

STRENGTHENING THE NATIONAL STRATEGY FOR CORRUPTION PREVENTION (STRANAS PK)

Evaluation Of Impact on The Implementation
of Presidential Regulation Number 54 Of 2018



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Transparency International Indonesia would like to thank USAID Integritas for its support in compiling this research. This publication reflects the monitoring of Transparency International Indonesia's research team.

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LIST OF ABBREVIATIONS

Action PK	Action Corruption Prevention
BPNT	Non-Cash Food Assistance
BPS	Central Bureau of Statistics
BULOG	Logistics Agency
CPI	Corruption Perception Index
DT-PPFM	Integrated Data for Poor Handling Program
DTKS	Integrated Social Welfare Data
FATF	Financial Action Task Force
GCB	Global Corruption Barometer
GNNT	Non-Cash National Movement
HET	Highest Retail Price
INSW	Indonesia National Single Window
K/L/D	Ministries/Institutions/Local Governments
KKS	Prosperous Family Card
KPK	Corruption Eradication Commission
KPM	Beneficiary Group
LAPOR	People's Online Complaint Aspiration Service
Moneyv	Monitoring and Evaluation
NIK	Population Identification Number
OSS	Online Single Submission
PEPs	Politically-exposed Persons
PERC	Political and Economic Risk Consultancy
Perpres	Presidential Regulation
PRS	Political Risk Services
PT	Process Tracing
RPH	Slaughterhouse
SIKS-NG	Next-Generation Social Welfare Information System
SINAS NK	National Commodity Balance System
SP4N	Public Service Complaint Management System
SPBE	Electronic Based Government System
STID	Single Truck Identification Data
Stranas PK	National Strategy for Corruption Prevention
TII	Transparency International Indonesia
UNCAC	United Nations Convention against Corruption

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EXECUTIVE SUMMARY

The presence of Presidential Regulation Number 54 of 2018 concerning the National Corruption Prevention Strategy (Stranas PK), which is expected to encourage a more focused, measurable, and impactful approach to corruption prevention, has not yielded significant results.

The results of the impact evaluation research conducted by Transparency International with support from USAID Integritas underscore two main findings. First, efforts to evaluate the chain of change using several proxy indicators found that the three corruption prevention actions monitored within the Stranas PK still require more effort to reach the level of impact.

The three selected actions became evaluation case studies from their respective focus of action—licensing and trade administration, state finances, and law enforcement and bureaucratic reform—at the outcome level at the farthest. In terms of having an impact, it is mainly contributed by the design, style, and policy approach, which is far from the spirit of Article 5 UNCAC and the Kuala Lumpur Statement on Anti-Corruption Strategies. Actions carried out tend not to be oriented towards the final beneficiary and, as a result, are isolated in a closed policy-setting agenda.

Second, the Stranas PK policy has been designed from the outset to respond gradually to the need for corruption prevention. However, this research found an inaccuracy between the corruption problems faced and the offered solutions within the Stranas PK policy framework. The policy paradigm, which tends to play on the margins and is dominated by a technocratic-administrative approach, has resulted in the main problem of corruption being left untouched, namely political corruption.

So that instead of Stranas PK being able to intervene in grand corruption practices, especially political corruption, the research results confirm that Presidential Regulation Number 54 of 2018 only works in place in areas of petty corruption practices. In turn, this approach not only has implications for declining public trust in state institutions and the rule of law on the one hand but also continues to turn a blind eye to the massive efforts to accumulate power (power accumulation) and expand power (power extension) on the other.

CHAPTER I INTRODUCTION

1.1 Background

The fall of Indonesia's Corruption Perception Index for 2022 is a bittersweet gift ahead of the 25th anniversary of reform. Ironically, this result was the worst since 1997, or a quarter of a century after the start of the post-New Order era.

Indonesia's score, which fell four points to 34, also reflects one of the steepest declines in the Asian region. Indonesia is currently ranked 110th out of 180 countries assessed, or down 14 ranks from the previous 96th position. Undoubtedly, this condition further immerses Indonesia in the position of 1/3 of the most corrupt countries in the world and is far below several neighboring countries such as Singapore, Malaysia, Timor-Leste, Vietnam, and Thailand – a heartbreaking position for the holder of the ASEAN 2023 Chairmanship stick.

Indonesia (34), along with other large countries experiencing democratic regression, such as India (40), the Philippines (33), and Bangladesh (25), also experienced a drop in the Corruption Perception Index score. This is allegedly an implication of the increasingly excessive consolidation of power in the hands of the executive, followed by intensified restrictions on civil space and suppression of freedom of expression.

This red report card for eradicating corruption results from a "legal disaster" in recent years. How many times have the public been shown the practice of abuse of power that seems to use legitimate legal instruments, such as weakening the legislature, weakening civil society, and weakening law enforcement agencies (revision of the KPK Law, revision of the Constitutional Court Law, Bill on the Position of Judges)? These moves have violated constitutional morality and democratic principles through the cover of state-capture corruption.

The shifting of the legal and political pendulum for eradicating corruption also stems from the tone of the corruption prevention policy. Implementing Presidential Regulation Number 54 of 2018 concerning the National Strategy for Corruption Prevention more or less four years ago did not contribute to boosting the Corruption Perceptions Index score. This policy appears to be "negotiating" and tends to avoid rooted problems that significantly impact corruption in Indonesia, namely political corruption.

In general, this policy is trapped in maintaining the status quo of corruption itself. There is an apparent mismatch between the main problem of corruption, a political problem,

and the technocratic solutions offered; in the end, it generates more questions than results. The preliminary diagnosis of the causes and symptoms of corruption, followed by the rhetoric of participatory monitoring, is only one example that makes this prevention policy package only work partially and seems to add to the long chain of red tape within the bureaucracy.

The implementation of the Stranas PK itself has entered the final phase of the second period (2021-2022) since it was enacted on 20 July 2018. The Stranas PK is the direction of the Indonesian Government's national policy, which contains the focus and targets for preventing corruption and is used as a reference for ministries, agencies, local governments, and other stakeholders. Other interests in implementing corruption prevention actions in Indonesia. In addition, Action PK is the elaboration of the focus and objectives of the Stranas PK in the form of programs and activities spread over three main focuses: licensing and trade administration, state finance and law enforcement, and bureaucratic reform.

From the civil society perspective, Transparency International Indonesia has developed some monitoring models for the National Strategy for PK, namely the Assessment of the Corruption Prevention Program (2018), the Independent Evaluation of the Implementation of the National Strategy for PK in the Regions on an Output basis (2019) and the Independent Evaluation of the Outcomes of the Implementation of the National Strategy for PK in the Regions in 4 Sub-Action (2020). These observations found that the corruption risks spread over the three focus areas of the National Strategy for PK were still relatively high and had not been followed by optimal community involvement in supervising and accessing corruption prevention actions.

In previous research, there were at least two essential findings that must be evaluated by the government, especially the National Stranas PK Team, which includes the Corruption Eradication Commission, the Ministry of Home Affairs, the Ministry of Administrative Reform and Bureaucratic Reform, the Presidential Staff Office, and the Ministry of Bappenas. First, the National Strategy for PK tends to avoid complex issues that significantly impact corruption in Indonesia. One of them is political corruption.

Even though the government can carry out many studies and recommendations, especially the Ministry of Home Affairs, to increase the transparency and accountability of political parties along with policies to increase financial assistance for political parties, the Ministry of Home Affairs has the authority to ask political parties to open up and be accountable for their finances to the public with incentives to increase financial assistance. If this is done, it will significantly prevent corruption in Indonesia.

Second, the National Strategy for PK is seen by the public as a technical and bureaucratic policy. The presentation of these policies to the public tends to be only in the form of development documents such as outputs and indicators, which, unfortunately, are also tricky for the public to understand. Because it was difficult for the public to digest, let alone see directly, the relevance and impact on people's daily lives, the National Strategy for PK failed to invite public participation. Stranas PK only stops at government documents and activities. Various policies, such as the procurement of goods and services or online permits, impact everyday society.

Departing from the monitoring findings, the government needs to take steps to increase public participation, for example, by simplifying the message and showing the progress of the Stranas PK policy. In addition, the government needs to enter into strategic sectors such as political party funding.

Past monitoring results also confirm that an effective national anti-corruption policy should go beyond administrative works. Unfortunately, the action plans within the Stranas PK framework since 2019 still rely heavily on normative targets that focus on complying with document achievements. Apart from impacting the complexity of measuring and reviewing impacts, these targets do not directly contribute to the root of the corruption problem in Indonesia, namely political corruption.

Transparency International Indonesia, in previous research, has also concluded that the capacity of the implementing units that are monitored is generally inadequate. This conclusion was reached using monitoring instruments compiled from the components of UNCAC article 5 and The Kuala Lumpur Statement on Anti-corruption Strategies and Resolution 5/4 of the CoSP to UNCAC (2013) on "Follow-up to the Marrakech Declaration on the Prevention of Corruption."

In 2019, the research team used five dimensions (Institutional, Human Resources, and Budget, Accountability, Corruption Risk Mitigation, and Community Engagement) as well as 25 indicators in it to review the performance and capacity of each work unit. Of the five dimensions monitored, Transparency International Indonesia encourages various interest groups, especially the PK National Team, to strengthen the dimensions of Accountability, Corruption Risk Mitigation, and Community Involvement of each implementing unit.

1.2 Purpose of the Research

This research uses official monitoring and evaluation tools in the policy cycle, which assumes a systematic and analytical nature using the UNCAC and the Kuala Lumpur

Statement. The overall objective of this evaluation system is to strengthen the efficiency, effectiveness, accountability, and transparency of the public sector and to improve the quality-of-service delivery, which ultimately contributes to the achievement of national goals.

This Stranas PK impact evaluation assessment activity specifically aims to:

- 1) Get evidence about the impact that has been produced (or the impact that is expected to be produced) from the output, outcome, and impact of the implementation of Stranas PK;
- 2) Identify the relationship between the contribution of the implementation of the National Strategy for PK to efforts to prevent corruption;

1.3 Research Questions

This research focuses on two main questions which include:

- 1) What is the impact that has been produced (or the impact that is expected to be produced) from the output, outcome, and impact of implementing the Stranas PK action?
- 2) What is the relationship between the contribution of the implementation of the Stranas PK to efforts to prevent corruption?

1.4. Scope of Research

The scope of the evaluation of the Stranas PK evaluation will be focused on three sub-actions of the Stranas PK, including:

- a) Action 1: Availability and utilization of valid, reliable, and confirmed national availability data, national consumption data, and import realization data in the Indonesia National Single Window (INSW) system in the meat strategic food sector as a basis for policy-making;
- b) Action 2: Targeted distribution of social assistance (BPNT) based on DTKS, which is equivalent to NIK;
- c) Action 3: Resolving Complaints via SP4N-LAPOR so that the Quality of Public Services Increases;

These three sub-actions are monitored because they have achieved more than 80%, have been implemented since 2018, have received significant attention from the public, are carried out by Ministries/Institutions/Regional Governments, and contribute directly to the level of corruption.

The data and information collection process was carried out using a sampling mechanism based on data from 3 regions: DKI Jakarta, North Sumatra, and South Sulawesi. This impact evaluation research was conducted from November 1, 2022, to February 28, 2023.

1.5 Significance of the Research

The importance of evaluating the impact of the national anti-corruption strategy is underlined in the UNCAC, especially in Article 5 and the Kuala Lumpur Statement on the anti-corruption strategy. This impact evaluation specifically dedicates to the impact evaluation process of the three implementations of the Actions within the National Strategy for PK.

In this context, the National Strategy for PK should receive broad support from all parties. Therefore, with support from the USAID INTEGRITAS program, Transparency International Indonesia took the initiative to initiate an impact-based evaluation model to reflect on the achievements of the implementation of Stranas PK from the perspective of civil society and the final beneficiaries.

The practice of reflecting on the implementation process is critical in order to be able to support the steps of the National Strategy PK regarding achievements, opportunities, and the effectiveness of the allocation of resources and funding to have better information. This idea is also considered necessary because experience is the key to guiding future actions in a better direction.

CHAPTER II CONCEPTUAL FRAMEWORK

1.1 Literature Review

a. Anti-Corruption Intervention

An anti-corruption intervention effort can be global, regional, national, local, sectoral, or institutionally specific. An anti-corruption strategy can generally be explicit (e.g., the Anti-Money Laundering Act) or implicit (e.g., reform in the selection of public office).

These strategies can also be standalone (e.g., development of a national anti-corruption strategy) or integrated (e.g., training for parent-teacher associations as part of a more extensive education program). This strategic approach can also be top-down or bottom-up, technical or political, internal or external.

The breadth and variety of definitions and spectrum of anti-corruption interventions mean that there is almost no panacea in responding to the phenomenon of corruption. This effort will usually be effective if it is following the dynamics and driving factors in each problem which are also contextual.

Most anti-corruption interventions are designed to respond to the principal-agent causes of corrupt practices. However, several other interventions aim to respond to social norms, collective action issues, or short-term corruption functions, such as supporting reformist politicians; values, ethics, and anti-corruption education; integrity pact; block leave policy; and economic formalization.

Experience in various countries in the world in dealing with the challenges and risks of corruption has also spawned various strategies. Unfortunately, how corruption reproduces itself is also highly dependent on historical, political, economic, social, and cultural factors. This condition directly affects the various paradigms and strategies for dealing with corruption.

The effectiveness of an anti-corruption strategy in a country will also depend heavily on the political will of the highest leadership and synergy with other ongoing anti-corruption efforts. The anti-corruption strategy is also very likely to fail if it is not based on the country's characteristics. An aspect that should also be underlined is that an anti-corruption strategy must include a robust monitoring and evaluation system and

provide space for the participation of civil society organizations and other external stakeholders.

Conceptually, the anti-corruption strategy itself is a set of policies developed by the government to mainstream and prioritize measures and reforms to fight corruption in a particular national context. These policies are often cross-sectoral and involve multiple government institutions. Thus, these strategies can be developed to complement and strengthen or, vice versa, compete with each other.

Consistent with the UNCAC mandate, States parties must adopt effective measures to prevent corruption (chapter II, articles 7 to 14), criminalize acts of corruption and ensure effective law enforcement (chapter III, articles 15 to 42) in collaboration with Other States Parties in enforcing anti-corruption laws (chapter IV, articles 43 to 50) and assisting each other in the return of assets acquired through corruption (chapter V, articles 51 to 59).

In addition to encouraging effective action in each of these specific areas, UNCAC article 5 sets out the more general requirement that individual States parties be encouraged to

1. Develop and implement or maintain an effective coordinated anti-corruption policy,
2. Establish and promote effective practices aimed at preventing corruption, and
3. Periodically evaluate relevant legal instruments and administrative measures to determine their adequacy to prevent and combat corruption.

Complementing the above approach, under Article 6, each State Party is required to ensure the existence of an appropriate body to prevent corruption by implementing the policies referred to in Article 5 and, if necessary, overseeing and coordinating the implementation of the policies.

Thus, one of the most critical obligations of States Parties under UNCAC, and to whom they must be accountable under the Mechanism for Review of the Implementation of the Convention established under article 63, is to ensure that their anti-corruption policies are effective, coordinated, and periodically assessed. For many countries, achieving the goals of article 5 of UNCAC can be interpreted as involving developing, publishing, and implementing a national anti-corruption strategy or building a blueprint for a realistic, comprehensive, and integrated plan to reduce corruption in the countries concerned.

There is no need for a formal, written strategy to comply with the provisions of articles 5 and 6. A state party can maintain an effective and coordinated anti-corruption policy without publicizing the strategy document. However, as stated in the Kuala Lumpur

Statement on Anti-Corruption Strategies (2013), issuing a national anti-corruption strategy can be an effective way for States Parties to ensure compliance with Article 5 obligations.

In the statement noted by the Conference of States Parties in resolution 5/4 entitled "Following Up the Marrakech Declaration on the Prevention of Corruption," it was also recognized that an anti-corruption strategy could provide a comprehensive policy framework on actions to be taken by States in fighting and preventing corruption.

This strategy can also be a valuable tool for mobilizing and coordinating efforts and resources of the Government and other stakeholders, for policy development and implementation, and for ensuring monitoring of policy implementation. In the report *Anti-Corruption Strategies: Understanding What Works, What Does not, and Why? Lessons Learned from the Asia-Pacific Region (2014)*, UNDP has identified countries in the Asia Pacific that have issued a single national anti-corruption strategy or set of documents that establish a comprehensive and coordinated anti-corruption framework as called for in the statement Kuala Lumpur.

Most countries have developed strategies during 2007-2010, named after the entry into force of UNCAC. Only two countries, Mongolia and Pakistan, had developed anti-corruption strategies before 2002. After completing the first cycle, several countries, such as Bhutan, Mongolia, Thailand, and Indonesia, were in the second cycle of updating their national anti-corruption strategies. In the Pacific, anti-corruption strategies are still rare, except for Papua New Guinea. Although other countries do not have national anti-corruption strategies, some Asian-Pacific countries, such as Australia, China, and Bangladesh, have national anti-corruption action plans.

In addition, this article also implicitly reflects that the anti-corruption measures of the States Parties must be included in a coordinated policy rather than being carried out separately or in an ad-hoc manner. This article underscores explicitly that an anti-corruption approach cannot be limited to technocratic solutions but needs to recognize the inherently political nature of anti-corruption work.

Article 5 especially strengthens the spirit of the Convention in preventing and combating corruption, particularly in promoting integrity and accountability and proper public management. Therefore, the challenge for national anti-corruption policies lies not only in building bridges between the fields of corruption prevention and law enforcement, but also linking these components adequately with other policies and reforms aimed at strengthening the country's governance system.

b. Corruption Manifestations

Corruption has various forms and types, which are carried out starting from the lowest level to the level of state administrators and legislature members. Transparency International divides three types of corruption based on the scale of impact and exposure, namely petty corruption, grand corruption, and political corruption.

Petty corruption is small-scale corruption that often occurs in society and is often taken for granted. Meanwhile, grand corruption is large-scale corruption with massive state losses and harms the wider community, while political corruption is corruption using political means that occur systematically, which harms state finances.

The practice of petty corruption is, of course, still dangerous because if it is cultivated on a larger scale, it will become even more significant, even though it is often taken for granted by Indonesian people. Petty corruption often occurs because of a need (corruption by need). This practice is generally carried out by low- or middle-level employees—who may be paid low and interact directly with the public—to make ends meet due to inadequate income.

Petty corruption is different from grand corruption, where greed (corruption by greed) is the central discussion, the perpetrators of which are employees with high positions already materially affluent. To a very different degree, political corruption has two main features, namely power accumulation and power extension, which are usually in favoritism and patronage politics, such as buying and selling votes.

In comparative studies of this type of corruption, the degree can vary from country to country. For example, major corruption can occur in a country with little or no petty corruption, while petty corruption can also occur in a country with a clean government. Nonetheless, there is a consensus that both large and petty corruption tend to go hand in hand and reinforce one another.

a. Petty Corruption

As the name implies, petty corruption is small-scale corruption by public officials interacting with the public. Types of corruption include illegal levies, gratuities, bribery, facilitation payments, or extortion to streamline public services or the bureaucracy. These services should be cheap or even free for the community.

Transparency International (2009) defines *petty corruption* as the abuse of power by low- and middle-level public officials in their interactions with ordinary citizens who

frequently access essential public services, such as hospitals, schools, police departments, and other institutions. The spectrum of corruption is also broad, including illegal levies, gratuities, bribery, facilitation payments, to sexual extortion (sextortion) in order to facilitate access to public services or the bureaucracy.

Petty corruption occurs in the everyday space of residents, for example, when giving gratuities when processing residence documents or 'peace money' to the police when they are given a ticket. This means that petty corruption occurs very blatantly but is often seen as usual in society. In fact, at the same time, citizens have lost the right to access and enjoy public services that should be fast, cheap, or even free.

The 2020 Global Corruption Barometer (GCB) research from Transparency International shows that this petty corruption can affect one in four people worldwide, which means nearly two billion people. In Asia Pacific alone, nearly 900 million people, including in Indonesia, pay bribes to access public services.

The 2020 GCB survey in Indonesia found that 30% of the public admitted that they had paid a bribe in the past year when accessing public services—a very unfortunate result. The prevalence of bribery in Indonesia occupies the 3rd highest position among the 17 surveyed Asian countries. The reasons people pay bribes vary, both because it is a sign of gratitude (33%), they are asked to pay an unofficial fee (25%), and they are offered to pay a bribe for a faster process (21%).

The increase in petty corruption will, in turn, strengthen public permissiveness. This phenomenon was marked by more than 90% of respondents at the 2020 GCB admitting that they had never reported bribery that they experienced, either because they did not know where to report it or thought that petty corruption was something normal in the context of accessing a public service.

However, even though it is often considered negligible, as Mekeng's statement, when aggregated, the amount will reflect a sizeable nominal amount of public resources. For example, even though it involves small nominal amounts, petty corruption will directly harm the poorest citizens in their interactions with public services, such as schools, hospitals, police, tax administration, and others that are not reached.

Therefore, the impact of petty corruption is never small. This practice will gradually influence citizens, which will significantly affect their living and well-being. In turn, the rampant petty corruption will also widen the permissiveness network of citizens because it is considered normal. At the same time, perpetrators of petty corruption, who are generally low-level employees, will continue to feel comfortable doing so because the

value of their corruption is considered minor and undetectable by the central government.

In the long run, petty corruption practices will harm sustainable economic growth, governance ecosystems, the ability of States to collect taxes, and on the rule of law as they create incentives for corrupt bureaucrats to enact more regulations, restrictions, and red-tape bureaucracy in order to increase the chances of getting bribes from the public.

b. Grand Corruption

Grand corruption, or what is commonly called big-time corruption, is corruption with a fantastic value of state losses, billions to trillions of rupiah. This type of corruption benefits a handful of elite officials and sacrifices society.

Transparency International (2016) stated that grand corruption is a high-level practice of abuse of power that benefits a few people at the expense of many people and causes serious and widespread harm to individuals and society, often ending with impunity.

Major corruption usually occurs at the highest levels in the public sphere and at the highest levels in private business. Such interactions include actors who make rules, policies, and executive decisions, often involving large sums of money.

Other standard definitions of grand corruption include the following:

- *"Abuse of public power by heads of state, ministers, and senior officials for personal financial gain" (Moody-Stuart 1994: 1). This definition has been used by several scientists such as Doig and Theobald (1999: 3); Houngnikpo (2006: 86); and González (2007: 50).*
- *"Rangest corruption at the highest levels of national Government, leading to widespread erosion of confidence in good government, the rule of law and economic stability" (Rose-Ackerman 1996) as well as "Corruption at the top of state hierarchies involving political leaders and their close associates and concerning awarding of major contracts, concessions, and privatization of state enterprises" (Rose-Ackerman 2010: 132). This definition is used in the United Nations Anti-Corruption Toolkit (UNODC 2004: 13) as well as in academic and advocacy work such as Langseth (2006: 9); UK Open Government (2016); Rotberg (2019: 34); and UNAFRI (2020).*
- *Others have also adjusted the definition of grand corruption by sector. For example, Kenny and Søreide (2008:5) define grand corruption as "cases when*

politicians or high-level civil servants manipulate state management or infrastructure industry regulations to gain an exclusive advantage.”

Meanwhile, the KPK, in its 2011-2015 Strategic Plan, has explained four criteria for grand corruption. First, involve decision makers on policies or regulations; second, involve law enforcement officials; third, broad impact on national interests; and fourth, the crimes are systemic and organized.

Although corruption is a complex phenomenon that cannot be viewed in a linear binary view as between "big" and "small," there are several features that distinguish petty corruption (street-level corruption) from higher crime rates.

The main difference between petty and grand corruption is the perpetrator's status. Major corruption is carried out by involving high-ranking officials who have discretion over their positions for their interests. At the same time, petty corruption is small-scale and has a daily scope, such as public officials' interactions with citizens while providing public services.

In contrast, petty corruption involves lower-level officials who usually enjoy discretion over the delivery of essential services, such as education and electricity (Heineman and Heimann 2006: 77) or during their meetings with citizens; for example, a police officer may extort a bribe, or a business person may pay facilitation payments to officials to expedite licensing procedures.

