Independent Reporting Mechanism (IRM): Indonesia Transitional Results Report 2018–2020

This report was prepared in collaboration with Sarah Jacobs, independent researcher.

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I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their progress and determine if efforts have impacted people's lives.

The IRM has partnered with Sarah Jacobs, an independent researcher, to carry out this evaluation. The IRM aims to inform ongoing dialogue around the development and implementation of future commitments. For a full description of the IRM's methodology, please visit https://www.opengovpartnership.org/about/independent-reporting-mechanism.

This report covers the implementation of Indonesia's fifth action plan for 2018–2020. In 2021, the IRM will implement a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.[1] The IRM adjusted its Implementation Reports for 2018–2020 action plans to fit the transition to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic's effects on OGP country processes.

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[1] For more information, see: https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/.

II. Action Plan Implementation

The IRM Transitional Results Report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not revisit the assessments for "Verifiability," "Relevance" or "Potential Impact." The IRM assesses those three indicators in IRM Design Reports. For more details on each indicator, please see Annex I in this report.

2.1. General Highlights and Results

Among the 19 commitments in Indonesia's fifth OGP action plan (2018–2020), 12 saw either substantial or complete implementation (63% of commitments). This action plan's completion rate is a downgrade from the previous action plan (2016–2018), in which 36 out of 45 commitments were substantially or completely implemented (80% of commitments).[1] This was the first plan with open parliament commitments, which largely saw limited completion, but did improve the usability of the parliament's online legislative information system (Commitment 1). When evaluating completion of commitments, discrepancies emerged between the completion rates directly reported by implementing agencies to the IRM, the Open Government Indonesia National Action Plan Implementation Report (government self-assessment report), and the action plan monitoring and evaluation published on the Open Government Indonesia website. This report relies on the latest data on implementation supplied by relevant agencies and civil society stakeholders through interviews and correspondence with the IRM from April–August 2021.

Overall, implementation faced several challenges. A primary obstacle was insufficient investment of high-level government leadership in the OGP process. Compounding this issue, in advance of the 2019 general elections, ministries slowed implementation, anticipating potential changes in priorities under the next administration. For parliament, during the consequent prolonged transition in leadership, meetings on implementation stalled. Additionally, government agencies experienced frequent staff turnover, which created difficulties maintaining programs' continuity and relationships with civil society partners. Restrictions to freedoms of speech and assembly also strained civil society organizations' relationships with government and collaboration on the action plan. COVID-19 presented another major obstacle to implementation during 2020, as discussed below.

Out of 19 commitments, two demonstrated notable early results. Commitment 1, introducing a beneficial ownership registry, majorly improved access to information. Under this commitment, the Ministry of Law and Human Rights launched the first national beneficial ownership registry in Southeast Asia. While this registry offers an important platform for transparency of company ownership, progress is still underway on ensuring free public access to the registry and on expanding the number of companies disclosing beneficial ownership information. Additionally, through Commitment 10, the national public service complaints management system marginally increased the number of participating government institutions, the number of government institutions with good complaints management, and the percentage of complaint reports receiving follow-up.

2.2. COVID-19 Pandemic Impact on Implementation

COVID-19 affected implementation and monitoring of the action plan during 2020. Government and civil society implementers were restricted in physical mobility and working hours, and faced many COVID-19 casualties. Government ministries and agencies were also forced to reallocate budgets to emergency measures.[2] Likewise, regional civil society donor funds were channeled to the pandemic response.[3] As a result, several planned programs were cut short. For example, implementation of the action plan's commitment on the Regional Education Budget (Commitment 4) was halted during 2020.[4] The pandemic also presented an obstacle to communication between government ministries and civil society organizations, and detracted from monitoring of implementation.[5] In terms of the action plan's open parliament commitments, the production of a parliamentary self-assessment report was delayed by COVID-19, with no report published as of June 2021.

Elements of Indonesia's COVID-19 response and recovery tapped into open government practices. In terms of fiscal openness, the Ministry of Finance and the World Bank performed a Public Expenditure Review with a particular component analyzing the constraints and effects generated by COVID-19.[6] Under this action plan, improvements to SP4N-LAPOR! (Commitment 10) laid the groundwork for more effective resolution of complaints related to COVID-19. Expansions of access to legal aid (Commitment 14), health information (Commitment 8), and social welfare data (Commitment 2) also responded to societal gaps exacerbated by the pandemic.

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[1] Ravio Patra, *Independent Reporting Mechanism (IRM): Indonesia End-of-Term Report 2016–2017* (OGP, 26 Aug. 2019), https://www.opengovpartnership.org/documents/indonesia-end-of-term-report-2016-2017/.
[2] Dwiana Fiqhi Cahyani and Dewi Resminingayu (Open Government Indonesia), interview by IRM, 6 Jul. 2021.
[3] Tanti Budi Suryani (MediaLink), interview by IRM, 7 Jul. 7, 2021; James Gomez and Robin Ramcharan, "COVID-19 shrinks civic space in Southeast Asia" *The Jakarta Post* (25 Apr. 2020), https://www.thejakartapost.com/academia/2020/04/25/pandemic-shrinks-civic-space.html.
[4] Cahyani and Resminingayu, interview.
[5] Suryani, interview.
[6] Open Government Partnership, "Guide to Open Government and the Coronavirus" (25 Aug. 2020), https://www.opengovpartnership.org/documents/a-guide-to-open-government-and-the-coronavirus/.

2.3. Early results

The IRM acknowledges that results may not be visible within the two-year timeframe of the action plan and that at least a substantial level of completion is required to assess early results. For the purpose of the Transitional Results Report, the IRM will use the "Did it Open Government?" (DIOG) indicator to highlight early results based on changes to government practice in areas relevant to OGP values. Moving forward, new IRM Results Reports will not continue using DIOG as an indicator.

Section 2.3 focuses on outcomes from the implementation of commitments that had an ambitious or strong design, per the IRM Design Report assessment, or that may have lacked clarity and/or ambition but had successful implementation with "major" or "outstanding" changes to government practice.[1] Commitments considered for analysis in this section had at least a "substantial" level of implementation, as assessed by the IRM in Section 2.4. While this section provides the analysis of the IRM's findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of the level of completion for all the commitments in the action plan.

