

# **Independent Reporting Mechanism**

Action Plan Review:  
Indonesia 2020–2022

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

## Introduction

In January 2021, the IRM began rolling out new products that resulted from the IRM Refresh process.<sup>1</sup> The new approach builds on lessons from more than 350 independent, evidence-based, and robust assessments conducted by the IRM and input from the OGP community. The IRM seeks to put forth simple, timely, fit-for-purpose, and results-oriented products that contribute to learning and accountability in key moments of the OGP action plan cycle.

The new IRM products are:

1. **Co-creation brief:** brings in lessons from previous action plans, serves a learning purpose, and informs co-creation planning and design. This product is scheduled to roll out in late 2021, beginning with countries co-creating 2022–2024 action plans.
2. **Action plan review:** an independent, quick, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. This product is scheduled to roll out in early 2021 beginning with 2020–2022 action plans. Action plan reviews are delivered 3–4 months after the action plan is submitted.
3. **Results report:** an overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning. This product is scheduled to roll out in a transition phase in early 2022, beginning with 2019–2021 action plans ending implementation on 31 August 2021. Results reports are delivered up to four months after the end of the implementation cycle.

This product consists of an IRM review of Indonesia’s 2020–2022 action plan. The action plan is made up of 24 commitments that the IRM has filtered and clustered into 14. This review analyzes the strength of the action plan to contribute to implementation and results. For the commitment-by-commitment data, see Annex 1. For details regarding the methodology and indicators used by the IRM for this action plan review, see Section III: Methodology and IRM Indicators.

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<sup>1</sup> For more details regarding the IRM Refresh, visit <https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/>.

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## Section I: Overview of Indonesia's 2020–2022 Action Plan

*If fully implemented, Indonesia's sixth action plan could better coordinate provision of social welfare, publish information on beneficial ownership, and increase transparency on public procurement and COVID-19 spending. Commitments with more concrete and ambitious targets would strengthen the plan's impact. Implementation will require greater political commitment within implementing agencies, mechanisms for beneficiary engagement, and regular communication with civil society.*

Indonesia joined the OGP as a founding member in 2011. This report evaluates the design of Indonesia's sixth action plan.

This action plan consists of 24 commitments, 20 of which continue from the previous action plan. The commitments are closely aligned with the policy priorities of Indonesia's 2020–2024 Medium-Term National Development Plan (RPJMN), as well as the Sustainable Development Goals (SDGs). Most commitments carry forward initiatives from the previous action plan, including open parliament, access to justice, and access to election data. The action plan also builds on past commitments on beneficial ownership transparency, open contracting, and budget transparency. Additionally, it continues to address public service complaint resolution, access to social welfare data, participatory village governance, access to online health services portals, and One Data Indonesia. The action plan introduces new policy areas, such as a cross-cutting focus on improving public service provision for marginalized populations, as well as new commitments on protecting civic space and implementing social accountability measures at the local level. To aid clarity and assessment, this report clusters commitments relating to judicial access (6–10), community development (4 and 12) and open parliament (19–24).

Indonesia's action plan was developed in two separate parts. Commitments 1–18 were directly proposed by civil society, often many organizations acting together, and developed through a collaborative co-creation process. Compared to previous plans, there was increased engagement from groups working on women's rights and legal aid, including civil society organizations from Papua, Aceh, and Bandung. While the secretariat provided informal feedback to CSOs on the seven suggested commitments that were not included in the action

### AT A GLANCE

**Participating since:** 2011

**Action plan under review:** 2020–2022

**IRM product:** Action plan review

**Number of commitments:** 24

#### Overview of commitments:

- Commitments with an open gov. lens: 24 (100%)
- Commitments with substantial potential for results: 4 (17%)
- Promising commitments: 4 (17%)

#### Policy areas carried over from previous action plans:

- Open parliament
- Access to justice
- Beneficial ownership transparency
- Open contracting
- Budget transparency

#### Emerging policy areas:

- Civic space
- Social accountability
- Inclusion of marginalized people

#### Compliance with OGP minimum requirements for co-creation:

- Acted contrary to OGP process: No

\* For commitments that are clustered, the IRM assessed potential for results at the cluster level, rather than the individual commitments.

plan, in the future, it could document this feedback to fully meet the OGP *Participation and Co-creation Standards*. The open parliament commitments (19–24) were developed through a separate process at the House of Representatives, which expanded civil society participation compared to the previous plan but did not include parliamentarians’ participation. According to Open Government Indonesia and Open Parliament Indonesia, differences in regulations, budgets, and priorities pose challenges to an integrated co-creation process. However, if future commitments are to be presented in a unified plan, greater coordination between government and parliament would be beneficial. Overall, there is also need for expanded participation from parliamentarians, high-level government ministry stakeholders, and civil society organizations in the co-creation process, and for increased civil society participation within the multistakeholder steering committee.

The action plan includes several promising commitments, although fewer than the previous plan. Commitment 1 would strengthen the transparency of public procurement, particularly during states of emergency like COVID-19. Commitments to integrate social welfare data into the Social Welfare Information System–Next Generation (SIKS-NG) online platform (Commitment 11) and to open public online access to COVID-19 budget information (Commitment 15) also have substantial potential for results. Additionally, Commitment 17 would open public access to the national beneficial ownership registry.<sup>1</sup> This commitment also responds to IRM recommendations in the previous design report. These promising commitments are examined in the next section (II).

