/en/konten/tugas-pokok-dan-fungsi

Hukum Online, “RAT Koperasi Diselenggarakan Asal-asalan, Adakah Hukumnya?", Klinik Hukumonline, 11 September 2023. https://www.hukumonline.com/klinik/a/rat-koperasi-diselenggarakan-asal-asalan-adakah-hukumnya-lt64fae95e1d736/

Lukman Hakim SM, “Jatim Catat 29.648 Koperasi Aktif, Aset Tembus Rp 63,22 Triliun,” ***Surabaya.Suaramerdeka,*** September 25, 2025, https://surabaya.suaramerdeka.com/jawa-timur/106115977710/jatim-catat-29648-koperasi-aktif-aset-tembus-rp-6322-triliun

Portal Data Indonesia, "Rapat Anggota Tahunan (RAT) Koperasi," Satu Data Indonesia, diakses dari https://data.go.id/dataset/rapat-anggota-tahunan-rat Diakses pada tanggal 28 Januari 2026

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APPENDIXES

List of Interview Questions

1. Tentang Mekanisme Pengawasan Kewajiban RAT Berdasarkan Hukum Positif

   a. Peraturan perundang-undangan apa saja yang menjadi dasar hukum bagi Dinas Koperasi dan UKM Provinsi Jawa Timur dalam melakukan pengawasan kewajiban pelaksanaan RAT oleh koperasi? Apakah sudah ada regulasi turunan di tingkat daerah yang secara spesifik mengatur hal tersebut? (Landasan Hukum)

   b. Bagaimana Dinas mengimplementasikan ketentuan Undang-Undang Nomor 25 Tahun 1992 tentang Perkoperasian, khususnya Pasal 26 yang menegaskan RAT sebagai kekuasaan tertinggi koperasi yang wajib dilaksanakan? Apakah implementasinya sudah berjalan sesuai ketentuan? (Implementasi Regulasi)

   c. Bagaimana mekanisme atau prosedur baku yang diterapkan Dinas dalam mengawasi kewajiban pelaksanaan RAT oleh koperasi, mulai dari pendataan, pemeriksaan, hingga tindak lanjut? (Prosedur Pengawasan)

   d. Apakah pengawasan yang dilakukan bersifat aktif seperti pemeriksaan langsung ke lapangan, ataukah lebih bersifat pasif dengan menunggu laporan dari koperasi? Bagaimana proporsi keduanya dalam praktik? (Bentuk Pengawasan)

   e. Bagaimana sistem pendataan koperasi yang sudah dan belum melaksanakan RAT dilakukan oleh Dinas? Apakah sudah terintegrasi dengan sistem digital seperti Online Data System (ODS)? (Sistem Pendataan)

   f. Berdasarkan data ODS per 31 Desember 2025, hanya sekitar 12.375 dari 29.987 koperasi aktif yang melaksanakan RAT. Apa langkah konkret Dinas dalam merespons kondisi ketidakpatuhan yang masih sangat tinggi tersebut?

   g. Bagaimana mekanisme koordinasi antara Dinas Koperasi Provinsi dengan Dinas Koperasi Kabupaten/Kota dalam menjalankan fungsi pengawasan RAT? Apakah pembagian kewenangannya sudah berjalan efektif?

h. Apakah terdapat SOP (Standar Operasional Prosedur) khusus yang mengatur tata cara pengawasan kewajiban RAT? Jika ada, bagaimana garis besar isinya dan apakah sudah diterapkan secara konsisten? (SOP Pengawasan)
i. Sumber data apa saja yang digunakan Dinas sebagai bahan dalam melakukan pengawasan RAT, seperti laporan tahunan koperasi, data keanggotaan, atau hasil pemeriksaan lapangan? (Sumber Data Pengawasan)
j. Mengapa RAT itu harus dilaporkan ke dinas dan apa fungsinya?

