

# Independent Reporting Mechanism

Results Report:  
Indonesia 2020–2022

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

# Executive Summary

**Indonesia’s sixth action plan improved access to information on social welfare programs, public procurement, and beneficial ownership. Many commitments benefited from government-civil society collaboration. Both Open Government Indonesia and Open Parliament Indonesia published new repositories on commitment implementation.**

### Early Results:

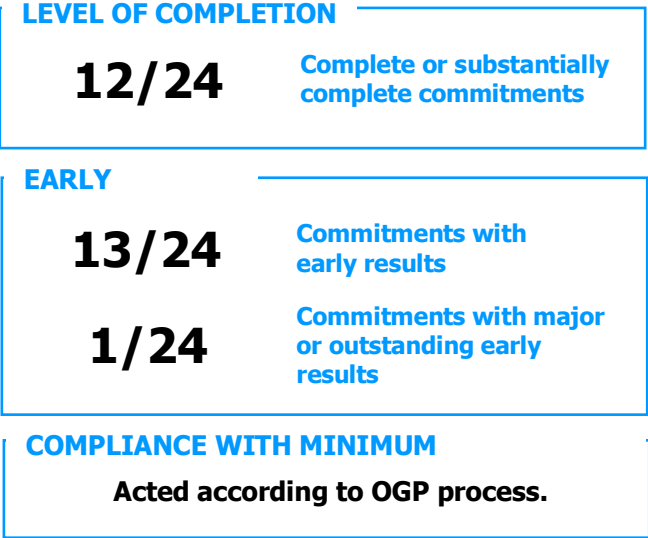
This action plan made major progress on expanding access to information on social welfare eligibility for millions of Indonesians (Commitment 11). This reform was an exemplary open government achievement for Indonesia. Among the other three commitments that IRM identified as having the potential to realize the most promising results at the design phase, two achieved notable early results. Commitment 1 made marginal progress on opening access to public procurement information by instituting a revised Information Commission Regulation on Public Information Service Standards. Commitment 17 also made marginal progress on beneficial ownership transparency, providing free access to the Ministry of Law and Human Rights’ public register.

Among the action plan’s other commitments, half produced marginal early results in opening government, struggling with implementation obstacles or gaps in the design of intended reforms. For the open parliament commitments (19–24), most initiatives were internally focused. Although the commitments focused on access to justice (6–10) did not make major improvements to legal aid’s accessibility outside of major cities, they did result in positive steps, such as passing implementing regulations on accommodations for persons with disabilities in the Supreme Court and correctional institutions.

### Completion:

Half of the action plan’s commitments (12 of 24) were substantially or completely implemented, a slightly lower implementation rate than the previous plan (12 of 19). Among Indonesia’s open parliament commitments, one of six was substantially implemented. Obstacles to implementation included leadership turnover and lack of cross-parliamentary support for certain initiatives. As for the government action plan’s eighteen commitments, eleven were completely or substantially implemented—including the four most promising commitments (1, 11, 15, and 17). Enablers of implementation included strong civil-society-government collaboration and sufficient budget allocation by government or civil society stakeholders. Most of the open government commitments with limited implementation were civil society initiatives without sufficient uptake by necessary government stakeholders—for example, on access to justice (7, 9, and 10) and protecting civic space (16 and 18).

## IMPLEMENTATION AT A GLANCE



### **Participation and Co-Creation:**

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 were developed collaboratively. This process was led by Open Government Indonesia (OGI) Secretariat with a steering committee made up of eight government and one civil society representatives. The open parliament commitments (19–24) were developed through a separate process at the House of Representatives (DPR RI), which expanded civil society participation compared to the previous plan but did not include parliamentarians' participation. This process was led by the Open Parliament Indonesia (OPI) Secretariat.

Collaboration in implementation varied across the action plan. Some commitments saw strong government and civil society co-implementation. In other cases, government implementers communicated updates on commitments, but did not offer opportunities for collaboration. Meanwhile, some government implementers preferred to consult with the OGI Secretariat, rather than maintain direct communication channels with civil society counterparts. Overall, during the implementation phase, Indonesia met the OGP Participation and Co-Creation Standards by publishing OGI and OPI repositories, improving the transparency of open government efforts.

### **Implementation in Context:**

The implementation period for this action plan followed Indonesia's 2019 presidential election. As a result, a number of commitments were synchronized with the National Medium-Term Development Plan (RPJMN) 2020–2024. However, OGI was not undergirded by a firm legal basis, such as a presidential decree. As a result, the government did not make priority budget allocations for the implementation of the commitments. In addition, government budget was often diverted to COVID-19 pandemic response and recovery efforts, and international donors have offered progressively limited aid for development and governance reforms in Indonesia.<sup>1</sup>

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<sup>1</sup> Ben Davis, "Financial Sustainability and Funding Diversification: The Challenge for Indonesian NGOs," <https://www.ksi-indonesia.org/assets/uploads/original/2020/02/ksi-1580493181.pdf>.

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## Section I: Key Observations

This section highlights four key observations on Indonesia’s sixth action plan cycle. These observations address resourcing for open government initiatives, reforms that span multiple action plans, commitments that focused on subnational government, and Open Parliament Indonesia.

**Observation 1: Commitments’ success relies on sufficient resourcing.** Stakeholders emphasized that for a commitment to succeed, it needed to be sufficiently resourced. Implementation of commitments that were in line with ongoing government work plans, such as those on the official public complaint channel and access to social welfare data (Commitments 2 and 11), was seen as a priority and backed by strong financial support. Commitments that emerged from civil society suggestions were successfully implemented when civil society organizations could marshal sufficient financial resources—for example, in Commitments 1, 3, and 4. The government did not necessarily fill this resource gap, particularly when commitments were not taken up as priorities by relevant agencies—for example, Commitments 10, 16, and 18. This highlights the importance of timing the co-creation process in order for ideas from civil society organizations (CSOs) to be considered and used to shape possible government budget allocations. The lack of a strong legal basis for open government has been an obstacle to budget prioritization for such commitments. Moving forward, a presidential decree could be used to prioritize implementation of Indonesia’s open government initiatives within government work plans. These constraints also highlight the importance of identifying stakeholders necessary for implementation at the planning stage for commitments.

**Observation 2: Commitments spanning multiple action plans incrementally achieve open government reforms.** Most commitments (20 of 24) in this action plan carried forward initiatives from previous action plans, and more than half of the open government commitments continue in the next action plan. This reflects an incremental approach to tackling ambitious policy projects, ranging from open contracting to beneficial ownership transparency, integration of welfare data, access to justice, and open parliament. The scope of these reforms cannot be fully realized in a two-year span. Within an individual action plan, in some cases, these types of commitments make marginal changes to their reform’s trajectory. For example, over the course of Indonesia’s long-term efforts to achieve beneficial ownership transparency, the existing public beneficial ownership database became freely available during this action plan, and efforts to validate the database’s information will be carried on during the next action plan. These gradual phases have helped insulate reforms from being abandoned when they face setbacks. Although efforts to improve the transparency of social welfare data stalled under the previous Minister of Social Affairs, they were continued in this action plan and achieved major progress.

**Observation 3: Local-level commitments can scale up their results.** Of the five commitments that had a local-level focus (3, 4, 5, 12, and 15), most were substantially or completely implemented but achieved marginal early results in opening government at the national level. Four of these commitments aimed to pilot innovative initiatives in a small subset of regions (3, 4, 5, and 12). This was a realistic scope to experiment with local One Data policies, community-based evaluations of village development programs, and generation of new ideas to improve public services for marginalized populations. However, the commitments did not leverage the national action plan platform to scale up their efforts. The key to pilots’ impact

is consequent integration into reforms that reach beyond the limited region initially targeted. Meanwhile, one locally focused commitment attempted to undertake reform on a national scale. Commitment 15 targeted publication of COVID-19 budget information for all regency/city and provincial governments in Indonesia. However, the Ministry of Home Affairs was crucial to implementation and may not have been sufficiently invested in this effort. The Ministry is central to scaling up the impact of subnational commitments in Indonesia’s future action plans. Further engagement with the Ministry and other relevant national government bodies during commitments’ initial stages is essential, with customized engagement strategies to build government buy-in.

**Observation 4: Open Parliament Indonesia has focused on institutionalizing but has potential to participate in open government reforms.** This cycle included the second Open Parliament Indonesia (OPI) action plan. To date, most parliament commitments have been internally facing, as the OPI Secretariat has focused on institutionalizing its position. Initiatives that aimed to engage civic participation faced obstacles in terms of buy-in across parliament. For example, a commitment to provide online public access to information on parliamentarians’ activities, such as voting records and contributions to parliamentary discussions, would have required whole-of-parliament support to shift information-disclosure practices. Structurally, there are only a small number of parliamentarians on OPI’s steering committee (two from parliament leadership and one each from 9 political parties) and parliamentarians were not involved in the development of commitments. In the future, if OPI can build parliamentary support for open parliament, parliament can contribute more ambitious efforts to take legislative action, ensure parliamentary oversight, open up parliamentary processes, and create space for dialogue with the public. In conjunction, parliament can also play a role in progressing Indonesia’s next open government plan—for example, by contributing to reforms that require legislative action or undertaking an oversight role in implementation of government commitments.

## Section II: Implementation and Early Results

The following section looks at the three commitments that the IRM identified as having the strongest results from implementation. To assess early results, the IRM referred to commitments identified as promising in the Action Plan Review as a starting point. After verification of completion evidence, the IRM also took into account commitments or clusters that were not determined as promising but that, as implemented, yielded significant results.

### Commitment 1: Open Contracting in Government Procurement

#### Context and Objectives:

To open public procurement, this commitment instituted a revised Information Commission Regulation on the Public Information Service Standards (Perki SLIP), continuing the previous action plan's efforts. It also intended to institute online disclosure of procurement information during states of emergency and launch an annual Information Disclosure Index. This commitment was responding to a context in which public procurement plays a central role in government corruption. In 2019, 64 percent of corruption cases in Indonesia involved public procurement,<sup>1</sup> resulting in annual losses of up to four billion USD.<sup>2</sup> During the COVID-19 pandemic, compliance and accountability mechanisms loosened, while public procurement underwent a sharp increase, particularly in areas such as medical supplies and social protection programs.<sup>3</sup> This provided new opportunities for collusion, price markup, kickback, and fraud.<sup>4</sup> Meanwhile, the public's ability to monitor corruption was limited.<sup>5</sup> Many officials were reluctant to disclose procurement information and uncertain of the implications of releasing what they considered sensitive information. Lack of clarity on disclosure obligations stemmed from diverging interpretations of overlapping Central Information Commission regulations and Procurement Policy Agency decrees, particularly Information Commission Regulations No. 1 of 2010 on Public Information Service Standards and No. 1 of 2017 on Classification of Public Information<sup>6</sup> as well as the Procurement Policy Agency (LKPP) Information Officer Information Officer (PPID) decrees No. 1<sup>7</sup> and No. 3<sup>8</sup> of 2019 on Determination of List of Public Information.

#### Did It Open Government? Marginal:

On 30 June 2021, the Information Commission revised its regulation on public information service standards which clarified disclosure requirements of the prior overlapping Information Commission regulations and Procurement Policy Agency decrees. It replaced Information Commission Regulations No. 1 of 2010 and No. 1 of 2017, which are now no longer valid. The new regulation clearly states in Article 14 (2) that government procurement of goods and services is public information and provides a list of information that must be publicly accessible at each stage of public procurement in Article 15 (9).<sup>9</sup> It also provides the Information Commission with clear authority to determine the list of public procurement information. The new standards are enforceable by the Commission and are the legal basis for all government units' public information lists. The new standards have been widely disseminated among national and local government agencies,<sup>10</sup> which will issue their own corresponding decrees. In response, the Procurement Policy Agency (LKPP) issued Information Officer (PPID) decrees No. 1 and 2 of 2022 on public information for the agency as well as exceptions to the information disclosure rule.<sup>11</sup> Indonesia Corruption Watch did not consider the new decrees entirely in line with the new standards, with some cases of extended waiting periods for release of information.<sup>12</sup>

Overall, the new standards are seen to have introduced a stronger legal basis for transparency in public procurement,<sup>13</sup> but the Open Contracting Partnership reported that there was not yet information on the new standards' impact in practice.<sup>14</sup> The Open Contracting Partnership and Indonesia Corruption Watch describe the new standards as a critical element of opening access to public procurement information. By clearly stating the government's disclosure obligations, Perki SLIP can be used to overcome the common excuse that public bodies had employed to deny the release of public procurement information.<sup>15</sup> To date, public bodies have not yet made major changes to the release of public procurement information, although the new standards lay positive legal groundwork.