Another difference lies in that because major corruption occurs at higher levels, it is more likely in practice to involve changing laws, policies, or institutional structures for personal gain (U4 Anti-Corruption Resource Center; United Nations 2004: Kenny and Søreide 2008: 5), whereas petty corruption focuses on the abuse of existing laws and structures (Kenny and Søreide 2008: 4).

The United Nations (2004: 23) asserts, "an important difference between grand and petty corruption is that the former involves distortion of the central functions of government by senior public officials, while grand corruption develops within the context of functioning governance and social frameworks."

The second difference relates to the threshold amount involved. Massive corruption involves significant amounts of resources, for example, as described in the UNCAC as "large amounts of assets, which may constitute a large proportion of the country's resources." Meanwhile, petty corruption, also known as "administrative" or "bureaucratic" corruption, is everyday corruption that involves small amounts or giving small favors.

The third difference relates to the organizational and transnational nature of grand corruption compared to petty corruption. Massive corruption usually crosses borders and involves highly affiliated officials who engage in organized schemes to siphon state resources for their gain (Ware and Noone 2005; Cooley and Sharman 2017).

However, there are also challenges to distinguishing large and petty corruption by using a general definition. The terms "petty corruption" and "grand corruption" are not different legal definitions but are only used to describe variations of the same phenomenon (Peters 2015: 10). Like petty corruption and other forms of corruption, grand corruption includes bribery, embezzlement, unlawful enrichment and other abuses of power for personal gain.

Over the past few years, Transparency International has developed a legal definition of grand corruption. In 2016, the draft definition read as follows:

"Massive corruption occurs when:

- a public official or other person deprives a specific social group or the majority of a country's population of a fundamental right;
- or cause the country or its people to suffer losses of more than 100 times the annual minimum income of its people;
- as a result of bribery, embezzlement or other corruption offenses" (Transparency International 2016b).

By referring to "public officials or other people," the draft definition does not explicitly limit the perpetrators of significant corruption to only high-ranking public officials or individuals. As indicated in the explanatory note on the definition, a person includes both natural persons and legal entities (Transparency International 2016b), which means that any person or legal entity can be prosecuted and prosecuted for gross corruption using the definition.

"Fundamental rights" are defined as any rights included in the Universal Declaration of Human Rights; International Covenant on Civil and Political Rights; International Covenant on Economic, Social and Cultural Rights; or other international and regional human rights conventions applicable under the domestic law of the country concerned. "Depriving" those rights is consistent with the convention's official interpretation. A "specific social group" is referred to in Article 1(A)(2) of the United Nations Convention relating to the Status of Refugees. The explanatory note shows that by increasing accountability for corruption as a human rights crime that is very detrimental to citizens and too often with impunity, legal definitions provide legal relevance to victims of corruption. (Transparency International 2016b).

The legal definition was revised in 2019. The current draft definition reads as follows:

"Grand corruption means the execution of one of the offenses in Articles 15-25 of the UNCAC as part of a scheme which:

1. involving high-level public officials; and
2. result in the misuse of public funds or resources or serious human rights violations of a large proportion of the population or vulnerable groups" (Transparency International 2019).

Previously, in the previous edition, the definition of grand corruption included certain elements that were not present in the first version. First, it introduces elements of corruption schemes, meaning that significant corruption crimes must be committed as part of a systematic or well-organized action plan, where the number of victims is relatively high" (Transparency International 2019). To determine whether an act of corruption is part of a systematic or organized scheme, further factors to consider include: i) the number of transactions; ii) the duration of the offense; iii) the number of participants; or iv) the amount misappropriated (Transparency International 2019).

Second, the draft definition required the involvement of high-level public officials, which was not an element of the definition in the first version. That is, if only private persons or low-ranking officials are involved in a corruption scheme without the involvement of high-level public officials, it will not be considered grand corruption.

The definition of "high level" is based on Article 52 of the UNCAC, which refers to "individuals who are, or have been, entrusted with prominent public functions and their family members and close associates." This concept also adopts the Financial Action Task Force (FATF) in which politically-exposed persons are defined as individuals such as "heads of state or government, senior politicians, senior government officials, judicial or military officials, senior executives state-owned companies as well as, important officials of political parties" (FATF 2013:10). With this explanation, and it means that everyone who exercises high-level power in government, with or without a formal title, can be considered a high-ranking official.

Third, recent definitions have added the adjective "gross" to human rights violations. An explanatory note on the definition shows that the meaning of "serious violation" comes from the International Commission of Jurists in The Right to a Remedy and Reparation for Gross Violation on Human Rights. According to this guide, a major international law crime is a gross human rights violation.

In addition, "the intentional and systematic deprivation of basic foodstuffs, essential primary health care or shelter, and basic housing may also be considered a gross violation of human rights" (Transparency International 2019). This means that when grand corruption schemes lead to the deprivation of essential services such as food, health, and shelter, this practice can severely violate human rights, thus meeting the requirements of the proposed definition.

This manifestation of grand corruption often arises from 'cooperation' between employers and decision-makers or policy makers through state capture. State capture is a systemic corruption that occurs when private interests have influenced policymaking for their benefit. Grand corruption shows clearly where external interests illegally distort the highest levels of the political system for personal gain.

One of the clearest examples of grand corruption in Indonesia is the corruption in the e-KTP project, which has been carried out since 2011 with a state loss of IDR 2.3 trillion. This corruption involved seven people who have all been sentenced to between 6 and 15 years in prison. In this case, one of the crucial figures is the former DPR chairman, Setya Novanto, who was sentenced to 15 years in prison.

Transparency International has emphasized that the practice of grand corruption harms many people and violates human rights. In the case of e-KTP corruption, for example, this case has violated the fundamental rights of the community to have identity cards which are crucial for the need to access public services, for example, access to social assistance (bansos) during times of crisis.

The United Nations (2004) states that gross corruption spreads to the highest levels of government, leading to gross abuses of power, widespread erosion of the rule of law, economic instability, and a decline in trust in government. Regarding the consequences, there are variations because some definitions focus on political stability and sustainable development (UNCAC), others on the various dangers of grand corruption to individuals and society (Transparency International), and others on political integrity (U4 Anti-Corruption Research Center) and the rule of law: law, economic stability, and governance (United Nations, Rose-Ackerman 1996). Therefore, the general definitions provided by various sources need to be adapted to the context and characteristics of each country.

c. Political Corruption

Meanwhile, political corruption occurs when political decision-makers abuse their authority by manipulating policies, procedures, or rules to benefit themselves or their group. This advantage can be in wealth, status, or maintaining the office. Political

corruption includes bribery, influence trading, vote buying, nepotism, or campaign financing.

Like grand corruption, political corruption involves people at high levels of state administration who cooperate with the private sector in state capture efforts. Political corruption has the potential to occur when members of the legislature also double as entrepreneurs. These actors then manipulate political institutions to influence the government and the political system to benefit their companies. Some examples include laws and regulations that are abused, not enforced procedurally, ignored, or even drafted in self-interest.

In addition to enriching oneself and maintaining one's position, political corruption is also commonly carried out to raise funds for the victory of political parties or oneself in the next election. The money from corruption is then used to carry out money politics by bribing the people so that they can be re-elected.

Political corruption also degrades the democratic climate by influencing people's choices using materials. One of the most common forms of money politics is giving envelopes filled with money to get people to vote for them. Society must realize that the value of the money is not commensurate with the losses they will experience if dirty politicians sit as policymakers.

Political corruption can also be defined concerning the principal actors involved, i.e., people at the highest levels of the political system, and the goal is to maintain power. Often these two forms of political corruption are interrelated. Several political corruption scandals show the accumulation of power on the one hand and the misuse of public money for political purposes on the other.

In this context of accumulation, political corruption occurs when government officials use and abuse their power to extract the private sector from government revenues and state funds in general. Depending on scope and context, this accumulation process is called extraction, embezzlement, rent-seeking, looting, and even kleptocracy ("rule by the thieves").

Extraction occurs mainly in requests for bribes in procurement and government projects or the process of privatization and taxation. Military procurement, for example, is known to be heavily influenced by extractive political corruption worldwide due to the complicity of top-level politicians, national interests, and secrecy.

Another process occurs when extracted resources (and public money) are used for power accumulation and power extension, which are usually in the form of favoritism and patronage politics. This practice includes favoritism and the politically motivated distribution of material, benefits, gains, and spoils. For example, they buy votes by distributing financial and material assistance to build political loyalty and support. With it, power holders can pay their political rivals and the opposition to secure a parliamentary or cabinet majority.

By giving favoritism to private companies, these kleptocrats can gain party and campaign funding and can afford to pay government inspection and control agencies, for example, to stop investigations and audits and gain legal impunity. Moreover, by buying loyal decisions from the election commission and by buying the votes, they were able to secure his re-election.

Political corruption occurs at the highest levels of the political system and thus can be distinguished from administrative or bureaucratic corruption. Bureaucratic corruption occurs at the end of political implementation, for example, in government services such as education and health. At the same time, political corruption occurs at the end of political formulation, where decisions about the distribution of the country's wealth and the game rules are made.

Political corruption involves political decision-makers, those with the power to formulate laws and regulations (politicians and senior civil servants). Political corruption does not involve civil servants at the end of political implementation. It also excludes the service delivery sector, although the distinction is not clear and bureaucratic corruption can be a pyramid of upward extraction.

- Executive branch: president, ministers, civil servants, including leaders of the military and security forces
- Legislative branch: members of parliament
- Judicial branch: supreme and high court judges
- Local and regional authorities: governors, DPRD members, and others. Not included in all definitions

Political corruption is also closely related to the presence of people who are or have had public authority (*Politically-Exposed Persons*, PEPs). Transparency International Indonesia has six categories. The first is bureaucracy; they are people who are still active or have retired from bureaucratic positions. The second is the oligarchy. Political scientist Jeffrey Winters defines *oligarchy* as actors who own and control large amounts

of material resources to maintain or increase their personal wealth and exclusive social position.

The third is a PEP's close person, who can be a family member or an individual known as a PEP's confidant. The fourth is law enforcement officials, including prosecutors and police. The fifth is the military, and the sixth is a strategic position which can be defined as someone who has had strategic authority, including positions in companies, politicians, heads of public accounting firms, and heads of state universities.

c. Impact Evaluation

Impact evaluation seeks to determine the long-term results of a policy decision, whether through intervention, project, or program. The impact of this decision can be positive or negative, intentional or unintentional, direct or indirect¹.

However, as it is widely understood, there are often challenges to determining the appropriate way to carry out impact evaluations. Related to this problem, a combination of methods and design of impact evaluation is needed that is suitable for certain policy situations and contexts.

In determining the method and design of an impact evaluation, there are generally three aspects that need to be the primary considerations, namely (1) the modality of the resource, (2) the nature of the object being evaluated, and (3) the purpose of the evaluation itself².

Regarding resources and challenges, various evaluation methods and designs will depend sufficiently on the availability of data, internal knowledge and capacity, and funding modalities to engage external evaluators and the possible need for additional data collection and analysis. Other constraints also include the time available before the findings are reported.

The nature of the object being evaluated is the second issue to consider. The step of an impact evaluation is often determined in part by whether:

- program workflows are well understood or are still under development;
- impacts can be easily observed over a short period or only a few years later;
- program activities are standardized and predetermined or adaptive; And

¹ U4 Anti-Corruption Research Centre. (2013). *Methods for learning what works and why in anti-corruption: An introduction to evaluation methods for practitioners*. Hlm. 8

² Australia Government, Department of Industry, Innovation and Science. (2015). *Choosing Appropriate Design and Methods for Impact Evaluation*. Hlm. 19

- the program is the only factor that produces an impact or works together with other programs and other factors.

Several of these factors are essential to see how the interventions carried out can contribute to the desired impact.

The third issue to consider is the intended use of the evaluation itself. This will affect the types of questions asked, the timing of the assessment, and the scope of the definition of credible evidence.

Impact evaluations can provide evidence about impacts that have been produced (or impacts that are expected to be produced). This does not only require credible evidence that changes have occurred but also must be able to demonstrate a causal relationship that a particular project, program, or policy at least partly or wholly causes the changes that have occurred.

The term causal relationship itself is generally interpreted in two primary contexts³:

- **Attribution Relationship:** the term used to describe the estimated proportion of impact caused by a particular program or policy;
- **Contributory Relationship:** a term used to describe when an intervention has become a contributing factor that produces an impact.

In contrast to process evaluation which focuses on exploring the comparison of the design or initial design of a program and the reality of implementation and assessing the extent to which the process supports the achievement of program objectives, impact evaluation focuses more on the contribution of an intervention to changes in behavior, organization, politics, or community as outlined in the results chain or theory of change, and improving the quality of the evaluability of program intervention.

In terms of intended use, impact evaluation can also have different characteristics, generally known as formative impact evaluation and summative impact evaluation. Formative impact evaluation is generally used to inform program or policy improvements, especially when there are ongoing policy commitments. Meanwhile, summative impact evaluation is carried out to assist in making decisions regarding starting, continuing, or expanding a program or policy.

The relevant impact type in an anti-corruption intervention will depend on the nature of the intervention. The impact will have a different meaning depending on the ultimate

³ *Ibid.* Hlm. 22

goal of an intervention or program. Therefore, the conception of impact is not limited to changes or benefits to interventions but also to changes in attitudes, awareness, behavior, capacities, opportunities, performance, practices, and understanding of beneficiaries, communities, constituents, organizations, or individuals in any geographic location, whether local, regional, national, or international.

In the context of this research, the research team has listed the potential economic, environmental, and social impacts as a starting point for considering the broader possible impacts of the program. Monitoring data that has been systematically collected during program implementation can be used to estimate the contribution of interventions or to ensure that the program is running as planned. This is important because it is not always possible to wait until long-term impacts can be measured in impact evaluations to produce evidence to inform policy, investment, and implementation decisions.

Meanwhile, in the context of questions, social research around impact evaluation generally involves three different types of questions, namely descriptive (how were the current and previous conditions), causal (how did program interventions cause the target object to change), and evaluative (assessment of the overall value of the benefits or value of the changes brought about). The elaboration of the explanation can be seen below:

- Descriptive questions: explore how something happened and what happened. This dimension can include the initial situation and how it changed, intervention activities and other related programs or policies, as well as the environmental situation for implementation;
- Causal questions: exploring whether or not, and to what extent, the intervention being evaluated has brought about a change. Causal analysis is generally a method of understanding how interventions can contribute to impacts, along with other factors and programs;
- Evaluative questions: exploring the overall value of a program or policy, taking into account expected and unintended impacts, pre-set criteria and standards, and how different criteria should be considered;

In any impact evaluation, a combination of methods is needed to answer these questions. In the context of this study, impact valuation uses a mixed-method approach where the results of one method can be used to test or expand on other methods.

CHAPTER III RESEARCH METHODOLOGY

Evaluating an anti-corruption intervention is not easy because eradicating corruption is a complex, long-term effort. The evaluation methodology must also consider the difficulty of measuring corruption as a complex and secret phenomenon supported by various underlying driving factors, deep-rooted interests, and relations between powers.

As a result, many challenges arise in the evaluative process, ranging from measuring corruption accurately, proving cause-and-effect relationships, identifying potential stakeholder resistance to discussing the topic honestly and openly, the time needed to achieve impact, to possible consequences and reactions. Undesirable, as well as fairly measure the evaluation results sustainably.

Until now, conventional anti-corruption approaches have not consistently yielded the expected results, especially in Indonesia. Therefore, impact evaluation assessments that measure whether an anti-corruption intervention can contribute to broader change can help fill the evidence gap of anti-corruption interventions.

This study aims to provide specific advice in evaluating anti-corruption interventions in Indonesia, namely Presidential Regulation Number 54 of 2018 concerning the National Strategy for Prevention of Corruption (Stranas PK). In this research, there are several important conceptual aspects that have been used and considered in the process of developing impact evaluation research instruments, including:

1.1 The diversity of scales and types of corruption, as well as the perpetrators of corruption

Corruption has been exploited by many actors in various situations, from a politician accepting bribes from a company awarded a significant contract to a health worker offering exorbitant fees for quicker access to a vaccine.

Generally, manifestations of corrupt practices include bribery, influence trading, embezzlement, fraud, kickbacks, extortion, nepotism, clientelism, abuse of discretion, and corruption. In that case, determining which corruption is the most dangerous depends on the context.

In some cases, many small acts of corruption are more dangerous than one significant act. In other cases, large-scale corruption certainly contributes a more massive impact than petty corruption. The prevalence of each form of corruption varies between countries and between regions, sectors, and institutions within the country itself.

Corruption occurs in the realm of politics, the public and private sectors, and at the intersection of the three. Corruption can also be transnational and is most likely the result of external factors such as tax havens and foreign policy objectives, including regional security, trade relations, and diplomacy.

In some contexts, corruption is an anomaly that originates from the actions of several individuals. However, the majority of corruption is rampant. In the extreme, corruption is an integral part of the socio-political and economic system.

1.2 Diversity of anti-corruption Interventions

The various forms and manifestations of corruption also give rise to variations in the types of anti-corruption interventions. These interventions can be global, regional, national, sub-national, sectoral, or institutional.

Anti-corruption policies can also stand alone or be integrated into a more extensive program, either explicitly or implicitly, internally or externally, or directly or indirectly. In general, an anti-corruption policy is not designed explicitly for corruption prevention alone but for a broader purpose, such as good governance.

However, many recent studies have shown that many conventional anti-corruption interventions are ineffective. However, an anti-corruption intervention cannot definitively be labeled as effective or ineffective because its character, nature, and details deserve to be looked at more deeply. For example, anti-corruption agencies (Anti-Corruption Agencies/ACA), for example, have different mandates, human resources, and levels of

independence between countries, so they need to be looked at more contextually if you want to see their effectiveness.

Some anti-corruption bodies, for example, have investigative and prosecution powers, while others do not. Some are spearheaded by influential individuals willing and able to prosecute politicians and their families, while others are not. This variation is a crucial determinant of the possible impact that ACA can have. It is, therefore, essential to see the context of implementing an anti-corruption intervention.

1.3 The unique combination of causes of corruption

Corruption is again a complex phenomenon, which is often caused and sustained by various interrelated factors. These factors can often be broadly categorized into four drivers:

- principal-agent/institutional issues;
- collective action problems;
- problems of normalizing norms, values and pressures; And
- short-term corruption function problems.

These drivers are a broad category, and each requires further review. Principal-agent problems, for example, stem from a lack of transparency. This factor, for example, could arise from the absence of operational freedom of information laws.

Thus, an anti-corruption intervention needs to address the main causes of corruption, not just the symptoms. In the past, the focus has been largely on top-down 'technical' reforms. However, this approach, which is deeply reflected in the Stranas PK policy, is often not enough. For example, the approach pattern of the Stranas PK program which tends to be normative-administrative, in the end only encourages the intervened institution to measure and report progress administratively as well; while the problems and main actors remain enduring.

This problem-focused approach to understanding and tackling corruption requires exploration of all relevant stakeholders and drivers, as well as the broader socio-political and economic context. In any context, the strength and combination of drivers, as well as the actors involved, will vary.

Even when two countries, regions, sectors or institutions appear to have similar corruption problems, the exact causes, as well as possible solutions, will be determined by circumstances or context. When there are many triggers for acts of corruption, a

multi-dimensional approach is needed. But what seems certain, shallow and isolated anti-corruption interventions are unlikely to have a lasting impact.

The dynamic nature of corruption and the dynamic approach of current anti-corruption initiatives correlates closely with a number of implications for the evaluation process – from the way data is collected to the methodology of the assessment.

The evaluation process must therefore comply with the best practice standards that are continuously being developed. This aspect includes, among others, conducting evaluations that:

- Timely, useful and utilized;
- Clear, focused and contextual;
- Truly participatory;
- Responsive to gender, human rights and sustainability;
- Compliance with quality and ethical standards, as well as the principles of effectiveness;

Bamberger, Vaessen, and Raimondo identify five potentially interrelated dimensions of complexity in development evaluation: 1) interventions; 2) institutions and stakeholders involved in the intervention; 3) the effect of the intervention – including the process of causal change; 4) the context in which the intervention was carried out; and 5) the evaluation itself.

When an evaluation faces complexity, the evaluator in this case really needs to complement the established evaluation approach with new methods. Several potential methods are often the main reference, for example outcome harvesting, comparative qualitative analysis, contribution analysis, social network analysis, system mapping, and appreciative inquiry.

2.1. Method: Process Tracing

Process tracing (PT) is defined as: "Systematic examination of selected and analyzed diagnostic evidence based on research questions and hypotheses put forward by researchers" (Collier p. 823). Process tracing methods are designed to be applied in complex contexts where competing causal explanations can be found for observed outcomes (Beach and Pedersen 2013; Collier 2011).

This method allows for careful investigation and triangulation of types of evidence using multiple data sources and involving multiple actors. PT offers an explicit procedure for assessing the strength of causal inferential evidence, facilitating a balanced assessment

of the likelihood of rival hypotheses and explanations. In addition, PT is considered capable of encouraging the creation of new analytical generalizations. It is rated as “the preferred way of generalizing from case studies and evaluating case studies” (Yin 2013, p. 327).

Key attributes of a process trace methodology include:

- Careful description is the basis of process tracking. The researcher must move step by step in a causal chain by describing events with a sufficient level of detail;
- Sequencing is the key to capturing the changing values of the dependent and independent variables over time;

This process tracing method aims to capture an overview of the selected variables at certain times. This method will characterize the key steps in the process, which in turn allows the researcher to understand why and how the change has occurred. The process tracing method requires key steps, called diagnostic evidence or causal-process observations, which provide the basis for descriptive and causal inferences.

In tracking and identifying the diagnostic evidence, two approaches are used, namely first, observing patterns in empirical regularities (inductive approach), and second, conceptual frameworks, theories or explanatory models (deductive approach). In both cases, the goal is to identify the pieces of information that are critical to ensuring causality that follow at least three conditions (Babbie, 1999):

- a) The dependent and independent variables must be related empirically;
- b) Temporarily, changes in the independent variable occur before changes in the dependent variable;
- c) The relationship cannot be explained by other earlier variables;

In addition, to utilize the PT methodology to assess the impact of policy action interventions, it can be equipped with minimum causality conditions with the following considerations:

- Distinguishing the observed results of policy interventions from the results in the dependent variable which will occur anyway. While this may sound complicated, it should at least be established whether there is already a pattern of change impacting the observable dependent variable from before and independently of the intervention being assessed;
- Identify where the actions of others may also impact the dependent variable. For example, if there are other programs or activities that are independent from the

Stranas PK which aim to address the same problem (the dependent variable) then the question "attribution" becomes very relevant;

- Tracing the extent to which the impact of initial interventions is likely to diminish over time (sustainability);
- Exploring the extent to which the original situation was transferred elsewhere. This is especially important for the problem of corruption because, if the policy approach does not address the root causes of the problem, the most likely outcome is that corruption will emerge in a different place or take a different form;
- Investigate unintended consequences (negative or positive);

Therefore, case selection is very important in the tracing process. In following the strict academic research advice criteria are taken against selection bias based on knowledge of the dependent variable. This means that cases should not be selected because they produce findings that are consistent with the researcher's pre-existing beliefs or expectations.

In adapting the process tracking approach to Stranas PK monitoring, a number of aspects have been considered. Process tracing is an adequate methodology for assessing causal claims, which makes it suitable for evaluating the level of impact of Stranas PK implementation efforts.

In particular, this research will apply the PT method to develop concrete and detailed case studies for each area of activity monitored.

- The independent variable is Stranas PK activities that have been implemented. In the research the independent variables are the three selected actions;
- The dependent variable currently refers to the change chain handled by Stranas PK in the logframe. This dependent variable, or impact variable, must be placed outside the public sector because it refers to the ultimate change achieved by policy action.

However, in the absence of a theory of change in the Stranas PK policy, the research team then developed a working hypothesis about a causal chain which is expected to be able to link the activities carried out by the Stranas PK and the expected impact.

In an effort to overcome confirmation bias several strategies have been implemented:

- a) Build a conceptual framework that defines the expected interaction parameters of the independent and dependent variables and the expected outcomes;
- b) The main observations relating to causality between actions implemented under Stranas PK and outcomes and impacts (whether positive or negative) are

confirmed by more than one source and ideally also by some observable information;

- c) Hypotheses, data collection and analysis to be supported by the Basel Institute team, which are more detached from the Indonesian context, can help minimize the risk of confirmation bias;

2.2 Stranas PK Contributive Relations with Corruption Prevention

Proving a causal relationship between anti-corruption interventions and actual results and impacts has proven difficult:

1. Many interventions may also broadly support the same target unit (e.g., the judiciary).
2. Many past and present forces often cause change.
3. There are often data limitations.

