



Jurisprudential Thinking and Perfection Suggestions on Several Difficult Problems in Administrative Apology System in the New Era

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Abstract. Administrative apology is becoming more and more common and is constantly improving. In the process of standardization and legalization, some vague contents have appeared, including whether administrative apology is an administrative act or an administrative responsibility. Is the subject of apology an administrative subject or an administrative organ and its executive personnel? Is an administrative apology a formal apology, or is it an internal, substantial one? How does an administrative apology really work? By clarifying the vague content, the administrative apology is defined as the administrative responsibility; the administrative apology is made by the administrative subject; the administrative apology is both internal apology and external apology, the internal apology refers to the inner self-examination of the administrative subject on internal guilt, in order to achieve the purpose of blaming oneself for goodness; and the external apology means that the administrative apology has a coercive force. With the influence of space, time, audience size, external force and the subject of supervision, the administrative subject is forced to make an apology and take remedial measures.

Keywords: Administrative Apology; Administrative Subject; Administrative Action; Administrative Responsibility

1 Introduction

Introduction. Administrative apology refers to an apology related to administrative matters, usually issued by administrative organs. For such apologies, some laws in our country have already made the expression of 'apologize and make amends', such as the Civil Servants Law of the People's Republic of China, the Public Security Administration Punishments Law of the People's Republic of China, and the State Compensation Law of the People's Republic of China [1]. Although the contents are not identical, they all have the same manifestation, that is, an apology is made by the administrative organ to the managed person or the counterpart. Therefore, regarding administrative apologies, first, scholars such as Wang Chen, Zhu Yingping, and Luo Wanli have conducted preliminary studies on the characteristics and connotations of administrative apologies

from a theoretical perspective; Additionally, Hu Jian and others analyzed issues such as "Functional Orientation, Expression Structure, and Normative Improvement of Administrative Apologies in the Context of Party-Government Relations" [2]; Zhou Yi conducted research from the perspective that administrative apologies have a "service function" [3]; Professor Yang Linhong and other scholars focused on the "dual attributes of political responsibility and legal responsibility" of administrative apologies [4]; Professor Wang Chen studied "administrative apologies as part of the diversified dispute resolution mechanism, from the perspectives of substantive legal norms and procedural norms respectively") [5]. These studies have laid the foundation for the theoretical development of administrative apologies in our country. However, with the increasing number of apologies made by administrative organs in the process of governance in the new era, the social repercussions they bring have become more and more significant. Combined with practical work, a profound analysis from the perspective of administrative law theory reveals that there are still some basic issues with unclear definitions regarding administrative apologies. For example, the essence of administrative apologies, the attribution of the subject of administrative apologies, the expression methods of administrative apologies, and the manifestation methods of administrative apologies are all still uncertain. These issues need to be further clarified in the process of continuously institutionalizing and legalizing administrative apologies. This article mainly adopts the conceptual analysis method in jurisprudence, places the concept of "administrative apology" under the perspective of jurisprudence, combines administrative law theories such as administrative subject, administrative act, and administrative liability, and on the basis of existing research by relevant scholars, conducts in-depth analysis and clarification on ambiguous issues such as "Is administrative apology an administrative act or an administrative liability? Is the subject of administrative apology an administrative subject, an administrative organ, or an administrative staff member? Is administrative apology merely the oral expression of 'sorry'? How to implement administrative apology, and can we only rely on the initiative of the subject of administrative apology?" Thus, in the process of the continuous deepening of the rule of law in the new era of our country, we will reveal the deep connotation of the concept of "administrative apology" itself and explore a clearer theoretical framework.

2 The Defining Challenges of the Theoretical Definition of "Administrative Apology"

2.1 Theoretical Definition of Apology and Preliminary Definition of the Concept of Administrative Apology

To deeply understand the connotation of administrative apology, we must first understand the literal meaning of the word "apology." The word "apology" originally means "poor harvest, regrettable," and is a verb. It is then extended to mean "sad, regretful," and is an adjective; "sad feeling" is a noun. The dictionary defines it as "to harbor resentment, to feel uneasy" [6]. The modern Chinese interpretation is "feeling sorry for someone" [7]. In this context, "Dao" is a verb, meaning "to express", in essence, is the