Moving forward, as the new standards begin to shift government disclosure practices, civil society is well positioned to use newly accessible public procurement information to strengthen accountability. For example, since 2012, Indonesian Corruption Watch has maintained a digital portal for monitoring public procurement called [opentender.net](https://opentender.net). The portal provides easily accessible, structured data on which firms have been successful in tenders.<sup>16</sup> Open Government Indonesia and Indonesia Corruption Watch reflect that Perki SLIP will help maximize utilization of this portal to monitor public procurement.<sup>17</sup>

The commitment's other milestones achieved more limited impact. LKPP published narrow information on COVID-19-related procurement on the Electronic Procurement Portal (LPSE), but not on a separate dashboard.<sup>18</sup> This was meant to serve as a starting point for procurement information disclosure during all states of emergency. However, during the implementation period, other central and local government units were not yet providing necessary information, and there was no implementing regulation on what types of procurement information should be disclosed during states of emergency.<sup>19</sup>

The Information Commission published the Information Disclosure Index. The index does not include an indicator on transparency of procurement of goods and services, although this is covered by a sub-indicator under the "transparency" indicator.<sup>20</sup> Academics and experts were included in developing the methodology, but CSOs such as Indonesia Corruption Watch and the Freedom of Information Network Indonesia were not and as a result, no longer take part as assessors for the index.<sup>21</sup> At its inception, members of the Freedom of Information Network Indonesia saw the index as duplicative of the Commission's Public Institution Ratings that have been published annually since 2010 and have not impacted government bodies' transparency.<sup>22</sup>

### **Looking Ahead:**

By instituting the new Perki SLIP, this commitment achieved the fruition of an effort that began in the previous action plan—establishing a solid legal basis for disclosure of public information during government procurement process. The next action plan continues this effort, with a commitment to implement the new standards. It also aims to encourage government bodies to publish public procurement information in more detail, including emergency procurement information, and expand community participation in monitoring public procurement and related complaint channels.

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

### **Context and Objectives:**



This commitment aimed to improve provision of social welfare services by centralizing fragmented social welfare data into the Integrated Social Welfare Data (DTKS) database. The last action plan developed the Social Welfare Information System-Next Generation (SIKS-NG), an information system that supports the processing of the DTKS. At the time, DTKS only included contribution aid beneficiaries (PBI) data of the health protection program (JKN).<sup>23</sup> DTKS was last updated in 2015 and by 2020 no longer provided accurate, real-time data. Only 113 of 514 districts and municipalities in Indonesia were regularly updating the database.<sup>24</sup> Without a centralized database, many parallel information systems were used to track disparate social welfare programs, which posed a major obstacle to service delivery, coordination across institutions, and public oversight.<sup>25</sup> Following wide expansion of social protection programs in response to COVID-19, large inefficiencies in aid distribution emerged, with stories of low-income beneficiaries not receiving aid due to data discrepancies.<sup>26</sup> At the grassroots level, unclear criteria for receipt of social welfare aid sparked conflict among beneficiaries within communities.<sup>27</sup> In December 2020, the Social Affairs Minister was arrested by the Corruption Eradication Commission (KPK), accused of receiving Rp17 billion (\$1.2 million) in bribes related to COVID-19 aid distribution.<sup>28</sup>

### **Did It Open Government? Major:**

This commitment expanded access to information on social welfare eligibility for millions of Indonesians. Through marked improvements to DTKS and opportunities for public participation, the Social Affairs Ministry opened access to the full list of eligible recipients of its welfare programs, which can be used to channel provision of programs toward Indonesians who had previously been overlooked.

In April 2021, the commitment made information on all social welfare programs run by the Social Affairs Ministry accessible, using DTKS to unify the data. This was a collaborative effort between the Ministry's Data and Information Center and local governments, supported by the Social Affairs Ministerial Regulation No. 3 of 2021.<sup>29</sup> In addition to PBI, DTKS expanded its data coverage to all of the Ministry's other social welfare programs: the conditional cash transfer Family Hope Program (PKH) targeting 10 million low-income households, the Non-Cash Food Aid Program (BPNT), and the Cash Social Assistance (BST) program. Through 2022, the Ministry continued to update this data monthly.<sup>30</sup> DTKS now provides regular data on eligible beneficiaries, recipients, and sources of welfare, which has improved public access to information on social welfare eligibility.<sup>31</sup> It is now the government's only database for social protection and aid programs delivery.<sup>32</sup> Government officials and the public can access this database by sending requests to the Ministry. By 2023, DTKS had expanded to cover approximately 145 million eligible beneficiaries.<sup>33</sup>

Exceeding the commitment's initial plan, the Ministry of Social Affairs followed the DTKS update with the introduction of Cek Bansos ([cekbansos.kemensos.go.id](https://cekbansos.kemensos.go.id)), an online platform for public monitoring of social assistance. This is a freely accessible platform that can be used to search individuals by name to find which social welfare programs cover them. It was developed to verify the information in the expanded DTKS, which initially included overlapping and outdated data. At first, KPK recommended that the Ministry clean the database on their own, but this drew public protest as many social welfare recipients were removed without further clarification.<sup>34</sup> In response, the Ministry of Social Affairs developed Cek Bansos to provide an opportunity for citizens to check the data and eligibility of social assistance recipients. To optimize accessibility, the platform was paired with an app released in August 2021.<sup>35</sup> The

Ministry added a Propose-Rebuttal feature, which has been used widely to propose and reject beneficiary data, addressing exclusion and inclusion errors.<sup>36</sup> In addition, the Ministry established a phone hotline 021-171 for handling public compliance related to social welfare programs.

Through direct participation on the platform, numerous Indonesians learned that they were eligible for social welfare programs. A wide swath of the public engaged with Cek Bansos. According to the Ministry of Social Affairs, by the end of October 2022, approximately 125 million users had accessed the platform and approximately 1.5 million eligible social welfare beneficiaries had been verified using the Propose-Rebuttal feature.<sup>37</sup> Overall, this initiative fostered public participation and public trust in the fairness of DTKS data.<sup>38</sup>

Central and local government bodies also engaged with the database. By the end of October 2021, 282 local governments had requested to utilize DTKS for social assistance delivery to their residents.<sup>39</sup> Local governments also participated in improving millions of beneficiaries data, according to the Ministry of Social Affairs.<sup>40</sup> Proposals on eligible beneficiaries are routed to local governments for verification. However, the International Budget Partnership notes that heads of villages could be influenced by political considerations, leaving out potential beneficiaries who are not their political supporters.<sup>41</sup> In Brebes Regency of Central Java,<sup>42</sup> MediaLink ran a pilot that helped the local government verify almost 90 percent of beneficiary data by 2022.<sup>43</sup> There is room to continue to improve local governments' role in DTKS, through local regulations and allocation of sufficient budget and human resources training.<sup>44</sup>

Overall, the DTKS update and Cek Bansos platform began to address exclusion and inclusion errors that lead to misallocation of social welfare benefits. A study in 10 West Java regencies and cities, conducted by Inisiatif in mid-2021 found that mistaken exclusion from social welfare particularly impacted people who had recently become eligible due to economic downturns, for example during COVID-19, as well as marginalized populations like single-parent households, persons with disabilities, orphans, and indigenous populations. Social welfare is also sometimes mistakenly distributed to ineligible beneficiaries, such as people who had previously been eligible but had recently experienced an improved economic situation, deceased beneficiaries, and duplicate entries.<sup>45</sup>

Despite significant progress, the commitment faced key limitations. First, inclusion in DTKS does not guarantee that eligible beneficiaries will receive social welfare benefits, given that programs do not necessarily have sufficient resources to cover all those who are eligible.<sup>46</sup> Second, many local governments, particularly those outside of Java, struggled with data collection, verification, and validation due to financial and capacity constraints.<sup>47</sup> To begin addressing this issue, the Ministries of Social Affairs, Home Affairs, and Finance signed a joint decree to accelerate DTKS updates by local governments.<sup>48</sup> Third, the absence of a single identity-number model in population administration makes data integration difficult.<sup>49</sup>

Overall, this commitment made major improvements to the public accessibility of social welfare information. It followed IRM recommendations to develop a user-centered design, ensure feedback loops, and foster public engagement.<sup>50</sup> KPK has commended DTKS improvements and utilized the database for anti-corruption efforts focused on welfare funds.<sup>51</sup>

## Looking Ahead:

This commitment continued from the previous action plan, moving beyond improving access to information on PBI to integrating information on all of the Social Affairs Ministry's welfare programs through DTKS and facilitating interactive data collection and verification through Cek Bansos. This addressed pressing issues with data inconsistency and helped tackle fraudulent use of welfare funds. Moving forward, the Ministry of Social Affairs can consider the following steps as it continues to improve the transparency of social welfare information:

- **Regular coordination between ministries to continue sharing and improving data in DTKS.** The Ministry of Home Affairs, along with the Ministry of Villages, Development of Disadvantaged Regions, and Transmigration, can provide concrete support to local governments in collecting, verifying, and validating DTKS. Coordination should also include government bodies responsible for gathering relevant basic population data.
- **Strengthen data privacy protection within DTKS.** In line with the next action plan's commitment on Law No. 27 of 2022 on Personal Data Protection, it would be valuable to develop the legal and institutional frameworks to ensure data security of social welfare beneficiaries.
- **Improve the accessibility of Cek Bansos for marginalized populations.** While Cek Bansos has been utilized by the public for monitoring social welfare programs, measures could be taken to improve its usability for vulnerable and marginalized groups, including populations outside of Java, single-parent households, orphans, indigenous populations, and persons with disabilities. For instance, the current website and mobile app interface are not user-friendly for people with visual impairment.

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

### **Context and Objectives:**

This commitment aimed to improve utilization of beneficial ownership data for anti-corruption efforts by opening free access to the beneficial ownership database<sup>52</sup> launched by the Ministry of Law and Human Rights in 2019 under the previous action plan. Initially, the beneficial ownership database 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 Rp500 thousand (\$35). By 2020, only 15 percent of corporations (318,061 of 2,053,844 corporations) had disclosed their beneficial ownership,<sup>53</sup> and there was no process to verify this data.<sup>54</sup> Despite these shortcomings, according to the United Nations Office on Drugs and Crime, the registry's introduction represented significant progress toward providing public access to information on beneficial ownership in Indonesia.<sup>55</sup> The registry built on Presidential Regulations No. 13/2018 on the application of beneficial ownership principles and No. 54/2018 on the National Strategy for Corruption Prevention (Stranas PK).

### **Did It Open Government? Marginal:**

In July 2022, the Ministry of Law and Human Rights opened free public access to a subset of the beneficial ownership data for anyone who registered with the portal. This provided information on beneficial owners' names, correspondence addresses, and nature of beneficial interests. Open Ownership considers this to have been a notable advance.<sup>56</sup> By mid-2022, approximately one-third of corporations had disclosed their beneficial ownership information.<sup>57</sup> This reflected an increase in database coverage, although it still did not include information on most Indonesian corporations. There also remained no process to verify the data by, for

instance, linking to financial transaction data. Public notaries are required to incorporate companies but are not required to update beneficial ownership information in the database.<sup>58</sup> In terms of utilization, records were not searchable by name of beneficial owner, and could only be accessed by looking up full company names. According to Publish What You Pay, while free public access represented positive progress, limited disclosure means that the database has not yet been extensively used by civil society for anti-corruption efforts.<sup>59</sup>

In parallel, several other ministries and agencies continued to separately identify and collect beneficial ownership information. For the Ministry of Energy and Mineral Resources (ESDM), this process was conducted through the Extractive Industries Transparency Initiative (EITI). In 2019, it signed an agreement with the Ministry of Law and Human Rights to integrate their databases; this process was still in progress at the end of the implementation period. By mid-2022, the public registry was able to draw on data from the ESDM database. The Ministry of Cooperatives and Small and Medium Enterprises, Ministry of Finance, Ministry of Agrarian Affairs and Spatial Planning, as well as Ministry of Agriculture also signed memoranda of understanding with the Ministry of Law and Human Rights, whereas the Ministry of Energy and Mineral Resources made the most progress on data exchange and interoperability. According to Open Ownership and the Asian Development Bank, cooperative data integration and interoperability are critical for enhancing quality, and will assist efforts to verify disclosed data.<sup>60</sup>

Overall, as the Ministry of Law and Human Rights public beneficial ownership registry improves its coverage in the long term, public accountability can begin to play a role in preventing conflicts of interest between companies and government officials in licensing and encourage better oversight of illicit business practices.