Commitment 1: Improvement in Data Management and Compliance of Extractive, Forestry, and Plantation Sectors	
Aim of the commitment	This commitment aimed to launch a register of beneficial ownership, disclosing the real owners of all companies operating in Indonesia to prevent money-laundering, terrorism funding, and tax evasion. It also aimed to institute requirements for beneficial ownership information disclosure for corporations in the extractive, forestry, and plantation sectors. This commitment was linked to implementation of the Beneficial Ownership Roadmap led by the Extractive Industries Transparency Initiative (EITI) at the Coordinating Ministry for Economic Affairs. It is also linked to implementation of Financial Action Task Force (FATF) requirements, led by the Indonesian Financial Transaction Reports and Analysis Center (PPATK), and of the National Strategy for Corruption Prevention, led by the National Secretariat for Prevention of Corruption.
Did it open government? **Major**	The Ministry of Law and Human Rights launched an online national beneficial ownership registry on the Corporate Administration Management System (AHU Online) in 2019.[2] This registry was the first in Southeast Asia. It covers all domestic and international corporations operating in Indonesia, including limited liability companies, foundations, associations, cooperatives, and limited and unlimited partnerships.[3] It builds on a 2018 Presidential Regulation[4] and a 2018 Ministry of Energy and Mineral Resources Decree,[5] and is bolstered by several 2019 Ministry of Law and Human Rights Regulations that instituted sanctions for late submission of data and noncompliance with the requirements of disclosure.[6] To further encourage disclosures, the Ministry of Agriculture and the Ministry of Energy and Mineral Resources required companies to submit their beneficial ownership as a prerequisite to licensing.[7] This progress drew on high-level government commitment to beneficial ownership reform and strong inter-ministry cooperation.[8]

In terms of companies' compliance, in 2019, 3.86% of registered corporations (63,153 of 1,634,082 corporations) disclosed beneficial ownership information. By 2020, 15% of corporations (318,061 of 2,053,844 corporations) had disclosed this information,[9] including 22% of plantation companies (375 of 1,739 plantation companies).[10] As of June 2021, the registry included 21% of registered corporations (478,022 of 2,262,080 corporations).[11] |

During its initial phase, the beneficial ownership database faced several shortcomings. As illustrated, it included information on less than a quarter of registered corporations. Meanwhile, although the Financial Services Authority reportedly verified information,[12] there was no systematic process in place for verification of this information across government agencies.[13] Additionally, the database was freely accessible only to law enforcement agencies and other relevant government institutions. Public access required filing an information request to the Public Law Administration Directorate General at a cost of Rp 500,000 ($35).[14] However, by 2022, as part of its sixth OGP action plan, Indonesia plans to open access to the public and to increase the percentage of corporations that disclose beneficial ownership information.[15] According to Open Government Indonesia, further efforts are needed to ensure that corporations publish beneficial ownership information, regulations protect data from misuse, a roadmap is further developed, and international best practices are incorporated.[16]

Despite these shortcomings, according to the United Nations Office on Drugs and Crime, the registry's introduction represents significant progress toward providing public access to information on beneficial ownership in Indonesia.[17] The Corruption Eradication Commission (KPK) notes that law enforcement agencies, including itself and the Attorney General's Office, have utilized this beneficial ownership information. The Indonesian Financial Transaction Report and Analysis Center, a government agency, has referenced this information to analyze suspicious transactions. However, media and watchdog organizations have not drawn on the registry due to lack of free public access.[18] Publish What You Pay reports that this registry has not yet had an impact on corruption, but anticipates that when the registry becomes freely publicly available and the portion of corporations disclosing beneficial ownership increases, there could be corresponding reductions in corruption and increases in state tax revenue. [19]

Commitment 10: Quality Improvement on Public Service Complaints Resolution through SP4N-LAPOR!	
Aim of the commitment	This commitment aimed to improve government responsiveness to citizen complaints by strengthening SP4N-LAPOR!, the national public service complaints management system. In particular, the Ministry of Administrative and Bureaucratic Reform intended to connect 500 government institutions to SP4N-LAPOR!, increase the number of government institutions with good complaints management by 15%, and increase follow-up to complaints by 25%.
Did it open government? **Marginal**	By 2020, 34 ministries, 100 institutions, and 523 local governments were connected to SP4N-LAPOR!, exceeding a target of 500 government institutions. This reflected a marginal improvement since 2018, with a 6% increase in the number of connected local governments, rising from 493 to 523, as well as a 4% increase in the number of connected government institutions, rising from 96 to 100.[20] The number of government agencies with good complaints management (handle more than 50% of complaints) increased by 31%, rising from 122 to 160 agencies between 2019 and November 2020, exceeding the target of a 15% increase. Additionally, 35% of SP4N-LAPOR! complaint reports received follow-ups (65,366 of 188,937 total reports) in November 2020,[21] exceeding the target of 25%. This reflected a marginal

increase since 2018, when 31% of reports received follow-up.[22] The sixth action plan aimed to continue strengthening SP4N-LAPOR!.

As of October 2020, COVID-19 was a frequent topic of complaints, along with education, civil registration, digital financial services, and employment.[23] In the first quarter of 2020, there were 240 COVID-19 related complaints.[24] According to USAID, improvements to SP4N-LAPOR! laid the groundwork for more effective resolution of these complaints, with the majority of COVID-19 related complaints resolved within two days during 2020.[25] UNDP notes that some of this feedback included actionable recommendations. For example, in response to many SP4N-LAPOR! requests for more COVID-19 awareness materials on social media, the Ministry of Health began distributing such materials.[26] This use of SP4N-LAPOR! was increasingly salient in the first quarter of 2021, with 1,663 COVID-19 related complaints.[27]

This commitment's implementation was undergirded by open communication channels between the Ministry of Administrative and Bureaucratic Reform and its civil society counterparts, the Center for Regional and Information Studies (PATTIRO), and YAPPIKA—although personnel turnover within the ministry caused challenges in maintaining a point of contact. Implementation also benefited from a stable government budget allocation and support from USAID. In addition, to enhance uptake of SP4N-LAPOR!, PATTIRO and YAPPIKA conducted public discussions encouraging utilization of the system for submission of complaints, as well as trainings for local governments in nine districts on management of the system.[28] These training were targeted to regions with poor complaints management, based on monitoring and evaluation conducted by the Ministry of Administrative and Bureaucratic Reform.[29] Complementing the commitment's efforts, public engagement campaigns contributed to 50% more Indonesians accessing SP4N-LAPOR! between 2018 and 2020, with the number of users increasing from 766,237 to 1,145,944 users.[30]