2. Tentang Upaya Optimalisasi Pengawasan RAT
   a. Langkah-langkah konkret apa yang telah dan sedang dilakukan Dinas untuk mengoptimalkan fungsi pengawasan kewajiban RAT oleh koperasi di Jawa Timur?
   b. Apa saja bentuk pembinaan yang diberikan Dinas kepada koperasi agar pengurus memahami dan mematuhi kewajiban pelaksanaan RAT secara tertib? Seberapa rutin pembinaan tersebut dilaksanakan?
   c. Seberapa sering Dinas melaksanakan sosialisasi terkait kewajiban RAT kepada pengurus koperasi? Melalui media atau forum apa saja sosialisasi tersebut dilakukan?
   d. Sanksi apa yang dapat dijatuhkan kepada koperasi yang tidak melaksanakan RAT sesuai ketentuan hukum yang berlaku? Bagaimana tahapan penjatuhan sanksi tersebut, mulai dari teguran tertulis hingga kemungkinan pencabutan badan hukum?
   e. Apakah sanksi administratif yang tersedia saat ini sudah cukup efektif dalam mendorong kepatuhan koperasi terhadap kewajiban RAT? Apakah pernah ada koperasi yang sampai dijatuhi sanksi pencabutan badan hukum?
   f. Apakah ada program pendampingan khusus yang diberikan kepada koperasi yang belum pernah melaksanakan RAT atau yang tertinggal dalam pelaporan pertanggungjawabannya?
   g. Apakah Dinas memiliki target capaian tertentu terkait peningkatan persentase koperasi yang melaksanakan RAT dalam jangka pendek maupun

jangka panjang? Bagaimana ukuran keberhasilannya?

h. Apa rencana Dinas ke depan untuk terus mengevaluasi dan memperbaiki mekanisme pengawasan RAT agar fungsi pembinaan dan penegakan hukum dapat berjalan lebih optimal?

3. Tentang Kendala Pengawasan RAT

a. Faktor-faktor apa saja yang menurut Bapak/Ibu menjadi penyebab utama masih tingginya angka koperasi yang belum melaksanakan RAT di Jawa Timur?

b. Apakah keterbatasan jumlah personel atau SDM di Dinas menjadi hambatan dalam menjalankan pengawasan RAT secara optimal? Bagaimana Dinas mengatasinya?

c. Adakah kendala anggaran atau sarana prasarana yang menghambat efektivitas pelaksanaan pengawasan RAT di lapangan?

d. Apakah luasnya wilayah Jawa Timur dan banyaknya jumlah koperasi menjadi tantangan tersendiri dalam pengawasan? Bagaimana strategi Dinas dalam menghadapi tantangan tersebut?

e. Bagaimana tingkat kesadaran hukum pengurus koperasi terkait kewajiban RAT menurut pengamatan Dinas? Apakah ketidakpatuhan lebih disebabkan oleh ketidaktahuan ataukah kesengajaan?

f. Tentang Kemanfaatan Pengawasan RAT dalam Perspektif Maslahah

g. Menurut pandangan Bapak/Ibu, apa dampak nyata yang dirasakan oleh anggota koperasi ketika RAT tidak dilaksanakan, khususnya terkait transparansi pengelolaan keuangan dan perlindungan hak-hak anggota?

h. Apakah Dinas mempertimbangkan aspek perlindungan hak anggota koperasi sebagai tujuan utama dari pengawasan RAT, bukan sekadar pemenuhan kewajiban administratif semata?

i. Sejauh mana Dinas memastikan bahwa hasil pengawasan RAT benar-benar berdampak pada peningkatan kepercayaan, transparansi, dan kesejahteraan anggota koperasi secara nyata?

KEMENTERIAN AGAMA REPUBLIK INDONESIA
UNIVERSITAS ISLAM NEGERI MAULANA MALIK IBRAHIM MALANG
FAKULTAS SYARIAH
Jl. Gajayana 50 Malang 65144 Telepon (0341) 559399 Faksimile (0341)559399
Website: http://syariah.uin-malang.ac.id E-mail: syariah@uin-malang.ac.id

Nomor : 291 /F.Sy.1/TL.01/04/2026 Malang, 21 April 2026
Hal : **Permohonan Izin Penelitian**

Kepada Yth.
Kepala Dinas Koperasi, Usaha Kecil dan Menengah Provinsi Jawa Timur
Jl. Raya Bandara Juanda No. 22
Sidoarjo, Jawa Timur

Assalamualaikum wa Rahmatullah wa Barakatuh

Dalam rangka menyelesaikan tugas akhir/skripsi mahasiswa kami:

Nama : Nabila Eka Amelia
NIM : 220202110181
Program Studi : Hukum Ekonomi Syariah

mohon diperkenankan untuk mengadakan penelitian dengan judul : **Optimalisasi Peran Dinas Koperasi dan Usaha Kecil Menengah Provinsi Jawa Timur Dalam Mengawasi Kewajiban Pelaksanaan Rapat Anggota Tahunan (RAT) Oleh Koperasi Perspektif Hukum Positif dan Maslahah.,** pada instansi yang Bapak/Ibu Pimpin.

