

REFLECTING ON STATE TYPOLOGIES: INDONESIA AND THE GLOBAL HYBRIDIZATION OF FEDERAL AND UNITARY GOVERNANCE MODELS IN HETEROGENEOUS CONTEXT

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Abstract: *Global interest in ethical practices in the state is increasing, fuelled by the ineffectiveness of the law in maintaining public trust. Therefore, fostering and controlling ideal behaviour for judges is considered better through a system of ethics, with law as a last resort. This concept is reinforced by the idea of constitutional ethics, which is equivalent to constitutional law. This research is conducted to examine more deeply the supervision and enforcement of judges' code of ethics in Indonesia. The normative juridical research method with statutory and conceptual approaches is used in this research. The results of the analysis show that its development leads to the stage of functional ethics, namely the codification and positivisation of ethics with the support of its enforcement institutional infrastructure. The idea of judicial ethics court strongly supports the institutional strengthening of ethics to build judges' behaviour with integrity. The institutional construction of the ethics court must be in accordance with the principles of the judiciary in general and structurally the same as the Supreme Court and Constitutional Court. Nevertheless, it does not rule out the possibility that the establishment of an ethics court does not have challenges that must also be considered.*

Keywords: *Court of Ethics; Judicial Ethics; Constitutional Ethics; Rule of Ethics;*

INTRODUCTION

The traditional divide between federal and unitary systems has been a defining basis for understanding governance structures worldwide. Federalism, by design, involves a division of sovereignty between the central government and subnational units, ensuring a degree of autonomy for regions or states. On the other hand, unitary systems centralize authority, with regional powers delegated and controlled by the central government. However, this duality is no longer as clear-cut as it once appeared. In practice, federal states increasingly exhibit unitary tendencies through centralization of decision-making and policy control, while unitary states often adopt federal-like characteristics by granting significant autonomy to their regions or establishing frameworks for decentralized governance.

This convergence between federal and unitary systems is driven by complex, interrelated factors. Simultaneously, demands for regional identity, cultural preservation, and local self-determination have pressured unitary states to decentralize, granting regional governments greater legislative and administrative powers. This dual trend highlights a dynamic evolution in governance, where both models are adapting to balance central authority with local autonomy. This paper explores the phenomenon of federal and unitary systems moving closer together, examining how federal states have become increasingly centralized and how unitary states have incorporated decentralized mechanisms resembling federalism.

DISCUSSION

A. Multiculturalism and Governance Models

Several studies have indicated that cultural differences, linguistic diversity, geographical conditions, and variations in socio-economic situations within a country are key factors influencing the choice of a federal model.¹ However, some heterogeneous countries, such as Indonesia, have adopted the unitary model. The choice of state structure is influenced by a country's political will, socio-cultural factors, and history. Each form of state has its own strengths and weaknesses. A unitary state emphasizes central government control, with regional provinces having limited autonomy in managing their affairs. In contrast, a federal state treats the central government and the member states as equals, granting the states extensive autonomy to manage their own territories. Down below is the distinction between federal and unitary models:²

Models	Power Distribution	Constitutional Character	Legislative System	Civic Bond
Federal	Decentralized	Rigid	Bicameral	Central and Subnational Government
Unitary	Centralized	Flexible	Unicameral	Central Government

Table 1. Federal vs Unitary

American political scientist Joseph LaPalombara stated that even in unitary states, the creation of subnational organizations to carry out parts of the political process is considered necessary.³

¹ Krane, Dale A. "Does the Federal-Unitary Dichotomy Make Any Difference?: One Answer Derived from Macrocomparative Analysis." Social Science Research Network (SSRN), Nov 16, 1984, <https://www.chegg.com/homework-help/questions-and-answers/reforming-restructuring-portions-federal-bureaucracy-common-theme-national-politics-almost-q103796456> or <https://orbit.dtu.dk/en/publications/relationship-between-self-assessed-productivity-gender-and-age-in->

² Zahrin, Zuriana, and Ahmad Martadha Mohamed. "REVISING THE UNITARY VS. FEDERAL

Ivo Duchacek, a political scientist from The City College of New York, argues that no national government, whether democratic or authoritarian, can realistically, administratively, or politically enforce all regulations from a central authority.⁴ There are two types of governmental structures: 1) single-tier government and 2) multi-tiered government. A single-tier government centralizes power solely within the central authority. Meanwhile, in a multi-tiered government, power is distributed or regionalized among multiple levels of governance. In the unitary model, both government structures are practically recognized. Countries with small areas, such as Singapore, Monaco, the Cook Islands, and Vatican City, implement the single-tier government. Conversely, countries with larger areas, such as the Philippines, New Zealand, Norway, South Korea, and Indonesia, adopt the multi-tiered government.⁵