According to USAID, improvements to SP4N-LAPOR! have given citizens greater access to more accountable government.[31] The Ministry of Administrative and Bureaucratic Reform's Public Service Index showed a positive trajectory, rising from a score of 3.39 to 3.84 between 2018 and 2020, tracking public service provision, personnel professionalism, facilities, information systems, complaints management, and innovation.[32] The International NGO Forum on Indonesian Development (INFID) sees developments under this commitment as routine expansions of the SP4N-LAPOR! system.[33] PATTIRO emphasizes that further surveying is needed to determine this commitment's impact on the quality of government bodies' responses to citizen complaints and on public service provision.[34]

[1] IRM design reports identified strong commitments as "noteworthy commitments" if they were assessed as verifiable, relevant, and had "transformative" potential impact. If no commitments met the potential impact threshold, the IRM selected noteworthy commitments from the commitments with "moderate" potential impact. For the list of Indonesia's noteworthy commitments, see the Executive Summary of the 2018–2020 IRM design report: https://www.opengovpartnership.org/documents/indonesia-design-report-2018-2020/.
[2] Ministry of Law and Human Rights Directorate General of General Legal Administration, "Ditjen AHU Online [DG AHU Online]" (accessed 15 Jul. 2021), https://ahu.go.id/.
[3] UN Ofc. on Drugs and Crime, "Beneficial Ownership Regulations and Company Registries in Southeast Asia" (29 Sep., 2020), https://www.unodc.org/documents/southeastasiaandpacific//topics/anti-corruption/2020/200914_Beneficial_ownership_regulations_and_company_registries_in_Southeast_Asia.pdf.

[4] Pres. of the Rep. of Indonesia, "Penerapan Prinsip Mengenali Pemilik Manfaat Dari Korporasi Dalam Rangka Pencegahan Dan Pemberantasan Tindak Pidana Pencucian Uang Dan Tindak Pidana Pendanaan Terorisme [Application of the Principle of Recognizing the Beneficial Owners of Corporations in the Context of Prevention and Eradication of Money Laundering and Terrorism Financing Crimes]" *Presidential Regulation,* no. 13 (2018).

[5] Min. of Energy and Mineral Resources "Pedoman Pelaksanaan Permohonan, Evaluasi Serta Penerbitan Perizinan Di Bidang Pertambangan Mineral Dan Batubara [Guidelines for the Implementation of Applications, Evaluations and Issuance of Permits in the Mineral and Coal Mining Sector]" *Min. of Energy and Mineral Resources Decree,* no. 1796 K/30/MEM (2018).

[6] Min. of Law and Human Rights, "Tata Cara Pengawasan Penerapan Prinsip Mengenali Pemilik Manfaat Dark Korporasi," *Ministry of Law and Human Rights Regulation,* no. 21 (2019).

[7] Ferdian Ari Kurniawan (Corruption Eradication Commission), correspondence with IRM, 13 Jul., 2021.

[8] Extractive Industries Transparency Initiative, "EITI Indonesia" (25 May 2021), https://eiti.org/indonesia#beneficial-ownership-.

[9] Ferdian Ari Kurniawan (Corruption Eradication Commission), correspondence with IRM, 22 Jul. 2021.

[10] The Nat'l Secretariat for Prevention of Corruption, *Laporan Pelaksanaan Strategi Nasional Pencegahan Korupsi Triwulan VII Tahun 2020* (Jan. 2021), 20 and 160, https://stranaspk.kpk.go.id/images/2021/Laporan_Triwulan_VIII_2020_Final.pdf; Romain Pirard et al., "Corporate ownership and dominance of Indonesia's palm oil supply chain" *Trase Infobrief* (Jan. 2020), 2, http://resources.trase.earth/documents/infobriefs/infobrief09EN.pdf.

[11] Kurniawan, correspondence, 22 Jul. 2021.

[12] The IRM received this information from Stranas PK during the pre-publication period (9 Sep. 2021).

[13] The Nat'l Secretariat for Prevention of Corruption, *Laporan Pelaksanaan Strategi Nasional Pencegahan Korupsi Triwulan VII Tahun 2020* at 113; Aryanto Nugroho (Publish What You Pay), interview by IRM, 7 Jul. 2021.

[14] Extractive Industries Transparency Initiative, "EITI Indonesia."

[15] Kementarian PPN/Bappenas et al., *Indonesia Open Government Partnership National Action Plan 2020-2022* (OGP, 11 Jan. 2021), 63–66, https://www.opengovpartnership.org/wp-content/uploads/2021/01/Indonesia_Action-Plan_2020-2022_EN.pdf.

[16] The IRM received this information from Open Government Indonesia during the pre-publication period (9 Sep. 2021).

[17] UN Ofc. on Drugs and Crime, "Beneficial Ownership Regulations and Company Registries in Southeast Asia."

[18] Kurniawan, correspondence, 22 Jul. 2021.

[19] Nugroho, interview.

[20] Min. of Admin. and Bureaucratic Reform, correspondence with IRM, 21 Jul. 2021.

[21] Open Government Indonesia, "Peningkatan Kualitas Penyelesaian Pengaduan Pelayanan Publik Melalui LAPOR!-SP4N" (accessed 11 Jul. 2021), https://ogi.bappenas.go.id/en/detail-komitmen/data/57852.

[22] Min. of Admin. and Bureaucratic Reform, correspondence.

[23] LAPOR - Layanan Aspirasi dan Pengaduan Online Rakyat, "Data Keterhubungan" image post (Facebook, 28 Nov. 2020), https://www.facebook.com/lapor1708/photos/pcb.3812998422052423/3812998135385785/.

[24] Suyoung Hwang and Muhammad Iqbal, "E-Citizen platform helps Indonesian citizens' response to the COVID-19 crisis," *UNDP Indonesia* (24 Mar. 2020), https://www.id.undp.org/content/indonesia/en/home/presscenter/articles/2020/e-citizen-platform-helps-indonesian-citizens.html.

[25] USAID, "2020 USAID Indonesia Annual Report" (21 Jul. 2021), https://www.usaid.gov/indonesia/2020-annual-report.

[26] Hwang and Iqbal, "E-Citizen platform helps Indonesian citizens' response to the COVID-19 crisis."

[27] The IRM received this information from the Bappenas Directorate of Public Health and Nutrition during the pre-publication period (9 Sep. 2021).

[28] Bejo Untung (PATTIRO), interview with IRM, 11 Jul. 2021.

[29] The IRM received this information from the Bappenas Regional Directorate I during the pre-publication period (9 Sep. 2021).

[30] Min. of Administrative and Bureaucratic Reform, "Laporan Tahunan Pengelolaan Sistem Pengelolaan Pengaduan Pelayanan PublikNasional (SP4N) – LAPOR! [Annual Report on the Management of the National Public Service Complaint Management System (SP4N) – LAPOR!]" (18 Feb. 2021), 20, https://menpan.go.id/site/download/file/6397-laporan-tahun-2020-pengelolaan-sistem-pengelolaan-pengaduan-pelayanan-publik-nasional-sp4n-lapor.