Therefore, in the case of the Stranas PK evaluation, the research team is more appropriate to show contributions than attributions.

There are four approaches to building contribution relationships: the counterfactual framework; the regularity framework; the configuration framework; and the generative framework. Counterfactual methods, such as the Randomized Control Trial (RCT), are often cited as the most popular approach. Specific methods include Rapid Outcome Assessment (ROA), episode studies, and contribution analysis. The first two methods start with the change and then chart the process backward to determine the causal factors. This step can be an effective way of ensuring that the importance of the intervention is not overstated. Triangulation can also help overcome attribution and contribution challenges.

Unfortunately, anti-corruption interventions in the context of the Nastra PK do not have an explicit and adequate theory of change (ToC). So the research team could not compare this theory of change with situational analysis. The research team then worked with stakeholders to develop a theory of change retroactively, including making adjustments, one of which was by developing proxy indicators.

When evaluating the impact of an intervention, it is vital to be problem-driven, not method-driven. The evaluation approach, methodology, and techniques should be guided by the overall objective and scope of the evaluation; questions that need to be answered; intervention attributes; content; data availability; and allocation of budget, time, and human resources.

The research team then designed an impact evaluation considering the reality of corruption and the above anti-corruption measures. The ability of each evaluation method to measure impact in the context of complexity can be assessed on six dimensions:

- Attribution: Documenting changes and linking them to interventions
- Explanation: Showing how the intervention works and how it affects change
- Multiple causal pathways: Exploring multiple changes and confluence of factors influencing change
- Nature of causal change: Assess uncertain, non-linear, and emergent changes
- Emergence: Accommodating interventions that adapt over time and change in the broader context over time
- Scope of effects: Captures all effects, including unwanted results

2.3 Steps to Evaluate the Impact of Stranas PK

A. Preparation of Impact Evaluation Instruments

In this research, the first step taken in the process of perfecting the impact evaluation assessment instrument is to identify whether all the main prerequisites have been met to evaluate the impact of the implementation of the National Strategy for PK. As previously stated, there are three issues that need to be the main consideration, namely a) available resources and constraints; b) the nature of what is being evaluated; and c) the purpose of using the evaluation.

On the first issue, the availability of data is a major concern considering that not all actions that have been carried out have had significant developments. But apart from this aspect, internal knowledge and capacity as well as external evaluators are very possible, considering that the entire evaluation process is carried out collaboratively with a number of civil society groups.

On the second issue, the implementation of the Nastra PK refers to the logframe which contains mapping of actual conditions, background issues and strategic objectives which are then set into output targets and indicators, key activities and the Ministries/Institutions involved. It should be remembered, because PK Actions are heterogeneous with one another, assessment guidelines are made to adjust to each action. For example, there are actions whose basis of assessment is aimed at indicators or final results and there are those which are based on a combination of indicators and processes or key activities.

While on the third issue, the purpose of using this impact evaluation focuses on the causal contribution relationship. As will be explained in the following section, the purpose of this study is to explore (i) the contribution of an intervention to behavior, organizational, political, or societal change as outlined in a result chain or theory of change, and (ii) improving the quality of the valuability of an intervention. program. This causal analysis is a method of understanding how interventions can contribute to impacts, along with other factors and programmes; including providing information on how to effectively improve the implementation of Stranas PK.

After identifying the need to fulfill the three prerequisites above, the research team carried out the process of data collection and data analysis. A variety of data collection and analysis methods can be used to gather evidence to suggest that change has (or has not) occurred by:

- Preparation of key questions;
- Purposive sampling;
- Data management;
- Data analysis, especially options to identify patterns in data;
- Data presentation.

B. Data Collection and Validation

This assessment consisted of field reviews, desk research and desk research, including a review of reports, laws and media sources, followed by semi-structured interviews and focus group discussions with key stakeholders, both local government actors, experts and beneficiaries. This report will then be professionally reviewed before being released to the public.

Data collection was carried out by Transparency International Indonesia in North Sumatra, South Sulawesi and DKI Jakarta. The data collection process in the regions was carried out using in-depth interview techniques and focus group discussions with the Regional Government and civil society organizations to complement the data collected from the literature and literature review, and data that will be available on the Stranas PK reporting portal (www.jaga.or.id/monitoring).

The decision to determine who the informant is and how the data collection technique will be determined collectively. This depends on the completeness of the information available and considerations of the timing of data collection. In the data mining process, it was ensured that the informants were in a sufficient position to provide answers and represent their views accurately. As part of the data validation process, the Transparency International Indonesia team conducted field observations and data

checks by reviewing regional partners' periodic reports. The review results of these periodic reports determine the quality of data processing.

C. Data Processing and Analysis

Data processing from the policy evaluation research on the Stranas PK was carried out by the Transparency International Indonesia team. Data processing will be sourced from all the results of primary and secondary data collection. The analysis technique will use a causality approach.

After reviewing the available information, an evaluation matrix will be created showing the data analysis that will be used to answer each KEQ. This information is then used to identify and prioritize data gaps that need to be addressed by collecting new data.

This step helps ensure that data collection covers all KEQs, determines the need for triangulation and helps design data collection tools (such as questionnaires and interview questions) to ensure that information collection has been carried out properly.

The results of the processing and analysis of this research data systematically describe the process from upstream to downstream the conditions of the three PK Actions which are the object of research. Because this research reviews the impacts that are in the downstream position, of course by prioritizing the values of objectivity and fairness, it is important to trace the results of the general conditions of PK Action, the level of process or output and outcomes on the upstream side.

In this study, what is meant by concepts in the chain of change include:

- a) Output is short-term results, in the form of products or services;
- b) Outcomes are medium-term results, in the form of situations obtained from outputs;
- c) Impact is a long-term result, in the form of a situation that is obtained from an outcome, which is usually the contribution of many things, apart from the substance of the action/program;

In order to get a comprehensive description of the level of achievement of the National Strategy for PK Action, the research team determined proxy indicators from the achievement hypotheses for the National Strategy for PK Action starting from output, outcome, to impact as follows:

Table 1. Proxy Indicators for the National Stranas PK Impact Evaluation

No	Output	Outcome	Impact	Corruption Prevention
1	Action "Availability and Utilization of Valid and Reliable Meat Commodity Data at INSW as a Basis for Policy Making"			
	<ul style="list-style-type: none"> • Availability of national demand data for meat commodities • Availability of national meat commodity production data • Availability of import quota data 	The INSW/Commodity Balance is the basis for policy making stable prices	<ul style="list-style-type: none"> • Stable prices • Ease of obtaining permits for business actors (importers) • Pro national livestock and food self-sufficiency 	<ul style="list-style-type: none"> • Potential for preventing corruption • Corruption loopholes
2	Action "Targeted Non-Cash Food Assistance (BPNT) / DTKS Padan NIK Basic Food Program"			
	<ul style="list-style-type: none"> • KPM in DTKS according to BPNT poverty criteria • DTKS equals NIK 	<ul style="list-style-type: none"> • DTKS as the basis for making BPNT distribution policies for KPM • KPM from DTKS receives BPNT on time and in quantity 	<ul style="list-style-type: none"> • KPM's basic needs are met through BPNT • Social Welfare -Poverty Reduction 	<ul style="list-style-type: none"> • Potential for preventing corruption • Corruption loopholes
3	Aksi "Terselesaikannya Pengaduan via SP4N-LAPOR! yang Meningkatkan Kualitas Pelayanan Publik"			
	<ul style="list-style-type: none"> • SP4N-Lapor has been integrated/consolidated with the 	Community participation in synergizing with the government	Complaint resolution improves the	<ul style="list-style-type: none"> • Potential for preventing corruption

	Ministry/Institution/ Regional Government complaint system • Complaints received via SP4N-Lapor have been resolved (received, distributed, followed up)	through complaints made	quality of public services	• Corruption loopholes
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Based on the data obtained, then an analysis is carried out to identify and at the same time prove whether the predetermined achievement hypothesis has been achieved or not. In addition to substantive outputs, outcomes and impacts, the potential for corruption prevention and loopholes from these actions has also been analyzed and identified.

2.4 Research's Informants

The data sampling process was carried out based on data from 3 regions, namely DKI Jakarta, North Sumatra and South Sulawesi. This impact evaluation research was conducted from 1 November 2022 to 31 February 2023.

The monitoring and evaluation informants consist of the following parties. Details of informants who can be involved are determined by regional partners.

- A. Government Officials
 - National Corruption Prevention Team
 - National Secretariat for Corruption Prevention
 - Implementing ministries/agencies
 - Other related units

- B. Expert
 - Academics
 - Business Actors and/ business associations
 - Civil society organizations

- C. Clients/Beneficiaries
 - Service finder

- General public

2.5 Research Challenges and Limitations

The research team faced four data challenges: obtaining accurate data; obtaining intervention-specific data; getting enough data; and securing data ethically.

Corruption is an illegal activity. Therefore it is challenging to measure fully and directly. As a result, research teams still have to rely on proxy indicators, perception surveys, and expert opinion. These data sources at least have provided a realistic estimate of corruption and its consequences.

The available data may also not be specific to the intervention. The log frame document and the Stranas PK intervention monitoring system depend partly on secondary data. These data are often too scattered to relate to the intervention or capture small changes.

Although program-specific indicators are the best measure of the performance of a policy intervention, not all anti-corruption interventions have adequate baseline data and monitoring methods. This is generally the case when anti-corruption interventions are implicit or mainstreamed. Because anti-corruption efforts are political, the actors behind interventions often choose a closed approach and decide not to document results strictly.

The political nature of this corruption also resulted in some stakeholders not wanting to participate in interviews or other data collection methods. Even if some are willing to do so, there may be efforts to withhold information so that it is only normative and tends to be closed for fear of sanctions or reprisals.

Such concerns are justified, as whistleblowers, journalists, and reformers alike can potentially lose their jobs, be arrested, have their reputations destroyed, be threatened, and in many cases, even be killed. Gaining access to and obtaining honest answers from individuals who facilitate and engage in corruption is, therefore, not easy and, in some cases, ethically complex.

Furthermore, in practice, an anti-corruption intervention does not always have clearly stated objectives, targets, and indicators accompanied by baseline and monitoring data. These indicators are not always a barometer of success that can capture multiple areas. Some Stranas PK anti-corruption interventions have log frames with indicators beyond their control and influence.

When assessing effectiveness and impact, the research team had to keep in mind that even small changes in levels of corruption are difficult to implement and sustain. The impact of most interventions will be small in scale, and project cycles are often too short a timeframe to produce significant, lasting change.

Effectiveness and impact assessments also need to consider the context. For example, in a context where anti-corruption efforts are rife, preventing past corruption escalations could be a success.

In addition, this impact evaluation research has several limitations, which include the following:

- Actions that become research samples are limited to 3 sub-actions;
- Sampling is limited to 3 regions, namely DKI Jakarta, North Sumatra, and South Sulawesi;
- Limited access to data from several target informants;

Responding to the above challenges, this evaluation then focuses on the extent to which the underlying causes of corruption have been addressed – whether, for example, incentives and social norms have changed. This categorization is based on anti-corruption interventions that target a system of corruption that can theoretically impact three levels: reducing or eliminating certain corrupt practices, weakening the more extensive system of corruption, and contributing to maintaining deeper systems of accountability in society.

The last two levels of impact align with the evaluation approach to assessing transformational change and system change. In short, this research focuses on the impact assessment of how the dynamics of the system have changed, not on what changes have occurred in the system's dynamics.

CHAPTER IV FINDINGS AND ANALYSIS

This section seeks to understand the complexity of the impact-based evaluation process of the implementation of Presidential Regulation Number 54 of 2018 concerning the National Strategy for Prevention of Corruption (Stranas PK). In this part of the analysis, it is hoped that it can invite us to take a closer look at whether the Stranas PK policy initiative has produced the desired results.

In practice, the impact assessment of the Nastra can reflect on the implementation process from the point of view of the beneficiaries so that they are able to support this intervention step so that they can have better information about achievements, opportunities, and the effectiveness of the allocation of resources and funding that has taken place. This paradigm is important because past experience is the key to guiding future actions in a better direction.

Apart from that, it is hoped that the findings in this evaluation report will also strengthen the implementation of the Nastra PK and encourage the participation of civil society groups according to the mandate of Presidential Decree No. 54 of 2018 concerning the National Corruption Prevention Strategy so that its implementation in 2023-2024 can be more optimal.

3.1 Availability and Utilization of Valid and Reliable Meat Commodity Data on the INSW/Commodity Balance as a Basis for Policy Making

Output	Outcome	Impact	Corruption Prevention
<ul style="list-style-type: none"> ● Availability of national demand data for meat commodities ● Availability of national meat commodity production data ● Availability of import quota data 	<ul style="list-style-type: none"> ● The INSW/Commodity Balance is the basis for policy making stable prices 	<ul style="list-style-type: none"> ● Stable prices ● Ease of obtaining permits for business actors (importers) ● Pro national livestock and food self-sufficiency 	<ul style="list-style-type: none"> ● Potential for preventing corruption ● Corruption loopholes

Meat is one of the strategic food commodities whose import management has become the first stage of the food group besides corn, rice, sugar and fish which will be included in the Commodity Balance since 2022. For the Indonesian people, meat is a source of animal protein which is generally consumed, with consumption rate of beef per capita in Indonesia (2.7 kg per capita), which is still lower than Malaysia (7.2 kg per capita), Vietnam (7 kg per capita), and the Philippines (3.9 kg per capita)) (OECD-FAO).

Even though people have preferences for animal protein which will be consumed according to their economic, health, religious, and social/cultural backgrounds, it is undeniable that increased consumption of meat will contribute to reducing malnutrition or stunting in Indonesia, which is currently still 24.4%. , which is still far from the 2020-2024 RPJMN target of 14%.

Apart from that, it is also important to discuss meat imports by reflecting on the corruption case in 2013 in the case of a bribe of IDR 1.3 billion from the private party PT Indoguna Utama to Luthfi Hasan Ishaq as a member of the DPR for the 2009-2014 period and President of the Prosperous Justice Party to influence The Minister of Agriculture, Suswono, regarding the arrangement of an additional import cattle quota to 8,000 tons. In this case, the KPK named 5 suspects, namely Luthfi Hasan Ishaq, Ahmad Fathonah, and PT Indoguna Utama, namely Arya Abadi Effendi, Juard Effendi, and Maria Elizabeth Liman. This case is one of the indications that there are problems in the governance of import and export management which can have the potential for corruption.

Indonesia National Single Window (INSW) and Commodity Balance

The government's commitment to improving the quality of public services in the fields of export, import and logistics that are transparent, consistent, efficient and simple, was manifested through the birth of the Indonesia National Single Window (INSW) which is managed by the National Single Window Institution (LNSW) through Presidential Regulation No. 44 of 2018.

INSW is an electronic system (portal) that integrates data and information delivery and processing systems as well as single delivery of decisions in the export and import process through customs, quarantine, licensing, port/airport documents, and other documents related to export and import by LNSW, Ministry/ Institutions, service users who use INSW services (exporters, importers, customs service management

companies, transport service companies, temporary storage operators, other service users), as well as parties specifically granted access rights to SINSW.

With the INSW system or portal (www.insw.go.id), it is hoped that:

- a. provide business certainty by creating cost certainty and service time
- b. reduce costs and speed up service time related to the export-import process, thereby increasing business competitiveness
- c. provide complete and transparent information on all processes and decisions in services related to export-import
- d. provide certainty and solutions for solving export-import problems in a very dynamic and complex field
- e. encourage the effective and efficient utilization of company resources
- f. encourage the growth and development of entrepreneurship, by providing complete and easy information to start export-import activities
- g. support the application of the principles of Good Corporate Governance in all export and/or import service activities
- h. increasing collaboration and synergy across Ministries/Institutions

Furthermore, in 2022, within the framework of INSW, it is expected to be able to:

- a. supports the simplification and transparency of permits in the field of Export and in the field of Import
- b. provide accurate and comprehensive data as a basis for formulating Export and Import policies
- c. provide convenience and certainty in trying to increase investment and create jobs
- d. ensure the availability of consumption goods for residents and raw materials and/or auxiliary materials for industrial purposes
- e. encourage the absorption of commodities that pay attention to the interests of farmers, fishermen, fish cultivators, salt farmers, and other commodity-producing micro and small businesses

So through Presidential Regulation No. 32 of 2022 the Commodity Balance was born, namely data and information that contains the situation of consumption and production of certain commodities for the needs of the population and industrial needs within a certain period of time which is determined and applies nationally. The commodity balance is a subsystem of the Indonesia National Single Window (INSW) system available in the National Commodity Balance System (SNANK), which functions as:

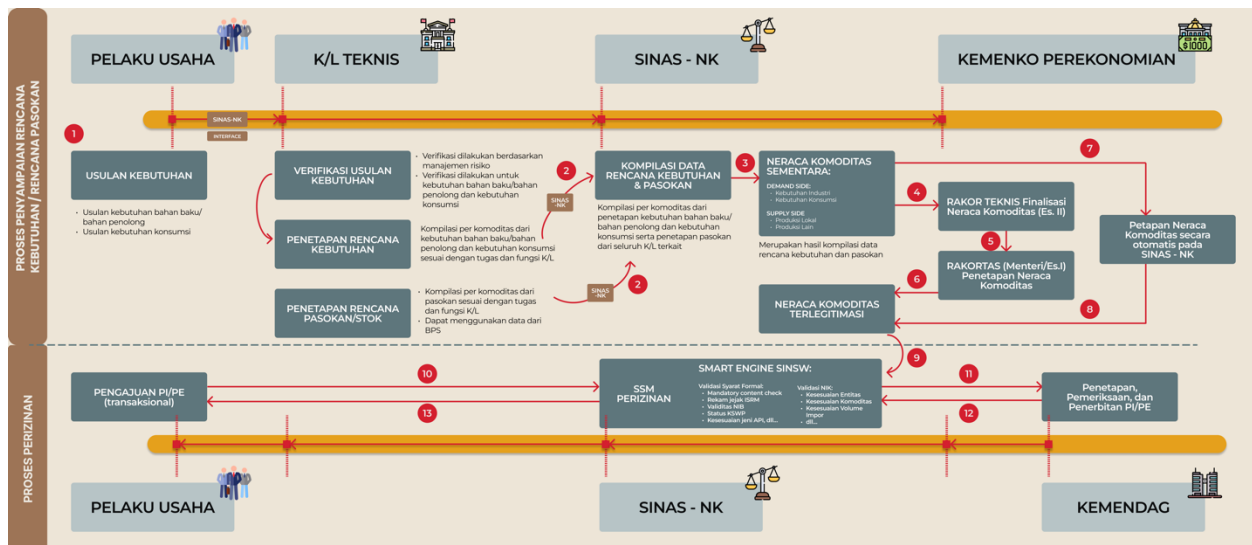
- a. basis for issuance of Export Approval and Import Approval
- b. reference data and information on the situation of consumption and production of a commodity on a national scale

- c. reference data and information on conditions and projections of national industrial development
- d. reference for the issuance of business licenses to support business activities in the Export sector and in the Import sector from ministries/non-ministerial government agencies for the guidance of the commodity sector

This was reinforced by the statement of one of the informants, that "The goal of the Commodity Balance Sheet is to build an integrated national system so that all data is transparent from upstream to downstream. In addition to openness and integration, there is certainty for business actors that does not need to be duplicated in submissions to Ministries/Institutions. So far, what has happened is that business actors submit recommendations to their technical ministries/institutions, then submit them again to the Ministry of Trade for the PBI, so that the amount submitted is often inconsistent and how many have been approved. For business actors certainty will be very important.

Regarding transparency, the Commodity Balance certainly involves Ministries/Agencies and data integration. The Commodity Balance calculates two main components, namely demand plans and supply plans (*fulfillment of needs*). Plans to meet the needs will be carried out through imports or locally. For each commodity, the calculation and characteristics will be different. In 2021 phase 1 has been implemented with 25 commodities that have determined their Commodity Balance. 2022 is implemented for phase 2 with 19 commodities that determine the Commodity Balance to be implemented in 2023. A total of 56 commodity groups have used the commodity balance.

Illustration 1. Commodity Balance Business Process Map



Source: Presentation Material of the Coordinating Ministry for Economic Affairs

The Beef Commodity Balance Sheet from 2019 to 2022 is as follows:

Table 2. Beef Commodity Balance 2019-2022

No	Data	2019	2020	2021	2022*
1	Number of Population (thousand people)	266.911.900	269.603.400	272.248.500	274.859.100
2	Consumption per Capita (Kg/Year)	2,56	2,53	2,46	2,53
3	Requirement (Tons)	683.294	682.097	669.731	736.316
4	Domestic Production (Tons)	404.590	404.997	423.443	389.668
5	Balance Sheet (Tons)	278.704	277.100	246.288	346.648
6	Imports of Meat Equivalent (Tons)	349.487	324.019	283.186	315.731
	a. Feed Cattle (Tons)	648.931	517.683	402.606	
	Feeder Cattle Equivalent to Meat (Tons)	145.432	116.018	77.176	
	b. Beef (Tons)	120.957	122.330	125.509	
	c. Buffalo Meat (Tons)	79.570	81.618	115.534	
	d. Brazilian Beef (Tons)	3.528	4.053	10.887	

3.1.1 The impact that has been produced (or the impact that is expected to be produced) from the output, outcome, and impact of the implementation of the Stranas PK

Output: Availability of National Availability Data, National Needs Data, and Meat Commodity Import Quota Data

In INSW/SINAS NK and also based on the Quarterly Report on Stranas PK and the JAGA application for meat commodities, we know that there are:

1. National Availability Data
2. Data on National Needs (Consumption)
3. Import Quota Data (Plan)

Unfortunately the results of this study found that these data were not fully accurate, valid and reliable. The conclusion is drawn from the limited systematic calculations, research and/or studies on the national population, production and consumption of cattle, so that many parties (breeders, academics, civil society organizations) doubt the accuracy of the data.

So far, a national livestock census has not been carried out due to unavailability of funds. To obtain detailed and accurate data, a national cattle census is needed with the right measurement method, agreed upon by all parties, and carried out regularly, by prioritizing price stability, availability of beef, welfare of breeders, and self-sufficiency or food security in Indonesia.

One of the sources stated: "Real availability calculations are still ambiguous." The data from the slaughterhouses are considered not in accordance with what is reported from the data on the number of cattle slaughtered (in head units) with the amount of meat produced by the slaughterhouses. "If you look at the physique, maybe an average of 400 kg per head is also a question mark because Bali, Kupang and other cattle slaughter 200 kilos or 250 kg (weight). But if we monitor the availability of meat in the country produced from slaughterhouses, the number of cattle slaughtered will be over one ton each."

Therefore, an ideal data calculation method is needed for the availability of beef in Indonesia, taking into account calculations based on: 1). the need for protein for the human body; 2). share of spending; 3). the number of livestock slaughtered at the RPH; 4). consumption participation, namely the number of people who consume meat in that area is calculated by the number of kilograms there together with the number of people.

Data on national availability and national needs are supplied by:

Table 3. Beef Commodity Data Supplier

Supplier	Data	Month
Businessmen; National Food Agency	Proposed Needs	September
Ministry of Agriculture; Central Bureau of Statistics	National Needs (Consumption)	Oktober
Ministry of Agriculture; Central Bureau of Statistics	National Availability (Stock and Production)	Oktober
Coordinating Ministry for Economic Affairs; Ministry of Agriculture; Central Bureau of Statistics; National Food Agency through Technical	Import Quota data specified in the Commodity Balance	Desember

Coordination Meeting (Echelon II) and Limited Coordination Meeting (Echelon I)		
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a. National Availability Data

Local beef production in Indonesia has not been able to meet the demand or consumption of beef in Indonesia. Based on data from the Ministry of Agriculture and the Central Bureau of Statistics from 2019 to 2022, Indonesia's domestic beef production is at an average rate of 417,433 tons (2.3 million cattle), with an average increase trend of around 2.57%.

