

# Evaluating the Convergence in International Human Rights and Criminal Procedures Law: An Indonesian case study

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## Evaluating the Convergence in International Human Rights and Criminal Procedures Law: An Indonesian case study

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### Abstract

*Criminal law and investigation play a crucial role in preserving public order. They are vital for promoting public safety, justice, impartial trials, and punishing criminals. Due to the prevalence of criminal activities around the globe, it has become essential to develop and implement an effective legal framework to protect human rights during criminal investigations. The "International Human Rights Law" (IHRL) effectively imposes legal punishments and promotes the equitable treatment of defendants during this procedure. IHRL and "Indonesian Criminal Procedural Law" (ICPL) share several similarities in promoting human rights protection during criminal investigations. Thus, the current study concentrates on the convergence analysis between IHRL and ICPL regarding human rights concerns in criminal law and investigation. Qualitative legal research was conducted to achieve this objective, and data was compiled from various primary and secondary sources. This study's findings demonstrated that ICPL and IHRL promote human rights protection during criminal investigations by granting defendants the right to legal representation. Additionally, these laws are effective in averting discrimination during the criminal procedure. Nonetheless, the "new Indonesian Criminal Code" (KUHP) has primarily promoted discrimination against religious minorities and other associated individuals, which can also impact criminal investigations. In addition, no lawful detention period is observed under the ICPL, which affects the defendant's human rights protection contrary to IHRL. Important recommendations have also been made to enhance the preservation of human rights in ICPL-governed criminal investigations. To this end, a comprehensive law can be drafted prohibiting torture during criminal investigations. This study has both theoretical and practical implications.*

Keywords: International Human Rights Law; Indonesian Criminal Procedural Law; Human Rights; Criminal Legislation; Criminal Investigation

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## 1. Introduction

Protection of human rights is integral to fostering justice, equitable treatment, and equal opportunities for all citizens in any nation. No nation can ensure fair treatment of its citizens by protecting their dignity and rights if it does not practice human rights. Similarly, the revolutionized world has observed Indonesian criminal justice and related institutions reestablish their independence, enhance their competencies and capabilities, and increase their responsiveness to human rights. Since 2003, the Supreme Court has implemented an all-encompassing reform strategy. Therefore, the Indonesian Judiciary has been transformed into an "independent branch of government" Other Indonesian government entities, such as "Indonesian National Policy" and "The Attorney General Office," implemented their reform plans (Hadiprayitno, 2010; Herbert, 2008). In addition to correctional administration, services, and the legal community, reform initiatives have been observed to be pursued. Indirectly or directly related to human rights protection, criminal justice, and thorough investigation in Indonesia are of the utmost importance. It is mandatory to increase access to justice for feeble, vulnerable, or minority groups, particularly children and women subject to problems such as domestic violence, child labor, and abuse (Hardjaloka, 2015; Rofiq, Disemadi, & Jaya, 2019). Children and other minority groups are largely excluded from Indonesia's Criminal Justice System due to inadequate responses to law conflicts involving children.

As the world has evolved on numerous fronts, criminal activity has increased proportionally, particularly in contexts with insufficient legislation to govern and direct criminal investigations. The objective of the criminal study in Indonesia is the same as in other nations: "to discover the truth by prevailing a system of equality and justice." Consequently, Indonesian criminal investigation involves processing a crime site to collect as much evidence and information as possible. Indonesia is a "civil law country" with five integral statutes. The Indonesian code of criminal procedure is governed by the KUHAP "Kitab Undang-undang Hukum Acara Pidana" (Sasangka & Rosita, 2000). After Indonesia's independence in August 1945, the country adopted the Dutch HIR as its "criminal procedure" code. However, it has been observed that KUHAP does not adequately protect human rights, resulting in disregarding safeguard practices, as there are no penalties for failing to comply with the act. Therefore, there is still work to be done in this regard.

