

# **Independent Reporting Mechanism**

Results Report:  
Indonesia 2022–2024

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

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## Executive Summary

**Indonesia’s seventh action plan took steps toward improving access to justice for vulnerable groups and beneficial ownership transparency, particularly for companies in high-risk sectors. Compared to the previous cycle, this plan achieved a higher level of completion, but a lower level of early results. Strengthening the legal basis for Open Government Indonesia could secure government support and strengthen the sustainability of open government reforms.**

### Implementation

Compared to the previous action plan, this plan achieved a higher level of completion, but a lower level of early results. This indicates the need to re-engage momentum for future open government reforms with more ambitious scope. Overall, 11 of the 15 commitments were either fully or substantially completed, and 6 achieved moderate early results. All three commitments identified as promising in the Action Plan Review were substantially or fully completed. Among these, Commitment 14 did not produce early results as collaboration with civil society fell short of open government objectives.

The strongest early results emerged from Commitments 2, 11, and 13. Under Commitment 2, over 97% of companies in high-risk sectors disclosed their beneficial ownership information. Commitment 11 introduced guidelines to guarantee proper accommodations for persons with disabilities by the Attorney General’s Office, while Commitment 13 took steps towards improving legal aid for vulnerable groups. These commitments benefited from alignment with implementers’ capacities, robust funding, and prioritization and collaboration by government and civil society organizations (CSOs).

Three other commitments took positive steps as well, but their results had narrower scope. Commitment 1 integrated beneficial ownership information into a government procurement database, Commitment 5 launched a mechanism to handle disinformation complaints during elections, and Commitment 9 piloted good governance practices in five villages.

### At a Glance

#### LEVEL OF COMPLETION

**11/15**

**Complete or substantially complete commitments**

#### EARLY RESULTS

**6/15**

**Commitments with early results**

**0/15**

**Commitments with significant results**

#### KEY OBSERVATIONS

- Strengthening the legal basis for Open Government Indonesia could improve commitment results.
- Commitments spanning multiple action plans fostered collaboration and implementation but could go further to achieve reforms’ objectives.
- Stronger mechanisms to address gaps in communication could benefit open government results.

**Compliance with minimum requirements during implementation: Yes**

## Participation and Co-Creation

Indonesia's OGP process is overseen by a multi-stakeholder board of directors and supported by the Open Government Indonesia (OGI) Secretariat under the Ministry of National Development Planning (Bappenas) along with an OGI-CSO Secretariat. OGI shifted from the Directorate of State Apparatus and Bureaucratic Transformation to the Directorate of Foreign Affairs and International Development Cooperation in January 2024.<sup>1</sup> This did not impact OGI coordination efforts with other government bodies. Strengthening the legal basis for OGI could secure government support and strengthen the sustainability of open government reforms.

Co-creation benefited from long-term relationships between government and civil society partners whose collaboration has now spanned multiple action plan cycles. During action plan design, there were improvements in outreach and reasoned response to civil society. During implementation, there was some decline in civil society interest compared to previous cycles. Half of commitment milestones incorporated active government-civil society collaboration, while others saw communication issues emerge. Some CSOs became less engaged due to lack of funding and a perceived lack of commitment by their government partners. Frequent changes in contact persons within both government entities and CSOs also negatively impacted collaboration. However, the process benefited from improvements in monitoring. Strong success metrics allowed for six-monthly evaluation of commitment implementation through meetings of the board of directors alongside government and civil society implementers.

## Implementation in Context

In 2024, elections for the presidency and national parliament as well as subnational parliaments and chiefs (governor, mayor, and regents) were held simultaneously for the first time in Indonesia. This context motivated the creation of Commitments 5 and 6 on election integrity and disinformation. It also affected government operations as preparing the elections demanded significant attention and financial resources.<sup>2</sup> Following the elections, reconfiguration of ministries required considerable effort from government stakeholders to adjust to new structures and authorities.<sup>3</sup> In the aftermath, observers noted lower prioritization of the OGP process.<sup>4</sup>

The operating environment for civil society faced restrictions and funding shortfalls during the action plan cycle. While Civicus continued to assess Indonesia's civic space as obstructed,<sup>5</sup> the action plan did not fully take up the opportunity to strengthen civic space. CSOs and think tanks observed restrictions on civil liberties and political expression, including diminished space to exercise political oversight and dissent against government policies.<sup>6</sup> Meanwhile, international donor funding for democracy promotion in Indonesia continued the downward trajectory from the past decade,<sup>7</sup> further restricting funding opportunities for CSOs focused on transparency, participation, and accountability. To some degree, this impacted the funding for OGP commitments implementation, especially CSO-led activities.

Finally, the national action plan was accompanied by local open government efforts. To date, Indonesia has eight OGP Local members, with three that joined in 2024 (Madiun, West Java, and Yogyakarta). During the implementation period, five completed local OGP action plans which comprised a total of 20 commitments (Banggai, Brebes, Semarang, West Nusa Tenggara, and West Sumbawa). Many of these focused on public service delivery, inclusion of underrepresented groups, and open data.<sup>8</sup>

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<sup>1</sup> Theodorus Agustinus Hasiholan (Open Government Indonesia Secretariat), correspondence with IRM, 9 April 2025.

<sup>2</sup> Arnoldus Kristianus, “Indonesia Spends Rp 59 Trillion on Elections and Counting,” The Jakarta Globe, 26 April 2024, <https://jakartaglobe.id/news/indonesia-spends-rp-59-trillion-on-elections-and-counting>.

<sup>3</sup> Fika Ramadhani, “How will Indonesia cope with Subianto's bloated government?” Deutsche Welle, 21 October 2024, <https://www.dw.com/en/indonesian-president-prabowo-subiantos-bloated-government-could-lead-to-more-inefficiency/a-70553653>.

<sup>4</sup> Faye Pasaribu, Nea Ningtyas, and Nathaniel Rayestu, “Indonesia helped launch Open Government—why are we now falling behind?” Think Policy, 9 June 2025, <https://thinkpolicy.substack.com/p/indonesia-helped-launch-open-governmentwhy>.

<sup>5</sup> “Civic Space Monitor: Indonesia,” Civicus, accessed 28 May 2025, <https://monitor.civicus.org/country/indonesia>.

<sup>6</sup> Robertus Robet, Ihsan Ali Fauzi, and Raditya Darningtyas, “NGOs say civic space shrinking fast in Indonesia,” University of Melbourne, 26 September 2023, <https://indonesiaatmelbourne.unimelb.edu.au/ngos-say-civic-space-shrinking-fast-in-indonesia>; “Freedom in the World 2025: Indonesia,” Freedom House, accessed 29 May 2025, <https://freedomhouse.org/country/indonesia/freedom-world/2025>.

<sup>7</sup> Ben Davis, “Financial Sustainability and Funding Diversification: The Challenge for Indonesian NGOs,” International Journal of Voluntary and Nonprofit Organisations (5), 2013, p. 1–26.

<sup>8</sup> “OGP Local,” Open Government Partnership, accessed 29 May 2025, <https://www.opengovpartnership.org/ogp-local>.

## Section I. Key Observations

The key observations below offer reflections from Indonesia seventh action plan cycle. These lessons aim to support Indonesia’s future action plans and broader open government journey.

### **Observation 1: Strengthening the legal basis for Open Government Indonesia could improve commitment results.**

With over a decade of OGP membership, some Indonesian government bodies have become long-time commitment holders, such as the National Public Procurement Agency (LKPP) and the National Law Development Agency (BPHN). However, not all government bodies are aware of OGP, and some commitment holders have not integrated OGP initiatives into their respective government work plans. Meanwhile, the implementation of certain action plan commitments is dependent on resources from civil society organizations (CSOs), which in turn depend on international donors. The legal framework for OGP in Indonesia was Presidential Decree No. 13/2014 and National Development Planning (Bappenas) Ministerial Decree No. 288/2018 – but the ministerial decree was outdated during the implementation period. This framework affirmed Indonesia's membership in OGP, but did not give OGI the authority to require action from ministries and government agencies.<sup>1</sup> Although CSOs and Bappenas have drafted a Presidential Regulation on the National Strategy for Openness, along with an accompanying roadmap, it was not incorporated into the 2025 Presidential Regulation Drafting Program as outlined in Presidential Decree No. 5/2025.<sup>2</sup> By July 2025, efforts were underway to update the ministerial decree. Formal institutionalization of OGI through a presidential decree and alignment of the updated ministerial decree with the OGP Participation and Co-Creation Standards could improve OGP commitment results, alignment with government priorities and work plans, and access to dedicated funding.<sup>3</sup>

### **Observation 2: Commitments spanning multiple action plans fostered collaboration and implementation but could go further to achieve reforms’ objectives.**

Several commitments built on long-term efforts from previous action plans, such as those on procurement transparency (Commitment 1), beneficial ownership transparency (Commitment 2), local social accountability (Commitments 8 and 9), and legal aid (Commitments 12 and 13). This sustained approach fostered strong collaboration between government and civil society, as stakeholders developed deeper understanding of each other's goals and perspectives. The commitments were also better designed than previous action plans, listing expected outputs for each milestone. This benefited the commitments’ implementation process, with most having been substantially or fully completed by the end of the cycle. However, the focus on outputs sometimes overlooked outcomes as overarching ambitions for reform have yet to be realized. To achieve more substantial results, future commitments would benefit from developing a framework for longer-term strategies, building stronger links between reform objectives and milestones, incorporating OGP commitments into government work plans, and broadening participation by the public—building on outreach efforts such as OGI Goes to Campus, OGI Talks, and Open Government Week.