The plan includes a positive continued effort to address shortcomings in legal aid provision (Commitments 6–10), with a valuable, cross-cutting focus on judicial access for women, disabled people, and other vulnerable populations. The commitments directly respond to an IRM recommendation in the previous design report to create an online platform where citizens can access information on legal aid (Commitment 7). Commitment 8 will improve the quantity, geographic distribution, and quality of legal aid services. However, the commitments do not specify numeric targets, nor financial and other resources to be made available, leaving ambiguity in their potential scope. Meanwhile, the commitments to assess judicial access do not include milestones to implement the assessments’ recommendations. Implementing this cluster of commitments should prioritize tangibly increasing the number of legal aid organizations and paralegals, particularly in underserved regions, and strengthening legal aid efforts on access to information. This cluster will require a parallel increase in the budget for legal aid reimbursement.

This plan also continues a positive effort to open the parliamentary process (Commitments 19–24). Namely, commitments that intend to institutionalize open parliament (Commitment 24) and to institute multistakeholder forums between parliamentarians and the public on substantive parliamentary information disclosure and transparency policies (Commitment 22) are constructive steps toward parliamentary openness. However, most of the commitments from the parliament are internally focused and limited in scope. They involve creation or updates of parliamentary websites and applications without sufficient mechanisms to ensure public participation. For example, Commitment 19 includes a milestone adding a public participation channel to the Legislative Information System (SILEG), but does not address the fact that the legislative information on SILEG is frequently outdated, particularly on controversial bills, which has limited user uptake.<sup>2</sup> Open-parliament commitments on digitization and reiteration of parliamentary online platforms may overlook the lack of political commitment from parliamentarians to meaningfully open up the legislative process and create more substantive

pathways to citizen engagement, particularly on critical pieces of legislation. Future commitments could update parliamentary information-disclosure regulation; establish a fixed timeline for public disclosure of information on legislative plans, drafts, debates, passage, and evaluation; and systematize citizen feedback on the parliamentary legislative process.

Additionally, the plan offers incremental progress on the critical area of protecting civic space (Commitments 16 and 18). Given that civic space in Indonesia is categorized as “obstructed,”<sup>3</sup> the previous IRM design report recommended commitments responding to shrinking civic space. However, this plan’s commitments do not offer sufficient measures to address this issue in a meaningful and comprehensive way. For example, although Commitment 18 would research the rights to information, expression, and assembly, it lacks milestones to implement the resulting recommendations. Future plans could offer a platform for both government and civil society leaders to safeguard civic space more ambitiously.

Overall, despite a diverse thematic focus, most commitments are too weak to generate substantial impact. Several commitments that develop assessments and policies lack enforcement mechanisms, such as Commitments 6, 10, and 18. Additionally, like Commitment 19, some commitments do not provide for sufficient engagement with beneficiaries. Other commitments introduce measures in nationally relevant policy areas, but do not set ambitious targets in terms of scope. For instance, social accountability at the local level could target a higher percentage of Indonesia’s villages in future action plans (Commitment 12). For commitments without clear targets, Open Government Indonesia and implementing agencies could work with stakeholders to concretize milestones and indicators.

Given frequent turnover in implementing agencies, civil society stakeholders expressed concern about government commitment to implementation. When faced with personnel changes, these agencies could improve the handover process to support preservation of institutional memory and ensure the new staff’s commitment to implement the action plan. The implementing agencies could also strengthen communication and collaboration channels between government and civil society through regularly scheduled meetings.

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<sup>1</sup> Beneficial owners are widely defined as those who ultimately control a corporate entity, even though they are not necessarily recorded as the legal owners of the company.

<sup>2</sup> Ravio Patra and Agus Wijayanto (Westminster Foundation for Democracy), interviews by IRM researcher, 2 Mar. 2021 and 11 Apr. 2021.

<sup>3</sup> *Civicus*, “Critical Voices Silenced, Impunity for Excessive Force And Unlawful Killings in Indonesia” (2 Jan. 2021), <https://monitor.civicus.org/updates/2021/02/01/critical-voices-silenced-impunity-excessive-force-and-unlawful-killings-indonesia/>.

## Section II: Promising Commitments in Indonesia’s 2020–2022 Action Plan

The following review looks at the four commitments that the IRM identified as having the potential to realize the most promising results. This review will inform the IRM’s research approach to assess implementation in the results report. The IRM results report will build on the early identification of potential results from this review to contrast with the outcomes at the end of the action plan’s implementation period. This review also analyses challenges, opportunities, and recommendations for the learning and implementation process of this action plan.

**Table 1. Promising commitments**

Promising Commitments
<b>1. Open Contracting in Government Procurement:</b> This commitment would open public access to previously inaccessible procurement information by revising the Information Commission Regulation on Public Information Service Standards and publishing emergency procurement information on the national procurement portal. Strengthening public procurement transparency could contribute to anticorruption efforts.
<b>11. Integrating Welfare Data:</b> This commitment would unify fragmented information on social welfare provision by expanding the SIKS-NG platform to integrate data from major social welfare programs. This could allow for analysis of gaps in social welfare provision and facilitate beneficiaries’ ability to establish their eligibility.
<b>15. Information Portal on COVID-19 Response and Recovery Budget:</b> This commitment would offer public access to COVID-19 spending information, to be published on the Ministry of Finance’s online portal. Given the size of this budget, meaningful disclosure of information could reduce risk of corruption.
<b>17. Utilization of Beneficial Ownership Data:</b> This commitment would provide public access to the online beneficial ownership database (which covers the extractives sector) established under the previous action plan. It would also increase the number of corporations disclosing beneficial ownership.