### Looking Ahead:

This commitment continued a positive national trajectory toward beneficial ownership transparency. As early as 2005, Indonesia implemented beneficial ownership disclosure for tax treaties.<sup>61</sup> Since then, reformers have tied beneficial ownership transparency to other domestic and international strategies and standards. Indonesia committed to implementing the High-Level Principles on Beneficial Ownership and Transparency in the G20 Anti-Corruption Working Group in 2014,<sup>62</sup> published a beneficial ownership transparency roadmap in 2016 to meet EITI requirements,<sup>63</sup> and hosted the EITI Beneficial Ownership Global Conference in 2017. To build momentum, OGP aligned commitments with Stranas PK, recommendations from the Financial Action Task Force, and relevant legislation. The next action plan carries this effort forward and can incorporate policy learning by implementing the following actions:<sup>64</sup>

- **Build collaboration between government bodies** on establishing an integrated beneficial ownership data management system for a robust verification mechanism. Include all bodies that identify and collect beneficial ownership information.
- **Ensure that regulations on beneficial ownership define and regulate all types of beneficial owners**, including ultimate beneficial owners, foreign-owned companies, foreign natural persons, and non-residents.
- **Develop a verification system** to conduct enhanced manual checks of higher-risk submissions. Work toward automated checks of the register against other state registers. This system can draw on guidance from Open Ownership.<sup>65</sup>
- **Improve data coverage** by developing effective sanctions for companies that do not disclose beneficial ownership information, through agencies such as the Financial Services Authority (OJK), the Financial Transaction Reports and Analysis Centre

(PPATK), and KPK. It would also be valuable to conduct awareness-raising and capacity-building activities to provide companies guidance on beneficial ownership data disclosure.<sup>66</sup>

- **Open access to further elements of beneficial ownership information**, such as company identifiers, dates the beneficial interest began, and beneficial owners' month and year of birth.
- **Focus targeted monitoring efforts** on beneficial owners related to politically exposed persons. The Ministry of Law and Human Rights can formulate an engagement strategy to improve data use and uptake.

<sup>1</sup> "Public Procurement Reform: How Far Have We Come?," Indonesia Corruption Watch, 9 February 2022, <https://antikorupsi.org/en/article/a-decade-of-eprocurement-in-indonesia>.

<sup>2</sup> "Public Procurement Reform in Indonesia," United Nations Office on Drugs and Crime (UNODC) Regional Office for Southeast Asia and the Pacific, 8 December 2020, <https://www.unodc.org/roseap/en/what-we-do/anti-corruption/topics/2020/public-procurement-reform-indonesia.html>.

<sup>3</sup> "Public Procurement Reform in Indonesia," <https://www.unodc.org/roseap/en/what-we-do/anti-corruption/topics/2020/public-procurement-reform-indonesia.html>.

<sup>4</sup> "Kolaborasi LKPP, KPK dan BPKP Cegah Penyimpangan di Masa Darurat Covid-19," [Collaboration between LKPP, KPK, and BPKP in Preventing COVID-19 Corruption], Procurement Policy Agency, <http://www.lkpp.go.id/v3/#/read/5913>.

<sup>5</sup> Heru Andriyanto, "Corporate Bribery Risks Increase during Pandemic," Jakarta Globe, 31 August 2021, <https://jakartaglobe.id/news/corporate-bribery-risks-increase-during-pandemic/>; Hendi Yogi Prabowo, "The Crisis Within a Crisis: COVID-19 and Corruption," Jakarta Post, 28 December 2020, <https://www.thejakartapost.com/academia/2020/12/28/the-crisis-within-a-crisis-covid-19-and-corruption.html>; Nivell Rayda, "Urgency of COVID-19 exacerbates corruption risk in Indonesia, says deputy chair of anti-graft commission," Channel News Asia, 9 March 2021, <https://www.channelnewsasia.com/asia/indonesia-corruption-commission-kpk-covid19-manipulation-313926>.

<sup>6</sup> Siti Juliantari Rachman (Indonesia Corruption Watch), interview with IRM, 25 October 2022.

<sup>7</sup> "Surat Keputusan PPID LKPP No. 1/2019" [Procurement Policy Agency Information Officer Decree No. 1/2019], Procurement Policy Agency, <https://ppid.lkpp.go.id/information/public/270/surat-keputusan-ppid-lkpp-nomor-1-tahun-2019>; <https://antikorupsi.org/id/article/dokumen-kontrak-pengadaan-barang-dan-jasa-adalah-informasi-publik>.

<sup>8</sup> "Surat Keputusan PPID LKPP No. 3/2019" [Procurement Policy Agency Information Officer Decree No. 3/2019], Procurement Policy Agency, <https://ppid.lkpp.go.id/information/public/271/surat-keputusan-ppid-lkpp-nomor-3-tahun-2019>.

<sup>9</sup> "Peraturan Komisi Informasi No. 1/2021 tentang Standar Layanan Informasi Publik" [Information Commission Regulation No. 1/2021 on Public Information Service Standards], Information Commission, <https://ntt.kemkumham.go.id/attachments/article/10859/PerKI%20No%201%20Tahun%202021.pdf>.

<sup>10</sup> Food and Drugs Administration, "Jangan Paranoid terhadap Perki 1 Tahun 2021" [Don't Be Paranoid about PerKI 1 of 2021], 14 September 2021, <https://www.pom.go.id/new/view/more/berita/23407/Jangan-Paranoid-Terhadap-PerKI-1-Tahun-2021.html>; Fany Rachma, "Dinas Kominfo Gelar Sosialisasi Perki 1 Tahun 2021 tentang Standar Layanan Informasi Publik" [The Ministry of Communication and Informatics Holds Perki 1 Year 2021 Socialization on Public Information Service Standards], 24 March 2022, <http://beritamagelang.id/dinas-kominfo-gelar-sosialisasi-perki-1-tahun-2021-tentang-standar-layanan-informasi-publik>; "Sosialisasi Standar Pelayanan Informasi Publik" [Socialization of Public Information Service Standards], BPKP Public Relations, 21 April 2022, <http://www.badankebijakan.kemkes.go.id/sosialisasi-standar-pelayanan-informasi-publik/>.

<sup>11</sup> Procurement Policy Agency Decree Number 1/2022, <https://ppid.lkpp.go.id/frontend/web/uploads/regulation/KeputusanPPIDLKPPNomor1Tahun2022.pdf>; Procurement Policy Agency Decree Number 2 2022, <https://ppid.lkpp.go.id/frontend/web/uploads/regulation/KeputusanPPIDLKPPNomor2Tahun2022.pdf>.

<sup>12</sup> Rachman, interview.

<sup>13</sup> Rachman, interview.

<sup>14</sup> Nanda Sihombing (Open Contracting Partnership), correspondence with IRM, 2 February 2023.

<sup>15</sup> Sophie Brown, "Partners in Crime Prevention: How Civil Society and Government Worked Together to Open Up Public Contracts in Indonesia," Open Contracting Partnership, 27 April 2022, <https://www.open->

[contracting.org/2022/04/27/a-partnership-for-better-procurement-how-civil-society-and-government-worked-together-to-open-up-public-contracts-in-indonesia/](https://contracting.org/2022/04/27/a-partnership-for-better-procurement-how-civil-society-and-government-worked-together-to-open-up-public-contracts-in-indonesia/).

<sup>16</sup> See <https://opentender.net/about/>.

<sup>17</sup> Rachman, interview; Maharani Putri S. Wibowo, Theodorus Agustinus Hasiholan, Andrieta Rafaela Arifin, and Armita Tri Yuniasningrum (Open Government Indonesia Secretariat), focus group discussion with IRM, 19 September 2022.

<sup>18</sup> See National Procurement Portal, <https://inaproc.id/>; Electronic Procurement Portal, <https://lpse.lkpp.go.id/eproc4/>.

<sup>19</sup> Rachman, interview.

<sup>20</sup> “Indeks Keterbukaan Informasi Publik 2022” [Information Disclosure Index 2022], Information Commission (2022), [https://drive.google.com/file/d/1GQ4KV\\_eevhp92Ff27duf0BiEI3MS019Y/view](https://drive.google.com/file/d/1GQ4KV_eevhp92Ff27duf0BiEI3MS019Y/view).

<sup>21</sup> Rachman, interview.

<sup>22</sup> Dessy Eko Prayitno & Danardono Sirajudin (Freedom of Information Network Indonesia), interview by IRM researcher, 1 July 2021.

<sup>23</sup> “Indonesia Transitional Results Report 2018–2020,” OGP, 13 December 2021,

<https://www.opengovpartnership.org/documents/indonesia-transitional-results-report-2018-2020/>.

<sup>24</sup> Robert Sparrow, Teguh Dartanto, and Renate Hartwig (2020) “Indonesia Under the New Normal: Challenges and the Way Ahead,” *Bulletin of Indonesian Economic Studies* 56, no. 3, (December 2020): 269–299, <https://doi.org/10.1080/00074918.2020.1854079>.

<sup>25</sup> Camilla Holmemo et al., *Investing in People: Social Protection for Indonesia’s 2045 Vision* (Jakarta: World Bank Indonesia, 2020), 191.

<sup>26</sup> Marchio Irfan Gorbiano, “COVID-19 crisis exposes holes in social aid disbursement,” *Jakarta Post*, 19 May 2020, <https://www.thejakartapost.com/news/2020/05/19/covid-19-crisis-exposes-holes-in-social-aid-disbursement.html>.

<sup>27</sup> Mulyadi Sumarto, “Welfare and Conflict: Policy Failure in the Indonesian Cash Transfer,” *Journal of Social Policy* 50, no. 3 (July 2021): 533–551, <https://doi.org/10.1017/S0047279420000252>.

<sup>28</sup> Niniek Karmini, “Indonesia Minister Turns Himself in for COVID-19 Aid Graft,” *ABC News*, 6 December 2020, <https://abcnews.go.com/International/wireStory/indonesia-minister-turns-covid-19-aid-graft-74564963>.

<sup>29</sup> “New DTKS: Single Database of Social Protection Programs,” Ministry of Social Affairs, 6 March 2022, <https://kemensos.go.id/en/new-dtks-single-database-of-social-protection-programs>; “Risma: Early 2021, Three Social Assistance Services Channels Simultaneously Throughout Indonesia,” Ministry of Social Affairs, 29 December 2020, <https://kemensos.go.id/en/risma-early-2021-three-social-assistance-services-channels-simultaneously-throughout-indonesia>.

<sup>30</sup> For instance, see Social Affairs Ministerial Decrees No.140/HUK/2022 (July 2022), No.153/HUK/2022 (August 2022), and No.189/HUK/2022 (September 2022).

<sup>31</sup> “Integrasi Data Bansos DKI Mudahkan Penyaluran untuk Warga Miskin” [DKI Social Assistance Data Integration Eases Distribution for the Poor], *Tempo*, 26 October 2022, <https://nasional.tempo.co/read/1649544/integrasi-data-bansos-dki-mudahkan-penyaluran-untuk-warga-miskin>.

<sup>32</sup> Presentation by the Social Affairs Ministry’s Data and Information Center, no date.

<sup>33</sup> “Keputusan Menteri Sosial Republik Indonesia Nomor 189/HUK/2022 Tentang Data Terpadu Kesejahteraan Sosial Baru Bulan” [Decree of the Minister of Social Affairs Number 189/HUK/2022 on New Monthly Integrated Social Welfare Data], Ministry of Social Affairs, September 2022; The IRM also received this information from Open Government Indonesia during the pre-publication period (23 April 2023).

<sup>34</sup> Darwanto (MediaLink), interview with IRM, 9 October 2022.

<sup>35</sup> “Aplikasi Cek Bansos” [Social Assistance Check Application], Ministry of Social Affairs, <https://play.google.com/store/apps/details?id=id.go.kemensos.pelaporan&hl=id&gl=US&pli=1>.

<sup>36</sup> Darwanto, interview; Aditya Wisnu (Ministry of Social Affairs), interview with IRM, 2 November 2022; “New DTKS,” <https://kemensos.go.id/en/new-dtks-single-database-of-social-protection-programs>.

<sup>37</sup> Presentation by the Social Affairs Ministry’s Data and Information Center, no date.

<sup>38</sup> “Manfaat Integrasi Data Bansos untuk Pemerataan Kesejahteraan di Jakarta” [Benefits of Social Assistance Data Integration for Welfare Equity in Jakarta], *kumparanNEWS*, 20 September 2022, <https://kumparan.com/kumparannews/manfaat-integrasi-data-bansos-untuk-pemerataan-kesejahteraan-di-jakarta-1ytcSVyx5Hu/1>.