### **Observation 3: Stronger mechanisms to address gaps in communication could benefit open government results.**

While the action plan had a strong implementation rate, a handful of commitments saw limited completion because government and civil society failed to reach an agreement or worked independently without effective coordination, as with Commitments 3, 6, and 8. When gaps in communication emerged, there was not a strong mechanism in place to bring government and civil society together. CSOs often had to make concerted effort to build communication with their government counterparts. The OGI Secretariat is uniquely positioned to bridge this communication gap but could take a more proactive role as a coordinating body if it had access to sufficient resources and strong, delegated authority.

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<sup>1</sup> “Indonesian Civil Society Calls for Strengthened Regulations and the Sustainability of Open Government Indonesia Amidst Global and Regional Challenges,” Indonesia Judicial Research Society, 14 February 2025, <https://ijrs.or.id/en/2025/02/14/indonesian-civil-society-calls-for-strengthened-regulations-and-the-sustainability-of-open-government-indonesia-amidst-global-and-regional-challenges-2>; cf. “IRM Co-Creation Brief: Indonesia 2024,” Open Government Partnership, 4 November 2024, [https://www.opengovpartnership.org/wp-content/uploads/2024/11/Indonesia\\_Co-Creation-Brief\\_2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/11/Indonesia_Co-Creation-Brief_2024_EN.pdf), p. 2.

<sup>2</sup> “Keppres 5/2025: Program Penyusunan Peraturan Presiden Tahun 2025,” [Presidential Decree No. 5/2025: Presidential Decree Development Program for 2025], Coordinating Ministry for Maritime Affairs and Investment of Indonesia, 12 February 2025, <https://jdih.maritim.go.id/berita/keppres-52025-program-penyusunan-peraturan-presiden-tahun-2025>.

<sup>3</sup> “IRM Co-Creation Brief: Indonesia 2024,” Open Government Partnership.

## Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments’ objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

### Table 1. Commitments with Early Results

<b>Commitment 2:</b> Under this commitment, over 97% of high-risk corporations disclosed their beneficial ownership information.
<b>Commitment 11:</b> This commitment introduced guidelines to guarantee proper accommodations for persons with disabilities by the Attorney General’s Office
<b>Commitment 13:</b> This commitment trained legal aid providers on services for vulnerable populations and incorporated public participation into an impending amendment of the Legal Aid Law.

### Commitment 2: Beneficial Ownership Data Disclosure

**Implementers:** Ministry of Law and Human Rights, Executive Office of the President, Financial Transaction Reports and Analysis Center, Ministry of Investment, National Secretariat for Corruption Prevention, Ministry of Energy and Mineral Resources, Ministry of Environment and Forestry, Ministry of Agriculture, Ministry of Agrarian Affairs and Spatial Planning, Ministry of Finance, Publish What You Pay Indonesia, Transparency International Indonesia, Indonesia Corruption Watch.

#### Context and Objectives

Continuing the previous three OGP action plans’ progress, this commitment aimed to strengthen information on the Ministry of Law and Human Rights online registry of beneficial owners – those who ultimately control or profit from a business. The registry launched in 2019 under the fifth action plan, and was the first in Southeast Asia.<sup>1</sup> It includes information on beneficial owners, such as their names, correspondence address, and nature of interests.<sup>2</sup> It 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), as well as the national Extractive Industries Transparency Initiative’s (EITI) beneficial ownership roadmap. Prior to this commitment, by August 2022, approximately 29% of Indonesian entities had disclosed their beneficial ownership information.<sup>3</sup> Transparency International noted that improving beneficial ownership transparency has been a priority, particularly as corruption has raised the risk of harmful natural resource exploitation.<sup>4</sup> The commitment’s implementation surpassed its initial design, which did not offer clear milestones.<sup>5</sup>

#### Early Results: Moderate

This commitment achieved moderate early results, disclosing new beneficial ownership information from corporations in the high-risk sectors of construction, trade, financial investment, and mining. During the implementation period, the National Secretariat for Corruption Prevention (Setnas PK) made its first concerted effort to raise the disclosure rate in these sectors and reported an increase to over 97% of relevant corporations by February 2025. These comprised 921 of 1,050 companies in construction (88%), 57 of 60 in trade (95%), 1,670 of 1,695 in financial investment (98%), and all 1,323 in mining (100%).<sup>6</sup> Beyond these sectors, the disclosure rate was

lower, but increased to some degree; reaching nearly 40% across all Indonesian entities by the end of 2024, according to EITI.<sup>7</sup> Setnas PK also reported progress on integrating government agencies into the Ministry of Law and Human Rights registry,<sup>8</sup> although there were still discrepancies between beneficial ownership data maintained by different agencies.<sup>9</sup>

From the perspectives of the OGI Secretariat and Setnas PK, this commitment advanced the overall landscape of beneficial ownership transparency.<sup>10</sup> EITI noted that the increasing rate of disclosure was motivated, in part, by compliance mechanisms as seen in the Ministry of Energy and Mineral Resources' refusal to issue licenses to companies that do not submit their beneficial ownership information.<sup>11</sup> CSOs specializing in anti-corruption and environmental issues reported leveraging beneficial ownership information to combat money laundering and terrorist financing, particularly by identifying politically exposed persons within mining company ownership networks during the 2024 election.<sup>12</sup> They explained that their efforts to track illicit finance often started with the beneficial owner listed on the registry.<sup>13</sup> Progress on beneficial ownership transparency also played a role in Indonesia's recognition as a member state of the Financial Action Task Force (FATF) in late 2023.<sup>14</sup>

By the end of the action plan cycle, there were still gaps in transparency. Most entities had not yet disclosed their beneficial ownership, and there was not yet a system in place to verify this data.<sup>15</sup> During this period, there were conflicting efforts to withhold this data under the guise of personal data confidentiality, and reporting by corporate nominees<sup>16</sup> complicated swift identification of beneficial owners.<sup>17</sup> Stakeholders also reported challenges in retrieving information from foreign owners and lack of reporting of politically exposed persons.<sup>18</sup>

However, progress continued beyond the action plan cycle. In February 2025, the government issued a new regulation (Ministry of Law<sup>19</sup> Regulation No. 2/2025) which introduced a verification process for beneficial ownership information, established a structured system of administrative sanctions, and expanded the entities required to release information to include civil partnerships.<sup>20</sup> Both Indonesia Corruption Watch and the Padjadjaran Institute for Legal and Policy emphasized that effective verification of disclosures, enforcement of sanctions, and switching the legal foundation from a presidential regulation to a law could further improve access to beneficial ownership information in Indonesia.<sup>21</sup>

## 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. 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, published a beneficial ownership transparency roadmap in 2016 to meet EITI requirements, and hosted the EITI Beneficial Ownership Global Conference in 2017. To build momentum, the OGP process aligned relevant commitments with Stranas PK, recommendations from the Financial Action Task Force, and relevant legislations.<sup>22</sup>

Moving forward, the Ministry of Law could use future commitments to:

- **Implement the new beneficial ownership regulation.** With the new Ministry of Law Regulation No. 2/2025, ensure that a strong verification mechanism and system of sanctions are applied in practice to significantly raise the rate of disclosures and ensure accuracy. Involving CSOs and business entities, especially for sectors with low compliance rates, could be beneficial. In the longer term, establishing a relevant law,

instead of relying solely on a presidential regulation, could grant the state the authority to impose criminal penalties on beneficial owners who violate the regulations.

- **Support public participation in relevant anti-corruption efforts.** Provide channels for civil society to report discrepancies based on information in the beneficial ownership transparency register. At the same time, the government can ensure legal protections and prevent the criminalization of civil society members conducting anti-corruption research on beneficial ownership by establishing strong legal policies.<sup>23</sup>

## Commitment 11: Accessibility and Accountability of Judicial Proceedings

**Implementers:** Supreme Court, Attorney General’s Office, National Police, Indonesia Judicial Research Society, Indonesian Legal Aid and Human Rights Association, Indonesian Women for Justice Legal Aid Foundation.

### Context and Objectives

This commitment aimed to introduce guidelines to guarantee proper accommodation for persons with disabilities by the Attorney General’s Office. It built on the previous action plan, which developed these guidelines and issued a related Supreme Court circular letter and correctional institutions’ regulation.<sup>24</sup> It also sought to pilot a process for monitoring and evaluating how women are treated in the legal system as well as the digitization of judicial proceedings for vulnerable persons.<sup>25</sup> The commitment was proposed by civil society groups, in line with government priorities,<sup>26</sup> to improve access to justice for vulnerable populations.

A 2022 study found that persons with disabilities faced discrimination in Indonesia’s judicial system as police, lawyers, and judges were often unaware of their specific needs and did not offer necessary accommodation.<sup>27</sup> Furthermore, the 2019 Indonesia Access to Justice Index showed that when faced with legal problems, women were less likely than men to resolve their issues either through informal or formal mechanisms; with one-third of women choosing to avoid legal action and 46% not taking action in discrimination and gender-based violence cases.<sup>28</sup>

### Early Results: Moderate

The commitment was fully completed and had moderate early results on access to justice guidelines. The Attorney General’s Office issued Guideline No. 2/2023 focusing on Adequate Accommodations and Inclusive Case Handling for Persons with Disabilities in Judicial Processes.<sup>29</sup> The guidelines are a fundamental tool for enhancing accessibility and accountability in the judicial system, as anticipated by many government and civil society stakeholders.<sup>30</sup>

Following their issuance, several groups of prosecutors were trained on the guidelines.<sup>31</sup> The Center for Human Rights Studies at Universitas Islam Indonesia (Pusham UII), though not directly involved as a commitment implementer, built practical capacity on fair trials for persons with disabilities by holding trainings with the Attorney General’s Office’s Education and Training Center, the Supreme Court’s Law and Justice Education and Training Center, and the National Police’s Education Training Center.<sup>32</sup> However, according to the Indonesia Judicial Research Society (IJRS), by mid-2025, there was not yet information available on the guidelines’ rollout and to what degree they had improved access to justice for persons with disabilities.<sup>33</sup>

Additionally, the Supreme Court and Attorney General’s Office collaborated with CSOs to monitor and evaluate how women facing legal issues are treated. Meanwhile, IJRS conducted a study on the digitization of judicial proceedings for vulnerable persons, which was submitted to the

Supreme Court and presented to the National Police.<sup>34</sup> However, the Supreme Court and National Police had not acted on the research findings by the end of the implementation period.<sup>35</sup>

Progress on the commitment benefited from collaboration between government and civil society. The Supreme Court and the Attorney General’s Office joined CSOs in leading the commitment’s reforms, but some stakeholders remained unfamiliar with OGI and the National Police did not engage as implementers had hoped.<sup>36</sup>

### Looking Ahead

This commitment continued the strong cooperation between government and civil society organizations specialized on access to justice. Through the engagement of a coalition of CSOs, Indonesia’s recent action plans include a number of commitments aimed at improving the accessibility of the judicial process and legal aid provision. With IJRS as the coordinator of the OGI CSO Secretariat, access to justice continues to be a prominent feature of Indonesia’s open government work.

