

STRENGTHENING OF THE NATIONAL STRATEGY FOR **CORRUPTION** **PREVENTION** (STRANAS PK)

Study of Institutional Governance and Community Participation Mechanisms
in The Implementation of Presidential Regulation Number 54 of 2018

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LIST OF ABBREVIATIONS

Aksi PK	Corruption Prevention Action
APBD	Regional Revenue and Expenditure Budget
APBN	State Budget
ASN	State Civil Apparatus
BUMN	State-Owned Enterprises
CPI	Corruption Perception Index
Inpres	Presidential Instruction
IRM	Independent Reporting Mechanism
JAGA	Indonesian Corruption Prevention Network
Jampidsus	Junior Attorney General for Special Crimes
Kemendagri	Ministry of Internal Affairs
Kemenkopolkam	Coordinating Ministry for Political, Legal and Human Rights Affairs
Kemenkumham	Ministry of Law and Human Rights
KempanRB	Ministry of State Apparatus Empowerment and Bureaucratic Reform
KPK	Corruption Eradication Commission
KSP	Office of the Presidential Staff
KUHAP	Code of Criminal Procedure
LPSE	Electronic Procurement Services
Monev	Monitoring and Evaluation
OGI	Open Government Initiative
OGP	Open Government Partnership
OMS	Civil Society Organizations
PBJ	Procurement of Goods and Services
Perpres	Presidential Regulation
RAN	National Action Plan
SDGs	Sustainable Development Goals
Setnas PK	National Secretariat for Corruption Prevention
SIN	National Integrity System
SOP	Standard Operating Procedures
SPI	Integrity Assessment Survey
Stranas PK	National Strategy for Corruption Prevention
Stranas PPK	National Strategy for Corruption Prevention and Eradication
TA	Experts
TII	Transparency International Indonesia
Timnas PK	National Team for Corruption Prevention
UNCAC	United Nations Convention against Corruption

EXECUTIVE SUMMARY

In addition to the issue of the National Strategy for Corruption Prevention (Stranas PK) which does not touch political corruption, the institutional aspects of the PK National Team and the PK National Secretariat (Setnas) are still gaps in the problems that determine the success of the implementation of Stranas PK. This problem is coupled with Presidential Regulation 54/2018 which does not involve stakeholders in the legal field, in this case the Ministry of Coordinating and Human Rights and the Ministry of Law and Human Rights. Even though the two ministries have tasks directly related to the legal field.

In the aspect of community participation, the space for involvement of civil society organizations in the preparation, implementation, monitoring, monitoring and evaluation of PK Action is still partial and does not have a clear mechanism in accordance with the mandate of Presidential Regulation 54 of 2018 Article 9 concerning the involvement of their roles and stakeholders.

In order to strengthen the participation of civil society organizations in PK Action, it is necessary to establish clear mechanisms and standard operating procedures (SOPs) on concrete forms of involvement at every stage of PK Action preparation. In addition, a clear form of Co-Creation between civil society organizations and the PK Stranas Team will also be further developed if civil society organizations become an institutionalized part of the PK National Team.

In addition, the synergy model for the involvement of civil society participation to improve the quality of Stranas PK's achievements can take the example of collaboration in the form of co-creation of the Open Government Partnership initiative in Indonesia. Co-Creation starts from the involvement of civil society organizations from the highest decision-making level as members of the PK National Team to implementation, monitoring, and evaluation.

The data collected in this study have been analyzed in a qualitative descriptive manner. Presidential Regulation 54/2018 is seen for its effectiveness with several variables in the evaluation guidelines. Not everything in Presidential Regulation 5/2018 is analyzed, but focuses on institutional aspects and community participation. The analysis mainly looked at the conformity of Presidential Regulation 54/2018 with the Kuala Lumpur Statement on Anti-Corruption Strategies. The implementation of Presidential Regulation 54/2018 is also compared with participation mechanisms and practices in other commitments, such as SDGs and OGI.

CHAPTER I

INTRODUCTION

1.1 Background

Indonesia's commitment in carrying out efforts to prevent and eradicate corruption by the Government is marked by the issuance of Presidential Instruction (Inpres) No. 5 of 2004 concerning the Acceleration of Corruption Eradication. The Presidential Instruction mandated various strategic steps including the National Action Plan (RAN) for the Eradication of Corruption in 2004-2009. This information document then becomes a reference for the Central and Regional Governments in implementing the concept of eradicating corruption which emphasizes prevention and enforcement efforts as well as the implementation of monitoring and evaluation.

At that time in 2005, Indonesia was faced with the lowest point in efforts to eradicate corruption. This situation is reflected through the predicate of Indonesia's Corruption Perception Index (CPI) assessment which is ranked 133 out of 146 countries. Even the results of the Political and Economic Risk Consultancy (PERC) survey stated that Indonesia became the most corrupt country among 12 Asian countries because it had a score of almost touching the absolute number 10 with a score of 9.25. This condition then encourages the government to focus more on making various efforts to eradicate corruption.

Indonesia then began to be involved in various global initiatives, one of which was through the ratification of the United Nations Convention Against Corruption in 2003 through the issuance of Law Number 7 of 2006 concerning the Ratification of the United Nations Convention against Corruption (UNCAC). The government then targets a GPA of 5.0 in 2014 and the completion of 100 percent of the recommendations from the UNCAC implementation review as a measure of the success of eradicating corruption in Indonesia. In the long run, the government is also establishing a National Integrity System (SIN) to complement its measure of success.

To support this target, the President issued Presidential Instruction No. 9 of 2011 concerning the Action Plan for the Prevention and Eradication of Corruption in 2011 which was continued with Presidential Instruction No. 17 of 2011 concerning Action for the Prevention and Eradication of Corruption in 2012 which instructed the implementation of various detailed action plans with the main focus on corruption prevention in law enforcement agencies. The action is in the form of increasing accountability, information disclosure, capacity and human resource development, as well as coordination between institutions.