<sup>39</sup> Wisnu, interview.

<sup>40</sup> Presentation by the Social Affairs Ministry’s Data and Information Center, no date.

<sup>41</sup> Yuna Farhan (International Budget Partnership), interview with IRM, 24 February 2023.

<sup>42</sup> Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion.

<sup>43</sup> Darwanto, interview; Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion.

<sup>44</sup> Farhan, interview.

<sup>45</sup> "Implementasi Kebijakan Pemutakhiran Data Terpadu Kesejahteraan Sosial Kabupaten dan Kotadi Provinsi Jawa Barat [Implementation of Policy on Integrated Social Welfare Data Update for Regencies and Municipalities in West Java Province]," Inisiatif, 2022.

<sup>46</sup> Farhan, interview.

<sup>47</sup> Darwanto, interview; Dyan Widyaningsih, Ruhmaniyati, and Nina Toyamah, "Mendorong Pemutakhiran Berkelanjutan terhadap Data Terpadu Kesejahteraan Sosial" [Encouraging Continuous Updating of Social Welfare Integrated Data], Working Paper, SMERU Research Institute, Jakarta, Indonesia, 2022.

<sup>48</sup> Koesworo Setiawan, "Minister of Social Affairs, Minister of Finance and Minister of Home Affairs to Accelerate Updating of DTKS for Social Assistance," Ministry of Social Affairs, 9 August 2020, <https://kemensos.go.id/mensos-menkeu-dan-mendagri-percepat-pemutakhiran-dtks-untuk-bansos>.

<sup>49</sup> Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion.

<sup>50</sup> "Action Plan Review: Indonesia 2020–2022," IRM, 10, <https://www.opengovpartnership.org/documents/indonesia-action-plan-review-2020-2022/>.

<sup>51</sup> "DTKS Menjadi Data Dasar Penyaluran Segala Jenis Bansos" [DTKS Becomes Basic Data for Distribution of All Kinds of Social Assistance], National Strategy for Corruption Prevention, <https://stranaspk.id/publikasi/berita/dtks-menjadi-data-dasar-penyaluran-segala-jenis-bansos>.

<sup>52</sup> "Beneficial Ownership Database," Public Law Administration Directorate, [bo.ahu.go.id](http://bo.ahu.go.id).

<sup>53</sup> Ferdian Ari Kurniawan (Corruption Eradication Commission), correspondence with IRM researcher, 22 July 2021.

<sup>54</sup> Aryanto Nugroho (Publish What You Pay), interview with IRM, 1 April 2021.

<sup>55</sup> "Beneficial Ownership Regulations and Company Registries in Southeast Asia," UNODC, 21 March 2021, [https://www.unodc.org/roseap/uploads/documents/topics/anti-corruption/2022/Beneficial\\_ownership\\_regulations\\_and\\_company\\_registries\\_in\\_Southeast\\_Asia.pdf](https://www.unodc.org/roseap/uploads/documents/topics/anti-corruption/2022/Beneficial_ownership_regulations_and_company_registries_in_Southeast_Asia.pdf).

<sup>56</sup> Peter Low and Hani Rosidaini, "Beneficial Ownership Transparency in Indonesia: Scoping Study," Open Ownership, 10 August 2022, <https://www.openownership.org/en/publications/beneficial-ownership-transparency-in-indonesia-scoping-study/>.

<sup>57</sup> The IRM notes that official reports on the number of companies disclosing beneficial ownership information includes some variation. For more information, see: "Kemenkumham Blokir Akses Korporasi yang Belum Laporkan Beneficial Ownership" [Ministry of Human Rights Blocks Access for Companies that Have Not Submitted Beneficial Ownership Information], Ministry of Human Rights, 15 March 2023, <https://ntt.kemenkumham.go.id/berita-kanwil/berita-utama/12184-kemenkumham-blokir-akses-korporasi-yang-belum-laporkan-beneficial-ownership>; "Laporan Pelaksanaan Strategi Nasional Pencegahan Korupsi Triwulan VIII Tahun 2021-2022" [Implementation Report of the National Strategy for Corruption Prevention in the Third Semester VIII of 2021-2022], National Secretariat of Corruption Prevention, February 2023, <https://stranaspk.id/publikasi/laporan-aksi/laporan-pelaksanaan-stranas-pk-triwulan-viii-tahun-2022>; Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion; Aryanto Nugroho (Publish What You Pay), interview with IRM, 20 October 2022.

<sup>58</sup> Ramandeep Chhina, "Beneficial Ownership Transparency in Asia and the Pacific," December 2022, <https://www.adb.org/sites/default/files/publication/849876/beneficial-ownership-transparency-asia-pacific.pdf>.

<sup>59</sup> Nugroho, interview, 20 October 2022.

<sup>60</sup> Low and Rosidaini, "Beneficial Ownership Transparency," <https://www.openownership.org/en/publications/beneficial-ownership-transparency-in-indonesia-scoping-study/>; Chhina, "Beneficial Ownership Transparency," <https://www.adb.org/sites/default/files/publication/849876/beneficial-ownership-transparency-asia-pacific.pdf>.

<sup>61</sup> "Beneficial Ownership Disclosure in Indonesia Close the Loops for Advancing Governance," PWYP Indonesia, 18 July 2018, <https://pwypindonesia.org/en/beneficial-ownership-disclosure-in-indonesia-close-the-loops-for-advancing-governance/>.

<sup>62</sup> "G20 High-Level Principles on Beneficial Ownership Transparency," G20 Australia, 2014, [https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Thematic-Areas/Beneficial-Ownership-Transparency/G20\\_High-Level\\_Principles\\_on\\_Beneficial\\_Ownership\\_Transparency\\_2014.pdf](https://www.unodc.org/documents/corruption/G20-Anti-Corruption-Resources/Thematic-Areas/Beneficial-Ownership-Transparency/G20_High-Level_Principles_on_Beneficial_Ownership_Transparency_2014.pdf).

<sup>63</sup> Marie Gay Alessandra Ordenes, "Opening Up Ownership in Indonesia," EITI, 15 June 2018, <https://eiti.org/blog-post/opening-ownership-indonesia>.

<sup>64</sup> "Kertas Rekomendasi: Dialog Publik-Private 'Transparansi Kepemilikan Manfaat Perusahaan'" [Recommendation Paper: Public-Private Dialogue "Transparency of Corporate Beneficial Ownership"], Transparency International Indonesia, 14 October 2022, <https://ti.or.id/kertas-rekomendasi-dialog-publik-private-transparansi-kepemilikan-manfaat-perusahaan/>.

<sup>65</sup> "Verification of Beneficial Ownership Data," Open Ownership, May 2020, <https://openownership.orgprod-1b54.kxcdn.com/media/documents/oo-briefing-verification-briefing-2020-05.pdf>

<sup>66</sup> “Kertas Rekomendasi” [Recommendation Paper], <https://ti.or.id/kertas-rekomendasi-dialog-publik-private-transparansi-kepemilikan-manfaat-perusahaan/>; Chhina, “Beneficial Ownership Transparency,” <https://www.adb.org/sites/default/files/publication/849876/beneficial-ownership-transparency-asia-pacific.pdf>; Low and Rosidaini, “Beneficial Ownership Transparency,” <https://www.openownership.org/en/publications/beneficial-ownership-transparency-in-indonesia-scoping-study/>.



## Section III. Participation and Co-Creation

***Many commitments in Indonesia’s sixth action plan benefited from government-civil-society collaboration and collaboration across civil society coalitions. During the implementation period, both Open Government Indonesia and Open Parliament Indonesia published repositories, achieving positive progress on the transparency of ongoing activities.***

At the governmental level, Indonesia OGP process is led by the Open Government Indonesia (OGI) Secretariat, hosted by the Directorate of State Apparatus and Bureaucratic Transformation of the Ministry of National Development Planning (Bappenas). The OGI Steering Committee is made up of eight government representatives and one civil society stakeholder. According to MediaLink, members of the OGI Multistakeholder Forum are selected through a fair and transparent process.<sup>1</sup> However, turnover in leadership of government bodies involved in the action plan, such as the Director of State Apparatus and Bureaucratic Transformation and Deputy Minister for Politics, Law, Defense, and Security Affairs, was detrimental to high-level political engagement. Frequent turnover of points of contact within implementing ministries was an obstacle to continuity of implementation and led to a breakdown in communication with CSOs. However, members of the OGI Secretariat took the initiative to bridge communication gaps.

At the parliamentary level, the process is led by the Open Parliament Indonesia (OPI) Secretariat, hosted by the Leadership Bureau’s Secretariat of the Vice Speaker for Political and Security Affairs of the Indonesian House of Representatives (DPR RI). During the implementation period, OPI underwent changes in leadership, parliamentary members, and staff. This was an obstacle to OPI collaboration with civil society. OPI also reported that it struggled with insufficient human resources. Civil society actors and international organizations helped fill gaps, particularly in developing concepts for commitments. However, not all leaders or sections of parliament welcomed the involvement of these organizations.<sup>2</sup>

Under the leadership of OGI and OPI, Indonesia’s action plan was developed in two separate parts. Commitments 1–18 were directly proposed by civil society—often with 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 West Java. However, most organizations were still based in Jakarta. Open parliament commitments (19–24) were developed through a separate process led by DPR RI, which expanded civil society participation compared to the previous plan but did not include parliamentarians’ participation. According to OGI and OPI Secretariats, differences in regulations, budgets, and priorities pose challenges to integrating their co-creation processes.<sup>3</sup>

During implementation, government and CSO stakeholders collaborated well on commitments on open contracting, local One Data policies, community-based development evaluations, public services for marginalized groups, legal aid, welfare data, and beneficial ownership transparency—with exceptions among some government bodies.<sup>4</sup> With donor funding, some CSOs had more capacity to participate than others. Meanwhile, OPI Secretariat collaborated mainly with the Indonesian Parliamentary Center and the Westminster Foundation for

Democracy, although few other CSOs had opportunities to participate. In many cases, the level of engagement benefited from long-term efforts to further relevant reforms across multiple action plan cycles, developing mutual trust.

However, some commitments saw little government-CSO collaboration. For commitments on COVID-19 budget information portal and SP4N-LAPOR! public complaints channel, government agencies took the lead. During implementation of these commitments, officials chose to consult with the OGI Secretariat rather than directly engaging their civil society counterparts; or undertook some communication with civil society, but did not co-deliver activities. In some instances, CSOs withdrew from implementation. For example, civil society partners disengaged due to political differences on the provisions of the Truth and Reconciliation Commission Bill (RUU KKR) as well as when the Information Commission was perceived to not provide sufficient opportunities for participation in developing the Information Disclosure Index.

During the action plan cycle, both OGI and OPI published repositories, achieving positive progress on the transparency of open government efforts. There is still room to improve the consistency of information published on these repositories. During the implementation period, government and CSO stakeholders did not regularly update information on progress and supporting data in the repository.

### Compliance with the Minimum Requirements

The IRM assesses whether member countries met the minimum requirements under OGP’s Participation and Co-Creation Standards for the purposes of procedural review.<sup>5</sup> During co-creation, Indonesia acted according to the OGP process. The two minimum requirements listed below must achieve at least the level of ‘in progress’ for a country to have acted according to OGP process.

Key:

Green= Meets standard

Yellow= In progress (steps have been taken to meet this standard, but standard is not met)

Red= No evidence of action

Acted according to OGP process during the implementation period?	
<p><b>The government maintained an OGP repository that is online, updated at least once during the action plan cycle, and contains evidence of development and implementation of the action plan.</b> Both OGI and OPI published repositories during the action plan cycle.<sup>6</sup></p>	Green
<p><b>The government provided the public with information on the action plan during the implementation period.</b> This included government implementers sharing information with their civil society counterparts and information published on the OGI and OPI websites and repositories.<sup>7</sup></p>	Green

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<sup>1</sup> Darwanto (MediaLink), correspondence with IRM, 24 January 2023.

<sup>2</sup> Lumina Mentari (Open Parliament Indonesia), correspondence with IRM, 30 November 2023.

<sup>3</sup> “Action Plan Review: Indonesia 2020–2022,” IRM, <https://www.opengovpartnership.org/documents/indonesia-action-plan-review-2020-2022/>.

<sup>4</sup> See also: Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana Aksi Nasional VI Open Government Indonesia” [Monitoring and Evaluation Report of RAN OGI VI Open Government Indonesia] Semester IV Year 2021–2022, 7–8, <https://drive.bappenas.go.id/owncloud/index.php/s/InElp1v1TS3RMJi#pdfviewer>.