[31] USAID, "Democratic Resilience and Governance" (25 Aug. 2021), https://www.usaid.gov/indonesia/democracy-human-rights-and-governance.

[32] Min. of Admin. and Bureaucratic Reform, correspondence; Min. of Admin. and Bureaucratic Reform "Indeks Pelayanan Publik (IPP) [Public Service Index]" (24 Jun. 2020), https://www.menpan.go.id/site/pelayanan-publik/indeks-pelayanan-publik-ipp.

[33] Sugeng Bahagijo (International NGO Forum on Indonesian Development), interview by IRM, 18 Jul. 2021.

[34] Untung, interview.

2.4. Commitment Implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

Commitment	Completion: (no evidence available, not started, limited, substantial, or complete)
1. Improvement in Data Management and Compliance of Extractive, Forestry, and Plantation Sectors	**Substantial:** For details regarding the implementation and early results of this commitment, see Section 2.3.
2. Transparency and Collective Participation in Renewed Data on Recipient of Health Contribution Assistance	**Substantial:** The Social Welfare Information System - Next Generation (SIKS-NG) was developed in 2017 and launched as an android application in 2019, providing public access to data on Premium Assistance Beneficiaries (PBI).[1] Since its launch, SIKS-NG's effective utilization has suffered from administrative issues with data entry, verification, and validation, as well as lack of buy-in from relevant ministries.[2] By 2020, at least 20% of regencies and cities were not inputting data.[3] However, the Ministry of Social Affairs (Kemensos) did not have the authority to require local governments to verify and validate PBI membership data through SIKS-NG.[4] Despite data weaknesses, MediaLink considers the SIKS-NG app to be a positive basis for continuing efforts to synchronize Indonesia's fragmented social welfare data.[5] Under this commitment, the Ministry of Social Affairs also passed regulations and decrees to improve the quality of PBI data, and there are ongoing efforts to improve data matching between Integrated Social Welfare Data (DTKS) and Citizen Registration Numbers (NIK).[6] The sixth action plan endeavors to continue improvements to SIKS-NG.
3. Increasing the Access and Quality of Data Disclosures for Education, Health, Poverty Eradication Budget in Related Ministries/Institutions and All Regional Governments	**Limited:** Budget information for education, health, and poverty eradication was published on the APBN Data Portal in the form of four downloadable Excel spreadsheets on annual budget allocations over the past decade.[7] This information was previously available through relevant ministries, but centralized publication on the APBN Data Portal has eased access.[8] The Ministry of Home Affairs also established the local government information system portal (SIPD), but did not offer public access to local government budget data.[9] Efforts to disclose this information remain underway, and several local governments have offered public access to their budgets, such as DKI Jakarta, West Java Province, and Central Java Province.[10] The memorandum of understanding on budget publication for education, health, and poverty eradication among Ministry of Finance, the Ministry of Education and Culture, and the Ministry of Social Affairs did not occur.[11] According to Open Government Indonesia, it was not deemed relevant as the ministries were already disclosing budget information.[12]
4. The Utilization of Regional Education	**Limited:**

Budget for Participatory Education Budget Plan	Facing difficulties holding local governments accountable for allocating the legally required 20% minimum of APBD budget to education, the Ministry of Education and Culture developed the online Regional Education Index (NPD).[13] This index publishes education budget data and an overview of key components of the education system in each province, city, and regency. Under this commitment, to improve uptake of NPD, public engagement with communities and local governments on the index[14] occurred in 17 of Indonesia's 34 provinces. Consultations for the educational budget plan were only held for communities in 7 of Indonesia's 34 provinces, limited by COVID-19 constraints. The Open Government Indonesia secretariat could not confirm whether this commitment contributed to implementation of the Ministry of Education and Culture's policy recommendations to allocate 20% of regional budgets to education, and to improve classroom conditions, graduation rates, school accreditation, the national exam, teacher competency tests, and teaching staff.[15]
5. Encouraging More Accountable and Participative Village Government Planning	**Complete:** The Ministry of Village, Development of Disadvantaged Regions, and Transmigration issued two regulations to improve public participation in village forums,[16] building on a 2014 law which mandated public inclusion in village governance.[17] The Ministry of Home Affairs also developed guidance for village forums on development planning and budgeting, and conducted related evaluations through focus groups in 31 Maluku, Central Java, and West Sumatra villages. In addition, the ministry offered technical assistance on financial management in 30 villages.[18] Overall, implementation occurred within a limited geographic scope, targeting a small percentage of Indonesia's villages.[19] That said, according to Wahana Visi Indonesia, preliminary results suggest that the commitment improved performance in targeted villages' financial management, producing budgets more closely aligned with residents' needs. This was reflected by budgetary shifts from spending on infrastructure and bureaucracy to spending on health, child welfare, and water, sanitation, and hygiene (WASH).[20] Efforts to improve village governance were carried forward into the sixth action plan, with commitments on community-based evaluations and social accountability.
6. The Enhancement of Civic Participation in the Process of Developing Local Legislation through E-Legislation Portal	**Substantial:** The Ministry of Home Affairs issued circular No. 188.34/6588/OTDA to governors on the e-legislation platform in 2019.[21] As intended by the commitment, five regions (DKI Jakarta, DI Yogyakarta, Semarang, Central Java, and South Sulawesi) developed websites with varying levels of information on legislation. Out of the five, three websites have limited usability. The Semarang City DPRD (Regional People's Representative Assembly) e-Legislative portal only lists legislation from 2018,[22] the Central Java Provincial DPRD Sipelawan e-legislation portal only includes six draft regulations,[23] and the South Sulawesi Provincial DPRD e-Aspiration portal is broken.[24] Two websites offer more comprehensive information. The DKI Jakarta Provincial DPRD Silgeda portal lists draft regulations since 2017, including information on progress through stages of legislative process and