However, in practice, the eradication of corruption in Ministries/Institutions (K/L) and Regions still reaps challenges due to the lack of synergy, which in turn causes the targeted achievements to be not optimal. This situation then prompted the President to re-issue Presidential Regulation Number 55 of 2012 concerning the National Strategy for the Prevention and Eradication of Corruption (Stranas PPK) for the Long Term 2012-2025 and the Medium Term for 2012-2014 which contains the strategies contained in the Stranas PPK including: prevention, law enforcement, harmonization of laws and regulations, international cooperation, asset rescue, anti-corruption culture and reporting mechanisms.

This policy is expected to be a reference to continue, consolidate and perfect efforts to eradicate corruption in order to have a more significant impact on improving welfare and sustainable development. The presence of Stranas PPK is also expected to be able to direct steps to eradicate corruption so that it is taken more gradually and sustainably in the short, medium and long term.

In conjunction with existing national documents, Stranas PPK is positioned as a reference by the parties in preparing the RAN-PPK each year. The relevant agencies (K/L and Local Government) can also refer to this Stranas PPK and use the tools provided in the Stranas PPK to carry out their efforts in the prevention and eradication of corruption.

However, the problem of synergy and coordination among Ministries, Institutions, and Local Governments has not been resolved in the implementation of Stranas PPK. Therefore, it is necessary to involve the Corruption Eradication Commission (KPK) as a special institution which under the law is given the authority of coordination and supervision in the prevention and eradication of corruption. To answer the above problems, Stranas PPK was changed to the National Strategy for Corruption Prevention (Stranas PK) through Presidential Regulation Number 54 of 2018.

Stranas PK is intended to encourage corruption prevention efforts to be carried out in a collaborative manner and in synergy with Ministries, Institutions, Local Governments, KPK, and other stakeholders, including civil society. This synergy effort is realized through setting focuses and targets that are more in line with the needs of corruption prevention so that corruption prevention can be implemented in a more focused, measurable, and direct impact on the realization of a just, prosperous, and prosperous society.

After the issuance of Presidential Regulation 54/2018, Transparency International Indonesia prepared a working paper¹ containing two important notes regarding the management of the previous PPK Stranas so that it can be considered for improvement by the PK National Team.

¹ Accessible from: https://ti.or.id/wp-content/uploads/2018/10/kertas_kerja_stranasPK -TII.pdf

First, so far, the involvement of civil society in the regions has not been optimal. Second, socialization to the public, civil society, and related parties on the existence of Stranas PPK and its action programs in the regions is still very lacking. On these two issues, Transparency International Indonesia recommends two things, namely socialization about the existence of Stranas PK at the regional level and the need to develop a stakeholder engagement model.

Furthermore, in 2019, Transparency International Indonesia also released the Civil Society Group Self-Monitoring Report on the Implementation of the 2019 National Strategy for Corruption Prevention.² The report found that civil society groups were not involved in all regional corruption prevention action cycles, from planning, implementation, to evaluation. TII again gave an important recommendation, namely encouraging the PK National Team and the PK National Team to ensure proper participation from various communities when formulating corruption prevention actions for 2021-2022.

In addition to the issue of community participation that has not been given enough place in the Stranas PK, there is one other important thing mentioned in the Transparency International Indonesia report, namely that the action plans contained in the framework of the Stranas PK during 2019 still rely a lot on administrative targets that focus on complying with the achievements of the document. Unfortunately, these targets do not directly contribute to the root of the problem of corruption in Indonesia, namely political corruption.

In addition to the problem of lack of space for public participation and PK Action that does not touch political corruption, there are still various other problems related to the implementation of Stranas PK that need to be tested, for example the institutional model of the PK National Team and the PK National Secretariat (Setnas). This institutional aspect is also very important and also determines the success of the implementation of Stranas PK because the PK National Team has the functions of coordination, synchronization, monitoring and evaluation (monev), achievement reports and publications on the implementation of PK Actions. The PK National Team model in the form of a team from various elements of the government and the KPK needs to be seen for its effectiveness.

The above problems do not seem to be seen merely as a matter of regulatory implementation, but the initial design of the legal basis of Stranas PK, namely Presidential Regulation 54/2018, also needs to be examined. After running for almost 5 years, now is the right time to review Presidential Regulation 54/2018.

² Accessible from:
https://ti.or.id/wp-content/uploads/2022/12/20122022UNDPLAPORAN-TEMUAN-Pemantauan-Stranas-PK-4_konfirmasi.pdf

This study highlights specifically about how the governance of the National Strategy for Corruption Prevention in regulatory aspects, especially institutional governance and community involvement in the preparation, implementation, and monitoring and evaluation of Corruption Prevention Action reports. This study also examines the focus of issues set by Stranas PK in Presidential Regulation 5/2018.

1.2 Study Objectives

This study has two objectives, namely:

1. Review the institutional governance of Stranas PK in Presidential Regulation 54/2018
2. Review the mechanism and implementation of community participation in Stranas PK based on Presidential Regulation 54/2018

1.3 Study Questions

1. What is the institutional governance of Stranas PK in Presidential Regulation 54/2018?
2. What is the mechanism and implementation of community participation in Stranas PK based on Presidential Regulation 54/2018?

CHAPTER II

STUDY METHODOLOGY

2.1 Study Approach

This study uses an empirical normative approach, meaning that it combines both normative and empirical study models. In the normative realm, a statutory approach, a historical approach, and a comparative approach are used.

The object of study in this study places Presidential Regulation 54/2018 as the main focus. This Presidential Regulation is studied in terms of regulated norms, looks at the history of previous regulations containing strategies for preventing and eradicating corruption, and is also compared with action plan models in other fields such as SDGs and Open Government Initiative (OGI) as well as comparisons with anti-corruption strategies of other countries.