### Commitment 1: Open Contracting

For a complete description of the commitment, see Commitment 1 in [Indonesia’s 2020-2022 action plan](#).

#### Context and objectives:

From 2004 to 2019, 70% of Indonesian government corruption cases involved public procurement.<sup>1</sup> However, the public’s ability to monitor corruption is frequently limited by inconsistent access to public procurement information,<sup>2</sup> particularly during states of emergency.<sup>3</sup> In response, Indonesia Corruption Watch led development of this commitment to institute a revised Information Commission Regulation on Public Information Service Standards, continuing an incomplete commitment of the previous action plan. The current commitment also aims to institute online disclosure of procurement information during states of emergency, and to launch an annual Information Disclosure Index. This commitment aligns with the OGP value of transparency by offering public access to previously inaccessible procurement information.

#### Potential for results: Substantial



Public procurement accounts for almost half of Indonesian ministerial, institutional, and local government spending—but as much as \$4 billion USD is lost annually through public procurement corruption. Bappenas believes that strengthening the procurement system is essential to the nation’s anticorruption efforts.<sup>4</sup> Likewise, the United Nations Office on Drugs and Crime has encouraged enhanced access to information and meaningful civil society participation.<sup>5</sup>

To date, limited transparency has been a weakness of the public procurement process in Indonesia. Despite the Access to Information Law, local and national government bodies, like the Ministry of Public Works, frequently fail to comply with requests to fully disclose public procurement information.<sup>6</sup> Government bodies’ lack of clarity on procurement information disclosure policy has also resulted in contradictory verdicts on public information requests between the Central Information Commission and the State Administrative Court (PTUN).<sup>7</sup> During states of emergency, like COVID-19, the government uses offline procurement processes that are not publicly accessible. Although the government typically conducts retrospective evaluations of emergency procurement, these evaluations are also not made publicly available. Obstacles to accessing public procurement information have limited accountability efforts by civil society and journalists.<sup>8</sup>

Under this commitment, Indonesia Corruption Watch anticipates that the revised Information Commission Regulation on Public Information Service Standards will open access to previously unreported public procurement information on planning for the tendering process, specifications of goods and services, recipients of government contracts, duration of contracts, methods of payment, quantity of money to be disbursed, and amendments to contracts.<sup>9</sup> The Open Contracting Partnership sees this regulation as potentially important leverage for civil society and journalists to secure the release of public procurement information from noncompliant government bodies. Additionally, the intended update to the national procurement portal would publish previously inaccessible emergency procurement information. Particularly during the COVID-19 pandemic, emergency procurement spending represents an increasingly significant component of government spending.<sup>10</sup> In terms of the Information Disclosure Index, members of the Freedom of Information Network Indonesia see the index as duplicative of the Public Institutions Ratings that have been published annually since 2010. Reportedly, these ratings have not impacted government bodies’ transparency, implying that the Information Disclosure Index may have limited potential impact.<sup>11</sup>

### **Opportunities, challenges, and recommendations during implementation:**

Prompt passage of the revised Information Commission Regulation on Public Information Service Standards Indonesia is central to this commitment’s potential impact, but government bodies’ compliance with the regulation may be a challenge. Given issues with access to nonemergency procurement information, there are also concerns that the published emergency procurement information could have shortcomings in terms of data quality and open access.<sup>12</sup> As such, the following recommendations could enhance this commitment’s implementation:

- **Activate local governments’ implementation** of the revised Information Commission Regulation on Public Information Service Standards through outreach by the Central Information Commission, and passage of complementary policies from the Ministry of Home Affairs and OGP Local.
- **Fully open public access** to emergency procurement information without limitations.
- **Use the Open Contracting Data Standard** to guide decisions on disclosing data and documents throughout the emergency procurement process. Ensure the level of



emergency procurement information disclosure is at least on par with nonemergency information disclosure.

- **Inclusively develop the Information Disclosure Index**, strengthening methodology with the full participation of civil society stakeholders and experts.

### **Commitment 11: Integrating Welfare Data**

For a complete description of the commitment, see Commitment 11 in [Indonesia's 2020–2022 action plan](#).

#### **Context and objectives:**

Indonesia's social welfare system is characterized by extensive fragmentation. As a result of the number of line ministries, Indonesia could not coordinate a comprehensive information system on social welfare provision.<sup>13</sup> Instead, it has proliferated many parallel information systems. Fragmentation of this data poses a major obstacle to service delivery and complicates implementation of a cohesive strategy and coordinated processes across institutions.<sup>14</sup>

The problems this generates have been thrown into stark relief by the recent expansion of social protection programs in response to COVID-19. These programs received a budget of Rp 203 trillion (\$14.1 billion) in 2020,<sup>15</sup> but data discrepancies in distribution of social welfare funding have generated substantial public criticism.<sup>16</sup> According to Pahala Nainggolan, the Corruption Eradication Commission's (KPK) deputy for prevention, the commission has seen large inefficiencies in aid distribution, with stories of low-income beneficiaries not getting their share of relief due to inaccurate data.<sup>17</sup> In December 2020, the Social Affairs Minister was detained by KPK, accused of receiving Rp 17 billion (\$1.2 million) in bribes related to COVID-19 aid distribution.<sup>18</sup>

Overall, the absence of a comprehensive information system on social welfare provision produces data discrepancies that limit effective policymaking and leave opportunities for misused welfare funding. To address inconsistencies, Perkumpulan Media Lintas Komunitas (Medialink) proposed this commitment to ensure that social welfare data is available on the Social Welfare Information System—Next Generation (SIKS-NG). This online platform was developed under the previous action plan to provide public access to data on Contribution Aid Recipients (PBI). This commitment advances the OGP value of transparency by expanding public access to social welfare data.