	downloadable PDFs. However, the repository is not searchable and does not include a commenting feature or other feedback mechanisms.[25] The Provincial DPRD DI Yogyakarta e-Aspiracy portal offers a searchable repository of legislation along with statistics on legislation, which has been accessed by 159,686 visitors. It highlights recent legislation and frequently viewed legislation on its homepage but does not include a commenting feature.[26]
7. Data Integration to Increase Openness in the Management of National Election and Regional Election	**Substantial:** Data on the 2019 and 2020 election voting results were published on the official National Election Commission portal.[27] The former KPU portal (https://www.kpu.go.id/) was integrated into http://infopemilu.kpu.go.id to streamline election information. However, the election and regional election administration data was not connected with One Data, which would have enabled reusability and greater accessibility in open data format.[28]
8. Publication of Health Services Data in Government Health Facilities	**Complete:** Information on bed and service availability at users' nearest health facilities was added to the online Hospital Information System (SIRS), the online Inpatient Care Information System (Siranap),[29] and the Indonesia Health Facility Finder (IHeFF) mobile app.[30] These portals and apps are gradually integrating existing information from hospitals and primary health centers, and do not provide access to updated health data. Information availability varies by region, depending on updates from health facilities.[31] IHeFF received a 4.5/5 rating from users, but only has approximately 1,000 downloads, reflecting limited uptake.[32] Siranap has had 26,192 total visits, also reflecting somewhat limited uptake.[33] In 2021, Siranap was updated to offer information on emergency room beds.[34]
9. Implementation of Minister of Administrative and Bureaucratic Reform Regulation Number 16/2017 on Guidelines on Public Consultation Forum Indonesian Government	**Substantial:** In 2019, the Ministry of Administrative Reform and Bureaucratic Reform conducted a coaching clinic on public service standards for representatives of nearly one hundred district and city governments in Aceh, North Sumatra, Bengkulu, West Sumatra, Riau, Jambi, South Sumatra, Bangka Belitung, and West Java.[35] In terms of the monitoring and evaluation database, a Google Sheet established in 2017 (prior to the implementation period) published information on a portion of public consultation forums, including the agency, work unit, and team responsible for each forum; the scope of each forum; and an action plan for implementing the forum results.[36] Evaluations were also conducted to assess public services and community involvement in development of service standards at the Ministry of Education and Culture, the Ministry of Health, and the Ministry of Social Affairs. Overall, preceding the implementation period, public consultation forums were already a common practice across government institutions, with 153 taking place in 2018. The number of forums fluctuated during the implementation period, rising to 235 in 2019 and dropping to 105 in 2020, with COVID-19 restricting in-person meetings.[37]
10. Quality Improvement on Public	**Complete:**

Service Complaints Resolution through SP4N-LAPOR!	For details regarding the implementation and early results of this commitment, see Section 2.3.
11. The Development of Service System on Single Reference Complaint Management and Supervision in Environment and Forestry	**Limited:** The Ministry of Environment and Forestry (KLHK) issued Secretary-General Decree No. SK.33 / SETJEN / DATIN / SET.1 / 6/2019 concerning the Formation of a Management Team / Working Group for Complaint Handling and LAPOR Applications in KLHK to strengthen the complaints management service system and one-stop supervision in the environmental and forestry sector.[38] However, the draft regulation of the Secretary-General regarding the standard operating procedure for managing one-stop complaints within the scope of KLHK was not ratified during the implementation period.[39] Overall, SP4N-LAPOR! may not be the optimal system for KLHK complaints, as these complaints require immediate response to improve law enforcement's ability to protect environmental resources.[40]
12. The Enhancement of Transparency and Participation on Government Procurement	**Substantial:** 89% of government agencies were using the electronic procurement system (SPSE) by the end of implementation,[41] although the quality of information published remained inconsistent.[42] To facilitate public access to procurement information, the National Public Procurement Agency (LKPP) issued SK PPID LKPP No. 1 of 2019 concerning the Establishment of a List of Public Information on Government Procurement of Goods / Services in the LKPP Environment[43] and SK PPID LKPP No. 2 of 2019 on Determination of Classification of Public Information that is Excluded from Government Procurement Documents for Government Goods / Services in the Government Procurement Policy Institution.[44] These provisions list which LKPP procurement documents can and cannot be publicly accessed, with updates in response to any changes to relevant laws and regulations.[45] Additionally, the Central Information Commission (KIP) conducted public consultations to develop a regulation on public procurement transparency. After the end of the implementation period, the regulation was passed in June 2021,[46] having been carried forward into the sixth OGP action plan.
13. Strengthening Public Information Disclosure Based on One Data Indonesia Principles	**Limited:** The Central Information Commission continued to monitor public institutions' openness through the Public Institutions Rating but did not add One Data Indonesia Principles as indicators.[47] Reportedly, this rating has been implemented since 2010 and has not had a substantial impact on government transparency. The CIC began to revise Information Commission Regulation No. 1/2010 but did not authorize the revised regulation during the implementation period. According to members of the Freedom of Information Network Indonesia Secretariat, this reflects a lack of institutional commitment to this reform.[48] Public Information Service requests were not enabled through SP4N-LAPOR!.[49]
14. The Expansion and Increase in Quantity	**Substantial:**

and Quality of Legal Aid Services	The Ministry of Law and Human Rights reports that between 2018 and September 2020, the number of districts and cities with local legal aid regulations rose by 29%, increasing from 140 to 180 regulations, but fell short of the target increase of 100 district and city level regulations. The number of provinces with local legal aid regulations rose by 31% between 2018 and September 2020, increasing from 16 to 21 regulations, meeting the commitment's target. These regulations aimed to improve legal aid quality and local funding.[50] However, according to the Indonesia Legal Aid Foundation (YLBHI), a number of the local regulations were released before the implementation period, with progress on new regulations failing to meet expectations of this commitment.[51] Additionally, in terms of results, the Indonesian Judicial Research Society points out that these regulations did not improve distribution of legal aid beyond major cities.[52] Meanwhile, the number of legal aid service recipients decreased by 13% between 2018 and September 2020, falling from 13,325 to 11,577 recipients. In particular, this reflected a dip in non-litigation legal aid services. By 2020, 66% of legal aid service recipients expressed satisfaction about legal aid—representing minimal progress from the baseline of 64% in 2018,[53] but exceeding the target of 50%. Most Indonesians continue to lack access to legal aid,[54] and efforts to improve legal aid access were carried forward into the sixth action plan.
Open Parliament Indonesia Commitments	
1. Improvement of Data Management and Legislative Information Services	**Substantial:** The design of the online Legislative Information System (Sileg) was updated to improve usability and a 2020 regulation was passed on guidelines for implementing Sileg.[55] According to Open Parliament Indonesia, this facilitated greater legislative information availability, increasing the quantity and timeliness of published transcripts, as well as parliamentary meeting and discussion overviews.[56] The Westminster Foundation for Democracy added that the main improvement was the ability to track the stage of the legislative process for bills.[57] Nonetheless, draft bills on Sileg are still frequently not published in a timely manner, and public commenting via email remains non-functional. The sixth action plan endeavors to strengthen these features. Additionally, under this commitment, House Committees 1, 3, and 8 conducted pilot projects to improve reports and transcriptions of legislative sessions, but the results of these pilot projects were unknown by Open Parliament Indonesia. The number of transcribers and archivists in parliamentary committees increased from 30 to 60 between 2018 and 2020. However, no assessments or policy papers were published on data management and session record management.[58]
2. Promotion of Utilization of Parliamentary Information Technology	**Limited:** The parliamentary website was redesigned to integrate disparate websites from parliamentary units and to improve user friendliness.[59] According to the Westminster Foundation for Democracy, these updates offered surface level improvement, but left major issues with the usability of the website. The DPRNow