<sup>5</sup> Please note that future IRM assessment will focus on compliance with the updated OGP Co-Creation and Participation Standards that came into effect on 1 January 2022: “OGP Co-Creation and Participation Standards,” OGP, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>.

<sup>6</sup> For OGI, see <https://ogi.bappenas.go.id/>. For OPI, see <https://cloud.dpr.go.id/index.php/s/7Lgs9bZ7wcDSsJA>.

<sup>7</sup> For OGI, see <https://ogi.bappenas.go.id/>. For OPI, see <https://cloud.dpr.go.id/index.php/s/7Lgs9bZ7wcDSsJA>.

## Section IV. Methodology and IRM Indicators

This report supports members' accountability and learning through assessment of (i) the level of completion for commitments' implementation, (ii) early results for commitments with a high level of completion identified as promising or that yielded significant results through implementation, and (iii) participation and co-creation practices throughout the action plan cycle. The IRM commenced the research process after the first year of implementation of the action plan with the development of a research plan, preliminary desk research, and verification of evidence provided in the country's OGP repository.<sup>1</sup>

In 2022, OGP launched a consultation process to co-create a new strategy for 2023–2028.<sup>2</sup> The IRM will revisit its products, process, and indicators once the strategy co-creation is complete. Until then, Results Reports continue to assess the same indicators as previous IRM reports:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>3</sup> The level of completion for all commitments is assessed as one of the following:

- *No evidence available*
- *Not started*
- *Limited*
- *Substantial*
- *Complete*

### Did It Open Government?

The IRM assesses changes to government practices that are relevant to OGP values, as defined in the OGP Articles of Governance, under the "Did it open government?" indicator.<sup>4</sup> To assess evidence of early results, the IRM refers to commitments or clusters identified as promising in the Action Plan Review as a starting point. The IRM also takes into account commitments or clusters with a high level of completion that may not have been determined as "promising" but that, as implemented, yielded significant results. For commitments that are clustered, the assessment of "Did it open government?" is typically conducted at the cluster level, rather than the individual commitment level.

The Action Plan Review for Indonesia's 2020–2022 Action Plan clustered commitments relating to judicial access (6–10), community development (4 and 12), and open parliament (19–24). In terms of design, each cluster of commitments aimed to further a shared policy objective. However, implementation of these commitments varied widely. As such, this Results Report does not assess these commitments as clusters, and conducts the assessment of "Did it open government?" at the individual level, rather than the cluster level.

Commitments without sufficient evidence of early results at the time of assessment are designated as "no early results to report yet." For commitments with evidence of early results, the IRM assesses "Did it open government?" as one of the following:

- *Marginal*: Some change, but minor in terms of its effect on level of openness

- *Major*: A step forward for government openness in the relevant policy area but remains limited in scope or scale
- *Outstanding*: A reform that has transformed “business as usual” in the relevant policy area by opening government

This report was prepared by the IRM in collaboration with Hasrul Hanif and was reviewed by Brendan Halloran, IRM external expert. The IRM methodology, quality of IRM products and review process is overseen by the IRM’s International Experts Panel (IEP). The current IEP membership includes:

- Snjezana Bokulic
- Cesar Cruz-Rubio
- Mary Francoli
- Maha Jweied
- Rocio Moreno Lopez

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual<sup>5</sup> and in Indonesia’s Action Plan Review 2020–2022. For more information, refer to the “IRM Overview” section of the OGP website.<sup>6</sup> A glossary on IRM and OGP terms is available on the OGP website.<sup>7</sup>

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<sup>1</sup> OGI Repository: <https://ogi.bappenas.go.id/>; OPI Repository: <https://cloud.dpr.go.id/index.php/s/7Lqs9bZ7wcDSsJA>.

<sup>2</sup> See “Creating OGP’s Future Together: Strategic Planning 2023–2028,” OGP, <https://www.opengovpartnership.org/creating-ogps-future-together/>.

<sup>3</sup> IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, IRM assesses “potential for results” and “Did it open government?” at the cluster level. The level of completion is assessed at the commitment level. For more information on how IRM clusters commitments, see Section IV on Methodology and IRM Indicators of the Action Plan Review.

<sup>4</sup> See “Open Government Partnership Articles of Governance,” OGP, 17 June 2019, [https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP\\_Articles-of-Governance\\_2019.pdf](https://www.opengovpartnership.org/wp-content/uploads/2019/06/OGP_Articles-of-Governance_2019.pdf).

<sup>5</sup> *IRM Procedures Manual*, vol. 3, IRM, 16 September 2017, <https://www.opengovpartnership.org/documents/irm-procedures-manual>.

<sup>6</sup> “Overview Independent Reporting Mechanism,” OGP, <https://www.opengovpartnership.org/irm-guidance-overview/>

<sup>7</sup> “Glossary,” OGP, <https://www.opengovpartnership.org/glossary/>.

## Annex I. Commitment Data<sup>1</sup>

<b>Commitment 1: Open Contracting in Government Procurement</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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
<p>This commitment is assessed in Section II above.</p>	
<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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
<p>This commitment continued the previous action plan’s effort to improve government bodies’ response to SP4N-LAPOR! public complaints, but it did not disclose the intended data during the implementation period. By May 2022, according to the Ministry of State Apparatus Empowerment and Bureaucratic Reform (PAN RB), 33,220 of 43,414 (76.52 percent) public complaints had received follow up, exceeding the commitment’s target of 45 percent. In terms of implementing units, 1,216 central and regional government bodies (70 percent) had followed up on complaints. Among them, 837 (68.8 percent) followed up on all complaints received in the second semester of the action plan, exceeding the commitment’s overall targets of 30 percent of government bodies following up on 45 percent of complaints. The PAN RB Ministry facilitated this progress through mutual agreements and technical trainings for some provincial governments.<sup>2</sup> Information on the developments that took place under this commitment was made available in November 2022 through OGI,<sup>3</sup> but was not accompanied by supporting evidence and could not be confirmed by independent sources. In terms of transparency, data on government bodies’ response to public complaints was not made available to the public through the SP4N-LAPOR! Website during the implementation period. In 2023, certain data was made available by log in (including on varying response rates for some government bodies).<sup>4</sup> The Center for Regional Information and Studies (Pattiro) has reported some cases in which complaints were designated as having received “follow up” after a government body sent a reply but did not practically address the content of the complaint.<sup>5</sup> This commitment made positive progress, but IRM cannot confirm the quality of responses to complaints based on information available. Beyond the commitment scope, the Ministry continued to conduct publicity at the university level for SP4N-LAPOR! utilization through LAPOR! Goes to Campus.<sup>6</sup></p>	
<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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
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Following introduction of the national One Data Policy in 2019,<sup>7</sup> this commitment completed development of One Data local action plans in seven pilot regions: the Provinces of West Nusa Tenggara, Riau, and East Java; the City of Semarang; the Regencies of Banggai, West Sumbawa, and Brebes. Five of these pilot regions were selected because of their participation as OGP local members.<sup>8</sup> The action plans were developed in consultation with civil society organizations—particularly MediaLink, Publish What You Pay Indonesia, Community Solidarity for Transparency (Somasi), and Transparency International Indonesia—alongside the One Data Indonesia (SDI) Secretariat. The secretariat also provided preparatory assessment studies on each pilot region’s legal basis for One Data, data management, portal management, and level of preparedness for integration of the regional portal and SDI portal, focusing on existing data and infrastructure.<sup>9</sup> Overall, this commitment had a limited geographic scope among Indonesia’s 38 provinces, 98 cities, and 416 regencies.

In terms of the commitment’s local impact, implementation of its action plans varied. Each of the pilot regions issued a gubernatorial regulations or regent/mayoral decrees on One Data<sup>10</sup> and established an open data forum—responsible for coordinating data among the regional government’s units and guiding implementation. East Java’s forum was only established in December 2021, due to funding challenges.<sup>11</sup> Each region also identified thematic data to release based on local priorities (for example, on natural resources or poverty). These datasets differed from national-level datasets and were not comparable across regions.<sup>12</sup> By the end of the implementation period, the regions were still awaiting technical guidance on financial data from the central government. Riau,<sup>13</sup> Semarang,<sup>14</sup> West Nusa Tenggara,<sup>15</sup> and East Java<sup>16</sup> established One Data portals and publicly released accessible raw data or data summaries, including budget summaries. The Regency of Banggai developed a portal, but had not yet used it to publish detailed data by May 2023.<sup>17</sup> The Regencies of Brebes and West Sumbawa had not started portal development by the end of 2022.<sup>18</sup> Capacity building and assistance from the SDI Secretariat faced challenges in Banggai, Brebes, West Sumbawa, and Semarang as the One Data Policy’s scope is limited to only provincial governments at subnational level.<sup>19</sup> CSO funding and issues communicating with local governments also limited involvement in data production.<sup>20</sup>

**Commitment 4: Community-Based Evaluation for Development Programs**

<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>• This commitment has been clustered as: Community Development Programs (Commitments 4 and 12)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
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This commitment fully implemented its planned community-based evaluations of two village development programs, with pilots in Guwosari and Sriharjo Villages in the Bantul Regency of



Yogyakarta. The project was developed based on lessons learned from a comparable Japanese CSO’s local government program review.<sup>21</sup> Prior to the evaluations, local implementers participated in capacity building activities from November 2021 to January 2022. This process partially took place online due to COVID-19.<sup>22</sup> Tifa Foundation and local partner Alterasi Indonesia ran the evaluation projects from February 2022 to May 2022, involving randomly selected citizens in reviewing two development programs on providing supplemental food for toddlers and the rehabilitation of uninhabitable homes.<sup>23</sup> Implementation benefited from collaboration with the Japan Initiative and the Ministry of Village, Development of Disadvantaged Regions, and Transmigration, but there were reportedly communication difficulties with the Ministry of Home Affairs.<sup>24</sup> Prior to this commitment, development programs in the targeted villages were perceived as the purview of the elite. This project introduced an oversight role for ordinary residents and tested a new approach to local civic engagement in Indonesia. However, limited geographic scope restricted its overall impact.

**Commitment 5: Public Service Innovation Model for Marginalized Groups**

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| <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> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
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To improve the design of public service for marginalized populations at the subnational level, the Institute of Public Administration (LAN) held innovation laboratories—public discussions to generate innovative ideas—in the Regencies of Tanimbar, North Lombok, Oju Una-Una, and Sorong from March 2021 to November 2021. LAN prepared these workshops in consultation with the Institute for Human Resource Development and Studies of Nahdlatul Ulama (Lakpesdam NU),<sup>25</sup> and continued collaboration beyond the commitment.<sup>26</sup> Through these workshops, the agency reported to OGI Secretariat that it identified 19 ideas to improve public services for women and youth victims of violence, low-income communities, rural communities, persons with disabilities, and the elderly.<sup>27</sup> After the implementation period, LAN replicated the innovation laboratories in four more regencies—South Central Timor, Bulukumba, North Nias, and Merauke—and reported identifying 148 more ideas.<sup>28</sup> Overall, this commitment piloted a new civic participation practice, but Lakpesdam NU underlined that there was no evidence that governments in the pilot areas adopted the ideas generated in the process to improve public services for the target groups.<sup>29</sup>

**Commitment 6: Accommodations for Persons with Disabilities in Judicial Proceedings**

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| <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>• This commitment has been clustered as: Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
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Following a 2020 government regulation on adequate accommodation for persons with disabilities in judicial proceedings,<sup>30</sup> this commitment led to the issuance of relevant technical





regulations for two of the four institutions it targeted—the Supreme Court (MA)<sup>31</sup> and correctional institutions (Lapas).<sup>32</sup> Intended technical regulations for the Attorney General’s Office (Kejagung)<sup>33</sup> and the National Police (Polri)<sup>34</sup> were drafted but not finalized during the implementation period.<sup>35</sup> These institutions prepared the regulations in collaboration with the Indonesia Judicial Research Society (IJRS), the Australia Indonesia Partnership for Justice, Women, Disability, and Children’s Advocacy Center (SAPDA), the Ministry of Law and Human Rights, the Asia Foundation, the Center for Human Rights Studies of the Indonesian Islamic University (Pusham UII), and the Indonesian Association of Women with Disabilities (HWDI). Collaboration between the police and CSOs was reportedly limited.<sup>36</sup> The regulations began to address accessibility and accommodation issues, but a number of obstacles remain, according to Disability Advocacy Movement and Inclusion Space (SIGAB). In particular, it has been difficult to ensure budget allocation for implementation of these regulations.<sup>37</sup> IJRS notes that the technical regulations focus primarily on services, facilities, and infrastructure but offer little procedural provisions on ensuring fulfillment of rights and obligations.<sup>38</sup> For instance, the technical regulations offer instructions on how to identify a person’s category of disabilities but do not offer details on how to provide accessibility accommodations to persons with disabilities during trials.<sup>39</sup> Moving forward, the next action plan continues efforts to institute the technical regulations of the Attorney General’s Office.