#### **Potential for results: Substantial**

This commitment would centralize fragmented social welfare databases and could ultimately improve provision of social welfare services. Since its launch, effective utilization of SIKS-NG has suffered from administrative issues with data entry, verification, and validation, as well as a lack of buy-in from relevant ministries.<sup>19</sup> The Ministry of Home Affairs' previous under-involvement in SIKS-NG exacerbated these issues, allowing for inconsistent data updates from local governments.<sup>20</sup>

To decrease data discrepancies, this commitment will add data from large social welfare programs such as the Family Hope Program (PKH) and the Non-Cash Food Assistance Program (BPNT) to the SIKS-NG platform, integrating this data with the PBI data.<sup>21</sup> PKH reached 10 million households in 2018 and BPNT reached 15.6 million households in 2019,<sup>22</sup> indicating that this commitment could impact a widespread population of social welfare beneficiaries. This commitment could offer government, civil society, and beneficiaries the opportunity to strengthen provision of social welfare by coordinating fragmented data, allowing analysis of

provision gaps, reducing opportunities for misallocation of funds, and facilitating beneficiaries' ability to establish their eligibility for services.

In the past, improving access to information on social welfare rights has been shown to improve provision of social welfare in Indonesia. For example, in response to misappropriations of Indonesia's Raskin program ("Rice for the Poor," which was BPNT's predecessor), a 2018 study in 550 villages found that providing basic information to potential beneficiaries on their rights to rice subsidies subsequently increased their access to subsidies by 26%. Once eligible households had information on their social welfare rights, they gained the leverage to negotiate with local government representatives for their fair share of subsidies.<sup>23</sup>

### **Opportunities, challenges, and recommendations during implementation:**

Implementing this commitment should prioritize usability for beneficiaries, allowing those eligible for social welfare to easily access relevant information. Challenges to implementation might include local governments' buy-in; administrative issues with data entry, verification, and validation; and political coordination with the Ministry of Home Affairs. Effective implementation requires this commitment to be explicitly tied to the Indonesian government's priorities around more consolidated social welfare. It may also require upward revision of budget allocations to cover extra claims. The following recommendations can strengthen implementation of this commitment:

- **Incorporate a user-centered design process** for updating SIKS-NG, including early and active involvement of beneficiaries and grassroots CSOs in evaluating the expanded information system.
- **Ensure beneficiaries' data protection and privacy** through the development of a comprehensive legal and institutional framework, and incorporation of privacy- and security-enhancing processes and technology into SIKS-NG.
- **Encourage local governments' participation** through high-level political endorsement of the commitment and regular coordination meetings convened by the Ministry of Social Affairs with the Ministry of Home Affairs and the Ministry of Village, Development of Disadvantaged Regions, and Transmigration.
- **Coordinate with Statistics Indonesia (BPS)** to streamline the methodology and criteria used in collecting poverty data.
- **Enable feedback loops** with beneficiary operations management systems to improve SIKS-NG data validation and integrity.
- **Conduct a public education campaign** within each of Indonesia's provinces, including media and rights groups, coupled with training of relevant welfare agencies.

### **Commitment 15: Information Portal on COVID-19 Response and Recovery Budget**

For a complete description of the commitment, see Commitment 15 in [Indonesia's 2020–2022 action plan](#).

#### **Context and objectives:**

In Indonesia, the government has allocated a COVID-19 response budget of Rp 695.2 trillion (\$48.9 billion), constituting 4.3% of GDP.<sup>24</sup> Within this budget, there have already been cases of corruption and there is a severe continued risk of misuse of funds, which can be partially allayed by supporting systematic public monitoring. However, preceding this commitment, the Ministry of Finance's information portal on the COVID-19 response did not include key budgetary disclosures. To address this gap, the National Secretariat of the Indonesian Forum for Budget Transparency (Seknas FITRA), the Regional Center for Research and Information (PATTIRO), the Indonesia Budget Center, and the World Bank led development of this

commitment to offer, via the portal, public access to relevant budgetary information from the central government budget (APBN) and local government budget (APBD).

This commitment aligns with the OGP value of transparency by offering public access to previously inaccessible budgetary information. It builds on commitments in the last two action plans, which established Indonesia's online budget data portal and attempted to improve the quality of budgetary disclosures on education, health, and poverty alleviation.

### **Potential for Results: Substantial**

Indonesia's COVID-19 response budget comprises support to the health care sector, social assistance to low-income households, tax relief, capital injections into state-owned enterprises, and interest subsidies, credit guarantees, and loan restructuring funds for micro, small, and medium enterprises.<sup>25</sup> Last year's corruption scandal related to the distribution of COVID-19 aid<sup>26</sup> underscores the need for budgetary transparency, particularly given the budget's size and vital importance to Indonesia's recovery.<sup>27</sup>

Under this commitment, offering public access to information on the ongoing COVID-19 response budget and spending in the central government and the APBD could, according to PATTIRO, use public monitoring as an anticorruption tactic.<sup>28</sup> Prior to this commitment, the only available access to this information was through slide decks presented at the Ministry of Finance's monthly press conferences,<sup>29</sup> which are not widely attended by the public.<sup>30</sup> Through this commitment, the ministry will publish online budgetary information on COVID-19 spending on a monthly basis, along with infographics. The ministry is considering disaggregating data by region. Integrating this information into the ministry's online portal will allow for data downloads, Excel compatibility, and comparability with historical data. (However, this portal will only include data from the period following the portal's launch date.<sup>31</sup>) Overall, this commitment could substantially improve the public accessibility to COVID-19 response budget information.