To further strengthen the commitment’s real world improvements to access to justice for persons with disabilities, the Supreme Court and the Attorney General’s office could:

- **Allocate adequate resources towards the implementation of disability accommodation guidelines.** Internal incentives, such as data collection, could encourage compliance with the guidelines. The government could also involve civil society in its oversight and provide mechanisms for CSOs to report any delays or shortcomings in implementation.
- **Implement recommendations** produced by the commitment’s analyses regarding the treatment of women in the legal system and the digitization of legal proceedings for vulnerable populations.
- **Create sustainable feedback loops** for persons with disabilities, women, and vulnerable populations to report their access to justice needs and suggestions to the Supreme Court and Attorney General’s Office, for instance through a regular user satisfaction survey.

In addition, including CSOs that maintain effective communication with law enforcement could open a pathway to improving engagement with the National Police in future commitments.

## Commitment 13: Strengthening Legal Aid Provision for Vulnerable Persons in Indonesia

**Implementers:** National Law Development Agency, Ministry of Law and Human Rights, Indonesia Judicial Research Society, Indonesian Legal Aid and Human Rights Association, Indonesian Women for Justice Legal Aid Foundation.

### Context and Objectives

The commitment aimed to prepare input for updating the Legal Aid Law by involving civil society in mapping the needs of vulnerable persons. The commitment also aimed to build the capacity of legal aid providers to effectively serve these groups.<sup>37</sup> Under the previous action plan, collaboration between government and CSOs resulted in a regulation requiring legal aid providers to assess the vulnerabilities of aid recipients and legal requirements in relation to specific needs. However, unclear legal definition of vulnerable groups led to a lack of disaggregated data, while information on how vulnerable groups define their legal problems remained limited.<sup>38</sup>

**Early Results:** Moderate

This commitment was fully completed and had moderate early results on building the capacity of legal aid providers to serve vulnerable populations. It delivered a training program for legal aid providers in three of Indonesia's 38 provinces. While there have been similarly themed trainings in the past,<sup>39</sup> the commitment expanded the scope of issues covered.<sup>40</sup> It included new topics such as the Sexual Violence Crime Law, the Attorney's General Office's Guideline for Women and Children, legal aid service standards for vulnerable groups, and the Minister of Law and Human Rights' Regulation No. 4/2021 on Legal Aid Service Standards.<sup>41</sup> According to the Indonesia Judicial Research Society (IJRS), this was an important opportunity for providers to learn about how to better provide legal aid to vulnerable groups, and about the principles of gender equality, disability, and social inclusion.<sup>42</sup> However, the IRM did not find any evidence on how legal aid providers have applied the results of their trainings to improve access to justice.

The commitment also brought public participation into a proposed amendment to the Legal Aid Law. A consortium of CSOs surveyed 1,020 respondents from vulnerable groups in three provinces (Jakarta, East Kalimantan, and East Nusa Tenggara).<sup>43</sup> The National Law Development Agency (BPHN) reflected their perspectives in its recommendations for the amendment. These were incorporated into the government's proposal, which was included in the 2025–2029 National Legislative Agenda (Prolegnas).<sup>44</sup> While the Legal Aid Law was not amended during the implementation period, its inclusion in the national legislative agenda opens the possibility for deliberation by the Legislation Committee of the House of Representatives (DPR RI).<sup>45</sup> If passed, it could enhance the inclusivity of the Legal Aid Law; enacting public suggestions collected from the survey on addressing the needs of vulnerable groups and improving legal aid providers' knowledge and skills. The surveys also provided much-needed disaggregated data on vulnerable groups' access to justice needs.

Implementation benefited from a strong relationship between government and civil society leads, along with robust financial support from international donors, solicited by CSO efforts. This collaboration was particularly apparent in BPHN's approach of involving collaborators such as IJRS, the Indonesian Legal Aid and Human Rights Association (PBHI), and the Indonesian Women for Justice Legal Aid Foundation (LBH APIK) in meetings to discuss the Legal Aid Law amendments. However, participation of the broader, grassroots community remained limited when perspectives differed on politically sensitive issues.<sup>46</sup>

## Looking Ahead

Similar to Commitment 11, this commitment built on strong cooperation between government and CSOs specialized on legal advocacy. Through the engagement of a coalition of CSOs, Indonesia's recent action plans include a number of commitments aimed at improving the accessibility of the judicial process and legal aid provision. With IJRS as the coordinator of the OGI CSO Secretariat, access to justice continues to be a prominent feature of Indonesia's open government work.

Moving forward, the implementers could:

- **Support passage of the amended Legal Aid Law** with backing from a wide group of stakeholders, particularly in parliament.<sup>47</sup> A broader alliance involving the government, CSOs, and lawmakers is necessary to encourage the parliament to complete the new legislation. Public backing and advocacy will play a crucial role in ensuring that members of parliament recognize the importance of passing the new law.
- **Widen capacity building programs for legal aid providers** to a broader range of areas and legal aid providers across Indonesia. Government stakeholders could consult with CSOs to assess which areas and legal aid providers would benefit from receiving this training. Future

trainings can focus on ensuring that legal aid providers are able to empower their clients to understand the law, navigate legal processes, and support their respective communities.

- **Create sustainable feedback loops** for clients to report their legal aid needs and suggestions, for instance through a regular user satisfaction survey.

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<sup>1</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/open-ownership-principles-in-use-in-indonesia>; “IRM Results Report: Indonesia 2020–2022,” Open Government Partnership, July 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/07/Indonesia\\_Results-Report\\_2020-2022\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/07/Indonesia_Results-Report_2020-2022_EN.pdf).

<sup>2</sup> Low and Rosidaini, “Beneficial Ownership Transparency in Indonesia: Scoping Study,” Open Ownership.

<sup>3</sup> Hani Rosidaini and Peter Low, “Beneficial ownership transparency in Indonesia: The current regime and next steps,” Opening Extractives, October 2022, <https://eiti.org/sites/default/files/2022-10/Beneficial%20ownership%20transparency%20Indonesia.pdf>;

Raudatul Jannah, “PWYP Indonesia Gave Notes In the Implementation of Beneficial Ownership Transparency,” Publish What You Pay Indonesia, 4 February 2023, <https://pwyvindonesia.org/en/pwyp-indonesia-gave-notes-in-the-implementation-of-beneficial-ownership-transparency>.

<sup>4</sup> Ferdian Yazid, “How Indonesian beneficial ownership advocates are helping fight corruption in extractive industries,” Transparency International Australia, 22 March 2021, <https://transparency.org.au/indonesia-beneficial-ownership-advocates-fight-corruption>.

<sup>5</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership, 11 October 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/10/Indonesia\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/10/Indonesia_Action-Plan-Review_2022-2024_EN.pdf).

<sup>6</sup> “Laporan Pelaksanaan Strategi Nasional Pencegahan Korupsi Triwulan VIII Tahun 2023-2024,” [Implementation Report of the National Strategy for Corruption Prevention Eighth Quarter of 2023–2024], National Secretariat for Corruption Prevention, accessed 28 January 2025, <https://stranaspk.id/publikasi/laporan-aksi/laporan-pelaksanaan-strategi-nasional-pencegahan-korupsi-triwulan-viii-tahun-2023-2024>, p. 16–17.

<sup>7</sup> “Indonesia scores 67 points in EITI implementation,” Extractive Industries Transparency Initiative, 12 November 2024, <https://eiti.org/news/indonesia-scores-67-points-eiti-implementation>.

<sup>8</sup> “Implementation Report of the National Strategy for Corruption Prevention Eighth Quarter of 2023–2024,” National Secretariat for Corruption Prevention, p. 16–17.

<sup>9</sup> “Validation of Indonesia: Final assessment of progress in implementing the EITI Standard,” Extractive Industries Transparency Initiative, 11 September 2024, [https://eiti.org/sites/default/files/2024-10/ENG\\_Final%20Indonesia%20Validation%20Report%20%282024%29.pdf](https://eiti.org/sites/default/files/2024-10/ENG_Final%20Indonesia%20Validation%20Report%20%282024%29.pdf), p. 48.

<sup>10</sup> Maharani Putri S. Wibowo, Theodorus Agustinus Hashiholan, and Monica Ayuningtyas (Open Government Indonesia Secretariat), interview by IRM, 13 February 2025; “Laporan Monitoring dan Evaluasi RAN OGI VII 2023–2024 Semester IV,” [OGI 7th Action Plan Monitoring and Evaluation Report 2023–2024 4th Semester], Open Government Indonesia Secretariat, accessed 25 February 2025, <https://drive.bappenas.go.id/owncloud/index.php/s/6cLpDuqSPU2bqqC#pdfviewer>.