Demikian, atas perhatian dan perkenan Bapak/Ibu disampaikan terima kasih.

Wassalamualaikum wa Rahmatullah wa Barakatuh

Scan Untuk Verifikasi

Dekan,

Umi Sumbulah

Tembusan :
1.Dekan
2.Ketua Prodi Hukum Ekonomi Syariah
3.Kabag. Tata Usaha

Appendix 1. Pre-Research Letter

DINAS KOPERASI, USAHA KECIL DAN MENENGAH
PROVINSI JAWA TIMUR
SURAT PERNYATAAN
PENGGUNAAN DATA

Saya yang bertandatangan di bawah ini :
Nama : Nabila Eka Amelia
Instansi/Lembaga : Universitas Islam Negeri Maulana Malik Ibrahim Malang
Dengan ini menyatakan bahwa :

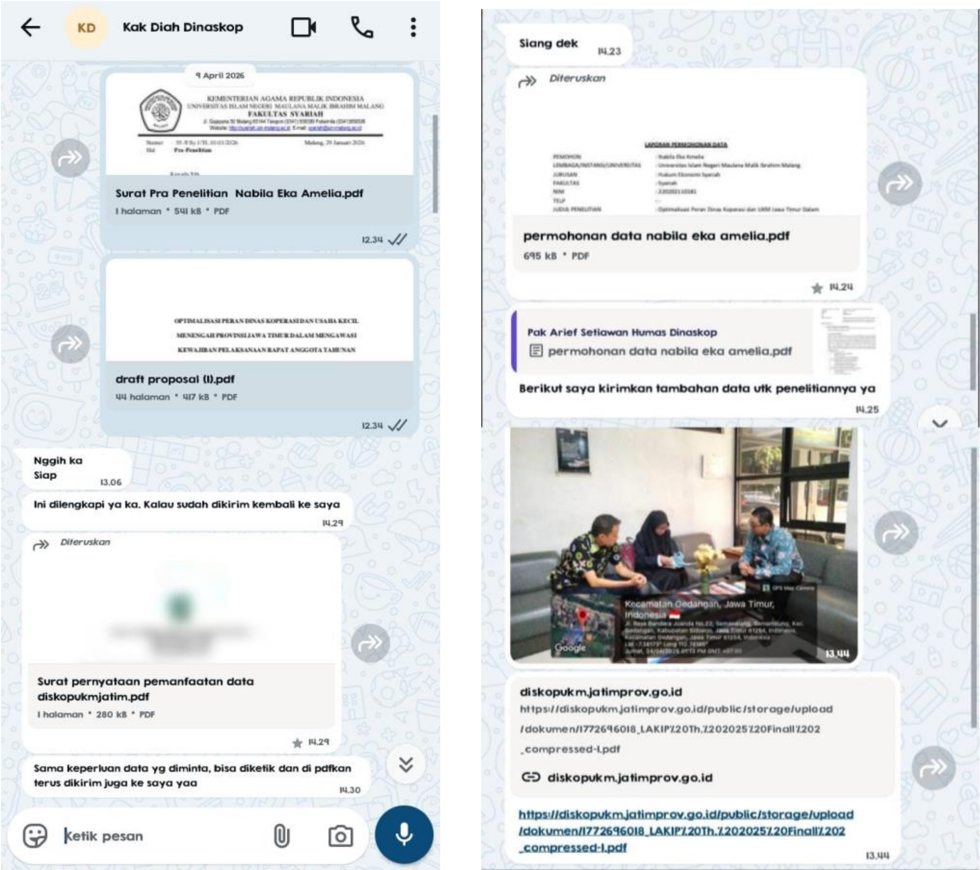
1. Akan mempergunakan data yang telah diberikan oleh Dinas Koperasi, Usaha Kecil dan Menengah Provinsi Jawa Timur hanya untuk keperluan menyelesaikan tugas akhir/skripsi sebagai syarat kelulusan S1. sesuai surat permohonan permintaan data yang telah kami ajukan;
2. Kami tidak akan menyebarluaskan data dimaksud untuk kepentingan yang lainnya; dan
3. Memberikan *feedback* pada Dinas Koperasi, Usaha Kecil dan Menengah Provinsi Jawa Timur atas hasil pengolahan atau pemanfaatan data dimaksud.

Demikian surat pernyataan ini kami buat dengan sebenarnya tanpa ada paksaan dari pihak manapun dan dipergunakan sebagaimana mestinya.