### Commitment 7: Legal Aid Information Portal

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| <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>• This commitment has been clustered as: Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
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This commitment intended to establish an integrated legal aid portal, bringing together the many existing portals of the Supreme Court (MA), the National Law Development Agency (BPHN), and the Ministry of Law and Human Rights<sup>40</sup> in response to an IRM recommendation from the previous action plan’s design report.<sup>41</sup> However, the intended portal was not developed. During the implementation period, implementers began preparatory work, such as identifying existing portals, signing a memorandum of understanding on the portal development with the relevant units at the Supreme Court, and conducting an IJRS study on using an integrated information portal as a one-stop service mechanism.<sup>42</sup> Initially, BPHN collaborated on these activities with access to justice CSOs—comprising the Indonesia Association of Legal Aid and Human Rights (PBHI), the Indonesian Legal Aid Foundation (YLBHI), the Indonesian Women’s Association for Justice Legal Aid (LBH APIK), and the Indonesia Judicial Research Society (IJRS), but coordination meetings tapered over the course of implementation.<sup>43</sup> Coordination between BPHN and the Supreme Court was also limited, and the portal was not a priority of the Supreme Court.<sup>44</sup> In terms of resourcing, CSOs lacked adequate funding for this project,<sup>45</sup> whereas BPHN had already allocated their definitive budget prior to the commitment being designed, leaving insufficient budget support for the portal development.<sup>46</sup> This effort was carried forward to the next action plan, with an initiative to map citizens’ legal needs in relation to the portal.

### Commitment 8: Strengthening Legal Aid Services

<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>• This commitment has been clustered as: Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
<p>This commitment intended to increase the number and distribution of legal aid service providers, increase the number and capacity of paralegals, and implement legal aid service standards for legal aid organizations. Compared to the 524 accredited legal aid service providers in 2019,<sup>47</sup> for the 2022–2024 period, 619 providers were accredited comprising 121 new providers and 498 reaccredited existing providers.<sup>48</sup> A total of 237 providers (38 percent) remained concentrated in the island of Java or major cities because of the strict accreditation requirements. CSOs advocated for affirmative action in some regions, but the Ministry of Law and Human Rights rejected this proposal.<sup>49</sup> There was no evidence of an increase in the number of paralegals. However, Ministerial Regulation No. 3 of 2021 on Paralegal in Legal Aid Services set the standards for conditions, rights and responsibilities, skills, capacity building, and monitoring and evaluation of paralegals.<sup>50</sup> The National Law Development Agency (BPHN) also published and disseminated guidance for paralegal trainings in collaboration with the Ministry of Law and Human Rights.<sup>51</sup> Finally, the Ministry of Law and Human Rights issued Ministerial Regulation No. 4 of 2021 on Legal Aid Service Standards for both litigation and non-litigation services.<sup>52</sup> Subsequently, BPHN also issued and disseminated guidance on legal aid service standards, covering rights and obligations of legal aid providers, standards for litigation and non-litigation services, and capacity building.<sup>53</sup> In the next action plan, a commitment plans for more technical guidelines to facilitate implementation of the standards. In terms of early results, the commitment improved the regulatory environment for legal aid, the number of legal aid providers, and standards for paralegals – but it did not make major changes to the existing access to justice landscape in Indonesia, particularly in regions outside of large cities. However, government implementers continued positive collaboration with civil society partners, including YLBHI, PBHI, and IJRS.<sup>54</sup></p>	
<p><b>Commitment 9: Inclusion of Vulnerable Groups in Legal Aid</b></p>	
<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>• This commitment has been clustered as: Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul>
<p>This commitment aimed to provide a legal aid policy for vulnerable groups and women, and to improve legal aid providers’ sensitivity to these populations. In terms of the policy, implementers attempted to amend Law No. 16 of 2011 on Legal Aid, which limits the scope of legal aid only for low-income populations.<sup>55</sup> Implementers conducted a review of the law and LBH APIK produced research on legal aid and vulnerable groups,<sup>56</sup> but the law was not amended.<sup>57</sup> Regarding capacity building for legal aid providers, paralegal training curriculum developed by BPHN addressed victim’s perspectives and issues related to gender, minorities, and vulnerable groups. It was disseminated to CSOs such as Sada Ahmo Association</p>	

(Pesada), LBH Justice and Peace, LBH APIK, and a number of legal aid providers in Riau.<sup>58</sup> LBH APIK provided related capacity buildings to local CSOs.<sup>59</sup> This had a positive influence on providers’ understanding of victims and marginalized groups.<sup>60</sup> However, IRM did not find evidence of improved access to justice for these populations during the implementation period. The next action plan intends to build on this effort through continued capacity building, researching legal aid law, and monitoring and evaluating law enforcement’s treatment of women and vulnerable persons facing judicial proceedings.

**Commitment 10: Legal Aid for Access to Information**

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| <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>• This commitment has been clustered as: Access to Justice (Commitments 6–10)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
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This commitment intended to strengthen legal aid related to information dispute cases by implementing study recommendations and opening access to disaggregated data on the cases. During the implementation period, BPHN conducted a brief study on strengthening support for legal aid related to access to information. In parallel, YLBHI and LBH Bandung conducted a needs assessment through a focus group discussion and collection of supporting data. However, this was not integrated into the study.<sup>61</sup> In terms of results, there was no evidence that recommendations of the study were implemented. Regarding disaggregated information dispute data, during the implementation period, the Information Commission published its 2020 and 2021 annual performance reports, which covered cases that occurred between 2010 and 2021,<sup>62</sup> similar to the data available in the 2019 annual performance report.<sup>63</sup> This did not include cases at the subnational level, which is outside of the Information Commission’s jurisdiction.<sup>64</sup> These jurisdictional issues reflect issues in mapping of stakeholders during design of the commitment.

**Commitment 11: Integrating Welfare Data**

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| <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> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Did it open government?</b> Major</li> </ul> |
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This commitment is assessed in Section II above.

**Commitment 12: Social Accountability Approach in the Village Development Program**

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| <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>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
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<ul style="list-style-type: none"> <li>• This commitment has been clustered as: Community Development Programs (Commitments 4 and 12)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	
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IRM did not find evidence that this commitment met its target to implement community-based development monitoring, focused on social accountability, in 200 pilot villages. The Ministry of Villages, Development of Disadvantaged Regions, and Transmigration (Kemendes PDTT) developed guidance on facilitating social accountability in villages, along with a scorecard, which it shared with the Indonesian Forum for Budget Transparency (Fitra), Transparency International Indonesia, and Wahana Visi Indonesia.<sup>65</sup> The Ministry reported that use of this score card was piloted in 40 villages, but it did not clarify whether this happened during the implementation period. It also reported that after the implementation period, workshops were held to disseminate information on this practice to 320 other villages in October 2022. It did not provide evidence of these activities.<sup>66</sup> The Ministry of Home Affairs did not address social accountability in the Strengthening Village Government and Development Program’s trainings for village governments and consultative councils.<sup>67</sup> CSO commitment leads did not reply to IRM requests for comment.<sup>68</sup> This commitment was carried forward to the next action plan.

**Commitment 13: Open Data for Election Accountability**

<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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
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Following introduction of Info Pemilu portal ([infopemilu.kpu.go.id](http://infopemilu.kpu.go.id))<sup>69</sup> under the previous action plan, the Election Commission (KPU) launched its open data portal ([opendata.kpu.go.id](http://opendata.kpu.go.id)) in 2021<sup>70</sup> to further integrate election management information systems through this commitment. The commission integrated the Voters List Information System (Sidalih), Candidate Information System (Silon), Political Party Information System (Sipol), and Recapitulation Information System (Sirekap). Overall, it centralized 10 categories of data and 155 datasets<sup>71</sup> on the 2019 elections (but not any other previous elections). According to the Association for Elections and Democracy (Perludem), the portal aligns with some open data principles as it can be analyzed, is not controlled by the owners, and is available at any time. However, it needs improvement to offer sufficiently timely, granular, complete, and license-free data<sup>72</sup> in a non-proprietary format. Most of the 16 key categories of election data designated by the Open Election Data Initiative<sup>73</sup> are published on this platform, although there are gaps particularly on election security, election campaigns, campaign finance, and polling stations. In addition, the platform experiences periodic outages and is difficult to navigate to from the main KPU website. The next action plan intends to complete efforts to make election data available in an open data format. With continued development, Perludem anticipates that this platform will productively contribute to the transparency of the next elections in 2024.<sup>74</sup>

KPU also completed the commitment’s effort to test Sirekap, an application used as a recapitulation tool for elections.<sup>75</sup> They conducted multiple trials of a process for



recapitulating election results by gathering data from polling stations in villages, districts, and regencies/cities up to submission to KPU. The trials focused on how the technology could be used by *ad hoc* polling officers in the field to scan recapitulation results. Early results of this effort cannot be determined until the data are made public.<sup>76</sup> However, throughout the effort, collaborative leadership by Perludem and KPU overcame obstacles to implementing this commitment.<sup>77</sup>

#### Commitment 14: Reproductive Health Service System Platform

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| <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> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
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This commitment did not develop its intended digital-based reproductive health service system platform for women. During the implementation period, the Ministry of Health began preparing for launch of M-Health, a health service platform. It conducted a pilot project at 253 community health centers (Puskesmas) in 10 locations—comprising six cities (Depok, Bogor, Karawang, Yogyakarta, Tegal, and Malang) and 4 regencies (Sukabumi, Purwakarta, Semarang, and Tegal).<sup>78</sup> The Ministry did not respond to suggestion from the International NGO Forum for International Development (INFID) to include sexual and reproductive health on the platform.<sup>79</sup> During the implementation period, the Ministry shifted its focus away from this commitment, instead prioritizing a new strategy on the digitalization of the health sector, which may incorporate reproductive health in the future.<sup>80</sup>

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

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| <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> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul> |
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This commitment improved publication of COVID-19 response and recovery budget information but did not publish the audited budget data as intended.<sup>81</sup> In 2020 and 2021, the Ministry of Home Affairs' portal provided annual general data on COVID-19 response and recovery budget expenditure for every regency/city and provincial government, but none in 2022.<sup>82</sup> From 2020 to 2022, the Ministry of Finance published weekly budget expenditure information of the national government's COVID-19 recovery effort (PEN) which covered health, community protection, and economic recovery programs. This was an improvement in terms of regular data publication. However, the portal publishes summary budget information rather than offering detailed datasets, making it difficult to use for public monitoring, according to Fitra.<sup>83</sup> Furthermore, an International Budget Partnership assessment found the disclosed information disaggregated, fragmented, and incomplete.<sup>84</sup> During the implementation process, the Ministry of Finance held one coordination meeting with civil society stakeholders,<sup>85</sup> but overall, did not offer sufficient opportunities for consultation.<sup>86</sup>

#### Commitment 16: Civil Society Involvement in the Truth and Reconciliation Commission Bill

<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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul>
<p>This commitment sought to meaningfully involve civil society in drafting the Truth and Reconciliation Commission Bill (RUU KKR), which did not pass during the implementation period. Opportunities for engagement were sporadic. In 2020 and 2021, the Human Rights Directorate of the Ministry of Law and Human Rights conducted preparatory consultations with academic and legal experts on cases of serious human rights violations and a discussion with the CSO National Commission for Victims of Violence and the Disappeared (Kontras). The Ministry also held many meetings with the Indonesian Association of Families of Disappeared (IKOHI) to discuss the draft bill,<sup>87</sup> but the OGI Secretariat did not have information on whether civil society was included in the later stages.<sup>88</sup> Hearings on the bill took place in August 2022,<sup>89</sup> but it had not been finalized by the following October.<sup>90</sup> Progress on the bill stalled due to the Presidential Decree to create the non-judicial human rights team.<sup>91</sup> A commitment in the next action plan intends for further civil society efforts to contribute to the drafting process for this bill.</p>	
<p><b>Commitment 17: Utilization of Beneficial Ownership Data</b></p>	
<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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
<p>This commitment is assessed in Section II above.</p>	
<p><b>Commitment 18: Ensuring Civic Space</b></p>	
<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>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul>
<p>This commitment aimed to guarantee the consideration of civic space protection in a new roadmap on restorative justice. The Ministry of National Development Planning's Directorate of Law and Regulation developed this roadmap in consultation with various government agencies and CSOs—comprising the Institute for Criminal Justice Reform (ICJR), the Institute for Independent Judiciary (LeIP), and IJRS.<sup>92</sup> IJRS supplemented this work with research on restorative justice in Indonesian criminal law.<sup>93</sup> However, the roadmap released did not address rights to information, expression, assembly, and association.<sup>94</sup> Without these civic space components, the roadmap fell short of the commitment's objective.<sup>95</sup> Following the implementation period, implementers agreed to conduct research on ensuring civic space.<sup>96</sup></p>	
<p><b>Commitment 19: Improving the Legislative Information System (Sileg)</b></p>	