<sup>11</sup> “Validation of Indonesia: Final assessment of progress in implementing the EITI Standard,” Extractive Industries Transparency Initiative, p. 47.

<sup>12</sup> For instance, see: Gita Ayu Atikah, Ferdian Yazid, and Haris Prabowo, “Transparency in Corporate Reporting: Penilaian Perusahaan Tambang di Indonesia,” [Transparency in Corporate Reporting: Assessment of Mining Companies in Indonesia], Transparency International Indonesia, July 2024, <https://ti.or.id/wp-content/uploads/2024/07/full-report-TRAC-Tambang.pdf>; “Jejaring Oligarki Tambang & Energi pada Pemilu 2024,” [Network of Mining & Energy Oligarchs in 2024 Elections], Mining Advocacy Network, 2024, <https://pemilu.jatam.org/Laporan-Pemilu-Oligarki-Tambang-Energi-2024.pdf>.

<sup>13</sup> Anonymous civil society stakeholder, interview by IRM, 14 January 2025; Anonymous civil society stakeholder, interview by IRM, 20 February 2025.

<sup>14</sup> “Feigning Transparency: Beneficial Ownership Disclosure by Indonesian Palm Oil Corporations,” Greenpeace Indonesia, January 2024, [https://www.greenpeace.org/static/planet4-southeastasia-stateless/2024/01/e48f4b54-beneficial\\_ownership\\_feigning\\_transparency.pdf](https://www.greenpeace.org/static/planet4-southeastasia-stateless/2024/01/e48f4b54-beneficial_ownership_feigning_transparency.pdf), p. 7.

<sup>15</sup> “OGI 7th Action Plan Monitoring and Evaluation Report 2023–2024 4th Semester,” Open Government Indonesia Secretariat.

<sup>16</sup> Corporate nominees are individuals who perform official duties or responsibilities for others in connection with corporate vehicles like companies, trusts, and various other legal entities or arrangements. See Stephen Abbott Pugh, “How to capture information on nominees in beneficial ownership data,” Open Ownership, 14 July 2023, <https://www.openownership.org/en/blog/how-to-capture-information-on-nominees-in-beneficial-ownership-data>.

<sup>17</sup> Anonymous civil society stakeholder, interview by IRM, 20 February 2025.

<sup>18</sup> “Validation of Indonesia: Final assessment of progress in implementing the EITI Standard,” Extractive Industries Transparency Initiative, p. 48.

<sup>19</sup> Following his inauguration in October 2024, President Prabowo Subianto announced a cabinet that reconfigured many existing ministries and introduced new ones. Among others, the Ministry of Law and Human Rights was split into three ministries: (1) Ministry of Law, (2) Ministry of Immigration and Corrections, and (3) Ministry of Human Rights. Beneficial ownership falls under the authority of the Directorate General of Legal Administration within the Ministry of Law.

<sup>20</sup> Inka Kirana and Natasha Christabel Ferdev, “Regulatory Update: Minister of Law Issues New Regulation on Verification and Supervision of Corporate Beneficial Ownership,” Lexology, 11 February 2025, <https://www.lexology.com/library/detail.aspx?g=bb78582c-3af0-4adc-80e8-50434da88021>.

<sup>21</sup> Mochamad Januar Rizki, “Perpres Beneficial Ownership Perlu Diatur Level UU,” [Beneficial Ownership Presidential Regulation Needs to be Legislated], Hukum Online, 8 February 2023, <https://www.hukumonline.com/berita/a/perpres-beneficial-ownership-perlu-diatur-level-uu-lt63e36e67b44e8>.

<sup>22</sup> “IRM Results Report: Indonesia 2020–2022,” Open Government Partnership.

<sup>23</sup> “Civil Society Urges Concrete Action to Strengthen the Implementation of Transparency in the Implementation of Beneficial Ownership after Indonesia Becomes a Member of the FATF,” Publish What You Pay, 23 November 2023, <https://pwpindonesia.org/en/civil-society-urges-concrete-action-to-strengthen-the-implementation-of-transparency-in-the-implementation-of-beneficial-ownership-after-indonesia-becomes-a-member-of-the-fatf>.

<sup>24</sup> “IRM Results Report: Indonesia 2020–2022,” Open Government Partnership.

<sup>25</sup> “11: Aksesibilitas dan Akuntabilitas Proses Peradilan di Indonesia,” [11: Accessibility and Accountability of Judicial Process in Indonesia], Open Government Indonesia Sekretariat, accessed 21 December 2024, [https://ogi.bappenas.go.id/RANVII/Komitmen\\_XI](https://ogi.bappenas.go.id/RANVII/Komitmen_XI).

<sup>26</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership.

<sup>27</sup> Mutiah Wenda Juniar, Arini Nur Annisa, Nanda Yuniza, and Andi Dahsyat, “The Issues of Implementing the Right Access to Justice for People with Disabilities,” *Awang Long Law Review* 5 (1), November 2022, p. 215–244.

<sup>28</sup> “Access to Justice Index in Indonesia 2019,” Civil Society Consortium for Access to Justice Index in Indonesia, May 2022, <http://ijrs.or.id/wp-content/uploads/2022/05/FINAL-INDEKS-A2J-ENGLISH-2022.pdf>, p. 114.

<sup>29</sup> “Pedoman Nomor 2 Tahun 2023 tentang Akomodasi yang Layak dan Penanganan Perkara yang Aksesibel dan Inklusif bagi Penyandang Disabilitas dalam Proses Peradilan,” [Guideline No. 2/2023 on Adequate Accommodations and Inclusive Case Handling for Persons with Disabilities in Judicial Processes], Attorney’s General Office of Indonesia, 2023, [https://jdih.kejaksaan.go.id/inventaris/berkas/berkas\\_NOMOR2TAHUN2023PHL.pdf](https://jdih.kejaksaan.go.id/inventaris/berkas/berkas_NOMOR2TAHUN2023PHL.pdf).

<sup>30</sup> Sonya Hellen Sinombor, “Pedoman Penanganan Perkara yang Aksesibel dan Inklusif Diluncurkan,” [Guidelines for Inclusive and Accessible Case Handling Launched], Kompas, 3 August 2023,

<https://www.kompas.id/baca/humaniora/2023/08/03/pedoman-penanganan-perkara-yang-aksesibel-dan-inklusif-diluncurkan>; Ferinda K. Fachri, “Tingkatkan Aksesibilitas Difabel, Kejaksaan Agung Luncurkan Pedoman No. 2 Tahun 2023,” [Attorney’s General Office Issues Guidelines No. 2/2023 to Improve Disability Access], Hukum Online, 4 August 2023, <https://www.hukumonline.com/berita/a/tingkatkan-aksesibilitas-difabel-kejaksaan-agung-luncurkan-pedoman-no-2-tahun-2023-lt64ccd07a9876d>.

<sup>31</sup> Arsa Ilmi Budiarti (Indonesia Judicial Research Society), correspondence with IRM, 27 May 2025.

<sup>32</sup> “Melayani Penyandang Disabilitas: Tugas Aparat Kejaksaan,” [Serving Persons with Disabilities: Duties of the Attorney’s General Office], Center for Human Rights Studies of Universitas Islam Indonesia, accessed 2 June 2025, <https://pusham.uui.ac.id/wp-content/uploads/2024/05/kejaksaan.pdf>; “Pendidikan dan Pelatihan tentang Peradilan yang Fair bagi Penyandang Disabilitas Berhadapan dengan Hukum di Diklat Reserse Lemdiklat Polri,” [Education and Training on Fair Trials for Persons with Disabilities at National Police Education and Training Center], Center for Human Rights Studies of Universitas Islam Indonesia, accessed 2 June 2025, <https://pusham.uui.ac.id/pendidikan-dan-pelatihan-tentang-peradilan-yang-fair-bagi-penyandang-disabilitas-berhadapan-dengan-hukum-di-diklat-reserse-lemdiklat-polri>.

<sup>33</sup> Budiarti, correspondence.

<sup>34</sup> “Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024,” Open Government Indonesia Sekretariat.

<sup>35</sup> “Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024,” Open Government Indonesia Sekretariat.

<sup>36</sup> Arsa Ilmi Budiarti, Arianda Lastiur, and Gregorius Yoseph Laba (Indonesia Judicial Research Society), interview by IRM, 15 January 2025.

<sup>37</sup> “Indonesia Open Government Partnership National Action Plan 2023–2024,” Open Government Indonesia Sekretariat, 31 December 2022, [https://www.opengovpartnership.org/wp-content/uploads/2023/01/Indonesia\\_Action-Plan\\_2023-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/01/Indonesia_Action-Plan_2023-2024_EN.pdf).