While it is difficult to be certain how citizens will engage with this information, civil society and the media have previously leveraged access to budgetary information to successfully generate public interest in government spending. For example, in 2017, the public scrutinized the Provincial Government of Jakarta after media and civil society reports revealed that the increased education budget for 2018 was allocated mostly for salary, building renovations, and office support, as opposed to initiatives that would improve education in the province.<sup>32</sup>

### **Opportunities, challenges, and recommendations during implementation:**

It is vital that implementation of this commitment begin as soon as possible, given the amount of ongoing COVID-19 response spending. To achieve a substantial impact, implementation will require monthly disclosures of complete and detailed COVID-19 budgetary information, including itemized costs of all activities. Open Government Indonesia notes that it may be difficult to disclose budgetary information on a monthly basis due to the audit process. Previously, inconsistent disclosure policies within government were also an obstacle to action plans' efforts to improve fiscal transparency. For this commitment, an additional challenge may be engaging citizens, civil society, and media in oversight once budgetary information is disclosed. Inclusion of local government data may also pose a challenge, given the audit process, according to Open Government Indonesia.<sup>33</sup> The following recommendations would increase the efficacy of the commitment:

- **Link relevant budget information to data on expenditure**, including procurement transactions, to support the identification of leakages and gaps. Spending channeled through extra-budgetary funds must also be reported alongside budgetary measures.

- **Disclose granular budget information** including budgetary line items and program names, in addition to aggregated data.
- **Develop participation opportunities in budget monitoring** by opening an online channel for public feedback on service delivery and project execution to complement budget information disclosed on the portal. Establish a protocol for addressing feedback, including feedback that requires the response of other ministries.

### **Commitment 17: Utilization of Beneficial Ownership Data**

For a complete description of the commitment, see Commitment 17 in [Indonesia's 2020-2022 action plan](#).

#### **Context and objectives:**

Under the previous action plan, Indonesia launched a beneficial ownership database in 2019. This commitment in the current action plan will introduce public access to the database, integrate data from relevant ministries and agencies, and encourage utilization for law enforcement, licensing, and procurement. By providing public access to beneficial ownership data, this commitment will combat money laundering, terrorist financing, and tax abuse.

This commitment is relevant to the OGP value of transparency, as it opens public access to the beneficial ownership database. Publish What You Pay proposed this commitment, which builds upon work by the Extractive Industries Transparency Initiative (EITI), the Financial Action Task Force (FATF), and the G20 Anti-Corruption Working Group (ACWG).<sup>34</sup>

#### **Potential for results: Substantial**

According to the United Nations Office on Drugs and Crime, in recent years, Indonesia has made significant progress in disclosing information on beneficial ownership.<sup>35</sup> However, Indonesia is still ranked 79<sup>th</sup> out of 133 by the 2020 Financial Secrecy Index, falling well behind the Philippines, Malaysia, and Thailand on financial transparency. The Index reveals a lack of transparency on recorded company ownership, other wealth ownership, limited partnerships, and legal entities.<sup>36</sup>

Since 2018, Presidential Regulation 13/2018 and Ministry of Energy and Mineral Resources Decree 1796 K / 30 / MEM / 2018 have required companies to report their beneficial owners to the Ministry of Law and Human Rights. To facilitate this, in 2019, the ministry revised its Legal Entity Administration System to include beneficial ownership information, provided by companies in connection with their license application. The Ministry of Agriculture also required companies to disclose beneficial ownership information as a prerequisite to licensing.<sup>37</sup> However, by 2020, only 15% of corporations (318,061 of 2,053,844 corporations) had disclosed beneficial ownership,<sup>38</sup> and there was no process to verify this disclosed data.<sup>39</sup> Meanwhile, the beneficial ownership database includes certain restrictions on public access. When launched, it was only accessible to law enforcement agencies and certain government institutions. Public access required filing an information request with the Public Law Administration Directorate General at a cost of Rp 500,000 (\$35). According to the Extractive Industries Transparency Initiative (EITI), it is crucial that beneficial ownership information be made publicly accessible.<sup>40</sup>

This commitment's effort to open public access to the beneficial ownership database represents substantial progress, according to Publish What You Pay.<sup>41</sup> Making the database publicly accessible ensures that civil society, corporate due diligence officers, and procurement officers can more readily expose corrupt practices, as well as enabling improved corporate transparency norms.<sup>42</sup> However, according to Open Government Indonesia, part of beneficial ownership data may not be made publicly available, depending on an upcoming regulation.<sup>43</sup> The commitment

also includes efforts to increase the percentage of corporations that disclose beneficial ownership information, such as public outreach by the Ministry of Law and Human Rights and public monitoring and evaluation reports on the level of disclosure conducted by the Corruption Eradication Commission (KPK).<sup>44</sup>

### **Opportunities, challenges, and recommendations during implementation:**

Implementation of this commitment needs to prioritize the beneficial ownership database's usability, allowing the public to easily access beneficial ownership information, and increasing the number of companies disclosing beneficial ownership. Potential challenges include private sector compliance with disclosure requirements, verification of disclosed beneficial ownership information, and public uptake of the newly available beneficial ownership information. Publish What You Pay also anticipates challenges in coordinating data collection and platform management across relevant ministries.<sup>45</sup> Encouraging the media's use of the database could lead to more coverage of which companies have complied and which have not. To that end, civil society and government could host workshops to engage with media organizations and investigative journalists on using beneficial ownership data. The following recommendations could enhance this commitment:

- **Conduct technical meetings** between relevant ministries and civil society stakeholders on coordinating the beneficial ownership platform and beneficial ownership data standards, including design of the public access platform and prioritization of key data points. These meetings can be convened by the Ministry of Law and Human Rights.
- **Develop a verification process** for disclosed beneficial ownership information, based on international best practices.
- **Institute regulations requiring companies to disclose beneficial ownership** as a prerequisite to licensing at the Ministries of Law and Human Rights, Finance, Environment and Forestry, and Trade, following the example of the Ministry of Energy and Mineral Resources and the Ministry of Agriculture.
- **Clarify regulations on sanctions** for late or non-submission of beneficial ownership data. Ensure that sanctions have sufficient weight to encourage disclosure.
- **Use beneficial ownership data to exercise public oversight** of private-sector corruption, with oversight conducted by civil society and the Ministries of Energy and Mineral Resources, Law and Human Rights, Finance, Agriculture, Environment and Forestry, and Trade. This oversight should capture insights from stakeholders affected by extractive, forestry, and plantation industries, including indigenous rights advocacy groups, miners, farmers, environmental advocacy groups, industry associations, and corruption watchdogs.

<sup>1</sup> Hayidrali (Corruption Eradication Commission), "UNODC Webinar on the Procurement Reform Agenda in Indonesia" (UNODC, 8 Dec. 2020), <https://www.youtube.com/watch?v=ELfzZBANzx8>.

<sup>2</sup> Michael Canares, "Making participation and use of open contracting data sustainable: Lessons from Bandung, Indonesia" (Open Contracting Partnership, 8 Apr. 2020), <https://www.open-contracting.org/2020/04/08/making-participation-and-use-of-open-contracting-data-sustainable-lessons-from-bandung-indonesia/>.

<sup>3</sup> Nanda Sihombing (Open Contracting Partnership), interview by IRM researcher, 28 Jun. 2021.

<sup>4</sup> Taufik Hanafi (Bappenas), "UNODC Webinar on the Procurement Reform Agenda in Indonesia" (UNODC, 8 Dec. 2020), <https://www.youtube.com/watch?v=ELfzZBANzx8>.

<sup>5</sup> Francesco Checchi (UNODC), "UNODC Webinar on the Procurement Reform Agenda in Indonesia" (UNODC, 8 Dec. 2020), <https://www.youtube.com/watch?v=ELfzZBANzx8>.

<sup>6</sup> Sihombing, interview. Siti Juliantari Rachman (Indonesia Corruption Watch), interview by IRM researcher, 24 Jun. 2021.

<sup>7</sup> Ravio Patra, *Independent Reporting Mechanism (IRM): Indonesia Design Report 2018–2020* (OGP, 6 Jul. 2020), 53, [https://www.opengovpartnership.org/wp-content/uploads/2020/07/Indonesia\\_Design\\_Report\\_2018-2020\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2020/07/Indonesia_Design_Report_2018-2020_EN.pdf).



- <sup>8</sup> Sihombing, interview.
- <sup>9</sup> Rachman, interview.
- <sup>10</sup> Sihombing, interview.
- <sup>11</sup> Dessy Eko Prayitno and Danardono Sirajudin (Freedom of Information Network Indonesia), interview by IRM researcher, 1 Jul. 2021.
- <sup>12</sup> Sihombing, interview. Rachman, interview.
- <sup>13</sup> OECD, *Social Protection System Review of Indonesia* (Paris: OECD, 2019), 152.
- <sup>14</sup> Camilla Holmemo, et al., *Investing in People: Social Protection for Indonesia's 2045 Vision* (Jakarta: World Bank Indonesia, 2020), 191.
- <sup>15</sup> Nadia Karina, "Strengthening Indonesia's social protection in the COVID-19 era: Strategy and lessons from evidence" (J-PAL, 20 Nov. 2020), <https://www.povertyactionlab.org/blog/11-20-20/strengthening-indonesias-social-protection-covid-19-era-strategy-and-lessons-evidence>.
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- <sup>19</sup> OECD, 153.
- <sup>20</sup> Dwiana Fiqhi Cahyani and Dewi Resminingayu (Open Government Indonesia), interview by IRM researcher, 8 Apr. 2021; Darwanto and Tanti Budi Suryani (Medialink), interview by IRM researcher, 5 Apr. 2021.
- <sup>21</sup> Cahyani and Resminingayu, interview.
- <sup>22</sup> Oxford Policy Management, "Building Inclusive Social Assistance" (Asian Development Bank, Dec. 2019), 4–6.
- <sup>23</sup> Abhijit Banerjee et al., "Tangible Information and Citizen Empowerment: Identification Cards and Food Subsidy Programs in Indonesia," *Journal of Political Economy* 126:2 (2018).
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- <sup>34</sup> Aryanto Nugroho (Publish What You Pay), interview by IRM researcher, 1 Apr. 2021.
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- <sup>36</sup> Tax Justice Network, "Financial Secrecy Index 2020" (2020), <https://fsi.taxjustice.net/en/introduction/fsi-results>.
- <sup>37</sup> Ferdian Ari Kurniawan (Corruption Eradication Commission), correspondence with IRM researcher, 13 Jul. 2021.
- <sup>38</sup> Ferdian Ari Kurniawan (Corruption Eradication Commission), correspondence with IRM researcher, 22 Jul. 2021.
- <sup>39</sup> Nugroho, interview.
- <sup>40</sup> Extractive Industries Transparency Initiative, "EITI Indonesia" (16 Feb. 2021), <https://eiti.org/indonesia#beneficial-ownership->.
- <sup>41</sup> Nugroho, interview.
- <sup>42</sup> Open Ownership, "Briefing: The case for beneficial ownership as open data" (accessed 25 Feb. 2021), <https://www.openownership.org/uploads/briefing-on-beneficial-ownership-as-open-data.pdf>.
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<sup>44</sup> Nugroho, interview.