Meanwhile, in the empirical realm, a description of the implementation of norms in Presidential Regulation 54/2018 is carried out. In practical terms, this study also utilizes the Guidelines for the Evaluation of Laws and Regulations³ which was originally intended as a standard guideline for the government as an implementer of the evaluation of laws and regulations. These guidelines recognize that:

"Often existing laws and regulations cause several problems so that they cannot realize a national legal system that reflects the values of Pancasila and the 1945 NRI Constitution. These problems include: a) laws and regulations often do not meet the needs and development of the community, so that the law becomes lagging behind and cannot support national development; and b) laws and regulations are often unable to function effectively and efficiently resulting in, among others: (1) the law is left behind by the community; (2) the law cannot work properly; (3) the usability and results of laws and regulations are still low; and (4) laws and regulations lack legal certainty."

Evaluation according to this guideline is a form of monitoring and review after the regulation comes into force so that it is known the achievement of planned results, the impact caused, and the benefits for Indonesia. This guideline uses six dimensions in which there are several variables and assessment indicators. The six dimensions are:

- a) Pancasila Dimension;
- b) Accuracy of Types of Laws and Regulations Dimension;

³ Guidelines for Evaluation of Laws and Regulations Number PHN-HN.01.02-07, National Legal Development Agency, Ministry of Law and Human Rights

- c) Arrangement Disharmony Dimension;
- d) Clarity of Formulation Dimension;
- e) Conformity of Principles in the Field of Law of the Relevant Laws and Regulations Dimension
- f) Effectiveness of Implementation of Laws and Regulations Dimension.

From these various dimensions, this study focuses on the dimensions of the effectiveness of the implementation of laws and regulations. This dimension is relevant, because it looks at the extent of clarity of objectives as well as the usefulness and results of a relevant legislation in the community.

The dimension of the effectiveness of the implementation of laws and regulations has many variables and indicators. Some relevant variables include aspects of relevance to internationally applicable law, institutional/organizational coordination, human resources, budget and sarpras, access to public information, community participation, SOPs, achievement of results, and impact of regulatory implementation.

2.2 Literature Review

The main literature used in this study is about corruption prevention strategies. Community participation can be interpreted as a process or mechanism of community involvement in the process of identifying problems, selecting and making decisions about alternative solutions to overcome problems and evaluate changes that occur.

In the national strategy for corruption prevention, the description of community participation is regulated in Article 1 of Presidential Decree No.55/2012 concerning Stranas PPK which states that community participation is the active role of individuals, community organizations or non-governmental organizations in the prevention and eradication of criminal acts of corruption.

The involvement of civil society in the national strategy to prevent corruption then becomes part of the involvement of other stakeholders from the stages of drafting, monitoring, implementing, monitoring, evaluating and reporting PK tranas. where the procedure for involvement is regulated by the PK stranas team.

2.3 Data Sources

This study used primary and secondary data. The primary data is obtained by organizing focus discussion groups with parties who have been involved in PK Action / know the implementation of PK Stranas. On several occasions, focus discussion groups were followed by in-depth

interviews with resource persons. The secondary data consists of primary material and secondary material.

Primary material consists of:

1. NRI Constitution of 1945
2. Law 30/2001 was last amended by Law 19/2019 on KPK
3. Law 7/2006 on the Ratification of UNCAC
4. Presidential Decree 54/2018 concerning Stranas PK
5. Kuala Lumpur Statement on Anti-Corruption Strategies

The secondary material consists of books, journals, reports, or other publications related to corruption and prevention strategies.

2.4 Study Limitations

This study was conducted in December 2022-February 2023. The scope of the study is limited to the institutional aspects of Stranas PK and the mechanisms and practices of community participation in Presidential Regulation 54/2018.

2.5 Analysis Techniques

The collected data is analyzed in a qualitative descriptive manner. Presidential Regulation 54/2018 is seen for its effectiveness with several variables in the evaluation guidelines. Not everything in Presidential Regulation 5/2018 is analyzed, but focuses on institutional aspects and community participation. The analysis mainly looked at the conformity of Presidential Regulation 54/2018 with the Kuala Lumpur Statement on Anti-Corruption Strategies. The implementation of Presidential Regulation 54/2018 is also compared with the mechanisms and practices of participation in SDGs and OGI.

CHAPTER III

ANALYSIS

The argument of some top government officials that the concoction of digitalization, deregulation and debureaucratization will be the right remedy to control the Corruption Perceptions Index score is highly questionable. The reason is, the Government seems ignorant and even seems to close its eyes to the fundamental problem of corruption itself, namely political corruption.

This view was expressed by the Government after the 2022 Corruption Perceptions Index score launched by Transparency International fell to sink, even the worst during the Reformation era. Indonesia's score dropped dramatically by four points to 34 with the ranking also dropping from 96 to 110 out of 180 countries assessed. This position is far below a number of Southeast Asian neighbors such as Malaysia, Vietnam and even Timor Leste, and on par with countries with other hybrid democratic regimes such as Gambia, Sierra Leone or Nepal.

If traced further, the collapse of the Corruption Perception Index is mostly contributed by the increasing grip of political risks that cause legal uncertainty in the business ecosystem in Indonesia. This explanation can be observed from the decline of a number of important data sources in the economic pillar – which was previously common as a 'prima donna' indicator because it always gets high marks.

For example, the International Country Risk Guide survey, the Political Risk Services (PRS), fell 13 points from 48 last year to 35. This indicator highlights the continued existence of extra payments and bribes related to export-import licensing felt by business actors. In addition, 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) collapsed by 3 points. These two data sources generally capture the severity of corruption in different countries, particularly in political systems.