Country	Administrative Divisions
Philippines	18 regions, 82 provinces, 1,493 municipalities
New Zealand	16 regions, 86 regional councils
Norway	19 regions, 433 municipalities
South Korea	17 metropolitan units include: 1 special city, 6 metropolitan cities, 1 special autonomous city, 8 provinces, and 1 special self-governing autonomous province
Indonesia	38 provinces, 5 special autonomy + 4 new provinces in Papua which included as special autonomy, 416 regencies

Table 2. Administrative Divisions in Unitary Countries (listed on 2024)

CLASSIFICATION". *Journal of International Studies* 18 (October 16, 2022): 125–157. Accessed December 1, 2024. <https://e-journal.uum.edu.my/index.php/jis/article/view/15714>.

³ Politics with in Nation: Pg. 101

⁴ Power maps: comparative politics of constitutions (Studies in comparative politics): pg. 93

⁵ Zahrin, Zuriana Binti. "Rethinking the Unitary-Federation Classification: Towards a Typology Approach and Performance Analysis" (Master's thesis, Universiti Utara Malaysia, 2022). Accessed November 25, 2024. https://etd.uum.edu.my/10577/2/s95751_01.pdf

As the federal system can subtly blend into the practical framework of a unitary state to meet socio-political needs, the unitary system can also infiltrate the practical workings of a federal system with similar objectives.

The authors selected three countries as samples for each model based on the linguistic and ethnic fractionalization numbers according to Fearon Analysis. Firstly, the federal countries:

1. Malaysia, ranks 66th highest in the ethnic fractionalization category;
2. Nepal, ranks 36th highest in the linguistic fractionalization category; and
3. United States of America, ranks 214th in the religious fractionalization category.

Secondly, the unitary countries:

1. Spain, ranks 101st in the ethnic fractionalization category;
2. South Korea, ranks 200th in the linguistic fractionalization category; and
3. Vietnam, ranks 92nd in the religious fractionalization category.

Below, the authors provide a detailed description of the practices of the sample countries, linking them to the convergence between the concepts of unitary and federal states.

1. Federal Countries

a. Malaysia

Malaysia consists of 13 states and 3 federal territories. Each state possesses its own written constitution, legislative

assembly, and executive council, which is accountable to the legislative assembly and led by a chief minister.⁶ The federal model is established in Article 1(1) of the Federal Constitution, which states: "*The Federation shall be known, in Malay and in English, by the name Malaysia.*" Since its inception, Malaysia has implemented a federal system. Despite being categorized as a diverse country, according to the Fragile State Index statistics in 2019, Malaysia has the lowest score of 60.50 for national security compared to other ASEAN countries like Indonesia and Thailand which achieved a score of 70 out of 120.⁷ Moreover, the Global Peace Index 2019 revealed a consistent upward trend in Malaysia's harmony score, with the nation achieving 1.529 in 2019, up from 1.619 in 2018 and 1.637 in 2017.⁸ This upward trajectory, coupled with Malaysia's ranking of 61 out of 189 countries in the 2019 Human Development Index, underscores the country's stable population and harmonious inter-ethnic relations.⁹ Such a positive performance can be attributed to several factors, including effective leadership, strong racial harmony, robust security measures, and sound government policies. While Malaysia's multiethnic federal system has shown positive signs, it is beset by challenges such as growing racial tensions, separatist movements, and internal political divisions. These issues are rooted in historical inequalities, ethnic nationalism, and religious polarization. The cumulative effect of these challenges threatens the nation's unity and the stability of its federal structure.¹⁰ Such incidents can occur due to excessive central

⁶ Britannica, "Local Government," in Malaysia, accessed November 25, 2024, <https://www.britannica.com/place/Malaysia/Local-government>.

⁷ Fragile States Index 2019 Annual Report. Fragile States Index, 2019. <https://fundforpeace.org/fsi/>

⁸ Institute for Economics and Peace (IEP). "*Global Peace Index 2019*". (2019). Accessed December 4, 2024, from <https://www.visionofhumanity.org/>.