<sup>45</sup> *Id.*



## Section III: Methodology and IRM Indicators

The purpose of this review is not an evaluation as former IRM reports. It is intended as an independent, quick, technical, review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. This approach allows the IRM to highlight the strongest and most promising commitments in the action plan based on an assessment of the commitments per the key IRM indicators, particularly commitments with the highest potential for results, the commitment's priority for country stakeholders, and the priorities in the national open government context.

To determine which reforms or commitments the IRM identifies as promising, the IRM follows a filtering and clustering process:

**Step 1:** Determine what is reviewable and what is not based on the verifiability of the commitment as written in the action plan.

**Step 2:** Determine if the commitment has an open government lens. Is it relevant to OGP values?

**Step 3:** Commitments that are verifiable and have an open government lens are reviewed to identify if certain commitments need to be clustered. Commitments that have a common policy objective or commitments that contribute to the same reform or policy issue should be clustered and its "potential for results" should be reviewed as a whole. The clustering process is conducted by IRM staff, following the steps below:

- a. Determine overarching themes. They may be as stated in the action plan or if the action plan is not already grouped by themes, IRM staff may refer to the thematic tagging done by OGP.
- b. Review objectives of commitments to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments by clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms or may be standalone and therefore not clustered.

**Step 4:** Assess the potential for results of the cluster or standalone commitment.

The filtering process is an internal process and data for individual commitments is available in Annex I below. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, the OGP Support Unit feedback as needed, interviews and validation with country stakeholders, and sign-off by the IRM's International Experts Panel (IEP). For this action plan review, the IRM conducted video conference interviews and received written responses from the following stakeholders:

Government and House of Representatives of Indonesia:

- Nandhi Endrayanto, Eko Kurniawan, and Rizki (Ministry of Finance of Republic of Indonesia), interview and correspondence with IRM, 29 March 2021 and 29 April 2021.
- Heriyono Adi Anggoro, Putu Lumina Mentari, and Djaka Winarko (Open Parliament Indonesia), interview with IRM, 6 April 2021.
- Endah Retnoastuti (House of Representatives), interview with IRM, 6 April 2021.
- Dwiana Fiqhi Cahyani and Dewi Resminingayu (Open Government Indonesia), interview with IRM, 8 April 2021.

- Ferdian Ari Kurniawan (Corruption Eradication Commission), correspondence with IRM, 13 July 2021 and 22 July 2021.

Nongovernmental and Civil Society Organizations:

- Ravio Patra and Agus Wijayanto (Westminster Foundation for Democracy), interviews with IRM, 2 March 2021 and 11 April 2021.
- Dio Ashar Wicaksana (Indonesia Judicial Research Society), correspondence and interview with IRM, 16 March 2021 and 8 April 2021.
- Rikardus Wawo (Wahana Visi Indonesia), interview with IRM, 18 March 2021.
- Nurma Fitrianingrum and Anto Sudaryanto (Yayasan TIFA), interview with IRM, 23 March 2021.
- Khotimun Sutanti (Asosiasi LBH APIK Indonesia), interview with IRM, 29 March 2021.
- Mia Rosmiati (Indonesia Budget Center), interview with IRM, 30 March 2021.
- Agus Sarwono (Transparency International Indonesia), correspondence with IRM, 30 March 2021.
- Bejo Untung (PATTIRO), interview with IRM, 30 March 2021.
- Aryanto Nugroho (Publish What You Pay), interview with IRM, 1 April 2021.
- Darwanto and Tanti Budi Suryani (MediaLink), interview with IRM, 5 April 2021.
- Gina Sabrina (Perhimpunan Bantuan Hukum dan HAM Indonesia), interview with IRM, 8 April 2021.
- Febi Yonesta and April Pattiselanno Putri (Yayasan LBH Indonesia), interview with IRM, 8 April 2021.
- Siti Juliantari Rachman (Indonesia Corruption Watch), interview with IRM, 24 June 2021.
- Nanda Sihombing (Open Contracting Partnership), interview with IRM, 28 June 2021.
- Dessy Eko Prayitno and Danardono Sirajudin (Freedom of Information Network Indonesia), interview with IRM, 1 July 2021.

As described in the filtering process above, the IRM relies on **three key indicators** for this review:

## I. Verifiability

- **Yes/No:** Is the commitment specific enough to review? As written in the action plan, the objectives stated and actions proposed are sufficiently clear and include objectively verifiable activities to assess implementation.

\* Commitments that are not verifiable will be considered “not reviewable”, and further assessment will not be carried out.

## II. Relevant — does it have an open government lens?

This indicator determines if the commitment relates to open government values of transparency, civic participation, or public accountability as defined by the *Open Government Declaration*, the *OGP Articles of Governance*, and by responding to the guiding questions below. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the *Articles of Governance*. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable a legal, policy, or institutional frameworks to foster accountability of public officials?