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	App was launched in February 2018, preceding the action plan's implementation.[60] The app offers information on parliament and public commenting. It was rated 3.4/5 by users, with reports of out-of-date parliamentary information.[61] The Indonesian Parliamentary Center assessed each parliamentary unit's performance on public information disclosure and shared the results of this assessment with parliament, but this assessment was not made publicly available. [62]
3. Promotion of Public Information Transparency of the Parliament	**Limited:** Guidelines on public information management for all committees and bureaus were produced addressing the responsibilities of teams involved in public information services. Despite these guidelines, it remains challenging for the public to gain access to information on politically sensitive legislation, like the Anti-Corruption Commission Amendment Bill or the Jobs Creation Omnibus Law.[63] A public information transparency tool was also produced, offering a checklist for committees to fill out. These self-assessments were sent to the Open Parliament Unit, which provided feedback and rankings to parliamentary units, but did not offer public access to the tool's results.[64] This process took place in 2018 and 2019, but not in 2020 due to COVID-19. The tool is not standardized across committees and does not measure frequency or quality of data. Finally, the Regulation of the Indonesian House of Representatives No. 1 of 2010 on Public Information Transparency of the Indonesian House of Representatives was not revised due to political blockages.[65] According to the Westminster Foundation for Democracy, this was the key component of this commitment, and its absence leaves access to parliamentary information at the ad hoc discretion of parliamentary units.[66]
4. Formulation of the Open Parliament Indonesia Roadmap	**Limited:** An Open Parliament Indonesia roadmap was developed based on a survey of 400 respondents on public demand for parliamentary information.[67] The development process included 12 civil society organizations.[68] The roadmap was not adopted by implementing stakeholders, reportedly due to limited awareness of open parliament among parliamentarians. However, according to Open Parliament Indonesia, the roadmap was used in developing the 2020–2022 action plan and will be the foundation of the next action plan.[69]
5. Establishing the Open Parliament Indonesia Institution	**Substantial:** A decree on the organizational structure of Open Parliament Indonesia was passed, applicable to 2020. Monitoring and evaluation meetings were scheduled every three months and reports were published each year, but both suffered from delays, particularly when results reflected unfavorably on parliament. The parliament produced the Open Parliament Indonesia implementation mechanism providing tools for planning, implementation, evaluation, and mutually-agreed decision-making but the tools were only used by three units (a small portion of parliamentary units). Open Parliament Indonesia plans to conduct meetings to improve utilization by other units. Work on a policy

	paper on the Open Parliament model institution is also ongoing, as the paper was not completed during the implementation period.[70] Efforts to institutionalize Open Parliament Indonesia were carried forward into the sixth action plan.

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[3] Farih Maulana Sidik, "Luncurkan SIKS-NG, Mensos Ingin Penerima Program Kemiskinan Tepat Sasaran [Launch SIKS-NG, Mensos Wants Poverty Program Recipients on Target]" (detikNews, 18 Feb. 2020), https://news.detik.com/berita/d-4903312/luncurkan-siks-ng-mensos-ingin-penerima-program-kemiskinan-tepat-sasaran/2.

[4] MediLink, "CSO-OGP Indonesia, evaluation of the 2018-2020 OGI Action Plan" (MediaLink, 31 Jan. 2020), http://medialink.or.id/cso-ogp-indonesia-evaluasi-renaksi-ogi-2018-2020/.

[5] Tanti Budi Suryani (MediaLink), interview by IRM, 7 Jul. 2021.

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[7] Min. of Finance, "Portal Data APBN Kementerian Keuangan Republik Indonesia: Dataset [State Budget Data Portal Min. of Finance of the Republic of Indonesia: Dataset]" (accessed 11 Jul. 2021), www.data-apbn.kemenkeu.go.id.

[8] Nandhi Endrayanto, Kandhi Aditya, and Rizki (Min. of Finance of Republic of Indonesia), interview by IRM, 12 Jul. 2021.

[9] Min. of Home Affairs, "Sistem Informasi Pemerintahan Daerah [Local Government Information System]" (accessed 11 Jul. 2021), https://sipd.kemendagri.go.id/.

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[11] Kantor Staf Presiden et al., *Open Government Indonesia National Action Plan Implementation Report 2018-2020* (OGP, 11 Jun. 2021), 18, https://www.opengovpartnership.org/documents/indonesia-end-of-term-self-assessment-report-2018-2020/.

[12] The IRM received this information from Open Government Indonesia during the pre-publication period (9 Sep. 2021).

[13] To maintain consistency with official publications, this report will refer to the index as Regional Education Index (NPD) as opposed to Regional Education Budget (REB) as used in the original text of the action plan.

[14] Min. of Education and Culture, "Neraca Pendidikan Daerah [Regional Education Balance]" (2019), https://npd.kemdikbud.go.id/.

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[16] Min. of Villages, Dev't of Disadvantaged Areas, and Transmigration Reg'n, "Musyawarah Desa [Village Conference]" *Min. of Villages, Dev't of Disadvantaged Areas, and Transmigration Reg'n* no. 16 (2019), https://peraturan.bpk.go.id/Home/Details/150752/permendes-pdtt-no-16-tahun-2019; Min. of Villages, Dev't of Disadvantaged Areas, and Transmigration Reg'n, "Pedoman Umum Pendamping Masyarakat Desa [General Guidelines for Village Community Facilitators]" *Min. of Villages, Dev't of Disadvantaged Areas, and Transmigration Reg'n* no.18 (2019), https://peraturan.bpk.go.id/Home/Details/150754/permendes-pdtt-no-18-tahun-2019.

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[18] Dwiana Fiqhi Cahyani and Dewi Resminingayu (Open Government Indonesia), interview by IRM, 6 Jul. 2021.

[19] Bejo Untung (PATTIRO), interview by IRM, 11 Jul. 2021.