Sidoarjo, 09 April 2026
Yang menyatakan,

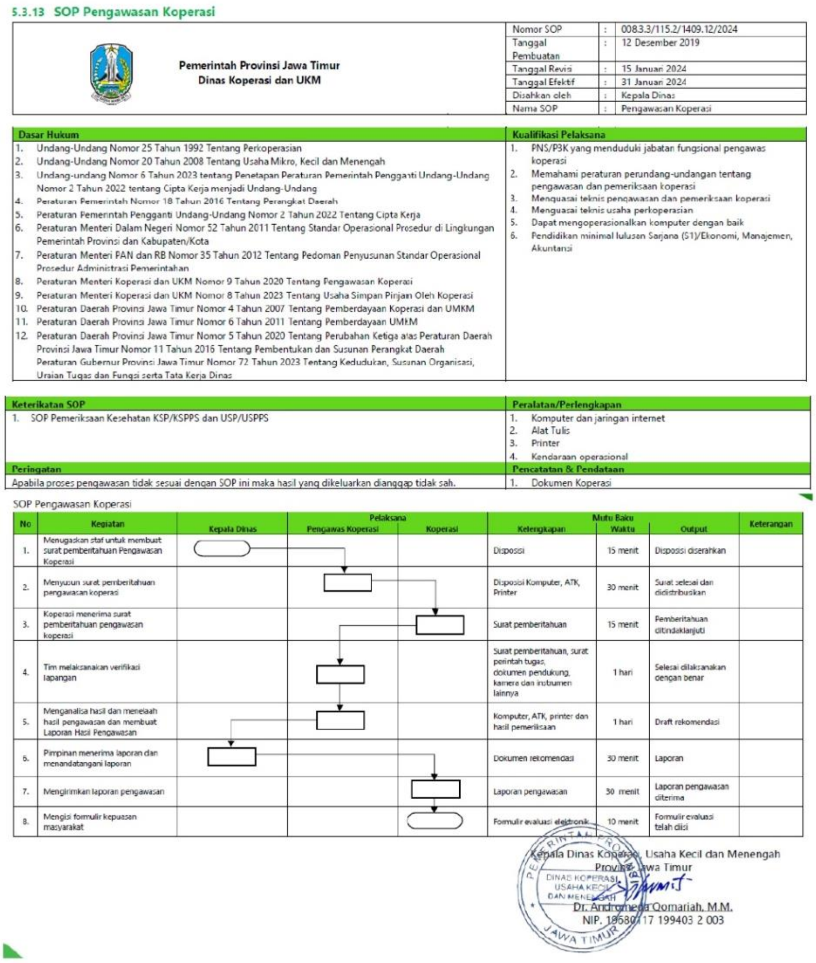
Nabila Eka Amelia

Appendix 2. Diskopukmjatim Data Use Statement Letter



Appendix 3 & 4. Pre-Research Response Letter

Appendix 5. Interview with Officials of the East Java Cooperative and SME Agency



5.3.13 SOP Pengawasan Koperasi

Pemerintah Provinsi Jawa Timur
Dinas Koperasi dan UKM

Nomor SOP	:	008.3.3/115.2/1409.12/2024
Tanggal Pembuatan	:	12 Desember 2019
Tanggal Revisi	:	15 Januari 2024
Tanggal Efektif	:	31 Januari 2024
Disahkan oleh	:	Kepala Dinas
Nama SOP	:	Pengawasan Koperasi

Dasar Hukum

1. Undang-Undang Nomor 25 Tahun 1992 Tentang Perkoperasian
2. Undang-Undang Nomor 20 Tahun 2008 Tentang Usaha Mikro, Kecil dan Menengah
3. Undang-undang Nomor 6 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 tentang Cipta Kerja menjadi Undang-Undang
4. Peraturan Pemerintah Nomor 18 Tahun 2016 Tentang Perangkat Daerah
5. Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 Tentang Cipta Kerja
6. Peraturan Menteri Dalam Negeri Nomor 52 Tahun 2011 Tentang Standar Operasional Prosedur di Lingkungan Pemerintah Provinsi dan Kabupaten/Kota
7. Peraturan Menteri PAN dan RB Nomor 35 Tahun 2012 Tentang Pedoman Penyusunan Standar Operasional Prosedur Administrasi Pemerintahan
8. Peraturan Menteri Koperasi dan UKM Nomor 9 Tahun 2020 Tentang Pengawasan Koperasi
9. Peraturan Menteri Koperasi dan UKM Nomor 8 Tahun 2023 Tentang Usaha Simpan Pinjam Oleh Koperasi
10. Peraturan Daerah Provinsi Jawa Timur Nomor 4 Tahun 2007 Tentang Pemberdayaan Koperasi dan UMKM
11. Peraturan Daerah Provinsi Jawa Timur Nomor 6 Tahun 2011 Tentang Pemberdayaan UMKM
12. Peraturan Daerah Provinsi Jawa Timur Nomor 5 Tahun 2020 Tentang Perubahan Ketiga atas Peraturan Daerah Provinsi Jawa Timur Nomor 11 Tahun 2016 Tentang Pembentukan dan Susunan Perangkat Daerah
    Peraturan Gubernur Provinsi Jawa Timur Nomor 72 Tahun 2023 Tentang Kedudukan, Susunan Organisasi, Uraian Tugas dan Fungsi serta Tata Kerja Dinas