Table 4. Production of Domestic Beef Commodities (tons)

2019	2020	2021	2022	2023 (prognosa)
404.590	404.997	423.443	436.700	448.432

Production Patterns

The pattern of cattle farming in Indonesia is still carried out in a traditional way, which has not been managed in a modern way using technology or strategy, in fact it is only a part-time business. The existing conditions of cattle farms in Indonesia are as follows:

- a. People's Animal Husbandry (farming system), livestock as "rojo koyo", and "social status" 98%
- b. Livestock company (livestock industry), which has SOP and profit oriented business 2%

Traditional maintenance on a small scale causes production costs to be more expensive as well.

Regarding cattle slaughter, this study found that not all cattle are ready for slaughter because they have a diverse composition, namely calves, young, adults, males and females. Cattle ready for slaughter are young and adult bulls that are more than two years old and unproductive cows (apkir) that are more than eight years old, of which from a live weight of 1,136 kg per head only 406 kg of meat can be taken. smaller than imported cattle). To further fatten cattle, breeders need to develop hatcheries and/or nurseries with support from the government to ensure the availability of seeds, seedlings and/or progeny.

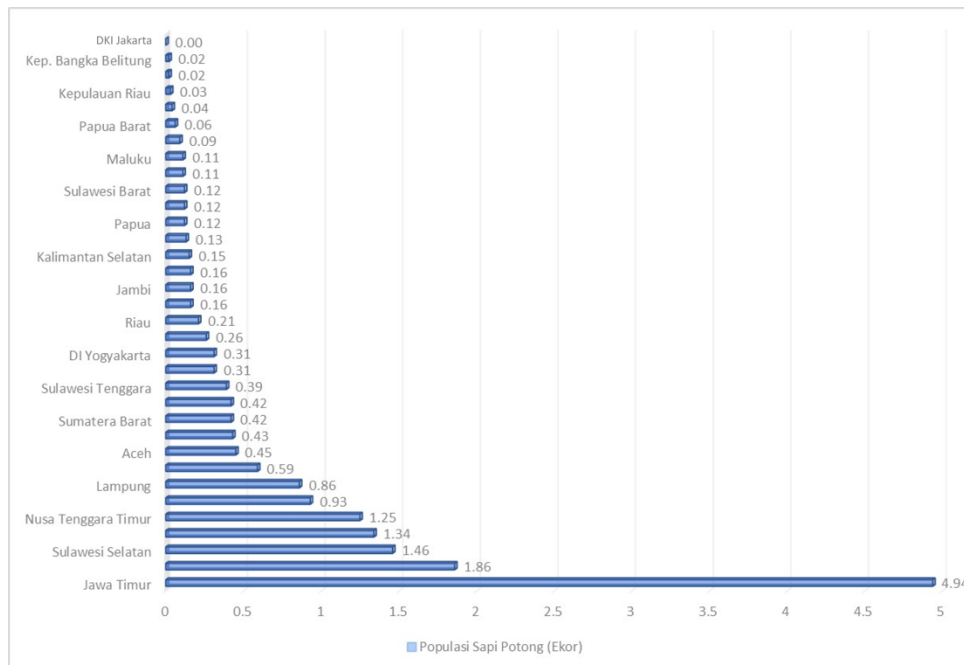
In a broader context, Indonesia has three patterns of community beef cattle development, namely:

- a. The first pattern is the development of beef cattle which cannot be separated from the development of agricultural businesses, especially rice fields and fields.
- b. The second pattern is the development of cattle is not related to the development of agricultural businesses. This pattern occurs in areas that are infertile, water scarce, high temperatures, and very sparsely populated, such as NTT, NTB, and parts of Sulawesi. In general, in this kind of area, there are vast plains that cannot be used as agricultural land.
- c. The third pattern is the pattern of developing a beef cattle fattening business which is really capital intensive, in a large scale business, but this business is only limited to raising feeder cattle into beef cattle. Even though the development of this large-scale business is growing quite promising, these fattening companies known as feedlotters still use imported feeder cattle for their fattening business.

Centers and Production Volume

Supply is seen based on population and production with the main components of land and feed availability. The five regions with the highest beef population centers in Indonesia are in East Java, Central Java, South Sulawesi, West Nusa Tenggara and West Nusa Tenggara.

Graph 1. Beef Population Centers

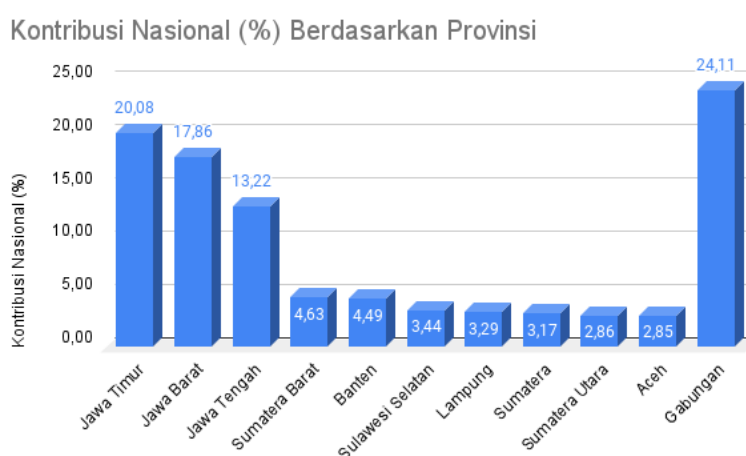


Estimation of cattle and buffalo populations from 2014 to 2020 using livestock mutation parameters. The livestock mutation parameter shows the proportion of each variable

that causes a change in the number of livestock for one year. The livestock mutation parameters currently used come from the Publication of the Livestock Business Household Survey, the 2013 Agricultural Census (ST2013-STU) and the 2017 Livestock Business Cost Structure Survey (SOUT2017).

The parameters used for population estimation are purchases, births, other additions, sales, slaughter, deaths and other reductions, and are corrected by SUTAS 2018 in the form of changes in the number of livestock business households per commodity.

Graph 2. Contribution of Beef Production in Indonesia



Cattle population centers cannot immediately show beef production centers, because it is not certain that in that population, all cows will be slaughtered. Based on the distribution of the contribution of beef production in Indonesia, the five highest regions are East Java, West Java, Central Java, West Sumatra and Banten.

Production Calculation Method

According to the Animal Husbandry Book in Figures for 2022 issued by the Central Bureau of Statistics, two methods of calculating beef and buffalo meat production are known, which include:

- a. Direct Method
 - a. Calculating meat production by recording all slaughtering of cattle and buffaloes carried out at slaughterhouses (RPH) and outside slaughterhouses. This method is difficult to implement considering the unavailability of data on unrecorded slaughtering of livestock outside the abattoir, especially slaughter by households and other parties on weekdays and Eid al-Fitr.
- b. Indirect Method

- c. Calculating beef production by estimating the potential amount of meat production from the livestock population. To perform this calculation, livestock population data is needed based on sex and age group.

Beef and buffalo meat production data from 2017 to 2022 uses the results of the 2013 Agricultural Census and the 2017 Livestock Business Cost Structure Survey (SOUT 2017), where livestock population data based on sex and age group is available, so that indirect calculation methods can be used. which results in the production potential of beef and buffalo to estimate ready stock.

Local Meat Distribution System

With limited land in cities, many cattle production centers are located in rural areas. And when compared with consumption needs which tend to be higher in urban areas with a denser population, transportation facilities are needed for trade from production centers in villages to consumption centers in cities, causing the cost of distribution of cattle to increase.

Illustration 2. Beef Distribution Chain



The long beef trading system chain can be seen from the distribution pattern of cattle from breeders to consumers through 7 (seven) to 9 (nine) stages as illustrated below:

b. Data on National Needs (Consumption)

With a total population of 275 million, the average beef consumption in Indonesia from 2019 to 2022 will be at 2.52 kg/per capita. This figure is still below the world average of 6.4 kg/capita.

Table 5. Indonesian Beef Consumption 2019-2022

Consumption/Necessity	2019	2020	2021	2022
Consumption per capita (kg/year)	2,56	2,53	2,46	2,53
Requirement (tons)	683.294	681.180	669.731	695.390

In fact, this information is very unfortunate, considering that there is an urgent need to solve malnutrition, one of which can be fulfilled through beef animal protein with the amino acid content needed for the growth and development of children.

The factors that influence beef consumption are population, income, and price. People's purchasing power is still low for meat, which is considered a luxury food commodity with relatively high prices, causing meat consumption in Indonesia to remain low. In addition, beef consumption centers are still located in urban areas, due to a denser population with higher income levels compared to rural areas.

During the Covid-19 endemic period in 2022, it can be seen that there has been an increase in the demand for beef in Indonesia by 3.83%. It is estimated that it will continue to increase in 2023 to around 17%.

Consumption Calculation Method

To calculate the amount of consumption as an indicator of domestic demand for meat, BPS collects data on the amount of demand for fresh meat at the consumer level of households, industries, both Large and Medium Industries (IBS) and Small Micro Industries (IMK) as well as Hotels, Restaurants, Catering (Horeka) and food service providers. other foods and drinks that use meat raw materials.

To collect data on meat consumption/needs in the food and drink supply business, starting in 2014 a Staple Materials Consumption Survey (VKBP) was carried out with a national estimation level. Whereas in 2015 and 2017 the VKBP results obtained estimates up to the provincial level.

By combining the results of the three surveys, national meat consumption can be calculated. The scope of companies/businesses from the VKBP Survey includes medium-sized companies, namely accommodation supply companies (star hotels, restaurant companies with legal status, catering companies, Large and Medium Industries (IBS) and hospitals. In addition, the VKBP Survey also covers micro-small

companies including companies provision of food and beverages and micro-small industry.

c. Import Data

The need for beef in Indonesia has not been fulfilled for almost a decade by local beef. Therefore, the fulfillment of beef is done through imports to meet the difference in shortages of 38% during the 2019-2022 period.

However, observations in the field show that an increase in local beef production will not necessarily be able to meet the demand for local beef as the population increases and the demand for beef itself increases. In addition, it is hoped that the adequacy of beef through imports will make beef prices more stable and even cheaper.

Table 6. Import Balance (tons)

2019	2020	2021	2022	2023 (prognosa)
278.704	276.183	246.288	266.065	306.786

The policy on the import of animals and animal products in Indonesia is limited, especially to overcome the shortage of domestic seeds, seedlings and/or saplings. Thus, imports of beef commodities can be done in the form of frozen meat, seeds, germs, and/or calves. Imported meat that comes before calves or calves, needs to be grown on the farm for 3 (three) or 4 (four) months.

In the context of the import balance, the Government has expanded its import policy for cattle/buffalo and their products, no longer based on country (country base) but on a zone basis (zone basis). On the one hand, this reduces Indonesia's dependence on imports from Australia and New Zealand, which has been running so far, but also has the potential to spread Nail Mouth Disease (FMD) because it opens up opportunities for imports from countries that are not yet FMD-free. In the 2019-2022 period, Indonesia has imported cattle from Australia, India, America, New Zealand, Spain and Japan.

In order to pursue the target price of beef or buffalo at IDR 80,000 and/or maintain its stability, the government has been importing buffalo from India since 2016. The number of imports from India continues to increase from year to year, fearing it will disrupt the growth of Indonesian livestock and take away Indonesian consumer rights with ignorance about buffalo meat mixed with beef on the market.

Business actors (importers) apply for import approval through the electronic system <http://inatrade.kemendag.go.id> which is then forwarded to the INSW portal. After the

import approval is obtained, the importers must also obtain a certificate of health and halal from the country of origin of the cattle. Apart from being carried out by private business actors, imports of cattle are also carried out through assignments from the Ministry of BUMN, based on the agreement of the Coordinating Ministry for Economic Affairs and the Ministry of Agriculture, in practice so far this has been given to BULOG and PT Berdikari. Here are some meat importers up to 2021:

Table 7. List of Meat Importers 2021

No	Companies Name
1	PT Bayu Lestari (Bali)
2	PT Berkat Mandiri Prima (Jakarta)
3	CV Cahaya Karya Indah (Bekasi)
4	PT Dua Putra Perkasa P (Bekasi)
5	PT Indoguna Utama (Jakarta)
6	PT Indogal Agro Trading (Jakarta)
7	PT Madusari Nusaperdana (Bekasi)
8	PT Masuya Graha T (Jakarta)
9	CV Prima Jaya Mandiri (Jakarta)
10	PT Sukandi Djaya (Jakarta)
11	PT Permata Cemerlang Abadi (Tangerang)

Improper import designation opens up a number of potentials:

1. Opportunity for FMD to re-enter in Indonesian livestock. Since the early 1990s until now, Indonesia has been declared free from FMD by the OIE. The policy of importing meat without paying attention to the condition of FMD from the country of origin is of course the same as importing (importing) diseases into Indonesia.
2. Reducing livestock productivity (taking shortcut policies instead of struggling to cultivate and produce domestically; only willing to sell cows on sacrificial holidays)
3. Economic losses for breeders. The emergence of unemployment and new levels of poverty, as well as reduced government revenue from taxes that should be paid by businesses and the livestock industry. Multiplier effects, both direct and indirect effects arising from commodity import activities
4. Disruption of national food security livestock is one of the national food supply sectors
5. Impact on veterinary public health. The definition of veterinary public health (Kesmavet) according to WHO, FAO, OIE, WHO/FAO Collaborating Center for Research and Training in Veterinary Epidemiology and Management (1999) is a

contribution to the physical health, mental and social welfare of society through an understanding and application of medical science animal

This potential is reinforced by statements from community informants that with imports, breeders do not slaughter cattle anymore. For example, the Makassar area actually doesn't need imports because it can still be met locally. Meat imports are only for business purposes such as restaurants, hotels and cafes.

Import Calculation Method

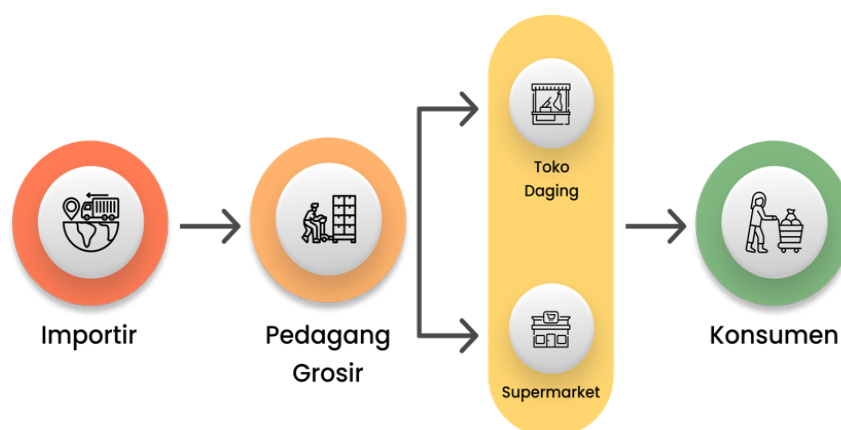
Import data is collected based on import information documents produced by the Customs and Excise Service Office. The data is obtained based on a complete calculation, and received from the Customs and Excise Service Office located in that country. While the import quota is calculated based on the difference between demand and cattle production.

Imported Beef Distribution System

The distribution of imported beef goes through a simpler stage compared to the distribution of local beef. This is because imported beef is a ready-to-cook product that does not require fattening places, slaughterhouses, or traders at livestock shelters before it can be consumed.

The two stages of distribution of imported beef include selling by importers to wholesalers, and by wholesalers to supermarkets or butcher shops selling to consumers. The exception is for imported beef that goes through fattening in Indonesia, the distribution stage is the same as the distribution of local beef.

Illustration 3. Local Beef Distribution Stage



Outcome: Building a Work Culture for Beef Import Quota Policymaking

INSW which includes Data on Beef Needs and Production from the Ministry of Agriculture and other technical-non-technical Ministries/Institutions used as the basis for making Import Quota policies

Through Technical Coordination Meetings (Echelon 2) and Limited Coordination Meetings (Echelon 1) coordinated by the Coordinating Ministry for Economic Affairs attended by the Ministry of Agriculture, Ministry of Trade, and Technical and Non-Technical Ministries/Institutions, INSW is used as an application/database information system to retrieve the import quota policy is based on beef demand and production data provided by the Ministry of Agriculture and other technical and non-technical ministries/institutions.

In addition, it was also agreed that INSW/NK would become the database for making import licensing policies by the Ministry of Trade.

Outcome: Ease of Management of Import Licensing and Import Realization for Business Players (Importers)

Through INSW, it is easy for business actors to take care of import permits with one door, but it still takes quite a long time (inefficiency), namely 32 days

Healthy market competition has been opened by the Government with other business actors able to import animal products after fulfilling certain requirements based on a coordination meeting held by the ministry that organizes coordination, synchronization and control of ministerial affairs in the administration of government in the economic sector.

Import permits are carried out by business actors (importers) through <https://inatrade@kemendag.go.id> which are then forwarded to INSW, which are then distributed to the Minister of Agriculture to obtain recommendations and import approvals. Meanwhile, the time needed by business actors (importers) to process import permits is quite long, namely 32 (thirty two) days, with the following details:

Table 8. Timing of Beef Import Permit

Licensing Documents	Estimated Document Completion Time (days)
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Business license	3
Customs Registration Certificate	10
Import Identification Number	5
Recommendation from the Minister of Agriculture	2
Import Approval from the Minister of Trade	2

Comparison of time, cost, number of importers: (before and after INSW)

Impact: Availability of Price Stability

The target price of IDR 80,000 as mandated by the President of the Republic of Indonesia only applies to frozen meat, while the Reference Price for Sale/Purchase (HAP) of fresh meat in 2022 is IDR 130,000-140,000 with an average market price of IDR 130,000

Price

President Joko Widodo's target for beef prices in Indonesia is below or up to IDR 80,000, considering that beef prices in neighboring countries such as Malaysia and Singapore can be cheaper than Indonesia.

Based on the Highest Retail Price (HET) or Sales/Purchase Reference Price (HAP), only frozen meat prices are stable at IDR 80,000 until 2022. Meanwhile, the price of fresh meat, when viewed from 2017 at a price of IDR 98,000, continues to move up to IDR 130,000-140,000 in 2022.

Table 9. HET Fresh Beef and Frozen Beef

Year	Fresh Meat	Frozen Meat
2017	Rp 98.000	Rp 80.000
2018	Rp 105.000	Rp 80.000
2019	Rp 105.000	Rp 80.000
2020	Rp 105.000	Rp 80.000
2021	Rp 130.000	Rp 80.000
2022	Rp 140.000	Rp 80.000

One respondent said that “suddenly prices go up, suddenly they go down. For normal situations per day it is almost never known. Because that was indeed the problem, there was no availability or there was no channel to publish further about it or there could also be one, but friends also never accessed it, never conveyed in detail regarding it ”

The high price of cattle in Indonesia is due to:

- High logistics costs. The process of loading and unloading a ship can take up to 7-21 days, whereas in Malaysia, loading and unloading of ships only takes 2 days, while in Singapore it only takes 1 day.
- Low growth of local cattle compared to national beef consumption growth.
- Dependence on imported feeders as the main source of fresh meat supply increases the price of feeder cattle imported from Australia
- Production costs on local farms are high because their rearing systems are small-scale.
- Long and complicated trading chain (many intermediaries)

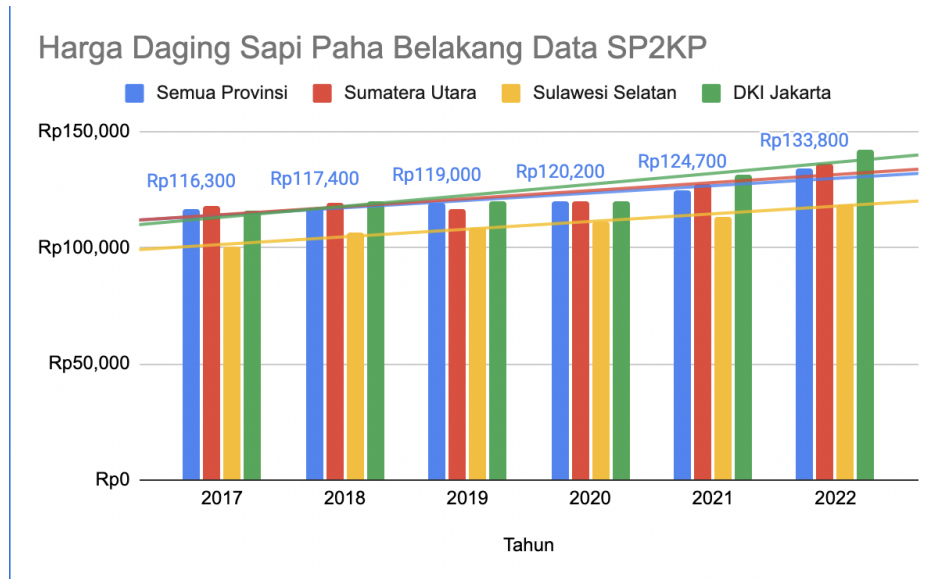
Currently, prices are allowed to run as the market mechanism. In accordance with Presidential Regulation No. 48 of 2016, BULOG is permitted to take whatever steps are necessary to stabilize the supply and price of beef throughout. BULOG conducts market operations with the aim of selling beef at lower or equivalent HET/HAP.

Table 10. Beef Commodity Stock/Supply Prices

Ministry of Trade's SP2KP data						
Provinces	2017	2018	2019	2020	2021	2022
All Provinces	Rp116,300	Rp117,400	Rp119,000	Rp120,200	Rp124,700	Rp133,800
North Sumatra	Rp117,900	Rp119,100	Rp116,400	Rp119,800	Rp127,300	Rp136,400
South Sulawesi	Rp100,300	Rp106,200	Rp108,400	Rp110,900	Rp113,100	Rp118,700
DKI Jakarta	Rp116,100	Rp119,700	Rp120,000	Rp120,000	Rp131,400	Rp142,100

In addition, the Ministry of Trade is given the task and authority to maintain price stability and the adequacy of the availability of staple goods and important goods (bapokting) in the community, in supporting inflation control, particularly through controlling food inflation. The Ministry of Trade in collaboration with the Provincial and Regency/City Governments collects and reports data on prices and stock/supply of bapokting on a daily basis through the Staple Needs Market Monitoring System (SP2KP).

Graph 3. Prices of Beef Hamstrings (SP2KP)

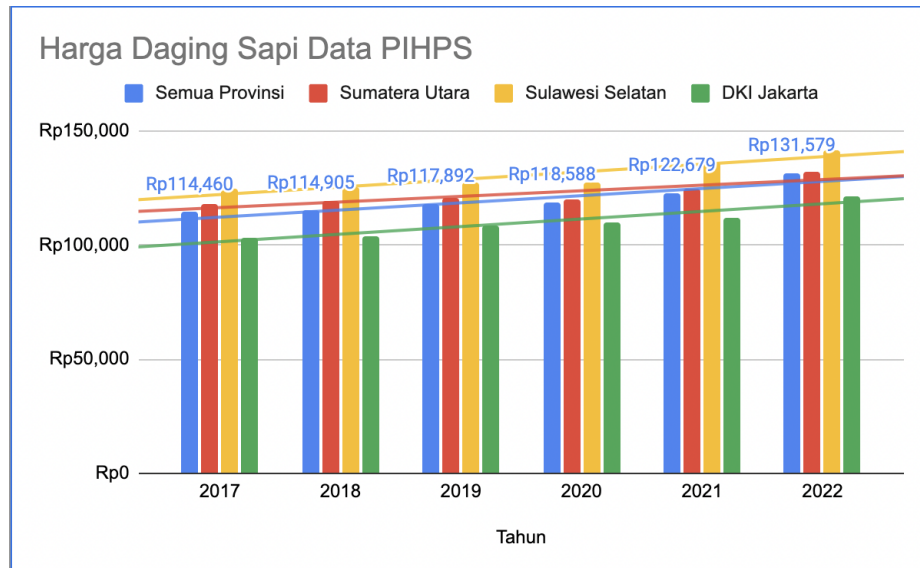


Price monitoring is also carried out by the Strategic Food Price Information Center (PIHPS):

Table 12. Beef Commodity Stock/Supply Prices (PIHPS)

National PIHPS Data (In IDR)						
Province	2017	2018	2019	2020	2021	2022
All Provinces	114,460	114,905	117,892	118,588	122,679	131,579
North Sumatra	118,220	119,191	120,529	120,270	124,759	132,108
South Sulawesi	124,688	125,150	127,500	127,400	136,032	141,392
DKI Jakarta	102,875	104,068	108,417	109,800	112,125	121,042

Graph 4. Beef Prices (PIHPS)



Impact: Pro National Livestock and Food Self-sufficiency

Based on Law no. 11 of 2020, the fulfillment of strategic food for meat commodities is carried out by taking into account the interests of national livestock and food self-sufficiency, but Indonesia's dependence on imports is still high

Indonesia is the largest archipelagic country in Southeast Asia which has abundant natural resource potential. The natural potential with a tropical climate and vast land wealth make it possible for this country to develop the agricultural sector, especially the livestock sub-sector.