A number of declines are also supported by the stagnation of law enforcement effectiveness and the stalling of bureaucratic reforms as shown by three other data sources, namely the Country Risk Ratings survey from Global Risk Insight, Transformation Index from Bertelsmann Stiftung and Country Risk Service from the Economist Intelligence Unit.

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

Unfortunately, this emergency situation is actually interpreted partially by the Government to justify controversial policies such as the Law on Job Creation. In fact, the results of the Corruption Perceptions Index have confirmed that there is a sharp contradiction between the structural transformation approach that the Government claims can be overcome through such policies as deregulation and debureaucratization in business licensing, and the views of the business actors themselves.

Businessmen, in fact, still view the Law on Job Creation has not provided legal certainty and ease of doing business for investors and business actors, especially for those who come from abroad. In addition to the endless lawsuits against formal and material aspects to date, the main risk-based business licensing recentralization approach contained in the Law on Job Creation seems to only break one foot of the problem.

This unfinished paradigm shift only moves the existing corruption problem from previously in the Regional Government to the Central Government, without touching the root of the problem. The persistence of corrupt patronage networks coupled with the de facto state of supervisory agencies, particularly the weak Corruption Eradication Commission, have in turn added to the rash in an already wide-gaping wound.

The tangled threads of this problem show that glorification of digitalization in the fight against corruption cannot be assumed like a miracle cure. Of course, no one refuses when the Government launches various systems that are factually needed, such as business licensing through the Online Single Submission (OSS) system, immigration document registration management, 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 ports.

However, the breakthrough seems to only work on the periphery on petty corruption. In fact, our main fundamental problem is political corruption, especially state-capture corruption. The above problems will certainly not stop with digitalization and debureaucratization. Moreover, the 51 implementing regulations that need to be pursued as a mandate from the Law on Job Creation

which was declared unconstitutional last year are certainly contrary to the spirit of deregulation itself.

Therefore, the above fundamental problems need to be responded fundamentally by focusing on improvements not only in the technocratic and administrative aspects of policy, but also in the political system. In principle, this improvement step can be started by building and implementing a Stranas PK policy that is right on target and has an impact.

3.1 Policy Logic of Presidential Regulation Number 54 of 2018

3.1.1 Technocratic Comparison of Perpres PPK, Keppres OGI, Perpres SDGs

Presidential Instruction 5/2004 on Acceleration of Corruption Eradication

Corruption prevention programs have a long history in Indonesia.⁴ At the beginning of the administration of President Susilo Bambang Yudhoyono, Presidential Instruction Number 5 of 2004 concerning the Acceleration of Corruption Eradication was issued. The Presidential Instruction contains various orders to ministers, the Attorney General, the Commander of the TNI, the Chief of the National Police, heads of institutions, and regional heads to accelerate the eradication of corruption.

Presidential Instruction 5/2004 marks the government's commitment to eradicating corruption. This Presidential Instruction can be referred to as a corruption eradication strategy that contains prevention and enforcement orders in accordance with the main duties and functions of each government institution. It's just that the choice of legal product, namely the Presidential Instruction, makes the strategy not very clear, because basically the Presidential Instruction is not a statutory regulation. The Presidential Instruction is not a product of regeling or regulating law, but a form of administrative action from the President as the highest administrative leader.

Presidential Instruction 5/2004 also does not design clear institutions to ensure that the program to accelerate the eradication of corruption can run effectively. The State Minister of State Apparatus Empowerment is indeed given the task of coordinating, monitoring, and evaluating the implementation of the Presidential Instruction. However, coordinating orders are not established in form and mechanism, so the effectiveness of coordination cannot be guaranteed. It can be said that the acceleration of corruption eradication through Presidential Instruction 5/2004 was not coordinated in a structured and systematic manner.

⁴ Anti-corruption resistance began since the Old Order began with the establishment of the Coordinating Board for Property Overseers in 1957, see: Denny Indrayana, *Jangan Bunuh KPK*, 2017, Intrans Publishing: Malang, p. 11

This Presidential Instruction is also not clear enough in determining priority issues and measuring success. However, the scope of the order already covers relatively various areas that can accelerate the eradication of corruption. These sectors include the state apparatus, procurement of goods and services, state finance, regulations to support the eradication of corruption, SOEs, education, campaigns, law enforcement, and local government. Such a wide field in the Presidential Instruction once again shows the absence of priority focus.

Beyond that, unfortunately, the space for public participation does not get any place at all in this Presidential Instruction. The legal product form of the presidential instruction indicates that the program to accelerate the eradication of corruption is aimed only at officials under the president. Presidential Instructions are not binding on parties outside the government, including the legislature, the public or the business world.

In implementing Presidential Instruction 5/2004, the State Minister of National Development Planning / Head of Bappenas made a Decree on the Establishment of a National Action Plan (RAN) Drafting Team for Corruption Eradication in 2004-2009.⁵ The drafting team of RAN PK 2004-2009 is chaired by the Main Inspector of the State Ministry of National Development Planning / Bappenas, consisting of three groups of work areas, namely:

1. Working Group on Corruption Prevention;
2. Working Group on Corruption Enforcement and Law Enforcement System Strengthening;
3. Monitoring and Evaluation Working Group;

This team is supported by the Secretariat chaired by the Director of State Apparatus, State Ministry of National Development Planning / Bappenas. There are several important points from this team. First, each working group always includes civil society groups, both civil society organizations, professional organizations, and universities. In the field of prevention, there are 13 civil society institutions involved, in the field of enforcement 3 civil society institutions, and the money working group involves 5 civil society institutions.

The institutions involved are also institutions that have a reputation related to the field of law or anti-corruption. This means that this is an advance from Presidential Instruction 5/2004 which does not mention community participation at all. The involvement of civil society groups is guaranteed through the Decree of the Minister of National Development Planning / Bappenas.