[20] Rikard Wawo (Wahana Visi Indonesia), interview by IRM, 8 Jul. 2021.

[21] Kantor Staf Presiden et al., *Open Government Indonesia National Action Plan Implementation Report 2018-2020* at 30.

[22] *See* "E-Legislasi" (Semarang City DPRD, accessed 5 Jul. 2021), http://dprd.semarangkota.go.id/legislasi/.

[23] *See* "E-Legislasi" (Central Java Provincial DPRD, accessed 5 Jul. 2021), https://elegislasi.dprd.jatengprov.go.id/.

[24] *See* www.dprd.sulselprov.go.id (accessed 5 Jul. 2021).

[25] Secretariat of DKI Jakarta Provincial Parliament, "Propemperda Tahun 2021 [Prompemperda Year 2021]" (2021), https://dprd-dkijakartaprov.go.id/program-legislasi-daerah/propemperda-tahun-2021/.

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[28] Kantor Staf Presiden et al., *Open Government Indonesia National Action Plan Implementation Report 2018-2020* at 34.

[29] Min. of Health, "SIRS/Online" (accessed 23 Jul. 2021), http://sirs.kemkes.go.id/fo/home/dashboard_rs?id=0; Min. of Health, "SIRANAP V 3.0 Sistem Informasi Rawat Inap [SIRANAP V 3.0 Inpatient Information System]" (accessed 23 Jul. 2021) https://yankes.kemkes.go.id/app/siranap.

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[32] Pusdatin Kementerian Kesehatan RI, "IHeFF."

[33] Dhynianti, correspondence, 26 Jul. 2021.

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35 Min. of Administrative and Bureaucratic Reform, "Coaching Clinic Standar Pelayanan Publik untuk 95 Pemda" (accessed 5 Oct. 2021) https://menpan.go.id/site/berita-terkini/coaching-clinic-standar-pelayanan-publik-untuk-95-pemda.

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47 Kantor Staf Presiden et al., *Open Government Indonesia National Action Plan Implementation Report 2018-2020* at 60.

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50 Masan Nurpian (Min. of Law and Human Rights), correspondence with IRM, 23 Jul. 2021.

51 Febi Yonesta (Indonesia Legal Aid Foundation), interview by IRM, 8 Apr. 2021.

52 Dio Ashar Wicaksana (Indonesian Judicial Research Society), interview by IRM, 12 Jul. 2021.

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54 Wicaksana, interview.

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56 Lumina Mentari (Open Parliament Indonesia), interview by IRM, 30 Jun. 2021.

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58 Mentari, interview.

59 *See* dpr.go.id.

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62 Mentari, interview.

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III. Multistakeholder Process

3.1 Multistakeholder process throughout action plan implementation

In 2017, OGP adopted the *OGP Participation and Co-Creation Standards* intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP's *Articles of Governance* also establish participation and co-creation requirements a country or entity must meet in their action plan development and implementation to act according to the OGP process. Indonesia did not act contrary to OGP process.[1]

Please see Annex I for an overview of Indonesia's performance implementing the Co-Creation and Participation Standards throughout the action plan implementation.

Table 3.2: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply it to OGP.[2] In the spirit of OGP, most countries should aspire to "collaborate."

Level of public influence		During development of action plan	During implementation of action plan
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✔	
Involve	The government gave feedback on how public inputs were considered.		✔
Consult	The public could give inputs.		
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		

Consultations with civil society occurred less frequently during the implementation period, compared to the co-creation process. Over the course of implementation, there were five multistakeholder forum meetings and two trilateral meetings with the Open Government Indonesia secretariat, implementing ministries, and relevant civil society organizations. In 2019, multistakeholder forum meetings were held on 22 July, 30 October, and 11 December, and trilateral meetings were held on 18–19 September and 16–17 December. In 2020, due to COVID-19, there were no trilateral meetings, but multistakeholder forum meetings were held on 9 June and 11 December[3] with opportunities for remote participation.[4] The steering committee also updated civil society organizations on implementation through a WhatsApp group.[5]

Overall, there is need for an improved level of government-civil society engagement during implementation of future action plans. As a member of the Steering Committee, the International NGO Forum on Indonesian Development (INFID) reports that the committee was not sufficiently supportive of engagement with civil society.[6] Beyond the Steering Committee, while there was engagement during the co-creation process, many government implementers did not sufficiently communicate with or involve civil society organizations in implementation, according to the Civil Society Coalition for the Indonesian Open Government Partnership.[7] A deteriorating national environment for civic activism, freedom of expression, and freedom of assembly has discouraged some civil society organizations' involvement in the process. Engagement has also suffered due to

frequent turnover of points of contact within ministries and the Open Government Indonesia secretariat.[8] That said, some ministries reportedly offered more open communication channels, such as the National Public Procurement Agency[9] and the Corruption Eradication Commission.[10] In terms of Open Parliament commitments, parliament maintained positive engagement with the Indonesian Parliamentary Center, but did not involve other civil society organizations.[11]

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[1] Acting Contrary to Process: Country did not meet (1) "involve" during the development or "inform" during implementation of the action plan, or (2) the government fails to collect, publish, and document a repository on the national OGP website in line with IRM guidance.

[2] IAP2, "IAP2's Public Participation Spectrum" (2018), https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf

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[5] Rikard Wawo (Wahana Visi Indonesia), interview by IRM, 8 Jul. 2021.

[6] Sugeng Bahagijo (International NGO Forum on Indonesian Development), interview by IRM, 8 Jul. 2021.

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[8] Tanti Budi Suryani (MediaLink), interview by IRM, 7 Jul. 2021.

[9] Siti Juliantari Rachman (Indonesia Corruption Watch), interview by IRM, 24 Jun. 2021.

[10] Aryanto Nugroho (Publish What You Pay), interview by IRM, 7 Jul. 2021.

[11] Ravio Patra (Westminster Foundation for Democracy), interview by IRM, 5 Jul. 2021.