⁹ United Nations Development Programme (UNDP). "*Human Development Report 2019*". (2019). Accessed December 4, 2024, from <https://hdr.undp.org/content/human-development-report-2019>.

¹⁰ NN. "Challenges of the Multinational Federation: The Case of Malaysia." *ResearchGate*. Accessed December 4, 2024, from

government interference in state affairs, as seen in the case of the Sabah and Sarawak separatist movements of 1963. These movements arose from the central government's disregard for the sovereignty of Sabah and Sarawak within the federal system. Article 20 of the Malaysia Agreement 1963 stipulates the special position of Sabah and Sarawak, encompassing immigration, the Borneoization policy in the civil service, the special rights of Bumiputera in Sabah and Sarawak, and financial autonomy. Moreover, the merger of Sabah and Sarawak into Malaysia was carried out without genuine consent from both territories. The formation process was allegedly manipulated by the British Colonial Office, Malayan leaders, and the Cobbold Commission, without providing clear information to the people of Sabah and Sarawak. Finally, the federal government has failed to recognize Sabah and Sarawak as primary founding partners in the formation of the Federation of Malaysia in 1963, alongside the Malay states and Singapore.¹¹ Despite its challenges, Malaysia's multiethnic federal system has functioned relatively well due to a high degree of compliance from its citizens towards the central authority.

b. Nepal

Nepal adopted a new constitution in 2015 that officially recognized the country as a secular, inclusive, multi-ethnic, and federal state for the first time. There are 7 provinces and 77 districts in Nepal.¹² The country is now in the early phases of establishing its federal structures and institutions. This

represents a critical moment for Nepal, as the five previous constitutions failed to eliminate discrimination or address the dominance of the majority ethnic group. Previously, Nepal implemented the unitary and centralized system under the frame of monarchy for 240 years. As mentioned before, according to Fearon Analyst, Nepal ranks 36th highest in the linguistic fractionalization category. This reflected on the facts that Nepal is a diverse country with a rich cultural and ecological tapestry.¹³ Ecologically, it's divided into three distinct regions: the mountainous Himalayas, the hilly regions, and the Terai plains.¹⁴ Ethnically, Nepal is incredibly diverse, with over 100 different ethnic groups. While no single ethnic group forms a majority, a few larger groups, such as the Chhetris, Brahmins, and Magars, make up a significant portion of the population.¹⁵ Nepal is a linguistically diverse country with a rich linguistic heritage. According to the 2011 census, there are 123 different languages spoken in Nepal. Nepali, an Indo-Aryan language, is the official language and is spoken by a majority of the population. However, numerous other languages, belonging to both the Indo-Aryan and Sino-Tibetan language families, are also spoken across the country. Some of the major languages spoken in Nepal include Maithili, Bhojpuri, Tharu, Tamang, and Newari.¹⁶

This diversity has become a major challenge for Nepal's transition to a federal system. Although federalism is often seen as an ideal system for managing diversity, the intricate layers of diversity within Nepal have led to a hybrid system that combines

<https://www.tandfonline.com/doi/pdf/10.1080/13597566.2020.1781097>.

¹¹ Ibid

¹² Central Bureau of Statistics, Nepal. (n.d.). Administrative divisions of Nepal. There are 7 provinces and 77 districts in Nepal [Figure 1]. Retrieved from https://www.researchgate.net/figure/Administrative-divisions-of-Nepal-There-are-7-provinces-and-77-districts-in-Nepal_fig1_366515518

¹³ Embassy of Nepal, London. "Culture & Society". Accessed December 4, 2024, from <https://uk.nepalembassy.gov.np/>.

¹⁴ National Tourism Board Nepal. "About Nepal". Accessed December 4, 2024, from <https://ntb.gov.np/>.

¹⁵ International Work Group for Indigenous Affairs (IWGIA). "Nepal". Accessed December 3, 2024, from <https://www.iwgia.org/en/nepal/5371-iw-2024-nepal.html>.