Second, the prevention working group is chaired by the KPK Prevention Deputy. Meanwhile, the enforcement working group is chaired by the Attorney General's Office for Special Criminal Acts

⁵ Decree of the Minister of National Development Planning / Head of Bappenas Number: Kep. 219 / M.PPN / 12/2004 as amended by the Decree of the Minister of National Development Planning / Head of Bappenas Number: Kep.191 / M.PPN / 05/2005

(Jampidsus) with one of its members being the Head of the Legal Division (Kadivkum) of the National Police Headquarters. The institutional team has engaged the KPK as a strategic partner of the government in combating corruption, although the KPK remains an independent state institution. In addition, this team has also involved law enforcement institutions from the beginning in planning actions in the field of enforcement. This is important considering that law enforcement institutions are the owners of law enforcement authority.

However, although the participation room has been opened, what also needs to be noted is that the team formed is the drafting team of RAN PK, not the RAN PK team. In this case, the tasks of this team are limited only to the scope of drawing up an action plan. While implementation, reporting, and money are not the tasks of this team.

Presidential Decree 55/2012 concerning Long-Term PPK Stranas 2012-2024 and Medium-Term 2012-2014

The Corruption Eradication Acceleration Program through Presidential Instruction 5/2004 was updated with the National Strategy for Corruption Prevention and Eradication (Stranas PPK) in Presidential Regulation 55/2012. Stranas PPK was prepared as a form of implementation of the Indonesian government's commitment to implement the 2003 United Nations Convention Against Corruption which calls on States parties to create effective corruption prevention programs.

In measuring the success of Stranas PPK, there are three indicators including:

1. Increased corruption eradication index
2. Improving the conformity of Indonesia's anti-corruption arrangements with UNCAC articles
3. Improvement of the National Integrity System

Stranas PPK Program in Presidential Regulation 55/2012 was replaced with Stranas PK through Presidential Regulation 54/2018. This study will again make notes on two things from Presidential Regulation 55/2012, namely institutional aspects and community participation.

Stranas PPK has outlined at length the anti-corruption strategy. While the institutional aspect only mentions that the PPK Stranas is described through the KDP Action by each K / L in coordination with Bappenas, while the regions coordinate with the Ministry of Home Affairs supported by Bappenas.

Money is carried out by Bappenas where K/L submits a KDP Action report every 3 months to Bappenas. Meanwhile, the Regional Government submits a KDP Action report every 3 months to

the Ministry of Home Affairs and Bappenas. Bappenas conveys the results of Stranas PK every 1 year to the President.

Looking at the institutional aspects in the KDP Stranas, it seems that there is no institutional design built in accordance with the many strategies and also the K / L / D that carry out KDP actions. The coordination function cannot be ensured to run effectively if Bappenas coordinates starting from the determination of actions for all K/L and support to the Ministry of Home Affairs for all regions.

In addition, it also still has to do monitoring and evaluation. As a result, the quality of the action plans set by each K/L/D cannot be fully guaranteed. So that the conclusion of the decentralized nature of KDP Action in every K/L/D, Stranas PPK is not sufficiently coordinated, directed, and integrated to be grounded. The advantage is that KDP action is bottom-up in accordance with the conditions and situations of each K / L / D.

Regarding community participation, Presidential Regulation 55/2012 guarantees normatively that the implementation of the K/L/D PPK tranas involves community participation. Starting from the stages of preparation, implementation, monitoring, evaluation, and reporting. The mechanism is adjusted to the characteristics of each K/L/D.

Presidential Decree of SDGs

Sustainable Development Goals (SDGs) hereinafter abbreviated as SDGs is a global development agenda to end poverty, improve welfare, and protect the planet, through the achievement of 17 (seventeen) goals until 2030. This SDGs Presidential Regulation also contains action plans at both national and regional levels.

This study will review the institutions in the SDGs Presidential Regulation. In order to achieve the national SDGs target in 2024, a national coordination team was formed consisting of:

- a) National steering boards;
- b) National implementation team;
- c) National working groups; and
- d) Team of experts;

The national steering board is tasked with providing direction in achieving the SDGs in Indonesia. The Steering Board is chaired by the President with the vice Chairman being the Vice President. The Vice Chairmen I-IV are the coordinating ministers. While the Executive Coordinator concurrently Member is the Minister of National Development Planning / Head of Member of the National Development Planning Agency. The members consist of the Minister of

Foreign Affairs, Minister of Home Affairs, Minister of Finance, Minister of SOEs, Cabinet Secretary, and Chief of Staff of the President's Office.

The national implementation team is led by one of the senior senior leaders at the ministry of national development planning/national planning agency with members consisting of elements of ministries/institutions, philanthropy, business actors, academics, and mass organizations. In carrying out the duties of the national implementation team assisted by a national working group with members consisting of elements of ministries / institutions, philanthropy, business actors, academics, and mass organizations.

The expert team is experts and / or professionals in fields related to the implementation of SDGs. In carrying out its duties, the national implementation team is assisted by the national secretariat led by one of the senior senior leaders at the ministry of national development planning/national development planning agency.

Looking at the SDGs Presidential Regulation institution, it looks quite different from the practice in the KDP Stranas. The SDGs Presidential Regulation designs a very inclusive institution involving almost all stakeholders in sustainable development that encourages wide open space for community participation.

In terms of national political leadership, the SDGs institution is also very strong and complete by being led directly by the President as chairman of the national steering board. All Coordinating Ministers are made vice-chairmen. Such a design is more likely to overcome various bureaucratic and sectoral ego obstacles that may arise in the implementation of actions.