Establishing standards based on "International human rights" has a significant impact on the security of human dignity by altering and enhancing the relationship between individuals and government and increasing public authorities' accountability. The most well-known standard for "international human rights" is the "International Bill of Rights" based on the "UDHR" (Universal Declaration of human rights), the "ICCPR" (International Covenant on Civil and Political Rights), and the "ICESCR" (International Covenant on Economic, Social, and Cultural Rights). Similarly, International human rights laws and legal procedures are intended to foster equality, reduce discrimination, and promote safety and justice for all global citizens. Alston and Goodman (2013) and Schmitz and Sikkink (2013) state that international justice ensures accountability for the most heinous offenses by punishing the perpetrator after a legal investigation (Alston & Goodman, 2013; Schmitz & Sikkink, 2013). International human rights laws seek to protect human rights, which have

expanded substantially over the past decade. This is to increase a sense of equality among nations and the recognition that many countries share fundamental legal expectations and values. Recognizing that people can be protected and shielded from certain harms is a crucial and noteworthy similarity. Therefore, international human rights laws must protect individuals from methods that ultimately influence the "global community" (De Schutter, 2019). Numerous studies have addressed human rights issues in criminal investigation and legislation. Still, a convergence analysis between Indonesian criminal procedure law and international human rights has been conducted infrequently. In light of this, the present study aims to conduct a convergence analysis between international human rights and Indonesian criminal procedure law.

## 2. Method

This study employs a "qualitative research design" to analyze the convergence between international human rights and Indonesian criminal procedure law. The qualitative research method is appropriate for the current study based on the objectives and objectives of the research. In addition, the researcher adopted an interpretive research philosophy due to the inductive methodology employed in this study. Due to this, the researcher has implemented a "normative juridical research method" by examining published secondary data from reputable internet sources. This research collected information from both primary and secondary sources. For the accumulation of preliminary data, the researcher utilized a variety of primary legal sources to gather pertinent information. These sources include a comprehensive examination of various legal documents, case laws, legislations, and laws.

Regarding secondary data, the researcher has gathered information from various sources, including books, journal articles, and online databases such as West Law, Hein Online, Lexis Nexis, Bloomberg Law, JSTOR, and others. In this study, the content analysis method has been utilized for data analysis. In this methodology, data from various sources pertinent to the research topic are reviewed, compared, and analyzed, and evidence in the form of conclusive results is derived. In addition, qualitative data has been analyzed using a content analysis technique. Qualitative data analysis evaluates concepts and a particular phenomenon associated with such concepts, phrases, or themes. Undertaking this method of study, the researcher has quantified and analyzed the data and evaluated the existence of certain associations and rationale behind concepts under investigation or themes in the research's collected data. Based on the topic's analysis and results, recommendations have also been made to address the research analysis-identified gaps. The methodological approach has thus been implemented.

## 3. Human Rights Concerns in Criminal Legislations

Donà (2020) emphasized that human rights are of equal importance in all societies, as it informs citizens of all nations of their entitlement to respect, dignity, equal opportunities, and protection of their rights. Human rights in a country assure the provision of equal rights and opportunities to individuals by safeguarding their dignity from birth to death. The political and civil rights of 'right to life,' 'privacy,' and 'freedom of expression' are enshrined in the Universal Declaration as fundamental

human rights. Flowers (1998) explains that the "Universal Declaration of Human Rights" is based on four pillars: equality, solidarity, dignity, and freedom. Any nation must be obligated and committed to ensuring these pillars' safety and equal provision for its citizens (De Feyter et al., 2011). Criminal procedure and criminal law have been deemed insufficient to preserve human rights in light of the global rise in crime. Various categories of offenses, including crimes against the public and violations of state order, are unclear and vague. This illuminates concerns regarding criminals, as they are sufficiently provoked to use themselves as weapons against "criminalized political opponents" and to harass minority and vulnerable groups in society. Additionally, journalists facing criminal defamation allegations threaten the press's freedom. Almost every aspect of "criminal procedural practice and laws" is related to human rights, regardless of the particulars of a criminal justice procedure. Although the association of human rights criminal procedure concerns with the "criminal justice system" is significant, their significance in "substantive criminal law topics" is growing (Basch, 2007). In this regard, the primary purpose of human rights is to protect against the state's power, thereby regulating and restricting the application and scope of criminal liability, punishments, and offenses. For instance, "the predominantly sequential innocence presumptions," the right to security and freedom, and respect and dignity are governed by "1 UDHR, 1 EU Charter, 11 ACHR, 5 African Charter, and 1 ASEAN Declaration."