- <sup>38</sup> “13: Strengthening Legal Aid Provision for Vulnerable Persons in Indonesia,” Open Government Indonesia Secretariat, accessed 21 December 2024, [https://ogi.bappenas.go.id/en/RANVII/Komitmen\\_XIII](https://ogi.bappenas.go.id/en/RANVII/Komitmen_XIII); “Indonesia Open Government Partnership National Action Plan 2023–2024,” Open Government Indonesia Secretariat, p. 60–62; “Mengenal Survei Kebutuhan Hukum bagi Kelompok Rentan,” [Survey to Understand the Legal Needs of Vulnerable Populations], Indonesia Judicial Research Society, accessed 17 December 2024, <https://ijrs.or.id/wp-content/uploads/2023/05/Infografis-mengenal-Survei-Kebutuhan-Hukum-bagi-Kelompok-Rentan.pdf>.
- <sup>39</sup> See Dio Ashar Wicaksana, Bestha Inatsan A., Nanda Oktaviani, et al., “Catatan Perjalanan IJRS 2019–2021: Mendorong Perubahan Kebijakan Berbasis Bukti,” [IJRS Journey 2019–2021: Enabling Change for Evidence-Based Policy], Indonesia Judicial Research Society, 15 March 2022, <https://ijrs.or.id/wp-content/uploads/2022/04/Lapah-IJRS-2019-2021-2.pdf>.
- <sup>40</sup> “Pelatihan Standar Layanan Bantuan Hukum bagi Organisasi Bantuan Hukum terkait Kelompok Rentan Berhadapan dengan Hukum,” [Training on Legal Aid Service Standards for Legal Aid Organization in Counseling Vulnerable Populations], Indonesia Judicial Research Society, 18 December 2023, <https://ijrs.or.id/2023/12/18/pelatihan-standar-layanan-bantuan-hukum-bagi-organisasi-bantuan-hukum-terkait-kelompok-rentan-berhadapan-dengan-hukum>.
- <sup>41</sup> “Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024,” Open Government Indonesia Secretariat.
- <sup>42</sup> “Training of Trainers (ToT) Organisasi Bantuan Hukum tentang Pendampingan Perempuan dan Anak Berhadapan dengan Hukum,” [Training of Trainers (ToT) for Legal Aid Organizations on Advocating for Women and Children in the Judicial Process], Indonesia Judicial Research Society, 26 June 2023, <https://ijrs.or.id/2023/06/26/training-of-trainers-tot-organisasi-bantuan-hukum-tentang-pendampingan-perempuan-dan-anak-berhadapan-dengan-hukum>.
- <sup>43</sup> Arsa Ilmi Budiarti, Dio Ashar Wicaksana, Gladys Nadya Arianto, et al., “Laporan Penelitian Survei Kebutuhan Hukum Bagi Kelompok Rentan 2022,” [2022 Survey Report on the Legal Needs of Vulnerable Groups], Indonesia Judicial Research Society, 10 November 2023 <https://ijrs.or.id/publikasi-ijrs/laporan-penelitian-survei-kebutuhan-hukum-bagi-kelompok-rentan-2022>.
- <sup>44</sup> Based on the Decision of the House of Representatives No. 64/DPR RI/I/2024-2025 on the 2025–2029 National Legislative Agenda and its 2025 Priority List.
- <sup>45</sup> Wibowo, Hasiholan, and Ayuningtyas, interview; Ady Thea DA, “Ini 8 RUU Usulan Pemerintah agar Masuk Prolegnas Prioritas 2025,” [Here are 8 bills proposed by the government in the priority legislative agenda for 2025], Hukum Online, 18 November 2024, <https://www.hukumonline.com/berita/a/ini-8-ruu-usulan-pemerintah-agar-masuk-prolegnas-prioritas-2025-1t673b1e1193123/?page=2>; Masan Nurpian (National Law Development Agency), interview by IRM, 15 February 2025; “Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024,” Open Government Indonesia Secretariat; “OGI 7th Action Plan Monitoring and Evaluation Report 2023–2024 4th Semester,” Open Government Indonesia Secretariat.
- <sup>46</sup> Budiarti, Lastiur, and Laba, interview.
- <sup>47</sup> Budiarti, Lastiur, and Laba, interview.

## Section III. Participation and Co-Creation

**Indonesia’s OGP process benefited from relationships that have developed between government and civil society partners collaborating on reforms that have spanned multiple action plan cycles. Outreach and reasoned response to civil society improved in the action plan design process. During implementation, civil society interest declined compared to previous cycles. Half of the action plan’s milestones incorporated active government-civil society collaboration.**

### OGP in Indonesia

OGP in Indonesia is supported by the Open Government Indonesia (OGI) Secretariat, an OGI-CSO Secretariat, and the multi-stakeholder board of directors. The OGI Secretariat, within the Ministry of National Development Planning (Bappenas), oversees the process. In January 2024, OGI shifted from the Directorate of State Apparatus and Bureaucratic Transformation to the Directorate of Foreign Affairs and International Development Cooperation.<sup>1</sup> The weak legal framework for OGI was at times an obstacle to prioritizing OGP commitments in government work plans.<sup>2</sup> The Indonesia Judicial Research Society (IJRS) coordinated the OGI-CSO Secretariat.<sup>3</sup> Meanwhile, the OGI Board of Directors comprised eight civil society and three government representatives during the implementation period.<sup>4</sup> This was a shift from the co-creation process, when it included two civil society and ten government representatives.<sup>5</sup>

The process relied on a mix of funding sources. While OGI is supported by the state budget, commitment implementation is funded by respective government and civil society commitment leads. Government bodies were able to fund some commitment milestones if they aligned with relevant work plans and budgets as they are not able to transfer funds to CSOs for implementation. In some cases, civil society-led milestones were directly funded by CSOs, as were the case with Commitments 8, 9, and 13. This was sometimes challenging, particularly given Indonesian CSOs’ reliance on international donors—whose support has been declining. The process received some OGP mini grants to cover the costs of several coordination meetings.<sup>6</sup>

OGI operates a dedicated website as well as a variety of social media platforms (Twitter, Facebook, Instagram, and YouTube) to share detailed information with the public about its activities and commitment implementation. While the repository was not always up to date, the monitoring reports OGI published showed significant improvement compared to the previous action plan cycle. The six-monthly reports routinely monitored the level of collaboration between government and civil society on implementing each commitment milestone. They also evaluated commitments’ performance based on success metrics that were mutually agreed upon during the co-creation process.<sup>7</sup> In addition, OGI invited public input through online forms<sup>8</sup> and outreach events like Open Gov Weeks and OGI Talks<sup>9</sup> over the course of the action plan cycle.

### Action Plan Co-Creation

Co-creation followed a similar process to prior cycles but showed improvements on outreach and reasoned response to civil society. It ensured alignment with Indonesia’s national development priorities. Before the start of the formal co-creation process, OGI gathered input on strategic directions for the action plan through a survey, which received 52 responses (27 from civil society and 25 from government representatives), and the OGI Goes to Campus initiative, which

collected 361 problem statements and solution ideas from young people in Medan, North Sumatera. It also held focus group discussions and special consultations with the National Secretariat for Corruption Prevention and the National Secretariat for Sustainable Development Goals. The initial phase resulted in the identification of several strategic themes for the action plan, some of which continued from previous plans. During the first stage of the formal co-creation process, OGI opened a call for proposals from August to September 2022, receiving 27 government and civil society commitment proposals. From September to December 2022, joint civil society and government working groups reviewed the proposals, aligned them with government work plans, and finalized 15 commitments—all of which emerged from civil society proposals.<sup>10</sup>

Overall, OGI was more proactive in facilitating opportunities for civil society and government meetings but also faced certain obstacles. Engagement still primarily centered on the same civil society and government stakeholders already involved in previous processes. OGI continued to face challenges in convening cross-government consultation, particularly in terms of reaching high-level officials and ensuring ownership of commitments.<sup>11</sup> Civil society also noted a need to establish more consistent criteria for commitments selection.<sup>12</sup>

### Participation during Implementation

During the implementation period, OGI convened its board of directors along with the group of government and civil society stakeholders involved in the commitments every six months to jointly monitor progress and obstacles.<sup>13</sup> IJRS recommended more in-depth discussions in the future.<sup>14</sup> The OGI-CSO Secretariat also held civil society meetings to discuss commitment implementation.<sup>15</sup>

In terms of co-implementation, 39 commitment milestones were assigned to government leads and 22 to civil society leads. OGI reported “active co-creation” for half of the milestones (32 of 61).<sup>16</sup> Collaboration was particularly robust for commitments 1, 11, 12, and 13. Overall, participation during implementation was positively influenced by long-term collaborations between government and CSOs, often initiated in prior action plan cycles, as well as government agencies’ understanding of OGI and its alignment with their priorities.

However, co-implementation was weaker in some cases. Certain commitments proposed by CSOs did not receive adequate government support—for instance, Commitments 3, 8, and 15. Meanwhile, commitments that required collaboration across multiple government bodies sometimes encountered challenges, as seen with Commitment 11.<sup>17</sup> The OGI Secretariat tried to resolve issues through mediation, successfully improving some of the communication issues, as seen in Commitments 7 and 14.<sup>18</sup> IJRS also noted a frequent need for CSOs to proactively re-engage communication channels with government partners.<sup>19</sup> Overall, participation during implementation was negatively influenced when: certain activities were exclusively handled by the government, government commitment to OGP had weakened, and commitments relied on CSO funding alone.<sup>20</sup> This led to a decline in CSO enthusiasm for participating in the implementation process compared to earlier action plans.<sup>21</sup>

### Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.<sup>22</sup> Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.<sup>23</sup> Due to a grace period, a country’s failure to comply with the minimum requirements does not currently have implications for their OGP status.

Minimum requirement	Co-creation	Implementation
<b>1.1 Space for dialogue:</b> The OGI Board of Directors comprised eight civil society and three government representatives during the implementation period. <sup>24</sup> OGI convened the board as well as government and civil society implementers every six months to jointly monitor progress and obstacles on implementation. <sup>25</sup> All regulations and activities are openly accessible on the OGI website. <sup>26</sup>	Yes	Yes
<b>2.1 OGP website:</b> OGI maintains a publicly accessible website, <a href="https://ogi.bappenas.go.id">ogi.bappenas.go.id</a> , which contains all of Indonesia’s action plans, <sup>27</sup> information on OGI, news of outreach activities, and co-creation and implementation updates. It also includes information on OGP Local members in Indonesia.	Yes	Yes
<b>2.2 Repository:</b> The OGI website offers an online repository with comprehensive details about co-creation and implementation of the action plan. While the repository was maintained regularly, it was not always up to date. As of March 2025, certain commitments were missing reports on the second year of implementation, along with some errors such as incorrect placement of the implementation reports. <sup>28</sup>	Yes	Yes
<b>3.1 Advanced notice:</b> See the Action Plan Review. <sup>29</sup>	Yes	Not applicable
<b>3.2 Outreach:</b> See the Action Plan Review. <sup>30</sup>	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> See the Action Plan Review. <sup>31</sup>	Yes	Not applicable
<b>4.1 Reasoned response:</b> See the Action Plan Review. <sup>32</sup>	Yes	Not applicable
<b>5.1 Open implementation:</b> During the implementation period, OGI convened the board, along with the group of government and civil society stakeholders, every six months. This served as a platform for CSOs to provide input and feedback on the implementation process. <sup>33</sup>	Not applicable	Yes

<sup>1</sup> Maharani Putri S. Wibowo, Theodorus Agustinus Hasiholan, and Monica Ayuningtyas (Open Government Indonesia Secretariat), interview by IRM, 13 February 2025; Theodorus Agustinus Hasiholan (Open Government Indonesia Secretariat), correspondence with IRM, 9 April 2025; “Board of Directors,” Open Government Indonesia Secretariat, accessed 6 December 2024, <https://ogi.bappenas.go.id/sekretariat>.