¹⁶ United Nations Statistics Division (UNSD). "Nepal - Census 2011 - Vol 1". (2011). Accessed December 3, 2024, from <https://unstats.un.org/unsd/demographic-social/census/documents/Nepal/Nepal-Census-2011-Vol1.pdf>.

elements of both federalism and unitary governance. Nepal's constitutional shift towards federalism is primarily motivated by a desire to democratize the country and ensure more equitable representation for all groups, particularly marginalized minorities who have been historically disadvantaged under a more centralized system. The division of states in Nepal is still being refined. The current system combines territorial and ethnic aspects, aiming to provide broader representation for all citizens, including minority groups. However, some groups, such as the Madhesi and Tharu, feel that they are not fully satisfied with this arrangement.¹⁷ On the other hand, the National Coalition Party (NCP) Marshal argues that the formation of a federal system would actually trigger the disintegration of the state due to competition among social groups. The NCP Maoist also criticizes the formation of states based on ethnicity, arguing that federalism erodes people's patriotism and desire to be a nation. Therefore, in the process of perfecting the federal system in Nepal, it must still be adjusted to the concept of a unitary state that was once implemented to achieve democracy and avoid fragmentation.¹⁸

c. United States

The United States consists of 50 states, the governments of the 50 states have structures closely paralleling those of the federal government. Each state has a governor, a legislature, and a judiciary. Each state also has its own constitution. The

federal model of the United States originated in 1787 with the drafting of the U.S. Constitution during the Constitutional Convention in Philadelphia. This system was developed as a compromise to address the inefficiencies of the Articles of Confederation, which had created a weak central government and granted substantial power to individual states.¹⁹ The practice of federalism in the United States involves a system of governance in which the Constitution divides authority between the federal government and the states, granting the federal government powers such as regulating interstate commerce, conducting foreign relations, and maintaining national defense, while reserving for the states powers not explicitly assigned to the federal level, such as education, law enforcement, and local governance, and allowing both levels to exercise concurrent powers like taxation and lawmaking; this balance has shifted over time due to historical events, legal interpretations by the Supreme Court, and evolving political priorities, demonstrating a dynamic interplay between centralized authority and state sovereignty as defined by key constitutional principles such as the Supremacy Clause and the Tenth Amendment.

2. Unitary

a. Spain

Spain's constitution is defined as a single, indivisible state, despite its substantial decentralization. This decentralization is carried out through the Estado de las Autonomías framework, which grants

¹⁷ Tan, Tai Yong. *"Hybrid Federalization in India, Sri Lanka and Nepal"*. (2014). Accessed December 3, 2024, from <https://dr.ntu.edu.sg/bitstream/10356/89194/1/Hybrid%20Federalization%20in%20India%2C%20Sri%20Lanka%20and%20Nepal.pdf>

¹⁸ Belbase, Krishna. *"Federalism in Nepal"*. Accessed December 3, 2024, from <https://www.tandfonline.com/doi/abs/10.1080/02185377.2018.1515639>.

¹⁹ Oxford Centre for Global Studies (OXGS). *"A Brief Overview of the American Model of Federalism"*. (2021, December 16). Accessed December 3, 2024, from <https://oxfordre.com/americanhstory/display/10.1093/acrefore/9780199329175.001.0001/acrefore-9780199329175-e-89?p=emailAg1e1iedHGQaY&d=/10.1093/acrefore/9780199329175.001.0001/acrefore-9780199329175-e-89>.

significant self-governing powers to its 17 autonomous communities and 2 autonomous cities. Each region has its own parliament and government, but ultimate sovereignty remains with the central government.²⁰ All of this is in the Constitution of 1978, which was enacted on December 29, 1978. This constitution marked the beginning of Spain's transition to democracy following the end of the Francoist dictatorship.²¹ In Spain, the unitary state concept operates within a decentralized framework established by the 1978 Constitution, which recognizes Spain as a constitutional monarchy and a parliamentary democracy while granting significant autonomy to its 17 autonomous communities and two autonomous cities. The central government retains control over matters such as national defense, foreign policy, immigration, and macroeconomic regulation, while the autonomous regions manage areas like education, health, and regional cultural policies under their Statutes of Autonomy. The Constitutional Court resolves conflicts between regional and national authorities, ensuring adherence to constitutional principles. Although regions hold considerable self-governance, the system maintains the unity of the Spanish state, requiring national parliamentary approval for changes to regional powers. Spain's model blends features of federalism and unitary governance, making it a unique example of regional autonomy within a unitary framework.