expression of one's inner feelings through language. It is interpreted as "admitting wrongdoing for inappropriate or harmful words or actions; acknowledging that one has wronged someone." In English, "apology" as a noun is defined as "apology; sorry; ill at ease"; apology is defined as "a statement expressing sorrow for a fault, for causing trouble or pain" [8]. "Sorrow" refers to "unhappiness; sadness; grief," expressing sorrow, grief, or pain caused by a mistake, trouble, or pain. As a verb, the English phrase for "apologize" is "offer an apology; make an apology, " or " apologize." [9] An apology, in essence, is an expression of remorse between the perpetrator and the victim. As Alan Lazar stated, an apology is "when two parties are facing each other, the party who has done wrong should admit their mistake to the victim, take responsibility for the other party's dissatisfaction, and express remorse or self-blame." [10]

So what does "apology" mean in law? Currently, there is no specific legal definition of "apology" in mainland my country. Even in the *"Interim Measures of Shenzhen Municipal Government Departments on Responsibility Review and Apology for Dereliction of Duty,"* implemented by the Shenzhen Municipal Government in 2007 to specifically regulate administrative apologies, a clear definition is not found. However, in the Hong Kong Special Administrative Region, On July 13, 2017, the Legislative Council of the Hong Kong Special Administrative Region passed the Apology Bill. So there was a legal definition. In the apology regulations, an "apology" is defined as: "an expression of remorse, regret, sympathy, or goodwill by a person for a matter, which may be oral, written, or behavioral. If part of the expression contains an admission of fault or legal responsibility, or a statement of fact, it is also within the 'meaning' of an apology." [11] The legal definition of "apology" is as follows: "Expressing remorse, regret, sorrow, sympathy, or goodwill" is its content; "oral, written, or behavioral" is its form; "admitting fault or legal responsibility, or a statement of fact" is its content; and "a person involved in the matter" is its subject.

Specifically, what about administrative apologies? Based on the above textual and legal meanings of the connotation of apology, an administrative apology is an apology related to administration. From a theoretical research perspective, Wang Chen was the first in China to propose the concept of "administrative apology" and conducted corresponding theoretical research. However, with the continuous practice and implementation of administrative apologies in practice, the legal connotations they embody are becoming increasingly profound. In the new era, in the process of the increasing legalization of administrative apologies, what are their unique characteristics? It is necessary to further explore the basic framework of administrative apologies to clarify their differences from the general connotations of apologies and to outline a clearer characteristic and structure of administrative apologies.

2.2 Several Major Problems Existing in the Theory of Administrative Apologies

1. Is an administrative apology an administrative act or an administrative responsibility?

Administrative apology is a relatively new concept. In existing domestic research, scholars such as Professor Wang Chen, Professor Luo Wanli, and Zhu Yingping have

conducted research on "administrative apologies" and proposed corresponding theories. The Administrative Responsibility Argument. Professors Wang Chen and Luo Wanli, who have researched "administrative apologies," have proposed, in different ways, that administrative apologies constitute administrative responsibility. Professor Wang Chen conducted extensive research on administrative apologies from 2011 to 2018. His works, including "A Brief Discussion on the Characteristics of Administrative Apologies" (issue 4, 2011), "A Review of the Legal Norms of China's Administrative Apology System" (issue 2, 2013), "A Study of Legal Apologies—Taking Administrative Apologies as the Main Line" (issue 5, 2013), "On Administrative Apologies" (issue 6, 2013), and "A Study of Types of Administrative Apologies in China" (issue 4, 2015), all define "administrative apologies" as "administrative responsibility," generally stating: "An administrative apology is a way for administrative bodies and their staff to express remorse to the public or specific administrative counterparts based on the exercise of administrative power or other illegal or inappropriate acts that affect the good image of the administrative body." [12] Only the article "An Analysis of the Alienation Types of Administrative Apologies" in Issue 4 of 2018 states that "an administrative apology refers to the way in which an administrative body and its staff express remorse to the public or a specific administrative counterpart, assuming administrative responsibility." Although the wording differs slightly, omitting the conditions for making an administrative apology, the conclusion is still based on the fundamental logic that "an administrative apology is an administrative responsibility."