Livestock self-sufficiency efforts that are oriented towards the welfare of breeders are very important. Market certainty by obtaining bargaining power on a more rational business scale will motivate breeders to actively participate in increasing the productivity of their livestock business. Improving cattle breeding governance is far more important and better than importing cattle which will lead to price stability.

The government's efforts to create availability of healthy meat and affordable prices are contained in the Food Self-sufficiency Road Map (2016-2026). In addition, according to Law no. 11 of 2020 concerning Job Creation article 34, pro national livestock and food self-sufficiency is illustrated in:

- a. Land that has been designated as a general grazing area must be maintained for its existence and utilization in a sustainable manner

- b. Regency/municipality regional governments that in their regions have available land that allows and prioritizes small-scale livestock cultivation are obliged to designate the land as general grazing areas.
- c. Provision and development of Seeds and/or Seedlings is carried out by taking into account the sustainability of micro, small and medium breeder business development.
- d. Importation of Livestock and Animal Products from abroad into the territory of the Unitary State of the Republic of Indonesia is carried out to meet the needs by taking into account the interests of breeders

However, there are still policy constraints such as:

- a. Policy on changing the weight of imported feeder cattle from 350 kg to 450 kg (Permentan 49/2016 jo. 02/2017 article 15)
- b. Policy on freeing Meat and Beef Imports (Permentan No 17/2016, Permentan No. 34/2016 and Permendag No. 59/2016)
- c. PP No. 11 of 2022 concerning Amendments to Government Regulation Number 4 of 2016 concerning Importation of Livestock and/or Animal Products in Certain Matters Originating from a Country or Zone within a Country of Origin
- d. In the Cattle and Buffalo Development roadmap compiled by the Directorate General of PKH (2015), that Indonesia in 2045 will become a world food barn
- e. Feeder-to-breed cattle import ratio policy (Permentan 02/2017 article 7).
- f. The last policy this year, is the issuance of Minister of Agriculture No. 136/2020 concerning quarantine and a circular letter from Bulog, the price of meat is Rp. 59 thousand/kg.

The government (Ministry of Agriculture and other stakeholders) has made efforts to build a National Animal Husbandry and Distribution System, but has not had a significant effect on increasing production which can reduce dependence on imports, as follows:

1. National Livestock System:

a. Cattle Population Increase:

- Accelerating the increase in beef cattle population, the government carried out Special Efforts for Compulsory Pregnant Cows (UPSUS SIWAB) in 2017 with a target of 4 million acceptors and 3 million pregnant cows (examination of reproductive status and reproductive disorders, AI services and natural mating, fulfillment of semen frozen and liquid N2, control of productive females and fulfillment of forages and concentrates) (Permentan Number 48 of 2016, improvement of the reproductive management system at UPSUS SIWAB)

- Importation of Large Ruminant Livestock into the Territory of the Republic of Indonesia: calves, breeders, productive males from countries that meet the requirements, for example imported breeding cattle currently reared by groups of breeders in the Provinces of Riau, North Sumatra and Aceh) (Permentan No. 41 Year 2019 concerning Importation of Large Ruminant Livestock into the Territory of the Republic of Indonesia)
- Strengthening seeding and nursery aspects to produce high quality seeds and seedlings
- Development of HPT (Forecast Animal Feed)
- Treatment of reproductive disorders
- Saving productive cows
- Management and eradication of animal diseases

b. Land:

- Extensification of cattle by providing large areas of land suitable for raising cattle (Eastern areas such as Sumbawa or Bima)
- Development of plant-cattle integration patterns, for example cattle-oil integration
- Development of pastures through optimizing ex-mining land and pasture areas in Eastern Indonesia
- Livestock Plant Integration: Agriculture has actually implemented a livestock crop integration system (SITT) program which is also elaborated in the plantation sub-sector with the oil palm cattle integration system (Siska) since 2007. Siska was then promoted to self-help plantations, large private companies, and PT Perkebunan Nusantara (PTPN). When integrated with farming and plantation business, cows that previously used grass as their main feed were tried to be complemented in the form of additional animal feed menus derived from plantation and agricultural business residues. In addition, cow manure and urine waste can be used as garden fertilizer. With this integration, land and animal feed problems can be overcome simultaneously. In addition, livestock waste can be used as an energy source for electric propulsion and gas stoves for cooking. The implementation of this concept has shown success in the provinces of Bengkulu, Riau and Central Kalimantan. These efforts can overcome the problem of limited land which can be juxtaposed with efforts to maximize farming and plantations.

c. Capital and Knowledge Capacity:

- Livestock business cooperatives that focus on access to financing, focus on real sector cooperatives that are export-oriented, labor-intensive and digital economy (e-Commerce)
- Reduction of credit interest rates for all breeders
- Programs for strengthening economies of scale and breeder institutions:

- Assistance to breeders by SMD WP (Bachelor of Development of Companion Entrepreneurial Villages), THL officers (freelance workers) and SPR Manager (People's Animal Husbandry Center)
- The government issued a Cattle Livestock Business Insurance policy (AUTS).
 - The government provides cattle assistance to farmers by way of revolving assistance
 - Providing housing assistance and counseling regarding livestock rearing and feeding patterns.
 - In implementing the livestock crop integration concept, support is also needed in the form of education for farmers and breeders as well as growing common ground from the banking sector, the private sector, to the government to achieve food sovereignty, especially in terms of meeting the demand for beef in Indonesia.

2. Distribution and Trading System/Logistics System and Supply Chain:

- a. Cutting beef distribution chains that are too long and the existence of allegations of “middle men” (aka brokers) in each link of the distribution chain
- b. Procurement and operation of livestock vessels that are designed to meet animal welfare standards (an 80% subsidy is allocated for livestock loading rates on livestock vessels - an additional 5 units of vessels)
- c. Construction of modern slaughterhouses (RPH) in production centers
- d. Improvement of import management and supervision involving all stakeholders involved
- e. Strengthening livestock and animal health data and information that is reliable and accountable to the public, through the development of an information network system in production centers and consumption areas to monitor population growth, production, availability and distribution of livestock and livestock products in an actual and accurate manner and integrated among stakeholders interest
- f. Utilization of Informatics Technology is an enabler in achieving the welfare of breeders through aspects of economic development (digital economics) and aspects of social transformation (digital culture). Information Technology is believed to be able to simplify the product distribution chain that is marketed through the Farmer Community-Based Livestock Management Application as an informatics portal. With online supply chain connectivity through expeditionary services or logistics agents and delivery services, MSME-scale livestock

business actors can market their products online directly to consumers, regardless of volume. Meanwhile, the online transaction process can be facilitated by the bank. Through the informatics portal, the farmer community can share information, carry out promotions and electronic transactions, Knowledge Management and documentation

- g. The local government plays a role in maintaining the balance of the livestock population structure and initiating the establishment of seed source areas in livestock-dense areas
- h. Beef beef in Indonesia comes from domestic and foreign supplies. East Java as a center for cattle population and beef production produces beef for the needs of other provinces. If the production center area cannot meet the demand of other regions, beef imports must be carried out.

From the explanation above, there are several important findings including:

- a) The demand for and consumption of beef continues to increase every year, so the government must ensure the availability of supply by adopting an import policy to cover the supply deficit. The import policy was taken due to a supply deficit, but trade policy has not yet led to the development of the meat industry in production centers.
- b) The history of beef self-sufficiency in Indonesia has in fact not been successful because of the low commitment of support in the form of funds, supporting policies, sectoral egos of ministries/agencies and between stakeholders;
- c) Beef import policies are prone to corrupt practices such as abuse of authority, rent-seeking and cartels, bribes, extortion, illegal deals, politicization and others. The beef supply chain is full of collusion and difficult to control or supervise.
- d) The stipulation and distribution and allocation of import quotas are not clear; requirements for importers are not stringent (opening brokerage opportunities); and the import policy for breeding cattle is prone to abuse. As a result, the management of cattle imports is prone to fraud.
- e) The existing system does not guarantee transparency and accountability in export and import decision-making. Export and import practices are not supported by accurate data, separated between Ministries/Institutions and the required documents are prone to abuse. Coordination between Ministries/Institutions has not been carried out properly.

Therefore, the contribution of the National Strategy for Corruption Prevention in this action is only at the scope or level of output and outcome:

- a. Output: availability of National Availability Data, National Needs Data, and Meat Commodity Import Quota Data

- b. Outcome: The INSW which contains Data on Cattle Needs and Production from the Ministry of Agriculture and other technical-non-technical Ministries/Institutions is used as the basis for making Import Quota policies

The level of outcomes contributed by the Ministry of Trade and the Coordinating Ministry for Economic Affairs in the form of facilitating licensing arrangements and the realization of imports was not contributed by the National Strategy for the Prevention of Corruption, which has also not occurred because importers still need quite a long time to process import permits. At the impact level, INSW/Sinas NK has not yet contributed to the target cattle price set by the President, which is IDR 80,000. The average market price is currently IDR 130,000, and is pro-National Livestock and Food Self-sufficiency, with high import quotas

3.1.2 Relationship between the contribution of the implementation of the National Strategy for PK to efforts to prevent corruption

With the INSW/Commodity Balance, the process of making import policies has been systemized, both for setting import quotas and import licensing for importers. However, this system focuses on data collection at the upstream level, while interactions between actors can still be established, especially in determining and implementing imports.

Improving licensing and trading systems and significantly improving the integration of export and import data has made progress, which in principle, fixes problems. This is due to the development of a system that allows import policymaking to be more focused, measurable, transparent, and accountable and have an impact by utilizing the Indonesian National Single Window (INSW) system and commodity balances.

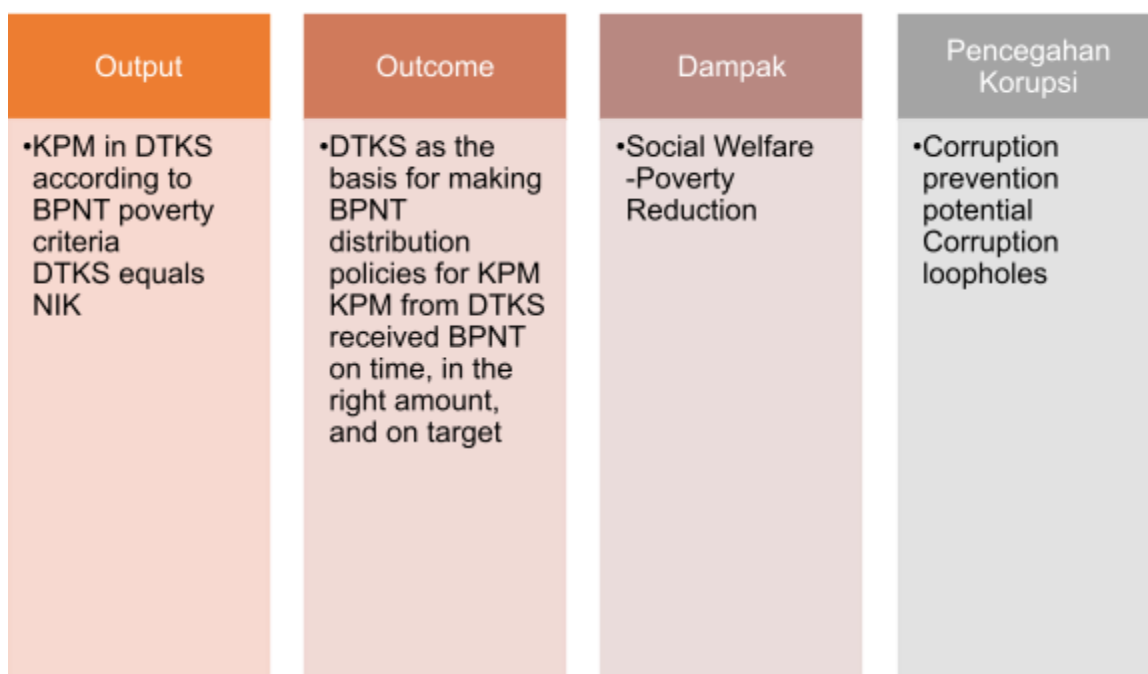
However, there are still Ministries/Institutions that lack the commitment to sending data, especially for calculating export and import needs. This affects the acceleration of integration, validity, and data quality. The data utilization for making export and import policies has also not been carried out because the data on the dashboard does not follow the data specifications required by K/L. In addition, there is no official data flow and dashboard usage procedure.

Therefore, the contribution related to this action stops at petty corruption. This is based on several aspects. First, the accuracy of sources and calculations of cattle demand and production data in the INSW/Commodity Balance is questionable, so determining import quotas and permits is carried out using an inaccurate database.

Second, the import assignment mechanism in terms of numbers and appointments is more transparent and accountable but does not touch on the central problem, considering that actors who have close ties with the Government get access, which is easier in the import process. which is involved. Third, several cases of corruption in beef procurement and export schemes during 2022 warn that the meat commodity still has loopholes for corruption, although it is not always directly related to the INSW/Beef Commodity Balance.

What needs to be followed up for the sake of accuracy of data on availability and national demand for beef commodities is that a national cattle census is needed with the proper measurement method, agreed upon by all parties, and carried out routinely by prioritizing price stability, availability of beef, the welfare of breeders, and self-sufficiency or food resilience in Indonesia. Then to get the price of cattle according to the target and be pro-national livestock and food self-sufficiency is to build a national livestock system seriously.

3.2 Targetability of Non-Cash Food Assistance (BPNT) / DTKS Padan NIK Basic Food Program



Improving people's welfare through social assistance programs is one of the government's main concerns. However, so far social assistance programs for the community have actually become a big loophole for corruption. In line with the intention to eradicate corruption, the distribution of social assistance by the government is also trying to close the loopholes for corruption in the distribution process by ensuring that assistance is right on target and received by those who deserve it, as well as that there are no multiple recipients of assistance.

One of the social assistance programs pursued by President Jokowi's government is Non-Cash Food Assistance (BPNT). Through a Limited Meeting on Inclusive Finance on 26 April 2016, the President gave directions for social assistance and subsidies to be distributed in a non-cash manner starting in 2017. These directives were then set forth in the form of Presidential Regulation No. 63 of 2017 concerning Distribution of Non-Cash Social Assistance.

Non-Cash Food Assistance (BPNT) is food social assistance in non-cash form from the government which is given to Beneficiary Families (KPM). This assistance is provided routinely through an electronic account mechanism that is used only to buy food at food vendors/e-warongs that work with banks.

Those who are referred to as Beneficiary Families (KPM) are residents with the lowest 25% socio-economic conditions in the implementation area.

The objectives of BPNT are:

- a. Reducing the burden of spending on KPM by fulfilling some food needs
- b. Providing more balanced nutrition to KPM
- c. Improving the targeting accuracy and time of receipt of Food Aid for KPM
- d. Provide more choices and control to KPM in meeting food needs
- e. Encouraging the achievement of the Sustainable Development Goals (SDGs)

With the following benefits:

- f. Increased food security at the KPM level as well as a mechanism for social protection and poverty alleviation
- g. Increasing non-cash transactions on the agenda of the National Non-Cash Movement (GNNT)
- h. Increasing public access to financial services so as to increase economic capacity in line with the National Financial Inclusion Strategy (SNKI)
- i. Increased efficiency in the distribution of social assistance
- j. Increased economic growth in the region, especially micro and small businesses in the trade sector.

The conditions of the BNPT/Basic Food Program Assistance from 2017 to 2022 are as follows:

Table 13. 2017-2019 BPNT Policy:

Components	2017	2018	2019
Program name	Non-Cash Food Assistance (BPNT)	Non-Cash Food Assistance (BPNT)	Non-Cash Food Assistance (BPNT)
Policy	• Decree of the Minister of Social RI No. 21/HUK/2017 concerning Determination of the Number of Families Recipient of the Prosperous Rice Subsidy and Non-Cash Food Assistance in 2017	• Decree of the Minister of Social RI No. 4/HUK/2018 concerning Determination of Changes in the Number of Beneficiary Families Distribution Phase of Rice for Welfare Social Assistance and Non-Cash Food Assistance in 2018	• Not yet found Decree of the Minister of Social Affairs
Amount of Benefits-Forms of Food Aid-Means of Payment	• Guidelines for Implementing Non-Cash Food Assistance 2017	• Guidelines for Implementation of 2018 Non-Cash Food Assistance	• Guidelines for Implementation of 2019 Non-Cash Food Assistance

ceiling	• Rp. 110,000/month	• Rp. 110,000/month (disbursed every 25th)	• Rp. 110,000/month (disbursed every 10th)
Data source	• Cash cannot be taken	• Cash cannot be taken	• Cash cannot be taken
Data Manager	• Rice and/or eggs at E-Warong	• Rice and/or eggs at E-Warong	• Rice and/or eggs at E-Warong
Beneficiary Data	• Combo Card (electronic money and savings, preferably in the name of a female head of household (KK) or spouse)	• Combo Card (electronic money and savings, preferably in the name of a female head of household (KK) or spouse)	• Prosperous Family Card (KKS) (electronic money and savings, preferably in the name of a female head of household (KK) or spouse, through opening a collective account (burekol)
Work partners			• 15,600,000 BPNT Beneficiary Families
Field officer	Beneficiary Families of 15,498,936 souls:	BPNT beneficiary families of 15,600,000 people:	• There is no description data per region yet

Table 14. BPNT Policies for 2020-2022:

Components	2020	2021	2022
Program name	Groceries Program Assistance	Groceries Program Assistance	Groceries Program Assistance
Policy	• Decree of the Minister of Social RI No. 29/HUK/2020 concerning Number of Beneficiary Families, Location, Amount of Value, and Local Food Materials in Distribution of 2020 Basic Food Program Assistance	• Regulation of the Minister of Social No. 5 of 2021 concerning Implementation of the Staple Food Program	• Regulation of the Minister of Social No. 5 of 2021 concerning Implementation of the Staple Food Program
Amount of Benefits-Forms of Food Aid-Means of Payment	• Guidelines for Implementing the 2020 Staple Food Program	• Not yet found Decree of the Minister of Social Affairs	• Not yet found Decree of the Minister of Social Affairs
ceiling	• Rp. 150,000,000/month (until February 2020)	• General Guidelines for the 2020 Change I Staple Food Program	• General Guidelines for the Staple Food Program have not yet been found

	– IDR 200,000/month (starting March 2020) (every 10th)		
Data source	• Cash cannot be taken		
Data Manager	• Rice, Corn, Sago, Eggs, Beef, Chicken, Fish, Legumes (including Tempeh and Tofu), Vegetables, Fruits (Bamboo Food program assistance may not be used to purchase: oil, flour, sugar, manufactured MP-ASI, canned food, instant noodles and other food ingredients that are not included in items a-d above. Assistance may also not be used to purchase credit and cigarettes)	• Rp. 200,000/month (every 15th / 3rd of the month: March, June, September, December)	• Rp. 200,000/month (every 15th / 3rd of the month: March, June, September, December)
Beneficiary Data	• Prosperous Family Card (KKS) (electronic money and savings, preferably in the name of a female head of household (KK) or spouse, through opening a collective account (burekol))	• Cash cannot be taken for regions I and II	• Can only be collected in cash via the Post Office (PT Pos Indonesia)
Work partners	• Beneficiary Families 15,600,000 people	• Can be taken in cash for region III via the Post Office	• Prosperous Family Card (KKS) (electronic money and savings, preferably in the name of a female head of household (KK) or spouse, through opening a collective account (burekol))

Field officer	<ul style="list-style-type: none"> • There is no description data per region yet 	<ul style="list-style-type: none"> • Rice, Corn, Sago, Eggs, Beef, Chicken, Fish, Legumes (including Tempeh and Tofu), Vegetables, Fruits (Bamboo Food program assistance may not be used to purchase: oil, flour, sugar , manufactured MP-ASI, canned food, instant noodles and other food ingredients that are not included in items a-d above. Assistance may also not be used to purchase credit and cigarettes) 	
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In terms of corruption loopholes, there are several vulnerabilities related to DTKS:

a. Data collection

According to the KPK, the main problem in administering social assistance is the accuracy of social assistance beneficiary data, both related to the quality of beneficiary data, data transparency and data updating. The problem stems from data collection problems. One of them is DTKS which does not match NIK data and is not updated according to population data and the lack of information about beneficiaries.

Problems in data collection related to social assistance recipients are known to be invalid and up to date. As a result, cases of inclusion and exclusion errors have emerged as well as discrepancies between local government data and RT data. In fact, DTKS should be updated regularly at least once a year by the district/municipal government and verified and validated by the provincial government and the Ministry of Social Affairs.

b. Procurement

According to ICW, there are at least 6 (six) main problems in the procurement of goods and services specifically related to handling the impact of Covid-19, as follows:

- Identification of procurement needs that are not in accordance with field requirements;
- The appointment of a provider is not based on the applicable provisions, but due to the proximity factor or the presence of bribes and promises (kickback) from the

provider to the procurement committee or other related officials, either directly or indirectly. In this stage, the appointed provider may be inexperienced and cut the price of the goods to cover the kickback costs;

- The provider appointed in the procurement does not carry out the procurement directly, but instead appoints a sub-contractor to carry out the procurement which then makes the procurement chain longer and has an impact on higher prices;
- Payments are made without careful inspection of the results of the procurement, causing procurement not to be fulfilled as it should be;
- Ineffective implementation of internal control by APIP from the planning process to the payment process;
- The opportunity for oversight from the public did not work due to limited procurement information disclosure. "Emergency" is generally used as a justification for the secrecy of procurement information.

c. Distribution/Distribution

Problems in the distribution of social assistance, including: uneven distribution of assistance, both in terms of time, target/recipient community and distribution area; unclear procedures and requirements for receiving assistance; people who are in a more emergency condition of hunger are not registered and vice versa, there are those who are registered but do not receive assistance; and there were those who could not receive assistance at their place of residence because of the immigrant's KTP.

The obstacle in this distribution is also the problem of minimal social assistance socialization to the community. Many people do not know how much the social assistance they should receive or what are the details of the groceries they are entitled to. As a result, people also have difficulty checking whether the social assistance they receive is appropriate or not. In addition, notifications for taking Cash Social Assistance (BST) to the post office are often delivered suddenly, causing crowds.

3.2.1 The impact that has been produced (or the impact that is expected to be produced) from the results of the output, outcome, and impact of the implementation of the Stranas PK

In ensuring that there are no budget leaks and recipients who are not on target, which has the potential to become a loophole for corruption, BPNT distribution needs to receive support in the form of complete, accurate and valid data, with the name Integrated Social Welfare Data (DTKS).

DTKS is master data that contains data on the need for social welfare services, beneficiaries of assistance, and social empowerment, as well as potential and sources

of social welfare. Through the Minister of Social Affairs Regulation No. 3 of 2021 concerning Integrated Social Welfare Data Management, the DTKS criteria include poverty, neglect, disability, remoteness, social disability and behavioral deviations, disaster victims, victims of acts of violence, exploitation and discrimination; and/or other criteria determined by the Minister.

Output: KPM in DTKS According to BPNT Poverty Criteria / Basic Food Program Assistance

Candidates for KPM are selected and validated based on "adjusted" Poverty Criteria (some Poverty Criteria are deemed not appropriate to the existing conditions) by the Regional Government. The 9 specified poverty criteria cannot be fulfilled by the Regional Government, so the Regional Government makes poverty criteria that are adjusted to the conditions of the community

KPM candidates are selected based on the poverty criteria set by the Ministry of Social Affairs, namely:

Table 15. Criteria for Beneficiary Groups (Ministry of Social Affairs)

No	Aspect	Criteria
1	Residence	1. A shelter or place of daily living
2	Work	2. Employment status
3	Food	3. Concerns about meeting food needs 4. Food expenditure > 70% of total expenditure
4	Clothing	5. Spending on clothes
5	Board	6. Most of the floors of the dwellings are made of earth 7. Most of the walls are made of bamboo, wire, or wood The source of electric lighting from PLN is 450 W or not electricity

According to the Regional Government, not all poverty criteria can be immediately used as the basis for selecting KPM candidates. This is because some of the poverty criteria are not in accordance with the existing conditions. What happens, when 9 (nine) criteria are met, it will be difficult to find and will reduce the number of KPM.