3.2 Overview of Indonesia's performance throughout action plan implementation

Key:
Green= Meets standard
Yellow= In progress (steps have been taken, but standard is not met)
Red= No evidence of action

Multistakeholder Forum	During Development	During Implementation
1a. Forum established: There is a forum to oversee the OGP process.	**Green**	**Green**
1b. Regularity: The Multi-Stakeholder Forum met three times during 2019 and twice during 2020.[1] OGP standards require that the forum meets at least once every quarter. The Steering Committee also met four times during 2020.[2]	Yellow	Yellow
1c. Collaborative mandate development: Members of the forum jointly develop its remit, membership, and governance structure.	Green	NA
1d. Mandate public: Information on the forum's remit, membership, and governance structure is available on the OGP website/page.[3]	Yellow	Yellow
2a. Multistakeholder: The forum includes both governmental and nongovernmental representatives.	**Green**	**Green**
2b. Parity: The steering committee consisted of three government stakeholders and one civil society stakeholder.[4]	Yellow	Yellow
2c. Transparent selection: Nongovernmental members of the forum are selected through a fair and transparent process.	**Yellow**	**NA**
2d. High-level government representation: The forum includes high-level representatives with decision-making authority from government.	Green	Green
3a. Openness: The forum accepts input and representation on the action plan implementation from any civil society and other stakeholders outside the forum.	**Green**	**Yellow**
3b. Remote participation: There are opportunities for remote participation in at least some meetings and events, including the two forum meetings in 2020.[5]	Yellow	Green
3c. Minutes: The OGP forum proactively communicates and reports back on its decisions, activities, and results to wider government and civil society stakeholders.[6]	Green	Green

Key:
Green= Meets standard
Yellow= In progress (steps have been taken, but standard is not met)
Red= No evidence of action

Action Plan Implementation	
4a. Process transparency: There is a national OGP website with quarterly updates on commitment progress, including progress against milestones.[7] In addition, the government published a self-assessment report. However, there are discrepancies between completion rates reported by the self-assessment report, the website, and implementing agencies. The parliament did not complete a self-assessment report as of June 2021.	Yellow
4b. Communication channels: The website page has a message feature and provides an email and phone number to allow the public to comment on action plan progress updates.[8]	Green
4c. Engagement with civil society: In both 2019 and 2020, the government held two monitoring and evaluation meetings with the 15 civil society organizations on the Multi-Stakeholder Forum, but the meetings were not open to wider civil society.[9] Open Parliament Indonesia held several meetings with the Indonesian Parliamentary Center, but did not involve other civil society organizations in implementation.[10]	Yellow
4d. Cooperation with the IRM: Open Government Indonesia and Open Parliament Indonesia shared the link to the IRM report with other government institutions and stakeholders to encourage input during the public comment phase.[11]	Green
4e. MSF engagement: The multistakeholder forum monitored and deliberated on how to improve the implementation of the NAP.[12]	Green
4f. MSF engagement with self-assessment report: The government submitted its end-of-term self-assessment report to the national multistakeholder forum for comments and feedback on the content of the report.[13] The parliament did not complete a self-assessment report as of June 2021.	Yellow
4g. Repository: During the implementation period, the national OGP website included no evidence related to implementation of any commitments from the 2018-2020 action plan, as required by IRM guidance. In November 2021, after the pre-publication review of this report, a repository was published.[14] Open Parliament Indonesia does not provide a publicly accessible repository on its commitments, but IRM was provided with implementation documentation on request.	**Red**

[1] Kantor Staf Presiden et al., *Open Government Indonesia National Action Plan Implementation Report 2018-2020* (OGP, 11 Jun. 2021), 4, https://www.opengovpartnership.org/documents/indonesia-end-of-term-self-assessment-report-2018-2020/.
[2] The IRM received this information from Open Government Indonesia during the pre-publication period (9 Sep. 2021).
[3] Open Government Indonesia, "Open Government Indonesia" (accessed 5 Jul. 2021), https://ogi.bappenas.go.id/.
[4] Dwiana Fiqhi Cahyani and Dewi Resminingayu (Open Government Indonesia), interview by IRM, 6 Jul. 2021.
[5] *Id.*

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[6] Tanti Budi Suryani (MediaLink), interview by IRM, 7 Jul. 2021.

[7] Open Government Indonesia, "Monitoring dan Evaluasi Rencana Aksi [Action Plan Monitoring and Evaluation]" (accessed 5 Jul. 2021), https://ogi.bappenas.go.id/en/komitmen.

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[11] Cahyani and Resminingayu, interview; Suryani, interview; Lumina Mentari (Open Parliament Indonesia), interview by IRM, 30 Jun. 2021.

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[13] Cahyani and Resminingayu, interview.

[14] Open Government Indonesia, "National Action Plan V Open Government Indonesia 2018-2020" (accessed 16 Nov. 2021), https://ogi.bappenas.go.id/en/dokumen-rencana-aksi-ran_v.

IV. Methodology and Sources

Research for the IRM reports is carried out by national researchers. All IRM reports undergo a process of quality control led by IRM staff to ensure that the highest standards of research and due diligence have been applied.

The International Experts Panel (IEP) of the IRM oversees the quality control of each report. The IEP is composed of experts in transparency, participation, accountability, and social science research methods.

Current membership of the International Experts Panel is

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

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the *Procedures Manual*[1] and in Indonesia's 2018–2020 Design Report.

About the IRM

The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

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[1] IRM, *IRM Procedures Manual* (OGP, 16 Sep. 2017), https://www.opengovpartnership.org/documents/irm-procedures-manual.

Annex I. IRM Indicators

The indicators and method used in the IRM research can be found in the *IRM Procedures Manual*.[1] A summary of key indicators the IRM assesses is below:

- **Verifiability:**
  - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
  - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance:** This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are:
  - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
  - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
  - Public Accountability: Will the government create or improve public-facing opportunities to hold officials answerable for their actions?
- **Potential impact:** This variable assesses the potential impact of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
  - Identify the social, economic, political, or environmental problem;
  - Establish the status quo at the outset of the action plan; and
  - Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion:** This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the *IRM Implementation Report*.

Results-oriented commitments?

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment design is one that clearly describes the:

1. **Problem:** What is the economic, social, political, or environmental problem? Rather than describing an administrative issue or tool (e.g., 'misallocation of welfare funds' is more helpful than 'lacking a website').
2. **Status quo:** What is the status quo of the policy issue at the beginning of an action plan (e.g., "26% of judicial corruption complaints are not processed currently")?
3. **Change:** Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment's implementation (e.g., "doubling response rates to information requests" is a stronger goal than "publishing a protocol for response.")?

Starred commitments

One measure, the "starred commitment" (✪), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating entities. To receive a star, a commitment must meet several criteria:

- The commitment's design should be **verifiable**, **relevant** to OGP values, and have a **transformative** potential impact as assessed in the Design Report.
- The commitment's implementation must be assessed by IRM Implementation Report as **substantial** or **complete.**

This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

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[1] IRM, *IRM Procedures Manual* (OGP, 16 Sep. 2017), https://www.opengovpartnership.org/documents/irm-procedures-manual.