Presidential Decree of OGI

Open Government Indonesia (OGI) is an initiative to encourage open and participatory government to realize innovative solutions for society. Where the implementation is carried out through a co-creation process that collaborates government and non-government elements such as civil society organizations (CSOs), academics and development partners.

The establishment of OGI was marked by the issuance of Presidential Decree Number 13 of 2014 concerning the Determination of Indonesia's Membership in Open Government Partnership at the Global level and the establishment of the OGI secretariat which aims to implement a number of Open Government Indonesia National Action Plans (RAN OGI).

3.2 Implications of the Economically Focused Policy Framework of Stranas PK

Stranas PPK based on Presidential Regulation 55/2012 in its journey is considered insufficiently coordinated, directed, and integrated. This situation prompted the emergence of Presidential Regulation 54/2018 which focuses on three issues, namely licensing and trade administration, state finance, and law enforcement and bureaucratic reform. After scrutiny, the three focus issues are strongly dominated by policies in the economic and financial fields.

There is no issue that responds to political corruption, even though the roots of corruption in Indonesia cannot be separated from political corruption. Corruption at the central and regional levels based on cases handled by the KPK is related to political actors, both in the legislature and executive. Unfortunately, Stranas PK does not touch political corruption at all, for example in the form of political party integrity programs.

Although Transparency International Indonesia has repeatedly noted that PK Action does not touch political corruption, as long as the legal basis through Presidential Regulation 54/2018 does not contain the focus of political issues, PK Action in this field will not be prepared. Therefore, it is necessary to examine how the problem statement from Presidential Regulation 54/2018 is prepared so that it focuses on three issues, namely licensing and commercial governance, state finance, and law enforcement and bureaucratic reform.

The government's reasons can be seen in the explanation of Presidential Regulation 54/2018. First, licensing and commerce are the focus because they are in direct contact with the community and business actors. Corruption in licensing hinders business and investment, economic growth and employment. Corruption in the trade system has an impact on high economic costs on basic commodities, so it becomes a burden, especially for the economically weak. This problem is based, for example, looking at various corruption cases handled by the KPK, there are many bribes in the field of licensing and commercial administration. So this issue is right to be the focus. Likewise, the setting of challenges and targets in the field of licensing and commerce has relatively shown a high level of urgency.

Second, corruption on the state revenue side was chosen to be the focus because it had an impact on not achieving state revenue targets and public services and development became not optimal and not on target. Similar to the focus on licensing and commercial governance issues, this issue is also recognized as very important in saving state finances. The identification of challenges and objectives undertaken in is also relatively appropriate including tax and non-tax, budgeting and spending, and BJP.

Third, law enforcement and bureaucratic reform were also chosen to be the focus because corruption related to law enforcement and bureaucracy greatly affects the level of public trust in the state. Note on this problem statement is that judicial corruption or corruption in the field of law enforcement is not said to have a direct effect on the effectiveness of combating corruption. This means that the main problem of corruption in the field of law enforcement is the quality of law enforcement which is still shrouded in corruption so that it will not be able to become an effective instrument of eradicating corruption.

The focus of legal issues identified the challenges faced, among others, first, the lack of optimal coordination of law enforcement officials in handling cases, especially the exchange of information and data across law enforcement officials. Second, there is still weak adaptation of the law enforcement process in the digital era with increasingly developed and complex crime modes, and third, there is still misappropriation in law enforcement.

For these challenges, three targets were set, namely the strengthening of transparent and accountable law enforcement based on the acceleration of information technology-based case handling systems, including the acceleration of information technology-based case handling systems, and the development of information systems across law enforcement. Second, the stronger management and quality of law enforcement institutions, and third, the creation of governance and anti-corruption bureaucratic culture as well as the capabilities of civil servants who are professional and with integrity.

The challenges and targets that form the basis of action on legal issues unfortunately have not answered the root of the problem of corruption in the field of law enforcement. Judicial corruption starts from the amount of authority possessed by law enforcement officials with a lack of control mechanisms. The great authority of law enforcement comes from the Criminal Procedure Code which is a type of crime control model that does not guarantee human rights aspects and prioritizes the effectiveness of law enforcement. So that law enforcement officials are given so much authority without adequate control.

Institutionally, law enforcement agencies also do not have supervisory agencies that can compensate for their great authority. The National Police Commission and the Prosecution Commission are under the President who cannot work independently. Meanwhile, the authority and resources given to these two commissions are also very limited. The problem becomes even more acute when corruption spreads systemically in law enforcement institutions ranging from recruitment, career development, to case trading and influence trading.

Unfortunately, this fundamental problem in law enforcement is not identified in Presidential Regulation 54/2018 so it is not set as a challenge and target of Stranas PK. This means that

these important things will also not appear in PK Action. In addition, in the legal field, there is also no need for laws and regulations needed in an effort to accelerate the eradication of corruption, for example related to the seizure of assets resulting from crime and restrictions on currency transactions.

Returning to the issue of political corruption, Presidential Regulation 54/2018 does not identify this issue as a priority issue. In fact, corruption that occurs in the first two focus issues, namely licensing and trade administration and state finance, is triggered by many political actors.

For example, corruption in licensing and commercial administration both at the central and regional levels, inseparable from political corruption, is carried out by political actors who are sitting in positions that have authority or even just influence. Revamping the two focus issues without touching political corruption such as improving downstream but leaving the upstream problems.

3.3 Institutional Aspects

3.3.1 Institutional Mandate and Structure

The National Strategy for Corruption Prevention (Stranas PK) is a national policy direction that contains the focus and targets of corruption prevention which are used as a reference for Ministries, Institutions, Local Governments and other stakeholders in implementing Corruption Prevention Action (Aksi PK) in Indonesia. The preparation of Stranas PK is intended to encourage more effective and efficient corruption prevention efforts.