b. South Korea

As a unitary republic, South Korea is distinguished by its centralized administration, which concentrates power at the national level. The legislative, executive, and judicial branches make up this system's

three main branches. A national popular vote elects the president, who holds the dual roles of head of state and head of government, to a single five-year term. With the National Assembly's approval, the President appoints the Prime Minister, who aids in leading executive ministries.²² Nine provinces (do), six metropolitan cities (*gwangyeoksi*), one special city (*teukbyeolsi*), and one special self-governing city (*teukbyeoljachisi*) make up the administrative division of the nation. Local governments, including provinces and metropolitan cities, operate under the authority delegated by the central government. They are responsible for implementing national policies at the regional level and managing local affairs such as education, transportation, and infrastructure projects. However, their autonomy is limited, as they rely on the central government for policy guidance, budgeting, and administrative direction.

c. Vietnam

Vietnam operates as a **unitary socialist republic** under the leadership of the Communist Party of Vietnam (CPV), which holds a central role in the nation's political system. The country's governance structure is characterized by centralized authority, with the CPV directing both state and societal functions. The most important political organization is the CPV, which directs state policy and makes sure socialist ideals are upheld. The goal of this centralization is to preserve national cohesion and enable consistent policy execution throughout the nation.²³ The National Assembly is the ultimate organ of state power and the highest representative body. It creates policies, has legislative authority, and manages all state operations. The National Assembly's

²⁰ La Moncloa. Presidencia del Gobierno. Accessed December 5, 2024, from <https://www.lamoncloa.gob.es/lang/en/Paginas/index.aspx>.

²¹ Federal Union. "Federalism and the Future of Spain". Accessed December 5, 2024, from <https://www.thenewfederalist.eu/Federalism-and-the-future-of-Spain-2nd-part>.

²² SNG-WOFI: World Observatory on Subnational Government Finance and Investment. "South Korea Profile," accessed December 5, 2024, <https://www.sng-wofi.org/country-profiles/>

²³ World Atlas, "What Type of Government Does Vietnam Have?" accessed December 6, 2024, <https://www.worldatlas.com/articles/what-type-of-government-does-vietnam-have.html>.

members are chosen to serve five-year terms.²⁴

The National Assembly elects the President, who serves as the head of state and speaks for Vietnam both at home and abroad. In addition to enacting laws, the president also acts as the head of state's military. The Prime Minister, appointed by the President with the National Assembly's consent, heads the government and oversees the implementation of laws and policies.

B. Indonesia's System and Practice on the Governance Model: Comparison to Global's Hybridization

Indonesia adopts a unitary system, as stated in Article 1(1) of the 1945 Constitution: "*Indonesia is a Unitary State in the form of a Republic*". The form of Indonesia's unitary state changed in 1949 to the Republic of the United States of Indonesia (RIS) through an agreement in the Round Table Conference (KMB) in The Hague. However, the federal form of the state did not last long. In 1950, based on an agreement between the governments of the states and the government of the Republic of Indonesia, it was agreed to revert to a unitary state.²⁵ The decision to return to a unitary form was based on the paradigm that the RIS system was a legacy of colonialism from the Dutch colonizers. At that time, many people from the states held demonstrations calling for the dissolution of the RIS and a return to

the unitary republic system.²⁶ Additionally, the federal system contradicted the ideology of Pancasila: 1) the third principle, "Unity of Indonesia," and 2) the motto "*Bhinneka Tunggal Ika*," meaning "Unity in Diversity."²⁷

There are two types of decentralization in Indonesia, symmetrical and asymmetrical decentralization.

Asymmetric decentralization in Indonesia is granted to nine provinces: DI Yogyakarta, DKI Jakarta, Nanggroe Aceh Darussalam, Papua, West Papua, Central Papua, Highlands Papua, South Papua, and Southwest Papua. These nine provinces are given special treatment, each with its own justification for the unity and integrity of the Unitary State of the Republic of Indonesia. The utilization of asymmetric decentralization is due to the special characteristics of these regions compared to others.²⁸ Outside of these nine provinces, symmetric decentralization is applied. The implementation is based on Law Number 23 of 2014 on Regional Government. These practices are also based on Article 18A of the 1945 Constitution, in the phrase "*...taking into account the special characteristics and diversity of regions*," which indicates that the constitution requires special arrangements for regions with unique and diverse characteristics. Charles Tarlton's 1965 concept of asymmetric federation provided the foundation for the notion of asymmetric decentralization. Tillin distinguishes between *de facto* and *de jure*

²⁴ Nguyen, Van A. ALA-VN legal system - Part 2. ASEAN Law Association. <https://www.aseanlawassociation.org/wp-content/uploads/2019/11/ALA-VN-legal-system-Part-2.pdf> (Accessed December 6, 2024).