Secondly, Professor Luo Wanli holds the "administrative responsibility theory." His research on "administrative apologies," as seen in several articles from 2013, reveals the basic meaning of "an administrative apology is an administrative responsibility." For example, in "A Preliminary Discussion on the Legal Relationship of Administrative Apologies" in Issue 4 of 2013, Professor Luo, through comprehensive analysis, argues that "an administrative apology" is "a form of government responsibility," [13] essentially "an administrative responsibility and administrative constraint, a regulation of the behavior of government officials." The article "The Legalization and Path of Administrative Apology" in Issue 5 of 2013 clearly defines "administrative apology" as: "an administrative responsibility borne by an administrative body to express apology to the public or a specific administrative counterpart based on the exercise of administrative power or other illegal or improper conduct that affects the good image of the administrative body." [14]

The behavioral perspective: Other researchers who have studied administrative apologies include Zhu Yingping and Li Yu, whose viewpoint leans towards "administrative apologies being behaviors." In their article "On Administrative Apologies" (issue 6, 2012), "administrative apology" is defined as a "behavior," specifically described as: "the act of an administrative agency and its staff publicly apologizing to the public and society for the adverse consequences caused by their failure to perform their administrative duties according to law or their erroneous performance of administrative duties." [15]

Regarding "administrative apologies," there is currently a difference in legal theory between the "administrative responsibility theory" and the "behavioral theory," implying different substantive legal interpretations. Therefore, should an "administrative

apology" be considered an "action," an "administrative act," or an "administrative responsibility"? This is an aspect that this article should clarify.

2. Is the subject of an administrative apology an administrative body or an administrative agency and its staff?

Based on the different interpretations of the concept of "administrative apology" by the aforementioned scholars, we can summarize their basic understanding of the subject of administrative apology. In Wang Chen's research on "administrative apology," in papers such as "A Brief Discussion on the Characteristics of Administrative Apology," "A Review of the Legal Norms of China's Administrative Apology System," "Research on Legal Apology—Taking Administrative Apology as the Main Line," "On Administrative Apology," and "A Study on Types of Administrative Apology in China." the same idea is made in the repeated definition of "administrative apology": "Administrative apology is the way of administrative responsibility taking that the administrative subject and its staff express apology to the public or specific administrative counterpart because of the exercise of administrative power or other illegal or improper behavior that affects the good image of the administrative subject." Only in his 2013 paper, "Research on Legal Apology—Taking Administrative Apology as the Main Line," did he break down the definition of administrative apology in slightly more detail, dividing it into narrow and broad definitions. The broad definition is consistent with the previous definition, while the narrow definition is "an administrative apology is an administrative responsibility borne by an administrative body and its staff to express remorse when the legitimate rights and interests of the public or specific administrative counterparts are harmed due to the illegal or improper exercise of administrative power." [16] Regardless of the definition, the subject of an administrative apology is consistently limited to "administrative bodies and their staff." Another scholar, Luo Wanli defines an administrative apology as "an administrative responsibility borne by an administrative body to express remorse to the public or a specific administrative counterpart based on the exercise of administrative power or other illegal or improper conduct that affects the good image of the administrative body." [14] In his definition, the subject of "administrative apology" is directly defined as the abstract "administrative subject", without specifying the "staff of the administrative subject". Other scholars, such as Zhu Yingping and Li Yu, define an administrative apology as "an act by which an administrative agency and its staff publicly apologize to the public and society for the adverse consequences caused by their failure to perform their administrative duties in accordance with the law or for their erroneous performance of their administrative duties." [15] They consider administrative apologies to be made by "administrative organs and their staff" indicating that the subject of an administrative apology is clearly "administrative organs and their staff." Compared to the "administrative body" advocated by the first two scholars, the subject of administrative apologies here is more specific, referring exclusively to administrative organs and their staff, excluding other "authorized organizations" that could be the subject of an apology. Therefore, theoretically speaking, is it more appropriate for an "administrative body" or "administrative organs and their staff" to apologize? This is a question that should be further clarified from a legal perspective.

3. Is an administrative apology merely a formality, or does it require a substantive apology?

How can an administrative apology truly express genuine remorse? Common practices include: a spokesperson holding a press conference; the relevant department publishing a written statement in a major local newspaper; staff members verbally expressing "I'm sorry," "I feel sorry," "I express my remorse," or "I feel deeply ashamed" to a specific person; and a responsible person bowing to the recipient of the apology. While these actions may seem like a sincere apology, upon closer examination, they only attract public attention and fail to convey the true sincerity of the administrative apology. They don't allow the wronged party or the public to genuinely feel the apology's remorse and guilt, and thus have "almost no psychological impact on the public." [17] To truly ensure that the person issuing an administrative apology expresses genuine remorse for their wrongdoing and that the recipient feels remorse, is it sufficient to focus solely on the formalities of the apology? Should we explore deeper, intrinsic moral requirements? This is a question that requires further investigation.