<sup>2</sup> Arsa Ilmi Budiarti, Arianda Lastiur, and Gregorius Yoseph Laba (Indonesia Judicial Research Society), interview by IRM, 15 January 2025; Bona Tua Parhusip (International NGO Forum on Indonesian Development), interview by IRM, 12 February 2025.

<sup>3</sup> “Konsolidasi Sekretariat CSO-OGI bangun komitmen keterbukaan untuk perluasan akses pelayanan,” [Consolidating CSO-OGI Secretariat to affirm commitment to wider access to services], Indonesian Legal Aid and Human Rights Association, 14 November 2023, <https://pbhi.or.id/konsolidasi-sekretariat-cso-ogi-bangun-komitmen-keterbukaan-untuk-perluasan-akses-pelayanan>.

<sup>4</sup> Maharani Putri S. Wibowo (Open Government Indonesia Secretariat), correspondence with IRM, 24 July 2025.

<sup>5</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership, 11 October 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/10/Indonesia\\_Action-Plan-Review\\_2022-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/10/Indonesia_Action-Plan-Review_2022-2024_EN.pdf).

<sup>6</sup> Wibowo, Hasiholan, and Ayuningtyas, interview.

<sup>7</sup> “Laporan Monitoring dan Evaluasi RAN OGI VII 2023–2024 Semester IV,” [OGI 7th Action Plan Monitoring and Evaluation Report 2023–2024 4th Semester], Open Government Indonesia Secretariat, accessed 25 February 2025, <https://drive.bappenas.go.id/owncloud/index.php/s/6cLpDuqSPU2bqqC#pdfviewer>.

- <sup>8</sup> “Masukan untuk Rencana Aksi Open Government Indonesia 2020–2022,” [Input for Open Government Indonesia Action Plan 2020–2022], Open Government Indonesia Sekretariat, accessed 25 February 2025, <https://docs.google.com/forms/d/e/1FAIpQLSfe8c9fnOzBLFSMAMTDyLolpRjPjOVdftVnxWpISs-jcLISJSw/viewform>.
- <sup>9</sup> See “Open Government Indonesia,” Open Government Indonesia Sekretariat, accessed 25 February 2025, <https://ogi.bappenas.go.id>.
- <sup>10</sup> “Proses Ko-Kreasi RAN VII,” [7th Action Plan Co-Creation Process], Open Government Indonesia Sekretariat, accessed 14 December 2024, <https://ogi.bappenas.go.id/en/kokreasiRANVII>; “Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024,” Open Government Indonesia Sekretariat, p. 1; “Indonesia Open Government Partnership National Action Plan 2023–2024,” Open Government Indonesia Sekretariat, 31 December 2022, [https://www.opengovpartnership.org/wp-content/uploads/2023/01/Indonesia\\_Action-Plan\\_2023-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/01/Indonesia_Action-Plan_2023-2024_EN.pdf).
- <sup>11</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership.
- <sup>12</sup> Parhusip, interview.
- <sup>13</sup> “Notulensi Multi-Stakeholder Forum II Tahun 2024,” [Minutes of Multi-Stakeholder Forum Second Meeting of 2024], Open Government Indonesia Sekretariat, accessed 21 February 2025, <https://drive.bappenas.go.id/owncloud/index.php/s/5907Jl7m5QZ8coJ#pdfviewer>; “Notulensi Multi-Stakeholder Forum I Tahun 2025,” [Minutes of Multi-Stakeholder Forum First Meeting of 2025], Open Government Indonesia Sekretariat, accessed 28 February 2025, <https://drive.google.com/drive/folders/1muY19SQ5s5N2LERCBB2ZFk5y1HAvohQn>.
- <sup>14</sup> Budiarti, Lastiur, and Laba, interview.
- <sup>15</sup> “Consolidating CSO-OGI Sekretariat to affirm commitment to wider access to services,” Indonesian Legal Aid and Human Rights Association.
- <sup>16</sup> “Minutes of Multi-Stakeholder Forum First Meeting of 2025,” Open Government Indonesia Sekretariat.
- <sup>17</sup> Budiarti, Lastiur, and Laba, interview.
- <sup>18</sup> Wibowo, Hasiholan, and Ayuningtyas, interview.
- <sup>19</sup> Budiarti, Lastiur, and Laba, interview.
- <sup>20</sup> Budiarti, Lastiur, and Laba, interview; Heroik Pratama and Usep Sadikin (Association for Elections and Democracy), interview by IRM, 10 February 2025; see Commitment 9 in “OGI 7th Action Plan Monitoring and Evaluation Report 2023–2024 4th Semester,” Open Government Indonesia Sekretariat, p. 81; “Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024,” Open Government Indonesia Sekretariat.
- <sup>21</sup> Wibowo, Hasiholan, and Ayuningtyas, interview; Pratama and Sadikin, interview.
- <sup>22</sup> “OGP Participation and Co-Creation Standards,” Open Government Partnership, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards>.
- <sup>23</sup> “IRM Guidelines for the Assessment of Minimum Requirements,” Open Government Partnership, 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf).
- <sup>24</sup> Maharani Putri S. Wibowo (Open Government Indonesia Sekretariat), correspondence with IRM, 24 July 2025.
- <sup>25</sup> “Minutes of Multi-Stakeholder Forum Second Meeting of 2024,” Open Government Indonesia Sekretariat; “Minutes of Multi-Stakeholder Forum First Meeting of 2025,” Open Government Indonesia Sekretariat.
- <sup>26</sup> “Minutes of Multi-Stakeholder Forum Second Meeting of 2024,” Open Government Indonesia Sekretariat; “Minutes of Multi-Stakeholder Forum First Meeting of 2025,” Open Government Indonesia Sekretariat.
- <sup>27</sup> “Rencana Aksi Nasional VII Keterbukaan Pemerintah Indonesia 2023–2024,” [Open Government Indonesia 2023–2024 National Action Plan VII], Open Government Indonesia Sekretariat, accessed 4 December 2024, [https://ogi.bappenas.go.id/dokumen-rencana-aksi-ran\\_vii](https://ogi.bappenas.go.id/dokumen-rencana-aksi-ran_vii).
- <sup>28</sup> See “Open Government Indonesia,” Open Government Indonesia Sekretariat.
- <sup>29</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership.
- <sup>30</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership.
- <sup>31</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership.
- <sup>32</sup> “IRM Action Plan Review: Indonesia 2022–2024,” Open Government Partnership.
- <sup>33</sup> “Minutes of Multi-Stakeholder Forum Second Meeting of 2024,” Open Government Indonesia Sekretariat; “Minutes of Multi-Stakeholder Forum First Meeting of 2025,” Open Government Indonesia Sekretariat.

## Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.<sup>1</sup>

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>2</sup> The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

### Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Hasrul Hanif and was reviewed by Thomas Kalinowski, IRM external expert. The IRM methodology, quality of IRM products, and review process is overseen by the IRM’s International Experts Panel (IEP).<sup>3</sup> For more information, refer to IRM webpage<sup>4</sup> or the glossary of IRM and OGP terms.<sup>5</sup>

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<sup>1</sup> For definitions of OGP terms, such as co-creation and promising commitments, see “OGP Glossary,” Open Government Partnership, accessed June 2025, <https://www.opengovpartnership.org/glossary>.

<sup>2</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

<sup>3</sup> “International Experts Panel,” Open Government Partnership, accessed June 2025, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>.

<sup>4</sup> “IRM Overview,” Open Government Partnership, <https://www.opengovpartnership.org/irm-guidance-overview>.

<sup>5</sup> “OGP Glossary,” Open Government Partnership, <https://www.opengovpartnership.org/glossary>.