In addition, regulations, preventions, and prohibitions against inhuman, cruel, or degrading punishment are acceptable under the "anti-torture provisions" of all general human rights instruments, i.e., "Article 5 UDHR, 7 ICCPR, 16 ADRDM, 5(2) ACHR, 3 ECHR, 4 EU Charter, 5 African Charter, 3 (1) Arab Charter, 3 CIS convention, and 14 ASEAN Declaration" (De Beer, 2019). The "ADRDM" also prohibits peculiar and infamous punishments (Bassiouni, 1993; Tulkens, 2011; Vanbeselaere, 2022). As a result of these provisions, punishments such as confinement in inhumane conditions, corporal punishments, and excessive disproportionality may be deemed objectionable.

Contrary to Article 37 of the United Nations' 1989 "Convention on the Rights of the Child," protracted legal custody with the possibility of release must not be applied to minors convicted of committing crimes (Machotta, Hansen, & Weiss, 2023). None of these legal provisions constitutes a life sentence. Despite this, the justification for this sentence can raise questions. The European Court recently ruled that a violation of Article 3 of the European Convention on Human Rights (ECHR) may occur when it can demonstrate that a life sentence cannot be justified on any "legitimate penological basis," such as deterrence, punishment, public protection, or rehabilitation, and the sentence is irreducible. Human rights protection regulations are formulated and administered with care in other nations, such as the United States. The United States criminal justice system is also concerned with human rights issues. There are human rights procedures in various world regions, but implementing these acts, rules, and procedures is inadequate, resulting in numerous issues (Hannum et al., 2023). Currently, more than three million individuals are incarcerated while awaiting trial worldwide.

Similarly, many individuals are persistently detained for years and months despite not being convicted. According to Medani (2010); Nouwen and Werner (2010),

criminal law reforms in Sudan are also fraught with complications. Apostasy is the act of abandoning one's religious beliefs, which violates the right to religious freedom. The overabundance of broad offenses in the law or other criminal codes, such as the "public order act," disproportionately prohibits the conduct defended as an expression of rights. As a result, it restricts an individual's democracy and freedom in Sudan. Concerns about human rights in Sudan result in insufficient preventive measures for detained or apprehended individuals. The "Bill of Rights in the National Interim Constitution" guarantees the right to life, protection from torture, and individual liberty or freedom. Therefore, the Sudanese governing bodies proposed a series of modifications to bring the behavior of security forces and police closer to international human rights standards.

In addition, they have suggested that the function of security forces should be retrained to "intelligence gathering" (Quinot, 2019; Rothe, 2003) despite illegally or falsely detaining or arresting individuals violating human rights standards. In addition, international human rights provide guidelines for the extent to which evidence is obtained through violations of human rights, such as the right to privacy in cases of surveillance and unlawful searches or the right to fair trials in cases of violations of the right to legal assistance or the right to silence, may be used against defendants. In Indonesia, numerous human rights issues exist, including torture, arbitrary or unlawful murders, detention or arbitrary arrest, political prisoners, strict imposition of rules against freedom of expression, internet censorship, etc. (Hadiprayitno, 2010). Nonetheless, on 6 December 2022, the Indonesian parliament adopted a new criminal code to safeguard the nation's human rights and other prevalent issues (Karim, 2020; Tongat, 2022). However, the following section of this paper contains an in-depth analysis of Indonesian criminal law and an analysis of the convergence between international human rights and Indonesian criminal procedure law.

#### 4. Findings and Discussion

The protection of human rights has been a significant global concern since the turn of the 20th century. Human rights are typically associated with the preservation of the rights of citizens, and the protection of the human rights of those undergoing criminal investigations has received little attention. In light of "International Human Rights Law (IHRL)" and "Indonesian Criminal Procedure Law (ICPL)," the primary emphasis of this study is on human rights concerns in criminal legislation and investigation. Consequently, this section focuses primarily on the study's findings and discussion. To this end, the IHRL and ICPL have highlighted criminal law and research, leading to a convergence analysis within the context of these legal frameworks.