"KPM-KPM does not fit the poverty criteria. It means they have motorbikes, they use gold, their floors are permanent floors, that's only temporary. This means that when they use the gold they just come home fishing to get money. That one will be sold later. If you use the motorbike, it will be cheaper for them to live. Compared to them taking public transportation, it's only natural that they have motorbikes. So, we just want to make sure, meaning that the criteria for poverty are general, and so are there poverty criteria per region in accordance with the conditions of the area?"

On the one hand, if it is reduced, of course it will be an achievement for the Ministry of Social Affairs because there is a decrease in the number of KPM. However, for people who are indeed poor, it will result in not being able to enter DTKS so that they cannot receive BPNT.

The following is the movement of the number of KPM from 2017 to 2022:

Table 15. Number of Beneficiary Groups (Ministry of Social Affairs)

2017	2018	2019	2020	2021	2022
15.498.936	15.600.000	15.600.000	15.600.000	18.800.000	18.800.000

The increase that occurred between 2020 to 2021-2022 was 17%, increasing from 15,600,000 to 18,800,000. The increase is needed to resolve the impact of Covid-19 which has caused a lot of unemployment.

The stages for selecting KPM candidates are determined in the DTKS as follows (infographic):

- a. Data Proposal Process and Verification and Validation:
 - The data proposal process comes from: RT/RW, Hamlet Head, Lurah/Village Head, Social Welfare Potential and Sources, and or Independent Registration to Village or Kelurahan Officials or other names
- b. Data Proposal Process can be submitted via:
 - village or sub-district meetings or other names;
 - proposals from the Ministry of Social Affairs; or
 - independent registration using the SIKS-NG application

verification and validation is carried out by the Ministry of Social Affairs and the Regional Government through the SIKS-NG application

verification and validation by the Ministry of Social Affairs through:

 - NIK and KK matching
 - ☞ Geo tagging spatial data from satellite imagery to see the condition of the KPM's house
 - ☞ Submission of proposals through the SIKS-NG application

The process of Quality Control/Assurance is carried out when problems are found, by involving Higher Education Institutions determined by the Minister
- c. The results of the Data Proposal Process, Verification, Validation and Quality Control/Assurance are submitted to the Minister to be determined as Social Welfare Integrated Data, every month
- d. Integrated Social Welfare Data can be amended, substantively or administratively

The Ministry of Social Affairs is updating integrated social welfare data (DTKS) in 2021, which has been carried out since 2020. This data update is to improve data quality and increase the coverage of DTKS (previously the lowest 40% of the population, which was later increased to around 60% to help the impact of Covid-19. The stages are:

- a. stages of hardware procurement, data support as well as prelist preparation
- b. the process of procuring consulting services and preparing the 2021 DTKS prelist
- c. training of instructors and officers in collaboration with the Central Bureau of Statistics (BPS)
- d. village meetings (musdes) and sub-district meetings (muskel),
- e. this visitation or home visit to find out the coordinates of the household
- f. examination and processing of data resulting from the implementation of the musdes/muskel as well as household visits

Unfortunately, in the process of updating the data, not all regions do it according to the procedure. One of the obstacles is the matter of cost.

"The data they increase when there is new data, new DTKS is old data. To carry out data collection of all kinds requires a fee, we do not have a fee. So we are increasing the data for 2021, even though we asked the assisting officers to do random verification, to the house, to several beneficiaries"

In addition, the people and officers in the field that we met did not really understand the process of conducting data validation, moreover the amount of data that had to be validated was quite large.

"Conditions on the ground, we really want to understand what verification and validation is being carried out by the Ministry of Social Affairs. What is the form of validation verification, with so much data "

Furthermore, the mechanism for distributing the Staple Food Program:

- a. Determination of the number of KPM for the Staple Food Program for each Regency/City by the Directorate General for Handling the Poor, Ministry of Social Affairs based on DTKS
- b. Submit a list of KPM candidates to the Regional Social Service through SIKS-NS
- c. Finalization of KPM data by the Regional Social Service, for account opening purposes
 - Inviting prospective KPM to attend with documents such as KTP and KK
 - Checking and completing documents and supporting data

- The results of the finalization are submitted to the Directorate General of Handling the Poor, Ministry of Social Affairs through SIKS-NG
- Determination of KPM data by the Directorate General for Handling the Poor, Ministry of Social Affairs
- KPM data is submitted to the distribution bank and the Regional Social Service

A KPM replacement can be made if a potential KPM is found: moved address, not found at address, died, is economically capable, refuses to accept assistance, has multiple memberships, becomes an Indonesian migrant worker before activating the Family Card. Proposals for replacing KPM must come from DTKS, whose subsequent process follows the DTKS proposal process.

- Opening of a collective account (burekol) by the channeling bank (if you don't have an account yet)
- Distribution of KKS (if you don't have KKS yet)
- The State General Treasurer, on the order of the Ministry of Social Affairs, transfers funds to the KPM account
- KPM received disbursement notifications from various media prepared by officers
- Utilization (per 3 months):
 - Non-Cash: come to the E-Warong to buy predetermined groceries, proof of transaction
 - Cash: come to the Post Office to get cash and spend groceries according to what has been determined anywhere, proof of transaction. Post Office verification and validation through:
 - Examination of KTP and KK documents
 - Geo tagging spatial data from satellite imagery to see the condition of KPM's houses
 - Biometrics, meaning face recognition whose application is connected to Disdukcapil
- Reporting

Output: DTKS and NIK

The results of matching New DTKS with NIK starting from 2021 to 2022 and running until now are 148,787,758, with around 56,881,851 data 'put to sleep' which has been controlled by involving the BPK, BPKP, KPK, Attorney General's Office, and the Police

The Ministry of Social Affairs has matched DTKS with NIK from the Directorate General of Dukcapil, Ministry of Home Affairs, which gave birth to the New DTKS on April 1, 2021. The Directorate General of Dukcapil has a Centralized Population Administration Information System (SIAK).

- a. Centralized SIAK is a digitization system that is used so that Dukcapil services can be connected online nationally
- b. Centralized SIAK was launched by the Ministry of Home Affairs (Kemendagri) through the Directorate General (Ditjen) of Population and Civil Registration (Dukcapil) in the 2022 Dukcapil National Coordination Meeting
- c. This centralized system is more efficient in terms of cyber security systems and can provide population administration services (Adminduk) more quickly
- d. All Adminduk services at the Dukcapil Office in the regions can be controlled by all parties, both the government and residents, thereby increasing accountability and transparency of their performance

The results of matching DTKS with NIK from the Directorate General of Dukcapil Kemendagri gave birth to New DTKS on April 1, 2021, as follows:

- a. The results of the New DTKS show that 21,156 million data have been 'put to sleep' which has been controlled by involving the BPK, BPKP, KPK, Attorney General's Office, and the Police.
- b. Data that is 'put to sleep' occurs due to several conditions, namely:
 - there is a double name
 - double receiving assistance (PKH and BPNT can, but if you receive BST you cannot receive other types of assistance)
- c. The New DTKS provides two sides, namely:
 - On the one hand, someone who has the right will be facilitated in proposing himself to receive assistance.
 - On the other hand, the objectors will hide several cell phone numbers behind them to give them courage
- d. For public transparency, you can check the New DTKS data at Cekbansos.kemensos.go.id.

Data improvement, regional verification and validation, as well as Dukcapil matching are carried out through a monthly cycle, with the results for 2022 as follows:

- a. Local Government Participation:
 - 33,851,038 repaired areas
 - 19,615,874 valid new proposals
 - 4,460,898 do not deserve social assistance
- b. Public Participation, through 'rebuttal proposals' at Cekbansos.kemensos.go.id with 1,582,537 proposals approved

Similar to verification and validation, the community and field workers we met did not understand how the matching process was carried out.

"There is matching with NIK, so what is meant by matching. If we understand the regulations, what should we do?"

Utilization of Population Data

Based on the Regulation of the Minister of Home Affairs No. 102 of 2019 concerning Granting Access Rights and Utilization of Population Data, Utilization of Population Data can grant access rights to population data by considering aspects of individual data protection and state security.

Granting the right to access and to use population data requires a cooperation agreement which takes precedence with a letter of application for the use of population data in writing to the Director General of Population and Civil Registration.

The Minister of Home Affairs also states that ministries or institutions or regional governments applying for access rights and utilization of population data must have implemented ISO 27001. ISO 27901 is the cornerstone of Presidential Regulation No. 62 of 2019 concerning the National Strategy for the Acceleration of Population Administration for the Development of Biological Statistics.

Therefore, matching DTKS with NIK by the Ministry of Social Affairs and the Regional Government as one of the KPM verification and validation mechanisms must fulfill the elements mentioned above.

Outcome: New DTKS as a Basis for Policy Making for the Distribution of BPNT / Basic Food Program Assistance for KPM

The New DTKS is a database that forms the basis for the Ministry of Social Affairs' decision making in determining KPM BPNT

KPM BPNT / Basic Food Program Assistance originates from New Social Welfare Integrated Data (New DTKS) which can be accessed by Provincial Governments and Regency/City Governments through the SIKS-NG application on the Food Social Assistance (BSP) menu. KPM that has been checked and finalized by the Regional Government and approved by the Regent/Mayor is reported to the Ministry of Social Affairs through the SIKS-NG application on the BSP menu.

The KPM candidate data in SIKS-NG is then verified and validated by the Ministry of Social Affairs. Due to time constraints, verification and validation were carried out by taking samples, especially those suspected of not being on target by looking at the area and conditions of residence and based on 'rebuttal suggestions' received through the Cekbansos.go.id website.

According to information from the Ministry of Social Affairs, the data findings were sent back to the Regional Government through SIKS-NG to be verified and validated. It is the final results from the Regional Government that will be used as the basis for determining the candidate KPM to become KPM in the New DTKS. Only KPM registered in the New DTKS are entitled to receive social assistance, in this case BPNT.

Outcome: KPM from DTKS Receives BPNT / Basic Food Program Assistance on Time, Right Amount, and Right on Target

KPM has received BPNT on time and in the amount. BPNT of IDR 200,000 is given per (3) months in cash via the Post Office. However, this is not necessarily the right target because there are still people who fall into the poverty criteria who are not registered in the New DTKS

In 2017-2019, the amount of BPNT received was IDR 110,000 which was distributed every month in non-cash, then spent on staple goods such as rice and eggs at E-Warong. In 2020, there is an increase in BPNT to IDR 150,000-IDR 200,000 every month.

Starting in 2021, a BPNT of IDR 200,000 will be given every 3 (three) months in non-cash anyway, except for Region III. Then in 2022, a BPNT of IDR 200,000 will be given per (3) months in cash via the Post Office. The change in this mechanism was caused by adjustments to several problems in the field that occurred, such as the difficulty of accessing e-Warung and the packaging of goods that was detrimental to KPM.

Outcome: Basic Needs of KPM Fulfilled through BPNT / Basic Food Program Assistance

With the BPNT/Sembako Program, KPM can fulfill basic needs in the form of rice, eggs and other predetermined staple foods. With the cash mechanism via PT Pos which was carried out in 2022 yesterday, it was found that KPM used BPNT money not only to buy basic food materials, but also other needs

Based on the results of interviews with KPM, the Sembako Program or BPNT is very helpful in fulfilling KPM's basic needs. Fulfillment of basic needs through BPNT / Basic Food Program Assistance allows KPM to focus on thinking about other needs such as Education and Health. However, there are KPMs who do not use the funds as they should, namely for food. But it is also used for other urgent needs.

Impact: BPNT / Basic Food Program Assistance Contributes to Social Welfare -Poverty Reduction

BPNT has not contributed directly to Social Welfare – Poverty Reduction

This BPNT program in a short time made the people who were targeted have purchasing power in terms of food. Increased purchasing power had the effect of suppressing inflation spikes. But the worry is if beneficiaries become dependent on this program so that they continue to expect assistance from the state. As a result, this will become a burden on the state in the long run.

The plan of the Ministry of Social Affairs with the National Economic Heroes (PEN) program, as a way to make KPM get out of the circle of dependence on state aid and be able to empower themselves needs to be followed up. So that the assistance provided by the state does not only become quick wins, or quick and momentary wins in saving the country's economy. But it is a program that empowers and improves the economic capacity of KPM.

When viewed based on the poverty rate, there are ups and downs which are quite difficult to use as a basis for whether the decline in the poverty rate is due to social assistance that is distributed in the right way, on time, and in the right amount.

Table 14. Number of Poor Groups 2019-2022

2019	2020	2021	2022 (s.d.Maret)
24,79 juta	27,55 juta	26,50 juta	26,16 juta

Dr. Dimpos Manalu, an academic at Nomensen University, Medan, North Sumatra stated:

Social assistance will never be able to eradicate poverty because social assistance is usually given in several contexts:

First, as I explained yesterday, social assistance tends to be given to the poor as "compensation" when a government policy will have an impact on increasing the prices of basic necessities, for example: increasing the price of fuel oil (BBM). Social assistance is also provided as "social protection" to deal with disasters or pandemics, such as Covid-19 and large-scale natural disasters. This is what I call a policy to suppress so that "social unrest" occurs.

Second, in Indonesia, social assistance policies are also closely related to electoral political interests. Social assistance by the central government, from the time of SBY to Jokowi, tends to be given as an effort to maintain the image of the government in power,

the image that its power is very "popular" or cares about the common people: fishermen, the poor, vulnerable groups, etc. It is in this context that social assistance tends to increase sharply ahead of elections. Here, social assistance can be said as a political tool or patronage.

Third, the same thing also happens in the regions: the provision of social assistance is closely related to the electoral politics of the regional elections. It is in the second and third contexts that the provision of social assistance is generally misdirected—not only given to the poor and vulnerable, but also to groups that have the potential to become voice pockets.

Thus, social assistance has never been able to reduce or eradicate poverty, because social assistance has never been able to answer or overcome the structural factors that cause low income, limited employment opportunities, narrowing of agricultural land (involution), education and skills of our workforce which are still low—including our very high socio-economic gap.

In order to develop the Non-Cash Food Assistance (BPNT) program to provide choice and control to Beneficiary Families in meeting food needs, the Staple Food Program was implemented based on Minister of Social Affairs Regulation No. 5 of 2021 concerning Implementation of the Staple Food Program.

Summarizing the explanation above, the contribution of the National Strategy for Corruption Prevention in this action is only at the scope or level of output, which in this case is DTKS which corresponds to NIK and fits poverty criteria. The management of DTKS which corresponds to NIK opens wider opportunities for prospective KPM who meet poverty criteria.

Several achievements at the outcome level were contributed by the Ministry of Social Affairs and the Regional Government which manage the DTKS and the distribution of BPNT directly to the KPM community. Meanwhile, at the level of impact, BPNT has not contributed directly to social welfare-poverty reduction, it only meets the food needs of KPM which can reduce inflation. The National Economic Hero Program, which is being initiated by the Ministry of Social Affairs, is expected to reduce poverty.

3.2.2 The relationship between the contribution of the implementation of the Stranas PK towards efforts to prevent corruption

DTKS which is the equivalent of NIK in this action has provided a breath of fresh air in ensuring that the government distributes BPNT with a good database so that aid is right

on target and narrows the gaps for corruption. However, regulations and mechanisms for selecting KPM still need to be improved, with the limited time and methods of verification and validation of DTKS and the availability of KPM quotas.

On a broader scale, this action has also not been able to close a number of corruption loopholes, including those that occur in the form of illegal levies at various stages of the process, especially when collecting data or withdrawing money. According to the results of field verification, the e-Warong system can still be distorted by creating sales packages that do not meet the criteria set by the government.

Some of the efforts that need to be followed up for BPNT's targeting are as follows:

- a. Strengthening the Regional Government to objectively determine KPM according to poverty criteria;
- b. More comprehensive verification and validation methods at the regional and central levels;
- c. Complete and routine socialization for the community regarding the mechanism for determining and distributing BPNT for KPM, so that the community has a good understanding and awareness to receive benefits and supervise BPNT;

In addition, efforts to increase welfare-poverty reduction within the scope of BPNT include continuing programs from BPNT distribution, in the form of providing capital for self-sufficient KPM to build MSMEs, as well as strengthening Regional Governments to be independent in managing social assistance and poverty reduction programs in their respective regions.

3.3 Resolving Complaints via SP4N-LAPOR which Improves the Quality of Public Services

Output	Outcome	Dampak	Pencegahan Korupsi
<ul style="list-style-type: none"> SP4N-Lapor has been integrated/consolidated with the Ministry/Institution/Regional Government complaint system Complaints received via Sp4n-Lapor have been resolved (received, distributed, followed up) 	<ul style="list-style-type: none"> Community participation in synergizing with the government through complaints made 	<ul style="list-style-type: none"> Complaint resolution improves the quality of public services 	<ul style="list-style-type: none"> Corruption prevention potential Corruption loopholes

Complaint management is one of the main elements in the effort to create quality public services. With the availability of a reliable complaint channel, the public can submit suggestions, criticisms and complaints about public services and the potential for corruption as a form of their rights and participation in an accountable, transparent and professional government process.

Since the rollout of Bureaucratic Reform, all Ministries/Institutions/Local Governments (K/L/D) have provided various direct and online complaint facilities to be open to public suggestions and criticism in carrying out government services. We admit that several K/L/Ds have effectively managed incoming complaints, but it cannot be denied that there are still many K/L/Ds that manage complaints only administratively.

For this reason, the Government has strengthened its commitment to complaint management by establishing a National Public Service Complaint Management System (SP4N) through Presidential Regulation no. 76 of 2013 concerning Management of Public Service Complaints. With SP4N, the Government wants to ensure and guarantee that all complaints at K/L/D are resolved quickly and reliably through centralized management and monitoring at the national level.

The People's Online Complaint Aspiration Service (LAPOR) itself was first used by the Presidential Work Unit for Development Supervision and Control during the presidency

of Susilo Bambang Yudhoyono. Since 2013, LAPOR has been established as the National Public Service Complaint Management System (SP4N).

The existence of LAPOR can be said to be a real form of implementation of the mandate of Law Number 25 of 2009 concerning Public Services and Presidential Regulation Number 76 of 2013 concerning Management of Public Service Complaints. In the modern public service paradigm, the focus of public services is oriented towards customer satisfaction (customer-driven government) where feedback or public perception of service is very important.

Some indicators of excellent service are that they must meet the following indicators:

- 1) Transparency, namely services that are open, easy and accessible to all parties who need them and easy to understand.
- 2) Accountability, namely services that can be accounted for under the provisions of laws and regulations.
- 3) Conditional, namely services that can be in accordance with the conditions and abilities of the giver and recipient of the service by sticking to the principles of efficiency and effectiveness.
- 4) Participation, namely services that can encourage community participation in the implementation of public services by taking into account the aspirations, needs and expectations of the community.
- 5) Equal rights, namely services that do not discriminate from any aspect, especially ethnicity, race, religion, class and social status.
- 6) The balance of rights and obligations, namely that every citizen has the right to the services received in the form of goods/services that take into account aspects of justice equate and do not discriminate between providers and recipients of public services.

Furthermore, the use of digital technology is one of the accelerations in Bureaucratic Reform, through the Electronic-Based Government System (SPBE) as mandated in Presidential Regulation no. 95 of 2018. However, currently, there are still various sectoral applications in the Central Government and Regional Governments that are at risk of state financial inefficiencies and are vulnerable to information security, so efforts are needed to integrate all of these applications.

Through SPBE, the process of accelerating integration is carried out by developing common applications in 4 (four) fields, namely:

1. Planning and Budgeting, Procurement of Goods and Services, Performance and Monitoring and Evaluation;
2. Personnel Sector;

3. Field of Archives;
4. Public Service Management Sector;

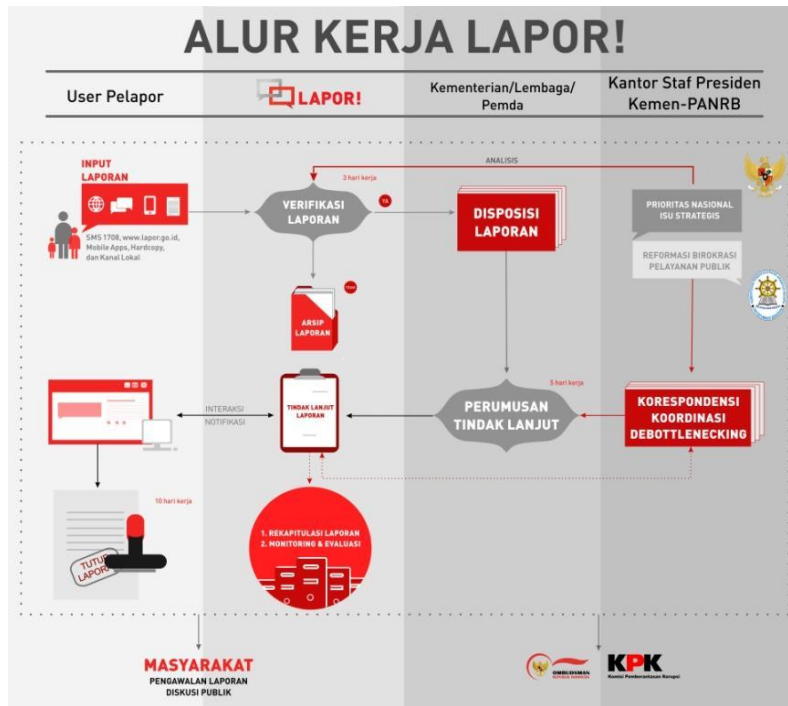
Likewise with complaint management which is part of the Public Service Management Sector, a National Public Service Complaint Management System Application has been established using the LAPOR! application. or hereinafter referred to as SP4N-LAPOR!, which is an online service for conveying all aspirations and complaints of the people that is integrated in the management of complaints in stages at every public service provider, which is regulated in the Regulation of the Minister of Administrative Reform and Bureaucratic Reform No. 46 of 2020 concerning the Road Map for the 2020-2024 National Public Service Complaint Management System.

This provision mandates that all Ministries/Institutions/Regional Governments that have implemented information technology-based public service complaint management, be integrated with LAPOR!, both inter-agency, cross-agency public service complaints, from the lowest unit to the top unit. Next, SP4N-REPORT! stipulated as a general application in the field of Public Service Complaint Management through Decree of the Minister of PANRB No. 680 of 2020, all agencies are required to use SP4N-LAPOR! in managing public service complaints.

SP4N-REPORT! carries a policy of "*no wrong door policy*" which guarantees the public's right that complaints from anywhere and of any type will be channeled to public service providers who are authorized to handle them. SP4N-REPORT! aims to:

5. Organizers can manage complaints from the public in a simple, fast, precise, complete and well-coordinated manner
6. The administrator provides access for public participation in submitting complaints
7. Improving the quality of public services

Illustration 3. SP4N-LAPOR! Workflow



Complaint Management Business Process via SP4N-LAPOR!:

1. The public submits reports through various SP4N-LAPOR! channels, such as www.lapor.go.id, SMS 1708 (iOS/Android), Twitter, Line, Telegram, and Facebook (under development)
2. The National Admin (KemenPANRB) verifies and disposes of the authorized K/L/D (Reports can go directly to the Agency Admin if the Rapporteur chooses the destination agency himself or via SMS subdomain/prefix) with a maximum of 3 working days
3. Agency Admin verifies and dispositions to the authorized Unit/OPD with a maximum of 3 working days
4. The Liaison Officer provides an initial response and coordinates with the relevant Unit/OPD and provides follow-up to the reporter. Completion that does not require field inspection is 14 working days. Completion that requires field inspection within 60 working days.