Kualifikasi Pelaksana

1. PNS/P3K yang menduduki jabatan fungsional pengawas koperasi
2. Memahami peraturan perundang-undangan tentang pengawasan dan pemeriksaan koperasi
3. Menguasai teknis pengawasan dan pemeriksaan koperasi
4. Menguasai teknis usaha perkoperasian
5. Dapat mengoperasionalkan komputer dengan baik
6. Pendidikan minimal lulusan Sarjana (S1)/Ekonomi, Manajemen, Akuntansi

Keterikatan SOP

1. SOP Pemeriksaan Kesehatan KSP/KSPPS dan USP/USPPS

Peralatan/Perlengkapan

1. Komputer dan jaringan internet
2. Alat Tulis
3. Printer
4. Kendaraan operasional

Peringatan

Apabila proses pengawasan tidak sesuai dengan SOP ini maka hasil yang dikeluarkan dianggap tidak sah.

Pencatatan & Pendataan

1. Dokumen Koperasi

SOP Pengawasan Koperasi

No	Kegiatan	Pelaksana			Mutu Baku			Keterangan
		Kepala Dinas	Pengawas Koperasi	Koperasi	Kelengkapan	Waktu	Output	
1.	Menugaskan staf untuk membuat surat pemberitahuan Pengawasan Koperasi				Disposisi	15 menit	Disposisi diserahkan	
2.	Menyusun surat pemberitahuan pengawasan koperasi				Disposisi Komputer, ATK, Printer	30 menit	Surat selesai dan didistribusikan	
3.	Koperasi menerima surat pemberitahuan pengawasan koperasi				Surat pemberitahuan	15 menit	Pemberitahuan ditindaklanjuti	
4.	Tim melaksanakan verifikasi lapangan				Surat pemberitahuan, surat perintah tugas, dokumen pendukung, kamera dan instrumen lainnya	1 hari	Selesai dilaksanakan dengan benar	
5.	Menganalisa hasil dan menelaah hasil pengawasan dan membuat Laporan Hasil Pengawasan				Komputer, ATK, printer dan hasil pemeriksaan	1 hari	Draft rekomendasi	
6.	Pimpinan menerima laporan dan menandatangani laporan				Dokumen rekomendasi	30 menit	Laporan	
7.	Mengirimkan laporan pengawasan				Laporan pengawasan	30 menit	Laporan pengawasan diterima	
8.	Mengisi formulir kepuasan masyarakat				Formulir evaluasi elektronik	10 menit	Formulir evaluasi telah diisi	

Kepala Dinas Koperasi, Usaha Kecil dan Menengah
Provinsi Jawa Timur

Dr. Andromeda Qomariah, M.M.
NIP. 19680117 199403 2 003

Appendix 6. Standard Operating Procedure (SOP) for Cooperative Supervision

Appendix 7. Cooperative Data In 2025

CURRICULUM VITAE

Name	:	Nabila Eka Amelia
Gender	:	Female
Place and Date of Birth	:	Pasuruan, May 11, 2004
Religion	:	Islam
University	:	Maulana Malik Ibrahim State Islamic University Malang
Address in Malang	:	Asrama Rahmani, Jalan Simpang Sunan Kalijaga I No. 13, RT.2/RW.7, Kelurahan Dinoyo, Kota Malang
Home Address	:	Dusun Joyomulyo, Gg. Satria II RT.2/RW.7, Kedawung Kulon, Kec. Grati, Kab. Pasuruan, Jawa Timur
Phone Number	:	082231333855
Email	:	nabilaekaamelia567@gmail.com
Educational Background	:	SDN Kedawung Kulon 1 (2010-2016) MTsN Kota Pasuruan (2016-2019) SMAN 1 Grati (2019-2022)