²⁵ RIS (Republik Indonesia Serikat): Ini Sejarahnya." detik.com, October 10, 2023.

<https://www.detik.com/edu/detikpedia/d-6973344/ris-atau-republik-indonesia-serikat-ini-sejarahnya>. Accessed December 1, 2024.

²⁶ Fakultas Hukum UMSU (n.d.). Republik Indonesia Serikat: Sejarah dan Tujuannya [The Republic of the United States of Indonesia: History and Objectives]. Retrieved November 25, 2024, from

<https://fahum.umsu.ac.id/republik-indonesia-serikat-sejarah-dan-tujuannya/>

²⁷ Kompas.com. (2023, November 11). 2 Alasan Indonesia Tidak Cocok Menggunakan Bentuk Negara Serikat atau Federal. Retrieved from <https://www.kompas.com/skola/read/2023/11/11/100000569/2-alasan-indonesia-tidak-cocok-menggunakan-bentuk-negara-serikat-atau>

²⁸ Kompas.com. "Desentralisasi Asimetris, Daerah Istimewa, dan Daerah Khusus: Menyangga Keutuhan NKRI." Kompaspedia, January 15, 2024. <https://kompaspedia.kompas.id/baca/paparan-topik/desentralisasi-asimetris-daerah-istimewa-dan-daerah-khusus-menyangga-keutuhan-nkri>

asymmetry. The former arises organically from inherent differences between regions, such as geographic size, economic potential, or cultural diversity. The latter, conversely, is a deliberate constitutional design, where disparities in power or autonomy are intentionally created to serve specific policy objectives. Indonesia has the asymmetric is a mandate from constitution and under the concept of regional autonomy based on statutory regulations. Asymmetrical decentralization serves to strengthen unitary systems by acknowledging the varying needs of different regions. As discussed in the previous section, practical reflections from various countries demonstrate the difficulty of implementing purely federal or unitary systems in nations with multi-ethnic and linguistic diversity. Even Malaysia, with its record of high national stability, still requires central authority for political, social, and economic stability.

In Nepal, the government's well-intentioned efforts towards democratization and inclusivity through a transition to a federal system have faced numerous challenges, particularly regarding the effective division of the country into states without causing further divisions. Nepal's current predicament mirrors Indonesia's past, where the formation of RIS was met with widespread rejection due to the loss of a sense of national unity. In contrast to Indonesia's demand for a return to a unitary system, Nepal is currently striving to maintain its federal structure. Given the diversity of these nations, governance systems must be adaptable to the specific circumstances and needs on the ground.

CONCLUSION

The need for flexibility in handling the complex realities of varied cultures is reflected in the convergence of federal and unitary government structures. As a unitary state, Indonesia exhibits this flexibility by implementing asymmetrical decentralization, which gives some provinces extra autonomy to account for regional, historical, and cultural uniqueness. Based on the Pancasila

doctrine and the motto "*Bhinneka Tunggal Ika*" (Unity in Diversity), this strategy demonstrates Indonesia's dedication to striking a balance between regional autonomy and national unity. Globally, countries like Spain, Malaysia, and Nepal illustrate similar trends. Spain's autonomous communities operate within a unitary framework, while Malaysia's federal system centralizes authority to address national challenges. Nepal, navigating its transition to federalism, faces the dual task of managing diversity and ensuring national coherence, mirroring Indonesia's historical journey from federalism back to a unitary system.

These case studies demonstrate that hybrid governance models are useful frameworks for overcoming heterogeneity's obstacles rather than only theoretical ideas. They maintain the overall integrity of the country while enabling states to promote local representation and self-determination. These systems do have certain drawbacks, though, such as the possibility of inefficiency, regional disparity, and national division. The ability to adapt governance approaches to the unique socio-political and cultural conditions of the country is crucial for the successful implementation of a hybrid system, as demonstrated by Indonesia's experience. Ultimately, the study of hybrid governance models reaffirms that no single system can universally address the needs of every society. Instead, tailored approaches drawing from both federal and unitary principles offer the most effective solutions for states navigating the complexities of diversity in the modern world.

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