Table 16. Conditions for Complaint Management via SP4N-LAPOR! 2020 to 2022:

Data	2020	2021	2022
Number of Reports	195.438	160,476	113,989
Status	66% completed follow-up	84.89% completed follow-up	84.46% completed follow-up
Media		Website, mobile application, SMS, manual report	Website, mobile application, manual report, SMS, twitter
Number of Integrated Ministries/Institutions	Website, mobile application, SMS, report/manual input	134 (84.72%)	135 (86.6%)
Number of Integrated Local Governments	134 (84.72%)	524 (95.62 %)	544 (99.27%)
5 Ministries/Institutions and Regional Governments Receiving the Most Reports	523 (95.43%)	Republic of Indonesia National Police; State Civil Service Agency; Provincial Government of DKI Jakarta; Ministry of Social Affairs; Ministry of Education, Culture, Research and Technology	Republic of Indonesia National Police; State Civil Service Agency; Provincial Government of DKI Jakarta; Ministry of Education, Culture, Research and Technology; Ministry of Social Affairs
Top Report Topics	Republic of Indonesia National Police; Financial Services Authority; Provincial Government of DKI Jakarta; Ministry of Social Affairs; Ministry of Education, Culture, Research and Technology		Social Assistance; Education and culture; Population Administration & Civil Registration; Peace / Public Order; Fraudulent Content; Pre-Employment Card
Average Verification Rate and Follow-Up Time		Population Administration; Social Assistance; Peace/Public Order; Fraudulent Content; Fintech Billing System	Average verification rate: 3 business days

In 2024, SP4N-LAPOR is targeted to be able to manage 1,819,160 complaints with the status of complaints that have been successfully followed up reaching 90%.

In fact, REPORT! Currently it has been connected to all Ministries/Institutions at the Central level and the majority of Regional Governments. However, there are several problems, namely: several regions were found to have built their own complaints system; areas that have been connected to LAPOR! have not optimized the use of this platform; internet network problems to people in areas who are not familiar with LAPOR!

Apart from that, Stranas PK is intervening in a fundamental matter, namely a system that supports LAPOR! as a channel to accommodate people's aspirations. In addition, this intervention has accelerated the implementation of LAPOR! in all Central Ministries/Institutions and the majority of Regional Governments.

3.2.1 The impact that has been produced (or the impact that is expected to be produced) from the output, outcome, and impact of the implementation of the Stranas PK

Output: SP4N-REPORT! has been integrated/consolidated with the Ministry/Institution/Regional Government complaint system

SP4N-REPORT! has been connected and has become one of the complaint media for Ministries/Institutions/Regional Governments
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The PANRB Ministry claims that 92.9% (679) K/L/D that have been integrated with SP4N-LAPOR! up to 2022. The intended meaning of integration is still biased, bearing in mind that with the stipulation of SP4N-LAPOR! as a general complaint application, it is expected that SP4N-LAPOR! will be the only or at least all complaint applications connected to SP4N-LAPOR!.

However, in reality K/L/D only considered SP4N-LAPOR! as one of the complaint facilities among the complaint facilities that are managed independently by the K/L/D. This can also be seen from the small number of reports submitted via SP4N-LAPOR! compared to K/L/D complaint facility. And sadly, several K/L/D admit that manually inputting all complaints received via the internal complaint facility into SP4N-LAPOR! to fulfill reporting to the Ministry of PANRB.

This happened because K/L/D considered that there was still a lack of assistance from the Ministry of Administrative and Bureaucratic Reform and the Ministry of Communication and Informatics in realizing this integration. On the one hand, K/L/D are

ready to support and integrate with SP4N-LAPOR!, but on the other hand, they question the position of other internal complaint facilities that are more popular with the local community.

The Ministry of PANRB said that "the problem of integration is indeed a big homework. Expected SP4N-LAPOR! will be the only main channel for complaints. There are many that are not understood by K/L/D. In accordance with SPBE regulations, the integration process is the responsibility of the Ministry of Communication and Informatics. Unfortunately there are around 40 K/L applying for integration, but the Ministry of Communication and Informatics has not responded quickly."

Output: Complaints received via SP4N-LAPOR! resolved (received, distributed, followed up)

Complaint via SP4N-LAPOR! has been followed up by an average of 78.45% from 2020 to 2022, but the number of reports is still small

Complaint via SP4N-LAPOR! have indeed been received, distributed to related units/OPDs, and then followed up on by an average of 78.45% (2020 to 2022) of the average number of hundreds of thousands of reports which is still far from the target of one million in 2024 later.

Complaints are followed up on average within 6 days, from a maximum of 14 to 60 working days, depending on the classification of the complaint. Through the SP4N-LAPOR mechanism, the commitment of the State Civil Apparatus (ASN) has begun to be open and provide a quick response to resolve incoming complaints.

Outcome: Community participation in synergizing with the government through complaints made

There is still a lack of people making complaints via SP4N-LAPOR!

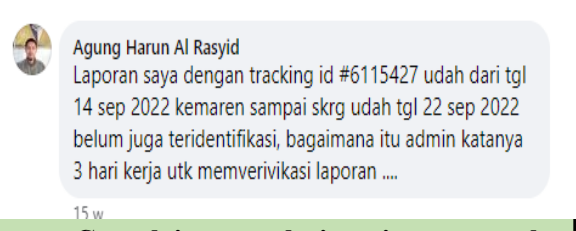
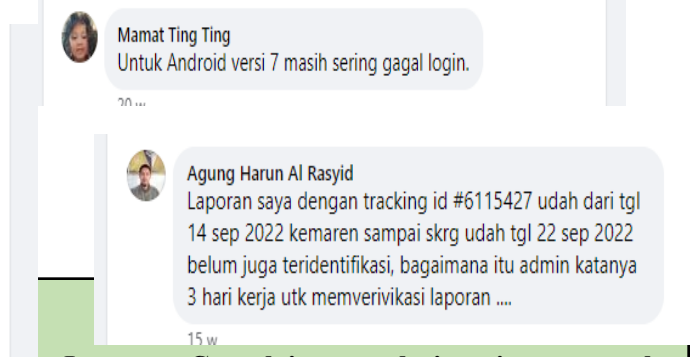
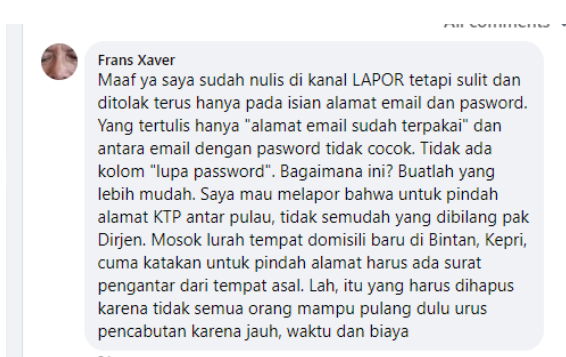
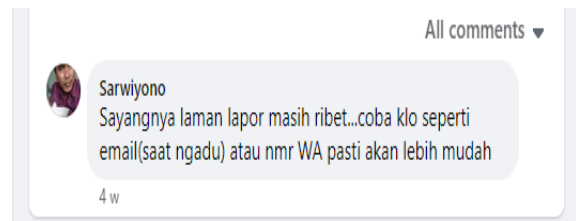
Number of complaint reports received via SP4N-LAPOR! still small with an average number of reports of 156,500, which is still far from the target of 1.8 million reports in 2024, so it is quite doubtful whether the handling of incoming complaints via SP4N-LAPOR! will make a significant contribution to the improvement of public services.

This number is still far below the number of complaint reports submitted via the internal complaint facility managed by K/L/D. In addition, the number of incoming reports also continued to decrease from 195 thousand (2020), 160 thousand (2021), to 113

thousand (2022). The small number of these reports, aside from of course, could be due to the fact that the public chooses to make complaints via other means of complaint, it is also due to the fact that there is still reluctance of the public to synergize with the government through complaints, aka they do not care about the existing condition of government services and are pessimistic that complaints will not be handled properly.

People are also still reluctant to make complaints via SP4N-LAPOR! because the system is quite complicated (must install the application) and self-identity is opened through the NIK number entered. Even though their identity is protected/kept secret, people are afraid to make complaints via SP4N-LAPOR!.

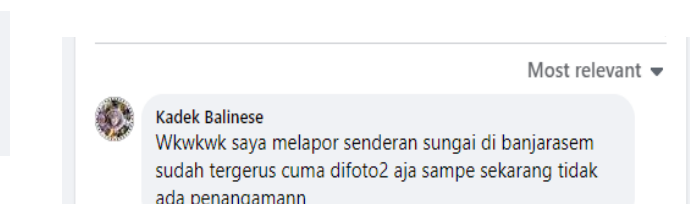
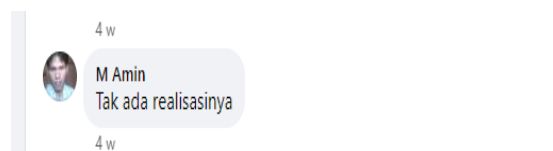
This is in line with what was stated by the respondent: "Many people do not know about SP4N-LAPOR! Even though socialization has been carried out, the community is not familiar with SP4N-LAPOR! Apart from that, using SP4N-LAPOR is considered quite difficult because you have to install and input your official identity." Here are some examples of complaints from the public against LAPOR!:

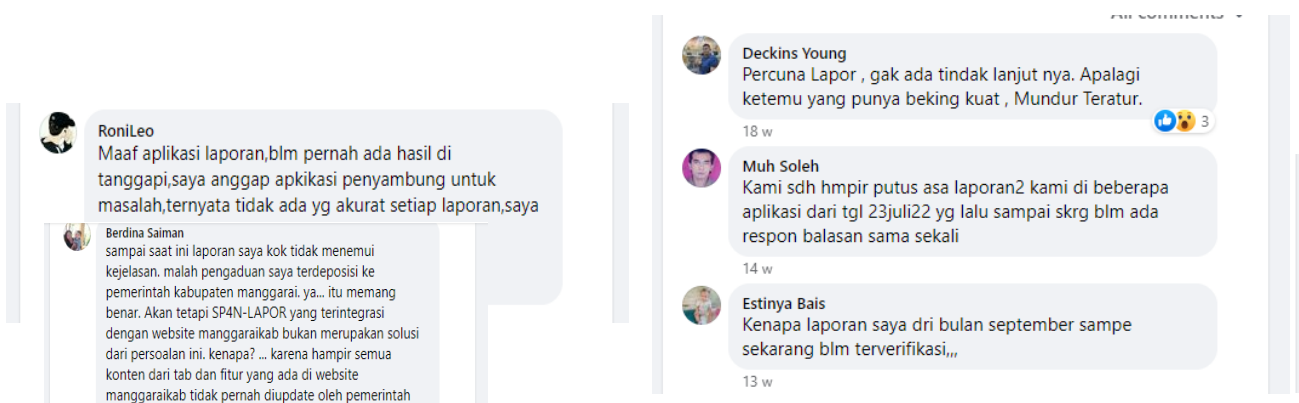


Impact: Complaint resolution improves the quality of public services

Complaint resolution improves the public service being complained about, but does not necessarily improve the quality of public service in general

Completion of incoming complaints quickly and reliably via SP4N-LAPOR clearly improves the public services that are being complained about. However, it turns out that there are still many complaints regarding the settlement of complaints via SP4N-LAPOR as follows:





C For For example, if an incoming complaint is not handled because the complainant should receive a clear explanation regarding the status of the complaint. In addition, considering that there are still very few complaints received via SP4N-LAPOR!, the micro improvements that have been made will not have a direct impact on improving the expected macro quality of public services.

When viewed from the parameters of the Public Service Index (IPP) carried out by the Ministry of PANRB, one of the components of the assessment is regarding consultation and complaints (indicator: available facilities and media for complaints that can be utilized by all levels of society and available rubrics, documentation, and publication of processes/ easily accessed complaint results), there was an increase from the index value of 3.79 in 2021 to 3.87 in 2022. However, this increase also needs to be analyzed in more depth how much the contribution of the complaint component is to the index value, more specifically regarding SP4N-LAPOR! .

Summarizing the findings above, it can be said that the contribution of the National Strategy for Corruption Prevention in this action is only at the scope or output level, namely the integration of SP4N-LAPOR! with the K/A/Pemda complaint system as well as receipt, distribution, follow-up of incoming complaints via SP4N-LAPOR! .

Meanwhile, at the outcome level, the contribution of the PANRB Ministry in the form of community participation in synergizing with the government through complaints made is still minimal with an average of 156 thousand from the target of 1.8 million in 2024. At the impact level, settlement of incoming complaints via SP4N-LAPOR! improve the

public services that are being complained about, but have not necessarily improved the quality of public services in general.

3.2.2 Relationship between the contribution of the implementation of the National Strategy for PK to efforts to prevent corruption

The theme of the most complaints that came via SP4N-LAPOR! are regarding the coronavirus, social assistance, education, population administration, as well as peace and order. While corruption, collusion and nepotism are not included in the top 5 (five) themes reported via SP4N-LAPOR!. Therefore, the mitigation category for the level of prevention of corruption in this action is petty corruption.

Meanwhile, complaints regarding Corruption, Collusion and Nepotism in 2021-2022 include 275 reports in 2021 and 203 reports for the 2022 period. Therefore, if SP4N-LAPOR! is expected to be the main vehicle for complaints of corruption, collusion and nepotism, based on the number of reports received, indicating the potential for preventing cases of corruption, collusion and nepotism via SP4N-LAPOR! not yet optimal, where the number of reports in 2022 has decreased from 2021.

Complaints of corruption, collusion, nepotism that come in via SP4N-LAPOR! if not followed up seriously, are very likely to become corruption loopholes that are detrimental to the state. In addition, there are concerns from community respondents that "the digitization of this complaint is only a wasteful program, which will become an object of corruption."

Thus, a number of efforts can be made to optimize the integration of LAPOR!, resolve complaints, and increase the participation of people who complain via SP4N-LAPOR! REPORT! in the context of preventing corruption is to provide an explanation and implementation of integration according to regulations and guidelines that are already available for ministries/institutions/local governments, as well as strengthening the use of SP4N-LAPOR! for Ministries/Institutions/Local Governments as well as the people of Indonesia.

In addition, in order to improve the quality of public services through the settlement of complaints via SP4N-LAPOR! including strengthening the capacity of Ministries/Institutions/Regional Governments to commit to resolving incoming public complaints quickly and accurately, as well as socializing the SP4N-LAPOR! more massively for Ministries/Institutions/Local Governments as well as the people of Indonesia.

The results of the analysis of the evaluation of the impact of the three actions above actually show that the National Strategy for PK policy is actually trapped in maintaining the status quo of corruption itself. There is a prominent mismatch between the main problem of corruption, which is a political problem, and the technocratic solutions offered, in the end, it generates more questions than results. The incomplete diagnosis of the causes and symptoms of corruption, followed by the rhetoric of participatory monitoring, is only one example that makes this prevention policy package only work partially and seems to add to the long chain of red-tape within the bureaucracy.

Unfortunately there is almost no sense of crisis from the State. This situation is even exacerbated by the proliferation of influence trading in the political system and government. At the same time, supervisory instruments are generally unable to carry out their functions optimally due to the expansion of executive discretion.

For example, today it seems natural to see public officials who have several attire at once: rulers who are businessmen at the same time, political parties with a sense of family, overlapping multiple positions, or even members of the military holding civilian positions. Gradually, this conflict of interest will only harm the interests of society because the distribution of welfare only revolves around a handful of elites. Unfortunately, regulations governing and responding to the risk of conflict of interest have been completely absent to date.

The symptoms of this legal crisis are exacerbated by the increasingly clogged deliberative critical function of the DPR due to the inferiority of the opposition, the not optimal role and function of the Corruption Eradication Commission due to institutional, ethical and leadership complications since the two years since Law Number 19 of 2019 came into force, and increasingly squeezed spaces of civil liberties.

The weak function of balancing power in the Indonesian democratic system has also been made more perfect when the phenomenon of attacking the independence of the Constitutional Court judge Aswanto through a midway stop went smoothly. There are almost no boundaries that respect the principle of limiting powers anymore. These dangerous signs have been consciously breached and have the potential to continue undermining the basic rights of citizens ahead of the 2024 election electoral process.

The approaches to digitization, deregulation and de-bureaucratization within the Nastra PK which seem to be a surefire drug to increase the Corruption Perception Index score are also very questionable. This is because the government appears to be indifferent and even seems to turn a blind eye to the fundamental problem of corruption itself, namely political corruption.

If explored further, the collapse of the Corruption Perceptions Index was most contributed by the increasingly gripping political risks which caused legal uncertainty in the business ecosystem in Indonesia. This explanation can be observed from the decline in a number of important data sources in the economic pillar – which previously

were commonly used as the 'prima donna' indicator because they always received high value.

For example, the indicator in the International Country Risk Guide survey, namely Political Risk Services (PRS), fell 13 points from 48 last year to 35. This indicator highlights the existence of extra payments and bribes related to export-import licensing that are felt by business actors. Besides that, the rampant conflict of interest between politicians and business actors, as well as the corruption of the political system should also be underlined.

In other data sources, such as the World Competitiveness Yearbook survey supported by IMD, Indonesia also fell 5 points. Meanwhile, the Asia Risk Guide survey issued by the Political and Economic Risk Consultancy (PERC) sank by 3 points. These two data sources generally portray the severity of corruption in various countries, especially in the political system. These declines were also supported by stagnation in the effectiveness of law enforcement and stagnation in bureaucratic reform as shown by three other data sources, namely the Country Risk Ratings survey from Global Risk Insight, the Transformation Index from the Bertelsmann Stiftung and the Country Risk Service from the Economist Intelligence Unit.

This means that the combination of the various data sources above in the Corruption Perceptions Index is actually a reflection of the lack of trust of business actors and experts in legal certainty. This lower score also confirms that corrupt practices are still the main obstacle impeding the flow of high-quality investment and ease of doing business in Indonesia, both due to the uninterrupted long chain of red-tape in the bureaucracy which is exacerbated by law enforcement which is considered to have not fulfilled a sense of justice.

Unfortunately, this emergency situation is actually interpreted partially by the Government where the orientation of the National Strategy for PK is very economic perspective. Even though the results of the Corruption Perceptions Index have confirmed that there is a sharp contradiction between the structural transformation approaches that the Government claims can be overcome through these policies, such as deregulation and debureaucratization in business licensing, with the views of the business actors themselves.

In fact, business people still view that the current corruption prevention instruments have not provided legal certainty and ease of doing business for investors and business actors, especially for those who come from abroad. This unfinished paradigm shift does not touch the root of the problem. The persistence of corrupt patronage networks coupled with the de facto state of oversight institutions, especially the weak Corruption Eradication Commission, has in turn added to the rash of wounds that have opened wide.

The tangled threads of this problem show that the glorification of digitalization in eradicating corruption cannot be relied upon as a miracle drug. Of course no one

objected when the Government launched various systems that were factually needed, such as business licensing through the Online Single Submission (OSS) system, management of immigration document registration, the Indonesia National Single Window (INSW) platform related to the chaos of commodity information for export-import, or Single Truck Identification Data (STID) to respond to the rampant back and forth of transport trucks at the port.

However, this breakthrough appears to only work on the margins of petty corruption. In fact, our main fundamental problem is political corruption, especially state-capture corruption. In short, the problems above certainly will not stop with digitalization and debureaucratization.

Therefore, it is necessary to respond fundamentally to the above fundamental problems by focusing on reforms not only in the technocratic and administrative aspects of policy, but also in the political system. The reform step requires two important prerequisites, all of which require courage.

First, the biggest homework for a country experiencing democratic regression like Indonesia is to make structural improvements in the formal aspects of making laws. This means that the policy-making process must be truly transparent, accountable and guarantee citizens' rights to participate in a meaningful way. The guarantee of meaningful public access allows monitoring of any possibility of taking over policies for the benefit of a handful of groups.

Second, it is necessary to re-strengthen oversight institutions. The principle of checks and balances will only exist on paper if the institution is not given the authority it needs and its independence is disturbed at any time. This is important because when there is a policy recentralization process such as in the Law on Job Creation, the existence of a strong oversight institution is crucial.

These institutions are primarily the Corruption Eradication Commission, the National Police Commission, and the Prosecutor's Commission. At the same time, the Government needs to continue to support the one-stop system run by the Supreme Court to strengthen the edge of legal reform. Another chain that is urgent to also be unraveled is the need to push for the renewal of the Criminal Procedure Code Bill and other judicial regulations such as the Judicial Law, the General Judiciary Law, the Supreme Court Law and also the Judicial Commission Law to make it much more harmonious.

It is hoped that each of these preconditions can provide light in the darkness of the war against corruption in order to achieve legal certainty. This idea should be initiated, not only to support the start of a progressive cycle of legal and business reform, but also to provide the best possible impact on society.

CHAPTER V CLOSING

4.1 Summary

The main objective of this research is to provide insight into how Indonesia has so far grappled with the challenges of making and implementing anti-corruption policies, as well as analyze the resulting impact on the main beneficiaries of the policies. It is hoped that the information found can contribute to future policy making in Indonesia.

In particular, this research is also expected to be able to explore in depth the driving force of the implementation of the Nastra PK emerging in Indonesia, the criteria used to select and prioritize sectors to be reformed. This study is based on a literature review,

empirical research, and a concluding analysis of what can be learned from this experience.

Unfortunately, it is quite clear that the reforms under the Stranas PK flag are centered on a technocratic agenda aimed at strengthening state institutions. However, unfortunately it does not significantly affect the balance of power. Political “bigger” issues, such as electoral reform and institutional reform to ensure the independence of oversight organizations, healthy party financing, access to information and transparency, are in fact not part of the Stranas PK agenda.

Even though it seems clear that in Indonesia small, big, and political corruption coexist and provide each other with input and protect one another. However, it should be noted that the face of corruption and its manifestations can change rapidly.

Summarizing the substance that can be learned from the experience of implementing Stranas PK, it was found that most of these approaches have not been very successful for various reasons, including the following special attention:

- **Lack of attention paid to the political dimensions of Stranas PK policies:** in particular, the high-level political will that gave birth to an anti-corruption strategy could not be sustained from the beginning to the end of the government cycle;
- **Implementing agency (National Secretariat) lacks strategy:** high-level leadership from the ministries and agencies that have to implement Stranas PK mostly do not participate actively in the process of preparing the action so that commitment to implementation is weak;
- **Lack of technical support and mentoring:** public agencies that have to implement Stranas PK policies often do not have the capacity needed to “mainstream” these measures into day-to-day business operations and the main anti-corruption agency often does not have the capacity to remedy the situation;
- **Monitoring and evaluation are almost entirely ignored:** assessments from monitoring and evaluation are of a technical-administrative nature, often yielding no results and review from external parties, for example by parliaments, research institutes and universities or civil society groups;
- **Lack of information and communication with implementing agencies,** political actors, media and the public hinders the creation of sustainable political discourse and thus minimizes political pressure to promote anti-corruption policies;

These results do not indicate that there are no serious actors who believe in the benefits of an anti-corruption strategy and are actively involved in the anti-corruption agenda. In fact, this research underlines that the current anti-corruption strategy in the form of the National Strategy PK policy easily slips from its original path and becomes an unmanageable business.

In relation to national ownership, the Stranas PK policy has indeed been based on clear initial political objectives. However, these goals tend to fall into the trap of strengthening the government's power base and maintaining the status quo. On the other hand, the formal democratic process has a positive effect because it allows the public to voice their aspirations, especially through elections, demonstrations and media reports regarding demands for anti-corruption policies. However, the lack of mechanisms to follow up on participatory processes throughout the policy cycle hinders the effectiveness of the anti-corruption efforts themselves.

Regarding the substance in Perpres 54/2018, most of the policy actions focus more on norms and institutions with limited effect on performance in controlling corruption. The prominent mismatch between the main problem of corruption, namely political problems and technocratic solutions tends to result in ineffective interventions. In addition, the expected solution is not based on an adequate diagnosis of the cause and often the diagnosis is completely irrelevant. This research further confirms that the integration approach with the government's reform agenda does occur on paper, but not in practice.

In the context of implementation, coordination and monitoring, it is worrying to note that this crucial phase of the policy cycle has not received sufficient political and operational attention. Leadership and oversight are often inconsistent with institutional capacity and ambitious goals. Furthermore, the lack of meaningful participatory monitoring and evaluation has turned anti-corruption policies into paper tigers.