Corruption prevention efforts become more effective if they focus on strategic sectors, which are sectors that affect development performance and public trust in the Government. Corruption prevention will be more efficient, if administrative burdens and overlaps can be significantly reduced through better collaboration between ministries, agencies, local governments, other stakeholders, and the Corruption Eradication Commission.

The objectives of the establishment of PK tranas are (1) providing direction on strategic efforts that need to be carried out by ministries, institutions, local governments, and other stakeholders to prevent corruption; (2) encourage corruption prevention programs that are outcome and impact oriented, not just outputs with measurable achievements; and (3) increase synergy between corruption prevention programs and central, regional government policies, as well as with strategic policies of the Corruption Eradication Commission.

The focus of the implementation of the PK Stranas Action does not only stop at administrative documents or meeting the targets of formality activities but ensures that the reported PK Action targets have been implemented properly and have a significant impact on Ministries, Institutions and local governments as well as the wider community.

Stranas PK is coordinated, synchronized, monitored, and evaluated by the National Corruption Prevention Team (Timnas PK) consisting of: (1) the Ministry of National Development Planning / Bappenas which organizes government affairs in the field of national development planning; (2) the Ministry of Home Affairs administering government affairs in the domestic sector; (3) KemenpanRB which organizes government affairs in the field of state apparatus; (4) The Office of the Presidential Staff that provides support to the President and Vice President in implementing the control of national priority programs and the management of strategic issues; and (5) the Corruption Eradication Commission which organizes the eradication and prevention of corruption.

Meanwhile, the tasks of the National Corruption Prevention Team are:

- a. Coordinating, synchronizing, monitoring and evaluating the implementation of PK tranas in ministries, institutions, local governments and other stakeholders.
- b. Submit reports on the achievements of the implementation of PK tranas in ministries, institutions, local governments and other relevant stakeholders to the President; and
- c. Publish reports on the achievements of the implementation of PK Action to the public.

This study wants to note the institutional model of the PK National Team regulated by Presidential Regulation 54/2018. As per the guidelines for the evaluation of laws and regulations, the variable of coordination / institutional governance has two indicators, namely the effectiveness of coordination between related agencies and the distribution of authority and tasks.

In addition, the PK National Team collaborates and synergizes not only with Ministries, Institutions, and Local Governments, but also with other stakeholders in implementing Corruption Prevention Action (Aksi PK), such as community representative organizations, development partners, academics, and the media.

Notes on the institutional model of the PK National Team include first, team composition. The PK national team does not involve the Coordinating Minister for Political, Legal and Security Affairs as officials who are given the authority to coordinate legal affairs are not involved. Indeed, corruption is not just a law enforcement problem, but cross-sectoral. Stranas PK also works in the realm of prevention, not enforcement.

However, what is prevented is corruption which is a legal problem. Revamping the system can suppress potential corruption, but not necessarily eliminate it. As in online licensing, a digitized system makes everything clear, quick, and easy. However, if you look at corruption cases in the field of licensing, what is missing is petty corruption in small amounts of quotations when service providers and applicants meet in person.

Likewise, the Minister of Law and Human Rights as the minister in charge of formulating national legal policies is also not involved in the PK National Team. One of the causes of corruption is the weakness of sectoral regulations that overlap, are incomplete, or do not guarantee certainty.

Effective eradication of corruption also requires support for the availability of laws and regulations. One of the sources of corruption problems in enforcement is the laws and regulations that underlie law enforcement officials who do not have sufficient control mechanisms, so there tends to be abuse of authority. This means that it is very important that corruption prevention programs include efforts to arrange regulations, which are the authority of the Ministry of Law and Human Rights.

3.3.2 Financial Support

PK action requires adequate budget support in order to carry out the planned program. Based on the guidelines for evaluating laws and regulations, budget aspects use indicators of budget support or availability and accountability for budget management.

Presidential Regulation 54/2018 regulates funding for the implementation of Stranas PK charged to:

- a) State Budget (APBN);
- b) Regional Revenue and Expenditure Budget (APBD);
- c) Other legal and non-binding sources of funding in accordance with the provisions of laws and regulations;

The proportion of K/L financing support is not regulated by Presidential Regulation 54/2018. Unfortunately, in Timnas PK and Setnas PK there are no standard fees listed. In terms of accountability, there is no publication regarding the Setnas PK budget that is easily accessible to the public. The financing trend since 2018, the portion of financing is almost 70% to pay for internal resources.

3.3.3 Human Resource Modalities

In carrying out the task of preventing corruption, the PK National Team is assisted by a Steering Team consisting of echelon I officials from each Ministry/Institution. Meanwhile, operational management is carried out by the National Secretariat for Corruption Prevention (Setnas PK), which is domiciled in the KPK, with the composition: 1 (one) Daily Coordinator, 15 (fifteen) Experts, and 28 (twenty-eight) Technical Teams representing 5 (five) members of the PK National Team, and 4 (four) administrative personnel.

Experts have a central role in the implementation of Stranas PK. However, Experts are ad-hoc with a contract duration of one year, so there is no guarantee of sustainability. The Expert Model of consulting services requires reliable knowledge and capacity so that human resources that change frequently can interfere with the implementation of Stranas PK.

Meanwhile, the recruitment mechanism for Setnas PK experts also needs to be seen. The recruitment system for the procurement of goods/services for the recruitment of experts that is less standard opens up opportunities for conflicts of interest. In 2018, there was a mechanism for direct appointments and interviews conducted by the KPK and KSP through the recommendation channel. In addition, if the procurement at LPSE can be conditioned, and if the recommended person does not pass the LPSE, a repeat order will be carried out. This then continues in 2021 towards 2022 which fully implements repeat orders.