##### 4.1. International Human Rights Law (IHRL)

IHRL regulates the obligations of states toward their citizens and other associated individuals within the scope of their jurisdiction. This statute primarily emphasizes the promotion of human rights and liberty. Therefore, the government cannot restrict the freedom and fundamental liberties of the people. Nevertheless, the "Universal Declaration of Human Rights," the IHRL, and other treaties are crucial for protecting human rights. In addition, the Universal Declaration of Human Rights (UDHR), the

International Covenant on Civil and Political Rights (ICCPR), the International Covenant on Economic, Social, and Cultural Rights (ICESCR), and the Convention against Torture (CAT) are additional international key instruments in the context of human rights protection (Moeckli et al., 2022). In 1948, the General Assembly of the United Nations (UN) adopted the UDHR, which outlines various economic, cultural, social, and civil rights. Simultaneously, ICESCR and ICCPR presented various social and economic liberties, resulting in effective outcomes. In addition, the CAT was implemented in 1984, focusing on preventing and eliminating torture and other forms of inhumane treatment and punishment.

Criminal procedure law is pertinent to IHRL standards because it promotes a legal framework to ensure justice, respect, and fairness for human rights within the criminal justice system (CJS). This has effectively provided essential guidelines for the trials, detention, treatment, and incarceration of those convicted or accused of committing various criminal acts. However, incorporating IHRL into criminal procedures is essential for promoting human rights protection in the criminal justice system, ensuring the protection of the accused against torture and other ill-treatment, and guaranteeing fair treatment (Lohne, 2019). This helps balance enforcement laws and fundamental rights protection, ensuring that the accused or convicted are treated fairly. The establishment of "The International Criminal Court (ICC)" has also been crucial in advocating the protection of human rights in international crimes. The International Criminal Court (ICC) was established to investigate and prosecute individuals accused of war crimes, genocide, crimes against humanity, and aggression (Kälin & Künzli, 2019). Consequently, the present study has effectively emphasized the incorporation of criminal investigation within the context of IHRL, resulting in positive outcomes.

#### *4.2. Indonesian Criminal Procedure Law (ICPL)*

The "Indonesian Criminal Procedure Code" (KUHP) was enacted in 1981 to replace "Het Herzienne Inlandsch Reglement" (HIR), which the Dutch government had drafted. This law is used extensively in criminal and civil proceedings (Wahyuningsih, 2020). Compared to HIR, KUHP is deemed more effective within the criminal procedure context because it has successfully harmonized the structure of the colonial criminal court. Indonesia has ratified numerous human rights conventions and covenants, including the ICCPR, the CAT, and others. In Indonesia, these conventions have successfully incorporated human rights principles and standards. Even though Indonesia ratified the CAT in 1998 via Law No. 5/1998, torture is still commonly practiced by law enforcement officers in Indonesia, affecting the preservation of human rights for the associated people (Kinanti, Hamzani, & Rizkianto, 2022). In this context, the absence of a specific law contributes significantly to promoting torture in Indonesia.

Additionally, KUHP has not promoted accountability processes and transparency within the context of "the Indonesian National Police (Polri)," resulting in inadequate human rights outcomes in Indonesia. The current Indonesian criminal law system provides the police with three institutions. However, the extent to which the involved institutions utilize these authorities varies. For example, police can detain a suspect during the investigation phase. During the trial phase, the judge and the prosecutor

have the authority to detain an individual. However, the prosecutor and police can legally hold suspects for approximately 27 days, while High Court and District Court judges can hold suspects for about 30 days (Setiawan, 2022).

In addition, the KUHP incorporates the "presumption of innocence" principle, which states that an individual is presumed innocent until proven guilty (Nurhayati, 2021). In the context of the criminal investigation, this law also emphasizes the promotion of impartial trials and due process. This law grants the accused the right to informed allegations, cross-examination of witnesses, and legal representation. Therefore, this Criminal Code aims to protect the human rights of the accused and convicted (Oktavia Wulandari, Ernawati, & Nurdin, 2020). Nonetheless, various limitations are still observed within the context of the code, which hinders the implementation of an effective and equitable CJS in Indonesia. The new Indonesian Criminal Code presented in 2022 is deemed to violate human rights protections substantially. The articles of the code violate the free expression and speech rights of religious minorities, women, and "lesbian, gay, bisexual, and transgender" (LGBT) individuals (Wirabakti & Rochaeti, 2022). Discrimination and other political, social, and cultural factors may affect criminal investigations.