4. Should administrative apologies be enforced?

An apology should ideally be a sincere expression of self-reproach and admission of wrongdoing, driven by the individual's inner will—emphasizing initiative. However, in reality, there are always instances of non-initiative in apologies. The main reason for this is the pressure the person apologizing bears of introspection and the potential negative consequences, leading to numerous concerns and thus a lack of initiative in apologies. If this is the case even between private individuals, how much more so in the administrative sphere? Because administrative apologies involve a series of complex matters, including the exercise of public power, the identification of responsible personnel, the clarification of the person making the apology, the assumption of responsibility, the remediation of consequences, and the improvement of operational procedures, coupled with the ambiguity or even absence of the apology procedure, they tend to be slow, inefficient, evasive, or even absent in practice. Consequently, from an outsider's perspective, administrative apologies lack initiative and enforceability. Therefore, given the lack of initiative in administrative apologies, is it necessary to impose coercive force on their implementation? This is a point that should be emphasized.

3 Clarification of Several Difficult Issues in the Administrative Apology System

(1) Administrative Apology as Administrative Responsibility in Legal Substance

Administrative apologies are achieved through actions. Legally, how is their substance determined? Is it an "action"? Or an "administrative action"? Or an "administrative responsibility"?

First, let's examine whether an administrative apology is an "action." A person's subjective intention expressed outwardly constitutes an action. However, an action expressing intention should produce a result that corresponds to the subjective will's expectation. If the actual result corresponds to the person's subjective will's expectation, then "the result is what the action inevitably produces." [18] Therefore, an apology is

first and foremost an act of expressing intention. What, then, is the outcome of an apology? The outcome should be that the remorse is forgiven by the other party, the damage is remedied, and the damaged relationship between the two parties is repaired. For an apology to be considered an "act" in legal terms, the remorse must correspond to the outcome of "being forgiven, making amends for the loss, and repairing the damaged relationship." Without these outcomes, an apology is merely an action, lacking the intent of an "act," and therefore carries no responsibility. "A person is only responsible for the inevitable consequences, because these consequences are contained within their subjective will." [18]

Secondly, an apology is an expression of remorse, an admission of one's mistakes, and an outward act of moral obligation to stand up against wrongdoing. Furthermore, "every moral obligation implies the moral right of the moral subject to fulfill his or her obligation without being hindered by others." [19] Therefore, it can be judged that an apology, as an act, fulfills both a moral obligation and an exercise of a moral right, and is naturally a moral act.

But is an apology a legal act? According to Savigny, a legal act is "an act of expressing intent by an actor to create a legal relationship of his or her own volition." [20] A legal act is an act that creates, modifies, or terminates a legal relationship, with the expression of intent at its core. Clearly, both moral and legal acts require a subjective expression of intent. Therefore, an apology, as a moral act, is also a legal act, where the infringing party, through an expression of remorse, seeks remedies beyond compensation for the actual damage to their legitimate rights and interests.

An apology is an act, a moral act, and then a legal act. An administrative apology is a special form of apology, and naturally, it is also an act of expression. Since administrative acts are also a concretization of acts, and they are "a form of expression of public power acts" [21] can an administrative apology be an administrative act? Assuming an administrative apology is an administrative act, it is necessary to determine what elements are required for the establishment of an administrative act. The establishment of an administrative act cannot be separated from its constituent elements, which generally include the administrative body, administrative power, expression of intent, and legal consequences. Among these, the decisive element is administrative power; "administrative power is the sole general requirement for the establishment of an administrative act." [22] Whether defined narrowly as "an administrative act is an act performed by an organization or individual with administrative power to exercise administrative authority and directly produce external legal effects on a specific matter against an administrative counterpart," [22] or broadly as "all acts performed by organs, organizations, and their staff with public management functions that affect the rights and interests of administrative counterparts in connection with the exercise of administrative power," [22] or "A new concept of administrative act — comprehensive administrative act" [23], all are administrative acts performed by exercising administrative power. An administrative apology, however, arises from the erroneous or unlawful exercise of administrative power, and serves as a remedy for the infringement of rights or public interests by a specific subject or the public. For the exerciser of administrative power, it represents accepting self-sanction, establishing a "special relationship" [24] between

power and rights regarding unlawful administrative acts and sanctions. Therefore, administrative acts are acts of exercising administrative power, while administrative apologies are acts of assigning responsibility for erroneous or improper exercise of administrative power, and are essentially administrative liabilities. More precisely, this article argues that administrative apologies are not administrative acts; their legal essence should be the expression of acceptance of administrative responsibility through action, that is, a legal act.