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

<b>Commitment 1: Transparency and participation 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>Early results:</b> Moderate</li> </ul>
<p>Building from the previous two action plans, this commitment aimed to enhance government procurement transparency, increase the participation of micro, small, and medium enterprises in government procurement, and broaden public involvement in monitoring these processes.<sup>2</sup> With strong government-civil society collaboration, the commitment milestones were substantially completed.<sup>3</sup> While the commitment had moderate early results on improving procurement platforms, several obstacles emerged.<sup>4</sup></p> <p>The National Public Procurement Agency (LKPP) and the Directorate General of Legal Administration under the Ministry of Law integrated beneficial ownership information into the Supplier Performance Information System (SIKAP),<sup>5</sup> a database which lists the information of potential suppliers of goods and services, as well as their performance records. By December 2024, a total of 179,751 providers had reported their beneficial ownership information. There was still a need to mandate the reporting and utilization of beneficial ownership information within the government procurement system.<sup>6</sup></p> <p>The commitment also developed a new e-catalogue and e-complaints channel, but these were not yet functioning by the end of the implementation period.<sup>7</sup> Government and civil society intend the new integrated e-complaint channel to strengthen public involvement in the oversight of government procurement activities once it is launched.<sup>8</sup> LKPP’s new version of the e-catalogue included artificial intelligence price curation and licensing conditions, and was integrated with the Ministry of Finance, the Ministry of Home Affairs, and local banks to facilitate payments through the platform.<sup>9</sup> For reference, the e-catalogue lists detailed specifications of goods and services that can be procured by the government through the e-purchasing system.</p> <p>The commitment did not introduce strictly enforced regulations on publishing detailed emergency procurement information. According to Indonesia Corruption Watch, this meant that some government units still did not consistently report on emergency procurement activities, and the data provided was not always up to date.<sup>10</sup></p> <p>Finally, Indonesia Corruption Watch reported that publication of government procurement information on the E-Procurement System (SPSE)<sup>11</sup> was not functioning effectively by the end of implementation. The unit designated to manage information disclosure lacked the authority to enforce compliance. Uptake of the Information Commission Regulation on Public Information Service Standards (Perki SLIP) remained uneven, and many local governments were uncertain about where to upload documents. There remained a need to standardize the system for publishing procurement information and bolster relevant technical guidance.<sup>12</sup></p>	
<b>Commitment 2: Beneficial ownership data disclosure</b>	
<ul style="list-style-type: none"> <li>● <b>Verifiable:</b> Yes</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Completion:</b> Substantial</li> </ul>

<ul style="list-style-type: none"> <li>● <b>Does it have an open government lens?</b> Yes</li> <li>● <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>● <b>Early results:</b> Moderate</li> </ul>
<p>This commitment is assessed in Section II above.</p>	
<p><b>Commitment 3: Legal protection on environmental cases</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>Early results:</b> No Notable Results</li> </ul>
<p>This commitment aimed to publish a study on the legal protection for environmental defenders, with recommendations for the National Police.<sup>13</sup> During the implementation period, the environmental CSO Auriga began drafting the study but was unable to finalize as it could not access key informants from the National Police and the National Commission on Human Rights.<sup>14</sup> The two agencies did not respond to outreach efforts by Auriga and the OGI Secretariat.<sup>15</sup></p>	
<p><b>Commitment 4: Implementing regulations for Personal Data Protection Law</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> Substantial</li> <li>● <b>Early results:</b> No Notable Results</li> </ul>
<p>This commitment sought to support the participatory development of implementing regulations for Law No. 27/2022 on Personal Data Protection (UU PDP).<sup>16</sup> The regulations are meant to outline how the future agency tasked with protecting personal data will work with other ministries and agencies and its role in approving international data transfers.<sup>17</sup> While the regulations were not completed by the end of the implementation period, the drafting process was marked by effective public engagement.<sup>18</sup> The government collaborated with the academia, CSOs, and the private sector on developing the regulations. For instance, Tifa Foundation organized consultation meetings to gather input for the Ministry of Communications and Informatics on drafting the implementing regulations and harmonizing the law with other relevant laws, such as the Electronic Transactions and Information Law (UU ITE) as well as the Public Information Disclosure Law (UU KIP).<sup>19</sup> Additionally, the government facilitated public contributions through their <a href="https://pdp.id">pdp.id</a> platform.<sup>20</sup> By the end of the implementation period, regulatory harmonization efforts at the Ministry of Law and Human Rights had delayed the completion of the draft. Meanwhile, CSOs raised concerns that their feedback was overshadowed by business interests.<sup>21</sup> As a result, this commitment did not produce early results, although it could open government in the longer term once the implementing regulations are put into practice.</p> <p>The Institute for Community Studies and Advocacy (ELSAM) observed that personal data protection in Indonesia did not improve during the implementation period. For instance, there were alleged legal breach concerning 668 million personal data records in early 2024.<sup>22</sup> This was exacerbated by a misunderstanding on the government side which delayed the effective implementation date of UU PDP to 17 October 2024—two years post its enactment. Additionally, reported data breaches were not seriously investigated. Meanwhile, the mandated</p>	

PDP agency has yet to be established despite its critical role in ensuring compliance with PDP standards and obligations imposed on data controllers and processors.<sup>23</sup>

#### Commitment 5: Mechanism to handle election disinformation

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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> Unclear</li> </ul> | <ul style="list-style-type: none"> <li>● <b>Completion:</b> Complete</li> <li>● <b>Early results:</b> Moderate</li> </ul> |
|---|---|

This commitment aimed to establish a mechanism to prevent the spread of disinformation during the elections, completing its planned milestones. A multi-stakeholder forum created to support this commitment deliberated on each stage of its implementation. In the first half of 2023, the Election Supervisory Agency (Bawaslu RI) launched a mechanism to handle disinformation complaints during elections via the ‘Jarimu Awasi Pemilu’ (lit. “monitor the elections with your fingers”) platform.<sup>24</sup> It was developed in collaboration with the Ministry of Communications and Informatics, the CSO Legislative Monitoring Committee (Kopel), and social media companies.<sup>25</sup> Later in the year, Bawaslu RI improved the platform in collaboration with Indonesia Anti-Hoax Society (Mafindo) whereas CSOs were brought to jointly monitor its effectiveness during the general elections.<sup>26</sup>

While the commitment improved the complaint system, its activities were too limited to curb the spread of election disinformation. The Civil Society Coalition to Combat Election Disinformation recorded 1,292 instances of political disinformation in 2023, which represents 55.5% of all instances of disinformation recorded that year. This marked the highest documented level in Indonesia’s elections history.<sup>27</sup> Focus shifted toward delegitimizing election organizers, bringing into question their independence, alignment with particular candidates, and allegations of fraud and foreign interference. According to Mafindo, Bawaslu RI needs to significantly reduce the spread of disinformation,<sup>28</sup> which would benefit from a more systemic approach and engagement with a broader range of stakeholders.<sup>29</sup>

#### Commitment 6: Openness of election 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> Modest</li> </ul> | <ul style="list-style-type: none"> <li>● <b>Completion:</b> Limited</li> <li>● <b>Early results:</b> No Notable Results</li> </ul> |
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Building from the previous action plan, this commitment intended to improve the transparency of the electoral process by disclosing five datasets in an open data format. However, its implementation was limited as the General Elections Commission (KPU RI) only released one dataset in an open data format - Electoral Districts Information System compilation data (Sidapil).<sup>30</sup> KPU RI also published the Final Voters List (DPT) and seat allocations in open data format, but these were not within the scope of the commitment.<sup>31</sup> The Association for Elections and Democracy (Perludem) raised concerns about the quality of the disclosed datasets:<sup>32</sup>

- Electoral District Information System (Sidapil)<sup>33</sup> was influenced by the House of Representatives (DPR RI), despite KPU RI’s exclusive authority in managing it as affirmed by the Constitutional Court.

- Political Party Verification Information System (Sipol)<sup>34</sup> indicated whether political parties have met or failed verification requirements but did not provide details.
- Legislative Candidates Information System (Silon)<sup>35</sup> did not disclose full information about legislative candidates due to misalignment with the Personal Data Protection Law.
- Campaign and Campaign Finance Information System (Sikadeka)<sup>36</sup> only published summaries of data without any comprehensive details.
- Election Results Information System (Sirekap)<sup>37</sup> published election results data but a lack of reliability of the tabulation process created doubts and potentially undermined the legitimacy of the electoral process.

During the implementation period, government-civil society collaboration declined compared to the previous action plan. KPU RI frequently postponed meetings, sent different representatives each time, and infrequently included election commissioners.<sup>38</sup> Meanwhile, Perludem became less engaged in the commitment,<sup>39</sup> which was attributed to inconsistent points of contact,<sup>40</sup> shifts in stakeholders priorities, and a perceived lack of support from the election commissioners for the institutionalization of open elections data.<sup>41</sup>

**Commitment 7: Digital accessibility guidelines for inclusive public communication and information services for persons with disabilities**

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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>Early results:</b> No Notable Results</li> </ul> |
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Under this commitment, the Ministry of Communications and Informatics established the Guidelines for Inclusive Public Communication and Information Services for Persons with Disabilities in 2023.<sup>42</sup> The guidelines align with the international Web Content Accessibility Guidelines 2.0,<sup>43</sup> intended for use by ministries, agencies, state-owned enterprises, and local governments.<sup>44</sup> Following a series of initial meetings, the ministry actively collaborated with the CSO Suarise on drafting the guidelines. Suarise particularly contributed by mapping the issues and status quo on digital accessibility for persons with disabilities.<sup>45</sup> After the guidelines were established, the ministry conducted a few outreach sessions in hybrid online and offline formats. The sessions included representatives from the communications, informatics, and statistics departments of local governments throughout Indonesia. Only one of these sessions reported participation from civil society.<sup>46</sup>

Improving digital accessibility for persons with disabilities will take further efforts. In mid-May 2024, a Suarise study revealed over 2,000 accessibility violations across a sample of 34 provincial government websites. Common issues included insufficient color contrast, links without content, and images lacking alternative text.<sup>47</sup> By June 2025, implementation of the guidelines was not yet mandatory, roles and responsibilities of each local and central government body were not clearly defined, and the guidelines were not integrated into the assessment criteria for the electronic-based government system or included in the performance indicators for local government’s departments responsible for managing communications, informatics, and statistics.<sup>48</sup>

By the end of the implementation period, the Ministry of Communications and Informatics had drafted a regulation to enforce the guidelines, which was still under internal review. Next steps would include promoting adoption of the guidelines by public organizations as well as relevant websites and app developers.<sup>49</sup> According to Suarise, there is a need for widespread outreach targeting central and local government units led by the ministry alongside its local government counterparts.<sup>50</sup> With increased awareness and rigorous enforcement, the guidelines could improve digital accessibility for persons with disabilities in the longer term.