<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>• This commitment has been clustered as: Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
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Under this commitment, the Secretariat General of parliament and its civil society partner, the Indonesian Parliamentary Center, continued the previous action plan’s internally focused effort to further develop the online Legislative Information System (Sileg) and introduce a new public participation channel on the platform.<sup>97</sup> For internal development efforts, implementers ran trainings and workshops to build staff capacity on legislative information and formulated the system’s implementation guidelines.<sup>98</sup> The milestone to introduce a parliamentary data and information format standard was not completed. This meant parliamentary committees’ minutes of meetings remained unstandardized. Parliamentarians were not invested in adopting the One Data format, whereas approval from parliamentary leadership is necessary in order to do standardize data and information formats across the parliamentary work units.<sup>99</sup>

In terms of impact, Sileg is meant to allow the public to track the progression of ongoing bills and, through the commitment’s new channel, participate in the legislative process. For example, by submitting input and requesting follow-up actions on hearing outcomes.<sup>100</sup> However, the Indonesian Parliamentary Center and the Westminster Foundation for Democracy found that legislative information uploaded to Sileg is still not consistently up to date—for instance, on prominent legislations, such as the New & Renewable Energy Bill (RUU EBET) and the Jobs Creation Omnibus Bill (RUU CK).<sup>101</sup> Without current versions of bills, public monitoring cannot effectively take place. Also, Sileg only publishes very brief meeting minutes, as the parliament secretariat require parliamentarians’ approval to publish the full minutes.<sup>102</sup>

Outside of the commitment’s milestones to address gaps in Sileg, the Indonesian Parliamentary Center launched a “mirror” portal ([openparliament.id](https://openparliament.id)) in 2019 aimed at monitoring transparency and participation in parliament’s legislative process. The portal publishes brief reports, minutes of meetings, draft bills, academic papers, schedules, and a variety of other materials owned and created by the parliament.<sup>103</sup> The Center used this portal to track how well the Indonesian parliament kept to this commitment.

**Commitment 20: Parliamentary Open Data**

<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>• This commitment has been clustered as: Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul>
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Under this commitment, the Data and Information Center (Pusdatin) of DPR RI developed the parliamentary data and video network.<sup>104</sup> The commitment’s five other milestones to open parliamentary data were not completed during the implementation period,<sup>105</sup> largely due to some parliamentarians' reluctance to release information.<sup>106</sup>

**Commitment 21: Strengthening Information System for Members of Parliament (Sigota)**

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| <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>• This commitment has been clustered as: Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
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This commitment intended to add information on members of parliament to the parliamentary website through a section named Sigota (Members of Parliament Information System).<sup>107</sup> It is meant to provide information on parliamentarians’ activities, including voting records and contributions to parliamentary discussions. However, its development was not completed. The commitment’s preparatory milestones stalled and did not complete the underlying guidelines and capacity building by the end of the implementation period.<sup>108</sup> In the interim, some members of parliament uploaded their profiles on the parliamentary website sporadically whereas some others developed their own personal websites, but most did not provide information on their parliamentary activities as disclosure remains voluntary.<sup>109</sup> Development of Sigota faced conflicting conceptions of its purpose. CSOs hoped for a public information channel, but some parliamentary members and secretariat staff conceptualized it as another internal platform. Once launched, compliance with information disclosure will also be an obstacle. While the parliamentary secretariat has the capacity and resources to develop it, only the parliament’s political party caucuses can approve information disclosure requirements for their parliamentary members.<sup>110</sup>

**Commitment 22: Multistakeholder Forum for Periodic Policy Dialogue**

- |  |   |
|--|---|
| <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>• This commitment has been clustered as: Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Not started</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul> |
|--|---|

This commitment did not establish a multistakeholder forum for policy dialogue between parliament and the public.<sup>111</sup> Efforts were stalled by lack of funding from parliament and the International Association for Public Participation (IAP2), the commitment’s CSO lead, as well as limited political support from members of parliament.<sup>112</sup> Following the implementation period, the OPI Secretariat was working with CSOs to develop a regularly scheduled small meeting between members of parliament and the public.<sup>113</sup>

**Commitment 23: Promotion of Parliamentary Openness Innovations**





<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>• This commitment has been clustered as: Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> No early results to report yet</li> </ul>
<p>This commitment publicized open parliament initiatives through official media channels and website. However, the parliament openness innovation competition and journalism hackathon did not take place during the implementation period.<sup>114</sup> Efforts to formulate guidelines on public information regarding parliament remained underway after the end of the implementation period.<sup>115</sup> Implementation was led by the parliamentary Public Relations team, but its management line transfer from the News Unit to the Protocols Unit impacted funding for the commitment.<sup>116</sup></p>	
<p><b>Commitment 24: Institutionalizing Open Parliament Indonesia</b></p>	
<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>• This commitment has been clustered as: Open Parliament (Commitments 19–24)</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Did it open government?</b> Marginal</li> </ul>
<p>This commitment intended to enhance the performance of the OPI Secretariat. During the implementation period, the secretariat remained in place, but struggled to adhere to OGP standards.<sup>117</sup> An OPI repository was developed, but implementation data on commitments were not up to date.<sup>118</sup> The commitment’s other milestones stalled. IRM did not find evidence that implementers conducted the intended feasibility study on a parliamentary call center or peer learning forums on information transparency and accountability. In terms of cooperation with CSOs and other stakeholders, communication with the OPI chair was limited.<sup>119</sup> Following the arrest of the former OPI chair by KPK in a corruption case in late 2021,<sup>120</sup> the OPI Secretariat have had difficulty in opening a communication channel with the new chair.<sup>121</sup></p>	

<sup>1</sup> Editorial notes:

1. Commitment titles may have been edited for brevity. For the complete text of commitments, see “Indonesia Action Plan 2020–2022,” OGP, 11 January 2022: <https://www.opengovpartnership.org/documents/indonesia-action-plan-2020-2022/>.
2. For more information on the assessment of the commitments’ design, see “Indonesia Action Plan Review 2020–2022,” OGP, 29 October, 2021, <https://www.opengovpartnership.org/documents/indonesia-action-plan-review-2020-2022/>.

<sup>2</sup> Open Government Indonesia Secretariat, “Laporan Monitoring dan Evaluasi Rencana Aksi Nasional VI Open Government Indonesia,” [Monitoring and Evaluation Report of RAN OGI VI Open Government Indonesia], Semester III Year 2021–2022, 31–33, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

<sup>3</sup> Open Government Indonesia Secretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

<sup>4</sup> Andrieta Rafaela Arifin (Open Government Indonesia Secretariat), written correspondence with IRM, 24 November 2022; Bejo Untung (Pattiro), written correspondence with IRM, 1 December 2022; see “Layanan Aspirasi dan Pengaduan Online Rakyat” [People’s Online Aspirations and Complaints Service], LAPOR!, <https://www.lapor.go.id/>.

<sup>5</sup> Bejo Untung (Pattiro), written correspondence with IRM, 29 December 2022.

<sup>6</sup> Untung, written correspondence, 29 December 2022.

<sup>7</sup> See <https://satudata.go.id/home>.

<sup>8</sup> Banggai, West Nusa Tenggara, West Sumbawa, Semarang, and Brebes are OGP Local members.

<sup>9</sup> Open Government Indonesia Secretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 38–43, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

<sup>10</sup> See:

- Riau Governorial Regulation on One Data: <https://peraturan.bpk.go.id/Home/Details/189823/pergub-prov-riau-no-23-tahun-2021>
- East Java Governorial Regulation on One Data: [https://www.dokumjdih.jatimprov.go.id/upload/41619/Pergub No 81 Tahun 2020 tentang Satu Data2.pdf](https://www.dokumjdih.jatimprov.go.id/upload/41619/Pergub%20No%2081%20Tahun%202020%20tentang%20Satu%20Data2.pdf)
- West Nusa Tenggara Governorial Regulation on One Data: <https://data.ntbprov.go.id/sites/default/files/Pergub%20No.%2045%20Tahun%202021%20-%20NTB%20Satu%20Data.pdf>
- Semarang Mayor Regulation on One Data: <https://peraturan.bpk.go.id/Home/Details/175754/perwali-kota-semarang-no-25-tahun-2021>
- Brebes Regent Regulation on One Data: [http://jdih.brebeskab.go.id/uploads/hukum/PERBUP\\_21\\_2021.pdf](http://jdih.brebeskab.go.id/uploads/hukum/PERBUP_21_2021.pdf)
- Banggai Regent Regulation on One Data: <https://banggaikep.go.id/portal/wp-content/uploads/2022/02/peraturan-bupati-banggai-kepulauan-nomor-35-tahun-2021-tentang-pengelolaan-satu-data-indonesia-tingkat-kabupaten.pdf>
- West Sumbawa Regent Regulation on One Data: <https://drive.google.com/file/d/1EOQdeYS-kwajbOlmxqxbiitWfco2oAP/view>

<sup>11</sup> Tanti Budi Suryani (MediaLink), interview with IRM, 26 October 2022.

<sup>12</sup> Suryani, interview.

<sup>13</sup> Riau Province One Data Portal: <https://rumahdata.riau.go.id/>.

<sup>14</sup> “Portal Satu Data Indonesia Tingkat Kota Semarang” [Portal One Indonesian Data at Semarang City Level], Semarang City One Data Portal: <https://data.semarangkota.go.id/>.

<sup>15</sup> West Nusa Tenggara One Data Portal: <https://data.ntbprov.go.id/>.

<sup>16</sup> See:

- East Java Province Open Data Portal: <https://opendata.jatimprov.go.id/frontend/homepage>
- East Java Province One Data Portal: <https://sata.jatimprov.go.id/>
- “Wujudkan Basis Data Pembangunan yang Akurat, Pemprov Jatim Siapkan Aplikasi Open Data Jatim” [Realizing an Accurate Development Database, the East Java Provincial Government Prepares the East Java Open Data Application], 6 September 2022, <https://infopublik.id/kategori/nusantara/664291/wujudkan-basis-data-pembangunan-yang-akurat-pemprov-jatim-siapkan-aplikasi-open-data-jatim>.

<sup>17</sup> Banggai Regency One Data Portal: <https://data.banggaikab.go.id/>.

<sup>18</sup> Tanti Budi Suryani (MediaLink), written correspondence with IRM, 9 December 2022.

<sup>19</sup> Suryani, interview.

<sup>20</sup> Suryani, interview; Open Government Indonesia Secretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 38–43,

<https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>; The IRM also received this information from Open Government Indonesia during the pre-publication period (23 April 2023).

<sup>21</sup> “Program Review: Pendekatan Evaluasi Program yang Mengubah Tata Kelola Pembangunan Jepang,” Tifa Foundation, 22 December 2020, <https://www.tifafoundation.id/artikel/program-review-pendekatan-evaluasi-program-yang-mengubah-tata-kelola-pembangunan-jepang>.

<sup>22</sup> Nurma Fitrianingrum (Tifa Foundation), written correspondence with IRM, 29 November 2022.

<sup>23</sup> Redaski, “Progam Review Berbasis Masyarakat dari Japan Initiative,” Energyworld Indonesia, 23 May 2022, <https://energyworld.co.id/2022/05/23/progam-review-berbasis-masyarakat-dari-japan-initiative/>; Tifa Foundation, “Uji Coba Program Review,” Facebook, 2022, <https://www.facebook.com/tifafoundation/videos/5456302684483524>; Tifa Foundation, “Uji Coba Program Review di Kalurahan Sriharjo” [Review Program Trial in Sriharjo Village], YouTube, <https://www.youtube.com/watch?v=zHxFqcaLw0>.

<sup>24</sup> Fitrianingrum, written correspondence.

<sup>25</sup> “Laporan Pelaksanaan Model Inovasi Pelayanan Publik untuk Kelompok Marjinal, Pusat Inovasi Administrasi Negara” [Report on the Implementation of the Public Service Innovation Model for Marginalized Groups, Public Administration Innovation Center], Institute of Public Administration,

<https://drive.bappenas.go.id/owncloud/index.php/s/uAm0wHTQEr5kCRp?path=%2FKementerian%20-%20Lembaga#pdfviewer>.