(2) The Subject of an Administrative Apology Should be an Administrative Body

Although the theoretical analysis of "administrative apology" by the scholars above can make people understand the cause of the apology as a whole, there are still differences in the details of the wording of the apology subject, including whether the apology subject is "administrative body and its staff", "administrative body", or "administrative agency and its staff", which raises the question of who exactly is the apology subject. If "administrative bodies and their staff" are the subjects of apology, in practice, it is highly likely that the subject of administrative apology will be directly concretized from the abstract administrative body to a staff member. In reality, the responsible leader will not appear, but only a specific staff member will represent them, easily creating the impression that the subject of apology is a specific individual. If "administrative organs and their staff" are to apologize, on the one hand, it not only excludes the authorized organizations that exercise administrative power, but also creates a situation where authorized organizations do not need to apologize even if they exercise administrative power illegally or erroneously, resulting in the overly one-sided phenomenon that the subject of apology can only be the administrative organ. On the other hand, it may also directly attribute administrative responsibility to the actual implementer of the behavior, regardless of whether they are qualified to bear administrative responsibility. As for expressing apology as "administrative organs and administrative staff", it excludes not only the authorized organizations, but also the organizations that accept the entrustment, and even ignores the decision-makers, giving the outside world the illusion that "administrative apologies are only related to administrative organs and individuals responsible for administrative work, and have nothing to do with other organizations exercising administrative power and non-administrative personnel." Whether it's the wording "administrative body and its staff," "administrative agency and its staff," or "administrative agency and its staff," the explanation of the subject of administrative apology is too specific and one-sided, confusing the subject of administrative apology with the person who actually makes the administrative apology, and failing to clarify the legal subject of administrative apology.

What if we describe the subject of an administrative apology as an "administrative body"? This might raise concerns about the abstract nature of the apology subject, making it difficult to assign responsibility to specific staff members. While some scholars, like Zhou Wei, have broken away from the traditional view that "the subject of the administrative act is the administrative body" in general theory regarding the elements constituting an administrative act, Replace it with the innovative view that the subject of administrative responsibility is the subject of administrative act. However, at the level of administrative apologies, using "administrative subject" to express "subject of administrative apology" is more appropriate than "subject of administrative action" or

"subject of administrative responsibility," Because the "administrative subject" is theoretically "the product of the unity of the right capacity, behavioral capacity, and liability capacity of the 'legal subjectivity' from which public administration arises" [25], and it is the actual exercising subject of administrative power, This encompasses administrative organs and authorized organizations, representing the state externally in exercising administrative power in their own name, safeguarding public interests, using public resources, managing public affairs, and independently bearing responsibility for actions taken by specific staff members on their behalf. Therefore, as administrative responsibility, administrative apologies should be borne by the true responsible entity—the administrative subject. Expressing the subject of administrative apologies as "administrative subject" fully demonstrates that an "apology" is an "administrative apology" where the administrative subject, including legal entities such as administrative organs and authorized organizations, expresses remorse.

(3) Internally, an Administrative Apology Reflects the Inner Guilt of the Administrative Subject's Staff

An administrative apology is a process by which the administrative subject expresses its inherent morality—inner guilt—externally, possessing its own legal nature and legal effects.

The preceding text has already explained the meaning of "apology," encompassing its literal meaning of "poor harvest, regrettable," its extended meanings of "sad, resentful," "a feeling of sadness," "resentment, unease," [6] and finally, "feeling guilty." [7] All of these embody a sense of guilt, including remorse, regret, shame, humility, compassion, and goodwill. It is a form of self-reflection within the individual, a process of self-affirmation during the use of subjective will to achieve good. Although one's inner thoughts and feelings are not influenced by others, one can control and evaluate one's own inner state, reflecting this in outward behavior. Like the familiar "sense of shame and aversion," this forms a morally conscious attitude towards negative phenomena, leading to aversion to inappropriate behavior and "inspiring action to stop evil." [26] and such actions "are consciously made choices" [27]. Therefore, "apology" reflects the inner conscience of a person's remorse for violating "goodness," a state of moral "guilt," while "the Way" actively reflects on this inner "guilt" and demonstrates the moral obligation to stand up against evil through words and actions.