#### 4.3. Convergence Analysis between IHRL and ICPL

This study has also effectively determined the convergence between IHRL and ICPL within criminal legislation and investigation, highlighting various concerns regarding preserving human rights during criminal investigations. After a meticulous examination of the IHRL and the ICPL, it has been determined that both incorporate the "presumption of innocence" principle, which states that an accused person is presumed innocent until proven guilty (Djufri, 2019). In addition, under the IHRL and ICPL, defendants are encouraged to seek legal counsel. It has been observed that defendants have equal rights to choose their attorneys, and in the absence of the necessary funds, they receive gratis legal representation. In addition, inhumane treatment and torture of defendants are prohibited under IHR standards, particularly the CAT.

Similarly, the ICPL prohibits torture against defendants; however, the lack of a specific law in this context is deemed ineffective in addressing the use of torture against defendants in the context of KUH<sup>2</sup> (Wahyuningsih, 2020). Likewise, neither IHRL nor ICPL supports discrimination in the context of a criminal investigation. However, the new Criminal Code of Indonesia has raised significant concerns regarding promoting discrimination, which may impact criminal investigation and CJS in Indonesia as a whole.

In addition, the IHRL prohibits arbitrary arrest and detention; however, the ICPL presents specific laws and standard guidelines regarding the detention of accused individuals. However, the associated defendants have also been granted privacy rights under IHRL<sup>2</sup> and ICPL. This has contributed to a more complete understanding of IHRL and ICPL in the context of criminal investigation. In the context of IHRL and ICPL, it has also been discussed that the ICC promotes human rights protections, which is crucial. Article 14(3)(d) of the ICCPR provides the right to legal assistance for a defendant in the context of IHR standards (Safinatunnajah, Ali, & Teeraphan, 2022). This article states that defendants who cannot afford legal representation will receive gratis representation.



Similarly, Article 57 of the KUHP stipulates that the defendant must be provided with legal representation from the outset of the investigation (Hammar, 2022). Under Article 64 of the KUHP, the government delivers gratis legal representation to an indigent defendant. Human rights protection in criminal investigations clearly illustrates the convergence between the IHRL and ICPL. Even though both the ICPL and IHRL promote human rights protection, there are notable differences between these laws in the context of criminal investigations. For instance, Article 9 of the International Covenant on Civil and Political Rights (ICCPR) promotes the right to a fair trial for defendants by requiring that those deprived of their liberty be brought before a judge to review their lawful detention (Hammar, 2022). Contrarily, article 21 of the KUHP imposes a 20-day detention period without judicial review on the defendants (Napitupulu & Firmansyah, 2022). During this phase, the police in Indonesia are authorized to detain the suspect and bring them before a magistrate for further proceedings. In the context of human rights protection in criminal investigations, this analysis determined the divergence and convergence between IHRL and ICPL. Even though both of these legal frameworks have been effective in promoting human rights protection during criminal investigations, there is still no specific law regarding the prohibition of torture and lawful detention, and the KUHP has limitations that can be overcome by incorporating IHRL guidelines to achieve effective results.

## 5. Conclusion

Within the context of a criminal investigation, the current study has focused on promoting human rights protection. It has been observed that defendants and convicted individuals are not treated equally and are not granted the right to necessities. However, this study emphasizes the defendants' human rights. The convergence between IHRL and ICPL in the context of human rights concerns in criminal law and investigation has been determined for this study. Even though both the IHRL and the ICPL focus on the promotion of human rights protection in criminal investigation by providing legal justice to the defendants and reducing discrimination and inhumane treatment of the accused, this study reveals that the ICPL has various limitations that prevent its effective implementation, resulting in ineffective outcomes. Similarly, it is observed that the implementation of KUHP, which promotes human rights protection in criminal investigations, is feeble, which impacts the overall legal framework in this context.

Moreover, this study reveals a convergence between the IHRL and ICPL in advocating the human rights of criminal defendants; however, some divergence has also been observed. For instance, under the IHRL, standards and guidelines for lawful detention have been established, whereas, under the KUHP, an unlawful 20-day detention period is initially imposed by the police without judicial review. This highlights the disadvantage of solely implementing KUHP to safeguard the human rights of defendants and other individuals involved in criminal investigations. The IHRL standards and guidelines should be incorporated into KUHP for effective outcomes.

## 6. Recommendations

Based on the preceding discussions, the authoritative bodies in Indonesia can modify the country's legislation to improve human rights and equal punishments for criminals to safeguard the rights of citizens.