<sup>26</sup> See Lakpesdam PCNU Bulukumba, Facebook, 29 March 2022, <https://hi.in.facebook.com/LakpesdamNUBulukumba/photos/3018682498446520/>; Nurun Nisa (Lakpesdam Nahdhatul Ulama), written correspondence with IRM, 12 December 2022.

<sup>27</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 52, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>. A number of ideas generated by this commitment and reported to OGI conflict with reports the Ministry made on its own website, where it identified 261 ideas of innovation. See <https://lan.go.id/?p=7395>.

<sup>28</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 53, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>; Fransisca Andeska Gladiaventa, “Kolaborasi dengan 2 Pemda, LAN Luncurkan 148 Inovasi di Kabupaten Merauke dan Nias Utara” [Collaborating with 2 Local Governments, LAN Launches 148 Innovations in Merauke and North Nias Regencies], Kompas.com, <https://nasional.kompas.com/read/2022/10/29/17562071/kolaborasi-dengan-2-pemda-lan-luncurkan-148-inovasi-di-kabupaten-merauke-dan>.

<sup>29</sup> Nisa, written correspondence.

<sup>30</sup> “Government Regulation No. 39 of 2020,” Cabinet Sekretariat, 3 December 2020, <https://setkab.go.id/en/govt-passes-several-regulations-on-persons-with-disabilities-to-realize-inclusive-development/>.

<sup>31</sup> Ministry of National Development Planning, <https://drive.bappenas.go.id/owncloud/index.php/s/BYqQTrhn7IjHOAp>.

<sup>32</sup> Ministry of National Development Planning, <https://drive.bappenas.go.id/owncloud/index.php/s/n4vqRW8zchq2e5g>.

<sup>33</sup> Ministry of National Development Planning, <https://drive.bappenas.go.id/owncloud/index.php/s/l7LTSgCRM9Zvw35>.

<sup>34</sup> Ministry of National Development Planning, <https://drive.bappenas.go.id/owncloud/index.php/s/RTorSZTSWFa7sJW>.

<sup>35</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 57–64, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

<sup>36</sup> Dio Ashar Wicaksana (Indonesian Judicial Research Society), interview with IRM, 17 October 2022; Maharani Putri S. Wibowo, Theodorus Agustinus Hasiholan, Andrieta Rafaela Arifin, and Armita Tri Yuniasningrum (Open Government Indonesia Sekretariat), focus group discussion with IRM, 19 September 2022; Gina Sabrina (PBHI Indonesia Legal Aid and Human Rights Association), interview with IRM, 8 December 2022.

<sup>37</sup> Joni Yulianto (SIGAB Disability Advocacy Movement & Inclusion Space), interview with IRM, 15 December 2022.

<sup>38</sup> Wicaksana, interview.

<sup>39</sup> Yulianto, interview.

<sup>40</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 67–72, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

<sup>41</sup> “Indonesia Design Report 2018–2020,” OGP, 6 July 2020, <https://www.opengovpartnership.org/documents/indonesia-design-report-2018-2020/>.

<sup>42</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 67–72, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

<sup>43</sup> Gina Sabrina, interview.

<sup>44</sup> The IRM received this information from Open Government Indonesia during the pre-publication period (23 April 2023).

<sup>45</sup> Wicaksana, interview.

<sup>46</sup> Masan Nurpian (National Law Development Agency), interview with IRM, 2 November 2022.

<sup>47</sup> Dio Ashar Wicaksana et al., *Index of Access to Justice in Indonesia* (Indonesia: Civil Society Consortium for the Index of Access to Justice), <http://ijrs.or.id/wp-content/uploads/2020/04/A2J-2019-Book-English.pdf>.

<sup>48</sup> “Perluasan Akses dan Kapasitas Layanan Bantuan Hukum” [Expansion of Access and Capacity of Legal Aid Services], Ministry of National Development Planning, [https://drive.bappenas.go.id/owncloud/index.php/s/xLUAKiNHDxmpW9T?path=%2FKL%2FKemenkumham%20\(BPHN\)%2FUK%201#pdfviewer](https://drive.bappenas.go.id/owncloud/index.php/s/xLUAKiNHDxmpW9T?path=%2FKL%2FKemenkumham%20(BPHN)%2FUK%201#pdfviewer).

<sup>49</sup> Sabrina, interview.

<sup>50</sup> “Paralegal Dalam Pemberian Bantuan Hukum” [Paralegals in Providing Legal Aid], <https://peraturan.bpk.go.id/Home/Details/170944/permenkumham-no-3-tahun-2021>.

<sup>51</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 73–82, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.

- <sup>52</sup> “Perluasan Akses dan Kapasitas” [Expansion of Access and Capacity], [https://drive.bappenas.go.id/owncloud/index.php/s/xLUAKiNHDXmpW9T?path=%2FKL%2FKemenkumham%20\(BPHN\)%2FUk%203#pdfviewer](https://drive.bappenas.go.id/owncloud/index.php/s/xLUAKiNHDXmpW9T?path=%2FKL%2FKemenkumham%20(BPHN)%2FUk%203#pdfviewer).
- <sup>53</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 73–82, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>; Sabrina, interview.
- <sup>54</sup> Wicaksana, interview; Sabrina, interview; Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion.
- <sup>55</sup> Sabrina, interview.
- <sup>56</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 83–90, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.
- <sup>57</sup> Sabrina, interview.
- <sup>58</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 83–90, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>; Nurpian, interview.
- <sup>59</sup> Sabrina, interview.
- <sup>60</sup> Wicaksana, interview.
- <sup>61</sup> “Penguatan Dukungan Penyelenggaraan Bantuan Hukum untuk Akses Informasi” [Strengthening Support for the Implementation of Legal Aid for Access to Information], Ministry of National Development Planning, <https://drive.bappenas.go.id/owncloud/index.php/s/zNkRMtMaXaHV7Wu?path=%2FKL%2FKemenkumham#pdfviewer>; Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 91–98, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>; Nurpian, interview; Sabrina, interview.
- <sup>62</sup> “Laporan Tahunan” [Annual Report], Information Commission, <https://komisiinformasi.go.id/v2/laporan-tahunan> (accessed 23 May 2023).
- <sup>63</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 91–98, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.
- <sup>64</sup> Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion.
- <sup>65</sup> “Panduan Fasilitasi: Akuntabilitas Sosial di Desa” [Facilitation Guide: Accountability Social in the Village], Ministry of Village, Development of Disadvantaged Regions, and Transmigration, 2019, [https://sikompak.bappenas.go.id/pembelajaran/view/46/id/modul\\_kegiatan/Panduan%20Fasilitasi%20Akuntabilitas%20Sosial%20di%20Des/download.pdf](https://sikompak.bappenas.go.id/pembelajaran/view/46/id/modul_kegiatan/Panduan%20Fasilitasi%20Akuntabilitas%20Sosial%20di%20Des/download.pdf); <https://seknasfitra.org/panduan-fasilitasi-akuntabilitas-sosial-di-desa/>.
- <sup>66</sup> “Pelaporan Kegiatan RAN OGI B24 tahun 2022” [Report on OGI Action Plan B24 Activities for 2022], Ministry of Village, Development of Disadvantaged Regions, and Transmigration, December 2022, <https://drive.bappenas.go.id/owncloud/index.php/s/xoUyeNiBq62p4zx#pdfviewer>.
- <sup>67</sup> “Learning and Understanding Grass-Root Level Issues,” OGI News, 16 February 2021, <https://ogi.bappenas.go.id/storage/files/news/MELEREsJZDv0INI9euTnodFfAFLRSMmIkMsUWtzW.pdf>; “Finalisasi Bahan Bacaan Akuntabilitas Sosial” [Finalization of Social Accountability Reading Materials], 23 September 2021, Ministry of National Development Planning Indonesia, <https://drive.bappenas.go.id/owncloud/index.php/s/nCivt6Cv0OzNy4L>; “Akuntabilitas Sosial Di Masa Pandemi” [Social Accountability in Pandemic Time], OGI News, 21 June 2021, <https://ogi.bappenas.go.id/storage/files/news/fpOxfuquZNKmR4rbu0FtZJfW3oINcyiivL5pKEst.pdf>; “Penyusunan Indikator Kerangka Logis Score Card Akuntabilitas Sosial” [Formulation of Social Accountability Score Card Logical Framework Indicators], Ministry of National Development Planning Indonesia, 19 October 2021, <https://drive.bappenas.go.id/owncloud/index.php/s/bX6RaOggS8vkcGB>; Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 95–111, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.
- <sup>68</sup> The IRM contacted Wahana Visi on 1 December 2022, 11 January 2023, and 25 January 2023, but did not receive a reply.
- <sup>69</sup> See <https://infopemilu.kpu.go.id/>.
- <sup>70</sup> See <https://opendata.kpu.go.id/>.
- <sup>71</sup> Open Government Indonesia Sekretariat, “Laporan Monitoring dan Evaluasi Rencana,” [Monitoring and Evaluation Report], 112–18, <https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.
- <sup>72</sup> “Menuju Keterbukaan Data Pemilu yang Memenuhi Prinsip Data Terbuka,” Perludem, November 2021. Mahardhika Pratama & Heroik Pratama (Perludem), interview with IRM, 21 September 2022.
- <sup>73</sup> “Section 3: Key Election Process Categories,” Open Election Data Initiative, <https://openelectiondata.net/en/guide/key-categories/>
- <sup>74</sup> Mahardhika Pratama & Heroik Pratama (Perludem), correspondence with IRM, 4 January 2023.

- <sup>75</sup> In Indonesia, votes from polling stations are counted, and then, during the recapitulation process, votes are gathered and recounted at the district, subdistrict, and provincial levels.
- <sup>76</sup> Pratama & Pratama, interview.
- <sup>77</sup> Wibowo, Hasiholan, Arifin, and Yuniasningrum, focus group discussion; Pratama & Pratama, interview.
- <sup>78</sup> Levy Dhynianti (Ministry of Health), written correspondence with IRM, 15 January 2023.
- <sup>79</sup> Ministry of National Development Planning, Indonesia  
<https://drive.bappenas.go.id/owncloud/index.php/s/OXS7zaaZLIHGA1c?path=%2FKementerian%20-%20Lembaga#pdfviewer>; Open Government Indonesia Sekretariat, "Laporan Monitoring dan Evaluasi Rencana," [Monitoring and Evaluation Report], 119–24,  
<https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.
- <sup>80</sup> Dhynianti, written correspondence.
- <sup>81</sup> Eryvn Kaffah (FITRA Indonesian Forum for Budget Transparency), interview with IRM, 18 November 2022; Nandhi Endrayanto, Budi Satrio, et al. (Ministry of Finance), focus group discussion with IRM, 23 November 2022.
- <sup>82</sup> See <https://keuda.kemendagri.go.id/datin/index/8/2020>.
- <sup>83</sup> See <https://pen.kemenkeu.go.id/in/page/data-realisasi>; Kaffah, interview.
- <sup>84</sup> "Budget Credibility in Response to Covid-19 in Indonesia," International Budget Partnership (IBP), June 2021, <https://internationalbudget.org/covid/wp-content/uploads/2021/08/Indonesia-Brief-Managing-COVID-Funds-English.pdf>.
- <sup>85</sup> The IRM received this information from Nandhi Endrayanto during the public comment period (21 June 2023).
- <sup>86</sup> Eryvn Kaffah, Seknas, interview with IRM, 18 November 2022.
- <sup>87</sup> "Capaian Target B06 atau Semester I Tahun 2021 Rencana Aksi Nasional Open Government Indonesia 2020–2022 Terlaksananya Pelibatan Masyarakat Yang Bermakna Dalam Penyusunan Kajian Substansi, Naskah Akademik Dan RUU KKR" [Achievement of Target B06 or Semester I of 2021 Open Government Indonesia National Action Plan 2020–2022 Implementation of Meaningful Community Involvement in the Preparation of Substance Studies, Academic Papers and the TRC Bill], Ministry of National Development Planning,  
<https://drive.bappenas.go.id/owncloud/index.php/s/Ad8yRIDPv6g05jx?path=%2FKementerian%20-%20Lembaga#pdfviewer>; Open Government Indonesia Sekretariat, "Laporan Monitoring dan Evaluasi Rencana," [Monitoring and Evaluation Report], 132,  
<https://drive.bappenas.go.id/owncloud/index.php/s/lnElp1v1TS3RMJi#pdfviewer>.
- <sup>88</sup> Arifin, written correspondence.
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