Thus, administrative apologies, as a special type of apology, are a form of apology related to the administrative body. Specifically, it involves an administrative agency or organization, through its staff, acknowledging its mistakes to the specific administrative counterpart or the public regarding the adverse effects or harm caused by the exercise of its administrative power, providing specific explanations, and demonstrating self-reproach, shame, humility, and sincerity, while proposing corresponding remedial measures. As an outward reaction to inner guilt, administrative apologies express the administrative body's introspective state of "self-reproach, shame, humility, and sincerity," releasing goodwill and ultimately achieving the moral requirement of "strict self-discipline" and "self-improvement."

(4) Administrative Apologies Require External Enforcement to Urge the Administrative Body to Implement Them

Ideally, an apology should stem from genuine inner pain, with the apologizer offering sincere self-reproach and acknowledging their mistake. This applies to administrative apologies as well. However, because administrative apologies are issued by public authorities exercising state power, their apologies must not only constrain administrative organs and their staff in the lawful exercise of their powers and fulfillment of their duties, but also serve as a model for the world, promoting social order and harmony. Therefore, as an expression of intrinsic morality, administrative apologies should also exhibit external legal enforceability.

"Law is the norm governing the external behavior of people." [28] Public acceptance is the foundation of enforcement. To achieve the universal fairness protected by law and ensure universal compliance, enforcement is essential, especially through legal liability, ensuring that "someone should be punished or forced to compensate for their actions or injuries under the law." [19] This emphasizes that law is "the total of all norms guaranteed by state enforcement procedures." [29]

Administrative apologies not only arise from administrative agencies' infringements or damages, thus becoming a common form of wrongdoing liability, but also from the actions of responsible governments in exercising administrative power, thus presenting as a necessary governmental responsibility. "Responsibility is the result of authorization" [30] To maintain public order and protect public interests, administrative agencies should enjoy the necessary duties and powers. However, power itself is coercive, and the actions of administrative agencies in accordance with their authority may harm the rights and interests of citizens, legal persons, and social organizations, leading to administrative disputes. Therefore, it is necessary to regulate administrative activities by law. "Without administrative law to constrain the power exercised by administrative agencies and the procedures and rules governing its exercise, infringements on citizens or other organizations will occur frequently." [31] Therefore, once administrative activities or actions such as "abuse of administrative discretion; arbitrary and capricious decision-making; decision-making completely disregarding facts and reason; actions contrary to the provisions of the Constitution and laws; violation of established due process standards; exceeding legally permitted authority; and failure to act or respond within a reasonable timeframe" [32] occur, it is essential to ensure that administrative agencies and their staff are accountable to the people. Mandatory accountability is imperative, and administrative apologies are merely a milder form of mandatory accountability.

In summary, the difficult issues in the administrative apology system have been clearly identified: the subject of the administrative apology makes the apology in the capacity of an administrative body; an administrative apology is an act performed by an administrative body, a unity of moral and legal behavior, and is essentially an administrative responsibility that the administrative body should bear; an administrative apology is an outward expression of the administrative body's inner remorse; and an administrative apology itself is mandatory, and the subject of the administrative apology will be compelled to make the apology by coercive force.

4 Conclusion

This paper addresses the ambiguities that have arisen in the standardization and legalization of administrative apologies, specifically including: Is an administrative apology an administrative act or an administrative responsibility? Is the apology made by an administrative body or an administrative agency and its staff? Is an administrative apology merely a formality, or does it encompass deeper meaning? How can an administrative apology be truly implemented? This paper provides a clear analysis of these questions. First, it clarifies the basic theories and meanings of administrative apologies. Second, it identifies and defines the existing problems in administrative apologies, including: Administrative apologies are administrative responsibilities; administrative apologies are made by administrative bodies; and administrative apologies have both internal and external aspects. The internal aspect is the administrative body's introspection on its own pain, aiming to achieve self-reproach and improvement. The external aspect is its coercive power, using space, time, the number of recipients, external forces, and even the influence of the supervising body to compel the administrative body to apologize and take remedial measures.

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