1. The analysis revealed that implementing human rights and criminal laws does not play a significant role in promoting justice in the country regarding equitable punishments for criminals, etc. The KUHP law governing criminal code proceedings in Indonesia must be upgraded. The literature revealed the need to strengthen the current implementation of this law. However, almost no guidelines or monitoring instructions are in place to oversee its implementation. To cultivate a sense of accountability, reduce crime, and promote equality among Indonesians, it is necessary to implement human rights legislation. Therefore, Indonesia has become a place where individuals hesitate and pause before engaging in illicit or unfair behavior with others. Fear of punishment, justice, and accountability can reduce the crime rate in Indonesia and impede the country's preservation of human rights.

To prohibit the torture of defendants in Indonesia, a specific comprehensive law or legal framework relating to the "prohibition of torture" must be formulated in the country. The purpose of this legislation must be to protect accused individuals from torture. Torture is never justifiable because it contradicts human nature and prohibits the protection of human rights. Therefore, the Indonesian government must promote and enforce a law to prevent torture across all departments.

3. The KUHP mandates 20 days of detention without judicial review for any individual. No law should detain a person unless they are declared a "legal criminal"; therefore, whenever such a situation arises, police officers must conduct a thorough investigation to declare a person a criminal. In addition, there must be no legal detention of these individuals beforehand. Therefore, a proper legal framework for preventing this unconstitutional detention must be established so that no one can be punished by police officers illegally or without being declared a criminal. Special measures designed to control and prevent detention under the KUHP rigorously must be prohibited. This also indicates the appropriate amendments, modifications, upgrades, and changes to the KUHP code of conduct.

To cultivate a sense of equality among people regardless of their gender, race, ethnicity, etc., a nondiscriminatory legal framework must also be promoted in the country.

## 7. Research Implications

Different governments and international organizations have taken significant steps to develop and implement significant laws and legislations to promote the defendants' human rights, as every individual has the right to necessities and life. This study has highlighted the convergence between IHRL and IPCL in the context of human rights protection in criminal investigations. According to the findings of this study, the KUHP contains several gaps that prevent its effective implementation from protecting the rights of defendants and accused individuals, thereby limiting the concept of human rights protection. In addition, this study has presented various IHRL standards that effectively promote the defendants' human rights, resulting in enhanced literature in this context that may be useful to future researchers. This study has also examined the divergence between IHRL and IPCL in the context of

human rights protection in criminal investigation, which has helped to identify the unlawful 20-day detention period in Indonesia. This can effectively encourage many human rights organizations and committees in Indonesia to concentrate on promoting and implementing crucial human rights legal frameworks.

In addition, this study promotes various practical implications that contribute to the study's value. This study, for instance, can effectively emphasize the negative impact of the new KUHP in promoting discrimination that impedes human rights protection, particularly in the context of criminal investigations. Consequently, the Indonesian government can be encouraged to make significant amendments to this new code, thereby fostering the protection of human rights during criminal investigations. This study can also effectively persuade the Indonesian government and other affiliated organizations to draft and implement a comprehensive law prohibiting torture in the context of criminal investigations. This strategy can also effectively increase public awareness of the importance of human rights protection in criminal investigations, encouraging citizens to play their part. However, various policymakers can be motivated to develop and implement significant policies promoting the protection of human rights in criminal investigations. After conducting a convergence analysis between IHRL and ICPL, significant changes can be made to incorporate IHRL's guidelines and standards into ICPL to promote the lawful detention process and human rights protection in criminal investigations by prohibiting torture.

### 8. Limitations and Future Research

Every research has some limitations. This also applies to the present investigation. The current study employs a "qualitative content analysis approach" to investigate, concentrating primarily on secondary data. For this reason, no direct data was collected from respondents, such as legislative bodies or authorized individuals involved in promoting human rights protection or prosecutors dealing with criminal proceedings, which could have provided a more instructive perspective for the research. Future researchers can circumvent this limitation by undertaking interviews or focus group discussions with personnel and governing bodies involved in human rights or criminal legislation. Future researchers can also conduct mixed-method research to incorporate qualitative and quantitative data sources to enhance the adequacy and integrity of their research. Due to time constraints, a limited number of databases containing data for analysis were accessed for the cross-sectional study presented here. Based on this limitation, future researchers can diversify or expand the website or data sources to generate a greater variety of information and improve the adequacy of the results.

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