4.1.1 Results against Impact Observations

The contribution of the National Strategy for Corruption Prevention in Action I is only at the scope or level of output and outcome. At the output level, what has happened is the availability of National Availability Data, National Needs Data, and Meat Commodity Import Quota Data. Meanwhile at the outcome level, the INSW which contains data on cattle demand and production from the Ministry of Agriculture and other technical-non-technical ministries/institutions is used as the basis for making Import Quota policies.

This level of outcome was contributed by the Ministry of Trade and the Coordinating Ministry for Economic Affairs in the form of ease of obtaining permits and the realization of imports, not contributed by the National Strategy for Corruption Prevention, which has not yet occurred because importers still need a long time to process import permits.

At the level of impact, INSW/Sinas NK has not contributed to the target price for cattle set by the President of the Republic of Indonesia, namely IDR 80,000 where the average market price is currently IDR 130,000, as well as Pro National Livestock and Food Self-Sufficiency, with still high import quotas.

While in Action II, the contribution of the National Strategy for Corruption Prevention is only at the output level, which in this case is DTKS which corresponds to NIK and fits poverty criteria. The management of DTKS which corresponds to NIK opens wider opportunities for prospective KPM who meet poverty criteria.

Several achievements at the outcome level were contributed by the Ministry of Social Affairs and the Regional Government which manage the DTKS and the distribution of BPNT directly to the KPM community. At the level of impact, BPNT has not contributed directly to social welfare-poverty reduction, it only meets the food needs of KPM which can reduce inflation. The National Economic Hero Program, which is being initiated by the Ministry of Social Affairs, is expected to reduce poverty.

In Action III, the National Strategy for Corruption Prevention in this action is only at the output level, namely the integration of SP4N-LAPOR! with the K/A/Pemda complaint system as well as receipt, distribution, follow-up of incoming complaints via SP4N-LAPOR!.

The level of outcomes contributed by the Ministry of PANRB in the form of community participation in synergizing with the government through complaints made is still minimal with an average of 156 thousand from the target of 1.8 million in 2024. Meanwhile at the impact level, the resolution of incoming complaints via SP4N-LAPOR! improve the public services that are being complained about, but have not necessarily improved the quality of public services in general.

4.1.2 Results for PK Action Contribution to Corruption Prevention

The three actions of the National Strategy PK reviewed in this study are on the prevention of corruption at the petty corruption level.

This conclusion is based on the fact that the corruption strategy stipulated in Presidential Decree 54/2018 is aimed more at lip-service, but not at changing the status

quo in favor of old and new elites. This problem is exacerbated by the lack of a participation mechanism in the full cycle which hinders effectiveness.

At the same time, “politically correct” preventive measures were put in place to win the public vote, but due to numerous design and implementation flaws, sadly died long before they even started.

The anti-corruption policies studied in this study tend to prioritize the establishment or strengthening of institutions and review of regulations. However, what often happens in implementation and enforcement is very different. In fact, the agreed benchmarks between governments are not focused on performance but on the extent of “relatively” easy formal compliance.

Apart from the recognition that corruption is mostly a political problem, the anti-corruption strategy presented through the National Strategy for PK actually focuses on technocratic and procedural responses. With the application of Presidential Decree 54/2018, the anti-corruption policy seems to be clearly trying to be linked to the ongoing governance policies within Ministries and/Institutions. But it is also clearly reflected that in practice, the link between the two is minimal.

4.2 Recommendation

4.2.1 General Recommendation

The results of this study underscore the importance that the Nastra PK encourages two efforts, namely building a policy framework that touches more on political corruption, followed by promoting an empirical evaluation system based on diagnostic evidence.

A good anti-corruption policy framework is built in earnest, ensuring that it has a comprehensive evaluation component. The internalization of the process demonstrates a commitment to continuous learning and process improvement towards the goal of not only designing more effective future initiatives that drive lasting change, but also delivering positive, sustainable impacts to all stakeholders and beneficiaries.

This recommendation is based on the fact that the presence of Presidential Regulation Number 54 of 2018 concerning the National Corruption Prevention Strategy is still trapped in administrative-technocratic problems, such as inefficient management patterns, coordination that is not optimal; or lack of structured planning. The lack of a solid oversight system for the implementation of the strategy and action plan has also resulted in sub-optimal implementation due to the lack of spaces for participation.

These problems do not appear to be conceptual issues, but result from a combination of inadequate political will, weak capacity of institutions to take the initiative and help

integrate the corruption dimension into government reform agendas, and a concomitant lack of awareness, vision, and willingness to collaborate within institutions. public accountability for priority reforms.

Therefore, a reasonable diagnosis is needed to decide how to cure the disease by addressing the cause, not just the symptoms. Unfortunately, when viewed from the paradigm and policy approach of the National Strategy for PK, the expected solutions are not yet based on an adequate diagnosis of the causes, patterns and dynamics of corruption itself.

The results of this study underline, the diagnosis tends to be done in a hurry and is not associated with the final anti-corruption strategy. In fact, in several actions, the government seemed to put aside the importance of diagnosis from the start because it considered "everything is known".

At the same time, civil society also has an important role in terms of monitoring and evaluating the implementation of anti-corruption policies. This encouragement seeks for policy makers to build efficient monitoring and evaluation mechanisms so as to get the best out of an implementation process.

4.2.2 Recommendation per Action

Action I

What needs to be followed up for the sake of accuracy of data on availability and national demand for beef commodities is that a national cattle census is needed with the right measurement method, agreed upon by all parties, and carried out routinely, by prioritizing price stability, availability of beef, welfare of breeders, and self-sufficiency or resilience. food in Indonesia. Steps that can be taken to get the price of cattle according to the target as well as pro national livestock and food self-sufficiency is to seriously build a national livestock system.

Action II

Several steps that need to be followed up for BPNT targeting include:

- a. Strengthening local governments objectively to determine KPM according to poverty criteria
- b. More comprehensive verification and validation methods at the regional and central levels
- c. Complete and routine socialization for the community regarding the mechanism for determining and distributing BPNT for KPM, so that the community has a good understanding and awareness to receive benefits and supervise BPNT

Some of the steps that need to be taken to increase welfare-poverty reduction within the BPNT scope are as follows:

- a. The follow-up program from BPNT distribution, in the form of providing capital for the independence of KPM to build MSMEs
- b. Strengthening local governments to be independent in managing social assistance and poverty reduction programs in their respective regions

Action III

Steps that need to be followed up for integration, resolution of complaints, and increased participation of the people who complain via SP4N-LAPOR! is:

- a. Explanation and implementation of integration in accordance with regulations and guidelines that have been made available to Ministries/Institutions/Regional Governments
- b. Strengthening the use of SP4N-LAPOR! for Ministries/Institutions/Local Governments as well as the people of Indonesia

Steps that need to be taken to improve the quality of public services through the settlement of complaints via SP4N-LAPOR! is:

- a. Strengthening the capacity of Ministries/Institutions/Regional Governments to commit to resolving incoming public complaints quickly and accurately
- b. SP4N-LAPOR Socialization! more massively for Ministries/Institutions/Local Governments as well as the people of Indonesia

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B. List of Tables:

In this study, the question approach that will be used is a causal question pattern. As has been described, causal questions are intended to explore whether there is or not, and the extent to which the intervention being evaluated has brought about a change.

Analysis of causal relationships is generally a method of understanding how interventions can contribute to impacts, along with other factors and programmes;

Therefore, this impact evaluation research will focus on answering a number of key evaluation questions (KEQ), such as:

Table 17. Key Impact Evaluation Questions

KEQ	List of Key Questions	Program Participants	Key Informants	Secondary Data	Observations
KEQ 1	How is the quality of the design and implementation of the Stranas PK action interventions related?	✓	✓	✓	✓
KEQ 2	How well are the related Stranas PK action interventions implemented and adapted as needed?	✓	✓	✓	
KEQ 3	Do the related Stranas PK action interventions provide the desired results in the short, medium and long term? If so, for whom, to what extent, and under what circumstances?	✓	✓	✓	
KEQ 4	What are the unintended outcomes—positive and negative—produced by the related Stranas PK action interventions? How did this happen?	✓	✓	✓	
KEQ 5	What are the obstacles and supporting factors that make the difference between the implementation and results of the Stranas PK action interventions regarding success or not?	✓	✓		

KEQ 6	How valuable are the results of the related Stranas PK action interventions for the service providers, clients, communities and/or organizations involved?	✓	✓		
KEQ 7	To what extent do the related Stranas PK action interventions represent efficiency, namely the best possible use of available resources to achieve results of the greatest possible value for participants and society?		✓	✓	
KEQ 8	Are there any positive results from the related Stranas PK action interventions that might be maintained?		✓		✓
KEQ 9	Is the Stranas PK action intervention related to facilitating the strengthening of relationships?	✓	✓		
KEQ 10	Is the Stranas PK action intervention related to facilitating the strengthening of relationships?	✓	✓		

Table 18. Results of Evaluation of the Working Mechanism of the National Strategy for Corruption Prevention

Action I. Evaluation of the Working Mechanism of the National Strategy for Corruption Prevention

In relation to the National Corruption Prevention Strategy (National Strategy for PK), the targets to be achieved are:

Output	Availability and utilization of valid, reliable and confirmed national availability data, national consumption data and import realization data in the Indonesia National Single Window (INSW) system in the strategic food sector (garlic, sugar, corn, rice, meat, salt) and health as a basis for policy making
Indicator	Data validity Availability (production + stock) nationally, national needs and import realization data for commodity: Meat

Evaluation of Results (Output, Outcome, and Impact)		
Change Levels and Statements		Change Results
Output 1	Availability of National Availability Data, National Demand Data, and Data on Meat Commodity Import Quotas	<p>In INSW/SINAS NK and also based on the Quarterly Report on Stranas PK and the JAGA application for meat commodities, we know that there are:</p> <ol style="list-style-type: none"> 1. National Availability Data 2. Data on National Needs (Consumption) 3. Import Quota Data (Plan) <p>However, it is not yet accurate, valid and reliable, due to limited systematic calculations, research and/or research on national population numbers, production and consumption of cattle, so that many parties (breeders, academics, civil society organizations) doubt the accuracy of the data. So far, a national livestock census has not been carried out due to unavailability of funds.</p> <p>To obtain detailed and accurate data, a national cattle census is needed with the right measurement method, agreed upon by all parties, and carried out regularly, by prioritizing price stability, availability of beef, welfare of breeders, and self-sufficiency or food security in Indonesia.</p>

Outcome 1	Developing a Work Culture for Beef Import Quota Policymaking	The INSW which contains Data on Cattle Needs and Production from the Ministry of Agriculture and other technical-non-technical Ministries/Institutions is used as the basis for making Import Quota policies
Outcome 2	Ease of Management of Import Licensing and Import Realization for Business Players (Importers)	Through INSW, it is easy for business actors to process import permits with one door/channel, but it still takes quite a long time (inefficiency), namely 32 days
Impact 1	Availability of Price Stability	The target price of IDR 80,000 as mandated by the President of the Republic of Indonesia only applies to frozen meat, while the Reference Price for Sale/Purchase (HAP) of fresh meat in 2022 is IDR 130,000-140,000 with an average market price of IDR 130,000
Impact 2	Pro National Livestock and Food Self-sufficiency	Based on Law no. 11 of 2020, the fulfillment of strategic food for meat commodities is carried out by taking into account the interests of national livestock and food self-sufficiency, but Indonesia's dependence on imports is still high
Corruption Prevention Potential		Corruption Gap
With the INSW/Commodity Balance, the process of making import policies is carried out in an accountable and transparent manner, both for setting import quotas and for import licensing for importers.		<ul style="list-style-type: none"> ● The accuracy of sources and calculations of cattle demand and production data on the INSW/Commodity Balance is doubtful, so that the determination of import quotas and import permits is carried out using an inaccurate database ● More transparent and accountable import assignment mechanism in terms of quantity and appointment ● Several cases of corruption in cattle procurement and export schemes in Jakarta, Aceh, South Kalimantan and West Sumatra during 2022 served as warnings that the meat commodity has loopholes for corruption, even though the form of

	corruption is not directly related to the INSW/Beef Commodity Balance
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Action II. Evaluation of the Working Mechanism of the National Strategy for Corruption Prevention

In relation to the National Corruption Prevention Strategy (National Strategy for PK), the targets to be achieved are:

Output	Utilization of population data for data collection and distribution of the Covid-19 handling program and the Acceleration of National Economic Recovery
Indicator	The number of accuracy of DTKS and data on recipients of social assistance from the Ministry of Social Affairs according to population data and according to poverty criteria

Evaluation of Results (Output, Outcome, and Impact)		
Change Levels and Statements		Change Results
Output 1	KPM in DTKS According to BPNT Poverty Criteria / Basic Food Program Assistance	Candidates for KPM are selected and validated based on "adjusted" Poverty Criteria (some Poverty Criteria are deemed not appropriate to the existing conditions) by the Regional Government. The 9 specified poverty criteria cannot be fulfilled by the Regional Government, so the Regional Government makes poverty criteria that are adjusted to the conditions of the community
Output 2	DTKS Padan NIK	The results of matching New DTKS with NIK starting from 2021 to 2022 and running until now are 148,787,758, with around 56,881,851 data 'put to sleep' which has been controlled by involving the BPK, BPKP, KPK, Attorney General's Office, and the Police
Outcome 1	New DTKS as the Basis for Policy Making for the Distribution of BPNT / Basic Food Program Assistance for KPM	The New DTKS is a database that forms the basis for the Ministry of Social Affairs' decision making in determining KPM BPNT

Outcome 2	KPM from New DTKS Received BPNT / Basic Food Program Assistance on Time, Right Amount, and Right on Target	KPM has received BPNT on time and in the amount. BPNT of IDR 200,000 is given per (3) months in cash via the Post Office. However, this is not necessarily the right target because there are still people who fall into the poverty criteria who are not registered in the New DTKS
Outcome 3	KPM Fulfills Basic Needs through BPNT / Basic Food Program Assistance	With the BPNT/Sembako Program, KPM can fulfill basic needs in the form of rice, eggs and other predetermined staple foods. With the cash mechanism via PT Pos which was carried out in 2022 yesterday, it was found that KPM used BPNT money not only to buy basic food materials, but also other needs
Impact 1	BPNT / Basic Food Program Assistance Contributes to Social Welfare -Poverty Reduction	BPNT has not contributed directly to Social Welfare – Poverty Reduction. This BPNT program in a short time made the people who were targeted have purchasing power in terms of food. Increased purchasing power had the effect of suppressing inflation spikes. 1 (one) follow-up program being initiated by the Ministry of Social Affairs is the National Economic Hero, by providing capital assistance for selected KPM to independently build MSMEs so they can get out of the poverty chain.
Corruption Prevention Potential		Corruption Gap
DTKS, which is the equivalent of NIK, ensures that the government distributes BPNT with a good database so that aid is right on target and narrows the loopholes for corruption		<ul style="list-style-type: none"> • Even though the regulation and mechanism for selecting KPM have been continuously improved, with the limited time and method of verification and validation of DTKS and the availability of KPM quotas, the selection of KPM candidates that were not appropriate resulted in BPNT not being on target • Opportunities for corruption occur in the form of extortion at various stages of the process, especially when collecting data or withdrawing money.

	The E-Warong system can also be perverted by making sales packages that do not meet the criteria set by the government
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Action III. Evaluation of the Working Mechanism of the National Strategy for Corruption Prevention

In relation to the National Corruption Prevention Strategy (National Strategy for PK), the targets to be achieved are:

Output	Quality and integrated Public Service Complaint Service through SP4N LAPOR!
Indicator	<ul style="list-style-type: none"> a. Advanced SP4N LAPOR application version 3.2 has been implemented b. Appointment and availability of complaint manager analysis functional positions c. Percentage of agency applications that have been integrated/consolidated with SP4N LAPOR!

Evaluation of Results (Output, Outcome, and Impact)		
Change Levels and Statements		Change Results
Output 1	SP4N-REPORT! has been integrated/consolidated with the Ministry/Institution/Regional Government complaint system	SP4N-LAPOR! has been connected and has become one of the complaint media for Ministries/Institutions/Regional Governments. The PANRB Ministry claims that 92.9% (679) K/L/D that have been integrated with SP4N-LAPOR! up to 2022. However, the meaning of integration still needs to be clarified for Ministries/Institutions/Local Governments
Output 2	Complaints received via SP4N-LAPOR! resolved (received, distributed, followed up)	Complaint via SP4N-LAPOR! has been followed up by an average of 78.45% from 2020 to 2022, but the number of reports is still small
Outcome 1	Community participation in synergizing with the government through complaints made	There is still a lack of people making complaints via SP4N-LAPOR! Number of complaint reports received via SP4N-LAPOR! still small with an average number of reports of 156,500, which is still far from the target of 1.8 million reports in 2024

Impact 1	Complaint resolution improves the quality of public services	Complaint resolution improves the public service being complained about, but does not necessarily improve the quality of public service in general. In addition, considering that there are still very few complaints received via SP4N-LAPOR!, the micro improvements that have been made will not have a direct impact on improving the expected macro quality of public services.
Corruption Prevention Potential		Corruption Gap
<p>The theme of the most complaints that came via SP4N-LAPOR! are regarding the coronavirus, social assistance, education, population administration, as well as peace and order. While corruption, collusion and nepotism are not included in the top 5 (five) themes reported via SP4N-LAPOR!.</p> <p>Complaints regarding Corruption, Collusion and Nepotism in 2021-2022 are as follows:</p> <ul style="list-style-type: none"> • 2021: 275 reports • 2022: 203 reports <p>If SP4N-REPORT! is expected to be the main vehicle for complaints of corruption, collusion and nepotism, based on the number of reports received, indicating the potential for preventing cases of corruption, collusion and nepotism via SP4N-LAPOR! not optimal</p>		Complaints of corruption, collusion, nepotism that come in via SP4N-LAPOR! if not followed up seriously, are very likely to become loopholes for corruption that are detrimental to the state

Table 19. National Anti-Corruption Strategy in Asia Pacific

Countries	UNCAC Ratification	National Strategy on Anti-Corruption
Afghanistan	August 25, 2008	Strategy and Policy for Anti-Corruption and Administrative Reform 2008 (the Azimi Report)

Australia	December 7, 2005	National Anti-Corruption Plan, September 2011
Bhutan	Signed on 15 September 2005, but not yet ratified	National Integrity & Anti-corruption Strategy 2013–2018
India	May 9, 2011	National Anti-Corruption Strategy 2010
Indonesia	Sept. 19, 2006	National Strategy for Prevention and Eradication of Corruption, 2011–2025 (National Strategy for PPK)
Malaysia	July 20, 2018	National Strategy for Prevention of Corruption, 2018-2022 (National Strategy PK)
Maldives	Sept. 24, 2008	Government Transformation Plan-National Key Result Areas (NKRA)–Fighting Corruption, 2009
Mongolia	March 22, 2007	Eliminating Corruption, under National Framework for Development 2009–2013
Nepal	January 11, 2006	National Program for Combating Corruption (2002–2010); drafting new strategy.
Pakistan	March 31, 2011	Strategy and Action Plan against Corruption, 2010
Philippines	August 31, 2007	National Anti-Corruption Strategy, 2002
Papua New Guinea	November 8, 2006	Good Governance and Anti-Corruption Cluster (GGAC) plan for 2012–16
Thailand	July 16, 2007	National Anti-Corruption Strategy 2010–2030

C. Transcription of Key Finding Points:

1. Not yet impact oriented as mandated by Presidential Regulation No. 54 Year 2018:

"If we arrive straight away, in my opinion this is part of planning language as well. If we look at the impact, it really has to be oriented around the program or activity that we're trying to push forward, this has a countdown effect not to the improvements that need to be made, that's it. We're just talking about the real impact. But for example, it's not only

about the impact, but what are we fixing? The process, the system, or whatever, that's also what we have to look at. If you say system repair, yes, yes, system repair, right? For example, that's an integrated service, right, that's an improved system. But it turns out that in practice, it didn't happen that the system didn't work properly. In fact, each hung on one door, inside. So what's the impact on society? That's the impact right? It turned out that the improvement of the system did not suddenly provide an improvement in service."

"But if you look at it from here, we're talking about impact, it's not easy. Measuring is also not easy. It means that from the upstream planning, you can actually raise it as a priority issue. There were actually a lot of considerations."

2. Unable to contribute significantly to the increase in the Corruption Perceptions Index:

"The action plan which has 8 columns and 5 columns is like that. In that position, I saw it was really weak. Finally, what we monitor, we move are the activities, not the impacts from the start. That's why when I entered there, I emphasized it. Let's try to make a mapping, we make a performance construction pattern, what do we want to achieve, there, try to look at the problems underneath, that's what is being intervened. After all, we're talking about the impact of the PK National Strategy, we're talking about the perception index."

"Eventually took some of this away, but again the connection to this. Even if we tinker with this, what is the relationship with the variables that determine the corruption perception index? That's the problem, it's not straight. I have a problem, have doubts about this, later measure it with the corruption perception index. We didn't do it very well, but the perception of corruption, seen from others, has increased. Because it has nothing to do with it, it's hard for us to claim, wow, this has worked. Yes, what did you measure it with, what did you do? What is being measured is perception in terms of what, it turns out not in terms of things like this. His complaint is not about this."

3. Lack of commitment of the Implementing Ministries/Institutions/Local Governments:

"Now, let's talk about operations. Even though it's good on paper, maybe you don't know that there are KLS that aren't really committed. I see that there are KLS that are not very committed to being involved in this national strategy. Maybe he's playing there. I even if he was involved there, he would give the points that produce programs that just relax and don't disturb their comfort zone. That one, hopefully not many like that. The second is also a matter of commitment in the context of not wanting to, not being happy if there is a lot of corruption. Not all of them are like that. But the risk to performance too."

Therefore, Stranas PK must have been included since the planning of Ministries/Agencies with Bappenas:

"I'm talking about Stranas and all kinds of things, not just PK. They are Bappenas making the RPJM. Bappenas then makes an RKP. The RPJM will serve as a reference for preparing the KL's strategic plan. Likewise, RKP became renja. Well, below will be born into PK-PK. So there's something to do. They already prefer to come here, and make their own PK. Suddenly, there were 20 strategic action plans. That's an additional task. There is something that can be embedded into their work. While doing this, please do this, it costs nothing more. Whatever it is, I think it's a distracting distortion. Earlier he wanted to focus here, suddenly there is this deposit again. In planning, they have already calculated the time needed and the costs needed to do this. Suddenly you get this, the address sometimes adds time"

"It means that the person who is making this RKP, no. I don't know who we are. I think we should just communicate here, bill it in the RKP, what must be achieved. Include everything that has been planned for the National Strategy which he didn't include in 2021, but he already knows this will have to be communicated properly. In 2022, what are the targets asked for by the Stranas? So it must be included in the RKP. I don't think it was by Bappenas. Let it be with him as planning outside the RKP by Bappenas. That can be criticized by Bappenas. So we have a lot of planning"

4. Monitoring and evaluation methods are needed that have an impact:

"I don't see it from a planning perspective, I look at it from a managerial perspective. So if we talk managerially, we need to check the monitoring and evaluation as well. We entered the monitoring and evaluation earlier. How to monitor and then x it right. This is talking about the x, right? Evaluate the impact so. Isn't that right. What we have achieved must be returned here, managerial as a whole. We evaluate the impact that the planned should have. When planning we use assumptions, we use all the power. What power do we need there? It doesn't count with the others. So okay. Managerial synergy and integration with the whole, not piecemeal. So that we don't double our work".

5. The implementation of the National Strategy for PK must affect performance appraisal:

"After this, it is certain that we must be paid according to these targets. And I will be deducted from my performance allowance when the 10 is not reached. Because it's still written 10, it's not negotiable. So I got another change. Isn't it fair like that? It's already in the tunnel. It's just a portrait, it's blushing, if there's anything, it's stupid. Reddened at most. Yes, not really stupid anyway. But if that's when I enter Tunkin, my money will be lost. Must enter there, sent there. So the plan has to really calculate, because the

impact on that person's performance is lethal. To the organization will also turn this off. We will know the organization before, we are red green yellow organization. But after that the organization went straight to the individual. To his perks, the head of this organization. Those from yesterday are only counted from the absences. What's not achieved, I'm sure I'm disturbed because I keep logging in incorrectly. Abis this will be affected."



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