### III. Potential for results

Formerly known as the “potential impact” indicator, it was adjusted, taking into account feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, this indicator was modified so that in this first review, it lays out the expected results and potential that would later be verified in the IRM Results Report, after implementation. Given the purpose of this action plan review, the assessment of “potential for results” is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:

- **Unclear:** the commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** a positive but standalone initiative or changes to process, practice, or policies. These commitments do not generate binding or institutionalized changes across government or institutions that govern a policy area (e.g., tools like websites, data release, training, or pilot projects).
- **Substantial:** a possible game changer, or the creation of new practices, policies, or institutions that govern a policy area, the public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM in collaboration with Sarah Jacobs and overseen by the IRM’s International Experts Panel (IEP). The current IEP membership includes:

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

For more information about the IRM, refer to the “About IRM” section of the OGP website, available [here](#).

## Annex I: Commitment-by-Commitment Data<sup>1</sup>

<b>Commitment 1: Open Contracting in Government Procurement<sup>2</sup></b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul>
<b>Commitment 2: Improve Complaint Settlement for Public Services</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 3: One Data Indonesia Action Plan at Local Government Level</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 4: Community-Based Evaluation for Development Programs</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Community Development Programs (Commitments 4 and 12)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 5: Public Service Innovation Model for Marginalized Groups</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 6: Accommodations for Persons with Disabilities in Judicial Proceedings</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 7: Legal Aid Information Portal</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 8: Strengthening Legal Aid Services</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> </ul>

<ul style="list-style-type: none"> <li>• <b>This commitment has been clustered as:</b> Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 9: Inclusion of Vulnerable Groups in Legal Aid</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 10: Legal Aid for Access to Information</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Access to Justice (Commitments 6-10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 11: Integrating Welfare Data</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul>
<b>Commitment 12: Social Accountability Approach in the Village Development Program</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Community Development Programs (Commitments 4 and 12)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 13: Open Data for Election Accountability</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 14: Reproductive Health Service System Platform</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 15: Information Portal on COVID-19 Response and Recovery Budget</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul>
<b>Commitment 16: Civil Society Involvement in the Truth and Reconciliation Commission Bill</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> </ul>

<ul style="list-style-type: none"> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 17: Utilization of Beneficial Ownership Data</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Substantial</li> </ul>
<b>Commitment 18: Ensuring Civic Space</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 19: Improving the Legislative Information System (SILEG)</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 20: Parliamentary Open Data</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 21: Strengthening Information System for Members of Parliament (SIAP)</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 22: Multistakeholder Forum for Periodic Policy Dialogue</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 23: Promotion of Parliamentary Openness Innovations</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>This commitment has been clustered as:</b> Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>
<b>Commitment 24: Institutionalizing Open Parliament Indonesia</b>
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> </ul>

- **Does it have an open government lens?** Yes
- **This commitment has been clustered as:** Open Parliament (Commitments 19–24)
- **Potential for results:** Modest

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<sup>1</sup> For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.

<sup>2</sup> Commitment short titles may have been edited for brevity. For the complete text of commitments, please see [Indonesia's 2020–2022 action plan](#).



## Annex 2: Minimum Requirements for Acting According to OGP Process

According to OGP's Procedural Review Policy, during development of an action plan, OGP participating countries must meet the "involve" level of public influence per the IRM's assessment of the co-creation process.

To determine whether a country falls within the category of "involve" on the spectrum, the IRM assesses different elements from OGP's *Participation & Co-Creation Standards*. The IRM will assess whether the country complied with the following aspects of the standards during the development of the action plan, which constitute the minimum threshold:

1. **A forum exists:** there is a forum to oversee the OGP process;
2. **The forum is multistakeholder:** both government and civil society participate; and
3. **Reasoned response:** the government or multistakeholder forum documents or can demonstrate how they provided feedback during the co-creation process. This may include a summary of major categories and themes proposed for inclusion, amendment, or rejection.

The table below summarizes the IRM assessment of the three standards that apply for purposes of the procedural review. The purpose of this summary is to verify compliance with procedural review minimum requirements, and it is not a full assessment of performance under OGP's *Participation & Co-Creation Standards*. A full assessment of co-creation and participation throughout the OGP cycle will be provided in the results report.

**Table 2. Summary of minimum requirements to act according to OGP Process**

OGP Standard	Was the standard met?
A forum exists: In June 2018, the Minister of National Development Planning issued a Ministerial Decree on the Formation of Strategic Coordination Team for the Implementation of Open Government Indonesia Action Plan, which serves as the legal basis for the MSF's leadership and membership. <sup>1</sup>	Green
The forum is multistakeholder: The MSF steering committee includes four representatives from government and two from civil society. <sup>2</sup>	Green
The government provided a reasoned response on how the public's feedback was used to shape the action plan: The OGP secretariat did not provide documented feedback and did not publish detailed responses on how it discussed each of the proposals received. However, CSOs were provided with a verbal response to proposed commitments. <sup>3</sup>	Yellow

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<sup>1</sup> Ministry of National Development Planning, "Keputusan Menteri tentang Pembentukan Tim Koordinasi Strategis Pelaksanaan Rencana Aksi Open Government Indonesia" (Decree of the Minister of VAT/HEAD of Bappenas Number KEP.88/M.PPN/HK/06/2018 Concerning the Establishment of Strategic Coordination Team for the Implementation of the Open Government Indonesia Action Plan) (22 Jun. 2018), <http://jdih.bappenas.go.id/peraturan/detailperaturan/515>.

<sup>2</sup> Dwiana Fiqhi Cahyani and Dewi Resminingayu (Open Government Indonesia), interview by IRM researcher, 8 Apr. 2021.

<sup>3</sup> *Id.*