#### **Commitment 8: Social accountability of village budget openness**

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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>Early results:</b> No Notable Results</li> </ul> |
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This commitment aimed to enhance social accountability in 15 villages across the province of Aceh, the regency of Jember in East Java, and the city of Kupang in East Nusa Tenggara by publishing government budgets on village websites and empowering citizens to monitor budget usage.<sup>51</sup> However, the commitment saw limited completion amid weak government-civil society collaboration.<sup>52</sup> Transparency International Indonesia began with an online national dialogue on discussing the first decade of the Village Law in March 2023, featuring the Director General of Village Government Development as a speaker.<sup>53</sup> Transparency International Indonesia then conducted capacity building activities and introduced social accountability modules in 15 pilot villages.<sup>54</sup> In April 2024, progress stalled following a funding freeze by the National Democratic Institute Taiwan. Transparency International Indonesia attempted but was unable to secure financial support from the Directorate General of Village Government Development.<sup>55</sup>

#### **Commitment 9: Social accountability on public services and village governance**

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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>Early results:</b> Moderate</li> </ul> |
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Building on the previous action plan, this commitment piloted social accountability practices during village deliberations and the program review method during villages' development processes.<sup>56</sup> The Ministry of Village, Development of Disadvantaged Regions, and Transmigration regularly engaged civil society during implementation, including those outside the CSO commitment leads, such as the Nahdlatul Ulama Institute for Human Resource Development and Studies (Lakpesdam NU) and the Partnership for Governance Reform (Kemitraan).<sup>57</sup> In terms of the program review pilot, the villages of Sriharjo and Guwosari in Yogyakarta had drafted village regulations for implementing this method in early 2023.<sup>58</sup> Aside from the ministry, this pilot was supported by Tifa Foundation, although they carried out their activities separately. Meanwhile, the social accountability pilot benefited from more direct cooperation between the ministry and Wahana Visi Indonesia (WVI), although collaboration was initially weaker.<sup>59</sup> In preparation for this pilot, the ministry organized several awareness-raising sessions later in 2023. Along with WVI, it also presented a study on this model in early 2024. The villages of Ende, Ngada, and Kupang in East Nusa Tenggara went on to pilot the social

accountability practices.<sup>60</sup> With a limited geographic scope, this commitment had moderate early results on improving public accountability.

#### **Commitment 10: Drafting of the Truth and Reconciliation Commission Draft Law**

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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> Not Started</li> <li>● <b>Early results:</b> No Notable Results</li> </ul> |
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This commitment sought to foster community participation in shaping the national policies of the Truth and Reconciliation Commission (TRC) for past human rights violations.<sup>61</sup> However, the commitment was not implemented. Instead, the government formed the Taskforce for Non-Judicial Resolution of Past Gross Human Rights Violations (PPHAM) via Presidential Decree No. 17/2022.<sup>62</sup> The taskforce’s mandate was to focus on providing support to victims rather than holding perpetrators accountable. Their missions included acknowledging and expressing regrets for past human rights violations as well as gathering information about the victims and reinstating their human rights.<sup>63</sup> The government framed this approach as a way to “restore humanity” albeit emphasizing that it does not preclude judicial actions. Some civil society activists have criticized the move, arguing it as an attempt to evade accountability.<sup>64</sup>

#### **Commitment 11: Accessibility and accountability of 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>● <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>● <b>Completion:</b> Complete</li> <li>● <b>Early results:</b> Moderate</li> </ul> |
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This commitment is assessed in Section II above.

#### **Commitment 12: Provision of quality and accessible legal aid**

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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>Early results:</b> No Notable Results</li> </ul> |
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Seeking to improve access to legal aid, this commitment completed publication of practical guidelines for legal aid services and a policy brief on optimizing the legal aid information portal.<sup>65</sup> The commitment benefited from partnership between the National Law Development Agency (BPHN) and civil society partners such as the Indonesia Judicial Research Society (IJRS), the Indonesian Legal Aid and Human Rights Association (PBHI), and the Indonesian Women for Justice Legal Aid Foundation (LBH APIK), which had developed over the previous two action plan cycles. Following collaborative development of the Legal Aid Service Provider Standards (Stopela)<sup>66</sup> under the previous action plan, the group continued collaboratively developing technical guidelines to facilitate implementation of the standards.<sup>67</sup> IJRS and PBHI further collaborated on conducting research for the policy brief on legal aid information portal.<sup>68</sup> However, by early 2025, evidence of early results was unclear. Neither government nor civil society evaluated whether provision of legal aid had improved. Moving forward, civil

society partners encouraged undertaking efforts to develop the information portal and engaging a wider set of stakeholders, including the Supreme Court.<sup>69</sup>

### Commitment 13: Legal aid provision for vulnerable persons

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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>Early results:</b> Moderate</li> </ul> |
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This commitment is assessed in Section II above.

### Commitment 14: Recovery mechanisms for sexual violence crimes

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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> Substantial</li> <li>● <b>Early results:</b> No Notable Results</li> </ul> |
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Following passage of the Sexual Violence Crime Law (UU TPKS), this commitment sought the participatory development of regulations on the Regional Technical Implementation Unit for the Protection of Women and Children (UPTD PPA) and the Victim Assistance Fund (DBK) as well as increase the scope and beneficiaries of the fund.<sup>70</sup> While its milestones were substantially implemented, collaboration with civil society fell short of the commitment’s open government objectives.<sup>71</sup> Presidential Regulation No. 55/2024 on UPTD PPA was issued in 2024,<sup>72</sup> but its development did not consistently incorporate civil society suggestions due to complex inter-agency coordination which limited the influence of CSOs. Provincial, district, and city governments were mandated to establish their respective UPTD PPAs but had not yet taken these steps by early 2025, indicating a need for longer process. By the end of the implementation period, relevant ministries were coordinating on drafting the regulation on the Victim Assistance Fund with limited CSO engagement. As the fund’s legal foundations were not completed, the commitment did not notably widen the fund’s coverage and beneficiaries.<sup>73</sup> In the longer term, this commitment could strengthen support for victims of sexual violence.

### Commitment 15: One Data system for natural resources and the environment

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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>Early results:</b> No Notable Results</li> </ul> |
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This commitment completed its milestones to create a unified dataset focused on natural resources, the environment, and spatial planning (SDA-LH), but collaboration with civil society fell short. The One Data Indonesia (SDI) Secretariat established a priority data list on SDA-LH through the National Development Planning Agency Ministerial Decree No. 5/2024,<sup>74</sup> published on the SDI portal.<sup>75</sup> However, according to OGI, the list did not incorporate the data proposed by CSOs.<sup>76</sup> The government reported that preparatory steps included mapping relevant data and data governance issues, as well as holding a data forum. During the data compilation process, CSOs prepared studies but were not engaged by relevant government stakeholders aside from the OGI Secretariat.<sup>77</sup>

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<sup>1</sup> Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see "Indonesia Open Government Partnership National Action Plan 2023–2024," Open Government Indonesia Secretariat, 31 December 2022, [https://www.opengovpartnership.org/wp-content/uploads/2023/01/Indonesia\\_Action-Plan\\_2023-2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/01/Indonesia_Action-Plan_2023-2024_EN.pdf).
3. For more information on the assessment of the commitments' design, see "IRM Action Plan Review: Indonesia 2022–2024," Open Government Partnership, 11 October 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/10/Indonesia\\_Action-Plan-Review\\_2022–2024\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/10/Indonesia_Action-Plan-Review_2022–2024_EN.pdf).

<sup>2</sup> "1: Encouraging Transparency and Participation in Government Procurement of Goods/Services," Open Government Indonesia Secretariat, accessed 13 December 2024, [https://ogi.bappenas.go.id/RANVII/Komitmen\\_I](https://ogi.bappenas.go.id/RANVII/Komitmen_I).

<sup>3</sup> Maharani Putri S. Wibowo, Theodorus Agustinus Hasiholan, and Monica Ayuningtyas (Open Government Indonesia Secretariat), interview by IRM, 13 February 2025; "Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024," Open Government Indonesia Secretariat; "Laporan Monitoring dan Evaluasi RAN OGI VII 2023–2024 Semester IV," [OGI 7th Action Plan Monitoring and Evaluation Report 2023–2024 4th Semester], Open Government Indonesia Secretariat, accessed 25 February 2025, <https://drive.bappenas.go.id/owncloud/index.php/s/6cLpDuqSPU2bggC#pdfviewer>.

<sup>4</sup> "1: Encouraging Transparency and Participation in Government Procurement of Goods/Services," Open Government Indonesia Secretariat.

<sup>5</sup> "Matriks Capaian RAN OGI B24 LKPP 2023–2024," [Results Matrix for OGI Action Plan – B24 Form LKPP 2023–2024], Open Government Indonesia Secretariat, accessed 28 March 2025, <https://drive.bappenas.go.id/owncloud/index.php/s/8iDbkd3vJexPRQL#pdfviewer>.

<sup>6</sup> "Government Self-Assessment Report for the 7th Open Government Indonesia National Action Plan 2023–2024," Open Government Indonesia Secretariat.

<sup>7</sup> "Rapat Koordinasi dengan LKPP, KPK Sampaikan Empat Rekomendasi Perbaikan Pengadaan Barang/Jasa," [Coordination Meeting with LKPP, KPK Conveys Four Recommendations for Improving the Procurement of Goods/Services], Corruption Eradication Commission of Indonesia, 20 January 2025, <https://www.kpk.go.id/id/ruang-informasi/berita/rapat-koordinasi-dengan-lkpp-kpk-sampaikan-empat-rekomendasi-perbaikan-pengadaan-barangjasa>; Wana Alamsyah and Siti Juliantari Rachman (Indonesia Corruption Watch), interview by IRM, 19 February 2025.

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