3.3.4 Work Mechanisms and Patterns (Pre and Post Revision of the KPK Law):

The National Secretariat for Corruption Prevention is placed in the KPK. However, Setnas PK is not under the KPK. These two different entities have their own tasks. The KPK has a prevention program, as does the PK National Team. There is an intersection between PK Action programs and Korsupgah's achievements so that data interoperability should be a standard for both.

Some of these problems include:

1. Stranas PK experts during visits to the regions are considered subordinate to the KPK Korsupgah even though in Stranas PK it is ad-hoc that cannot be regulated by the Korsupgah. In the quantitative assessment process, Stranas PK experts were forced to assess quantitatively based on constructions made by Korsupgah; even though the action of Korsupgah and the action of Stranas are different. The MCP action is homogeneous in 8 areas and is carried out uniformly by 542 regions. While in the PK Stranas, there are 3 focuses, 11 actions that are reduced to hundreds or even thousands

of heterogeneous programs. This means that it is not necessarily carried out by K / L and the position is different from each other between places in carrying out its actions.

2. There is a dominance of the KPK in the implementation of Stranas PK because the KPK Korsupgah is located in the KPK. Even though there are 4 K/L in Stranas PK who are involved in regular monthly to quarterly meetings. This resulted in the other 4 K/L not being serious in controlling Stranas PK which was seen in the delegation of employees involved in the Stranas PK forum, where it was not the decision maker so that the KPK led the process. As a result, the KPK admitted that it was all the work of the KPK, even though it was the work of the national team.

The corruption prevention sector itself can be said to be an anti-corruption priority program carried out by the KPK for the 2019-2023 period. This spirit is actually also seen from Law 19/2019. Operationally, a number of internal regulations such as the General Policy Direction (2020) and Commission Regulation Number 7 of 2020 (hereinafter referred to as Perkom 7/2020) concerning Organization and Work Procedures (Ortaka) which gave birth to many new positions, reflect this spirit.

However, the monitoring of the writing team during 2020⁶ actually shows that adjustments to the anti-corruption approach encouraged by the state and the KPK have not shown significant results. The revision of the KPK Law, which is claimed to strengthen the prevention sector, at the same time does not adequately accommodate the need to strengthen the prevention program itself. This condition is caused by several reasons which include:

First, the need to regulate strict sanctions for State Administrators who do not report the State Administrator's Property Report (LHKPN) remains unregulated. The level of compliance with state administration remains at a suboptimal percentage, because there is a vacuum in criminal sanctions to ensure this obligation is carried out.

Second, as part of coordination and supervision, the KPK is authorized to provide recommendations for improving the system and governance. But so far, the KPK has often found obstacles where recommendations are not followed up.

There is indeed an additional "monitoring" mandate that seems to be intended to oversee the implementation of the recommendations that have been submitted; however, it is also not clearly answered in the revised KPK Law. The effectiveness of recommendations ultimately depends on the commitment of the leadership of the institution or organization itself.

⁶ TI-ICW, "Pseudo-Strengthening of Corruption Eradication: One-Year Performance Monitoring of the KPK for the 2019-2023 Period" <https://ti.or.id/wp-content/uploads/2020/12/Pemantauan-Kinerja-Tahun-I-KPK-2020-TIICW-1.pdf> accessed on December 14, 2021

And *third*, the KPK's authority to supervise is reduced. Article 10 which regulates the KPK's authority to conduct supervision, research, or review of (...) and agencies that perform public services is no longer listed. Even though corruption that occurs in institutions that perform public services will be felt directly by the community, including corruption in the licensing sector. At the same time, data from the Global Corruption Barometer 2020⁷ also confirms that bribery in public services is still rife, with a percentage rate of 30% of the public admitting to having committed bribery. This situation may also be the impact of the KPK's authority to supervise reduced public services.

The overhaul of the structure and work procedures of the KPK contained in Perkom 7/2020⁸ is also considered to have the potential to create dualism of authority in corruption prevention work. In addition, other problems also arise from the absence of an empirical study base related to the overhaul of organizational structures that are publicly accessible.

This potential overlap can be seen in the new structure, for example in the Directorate of Community Participation Development with the Directorate of Socialization and Anti-Corruption Campaigns. The regulation in the Perkom indicates the potential for overlapping authority and scope of work. In addition, the new structure above also has the potential to overlap with the functions carried out with the Directorate of Education Networks and the Directorate of Anti-Corruption of Business Entities.

Likewise, a new Coordination and Supervision Deputy was also formed, not the answer to the problem of stalled exchange of information about SPDP with other law enforcers or the problem of overlapping assistance programs to local governments with programs from Stranas PK. At the same time, the Anticorruption Learning Center (ALCLC), which was previously a center for capacity building of law enforcement and the public, has been abolished.

So instead of increasing effectiveness, this actually increases the "bureaucratic burden" and the potential for overlapping authority. The birth of this regulation also further emphasizes the further orientation of the KPK to build a modern organizational climate which is reflected in the many overlapping functions and structures.

⁷ TII, "Global Corruption Barometer 2020-Indonesia", <https://ti.or.id/global-corruption-barometer-2020-indonesia/>, accessed December 13, 2021

⁸ KPK, "KPK Reorganizes Organizational Structure", <https://www.kpk.go.id/id/berita/siaran-pers/1939-kpk-tata-ulang-struktur-organisasi>, accessed December 11, 2021

3.4 Community Participation Mechanism

3.4.1 Pattern of Community Participation in Stranas PK

The process of community participation in Stranas PK can be interpreted as a form of collaboration between the government and the community in compiling, implementing, monitoring and evaluating PK Actions. The position and role of the community is very important in achieving the goals of preventing and eradicating corruption. With the engagement, it is hoped that Stranas PK can carry out various efforts to prevent and eradicate corruption so that it has an impact on improving the quality of public services in the development process.

The principles of co-creation, co-implementation and co-evaluation in Stranas PK are established as an effort to realize quality collaboration. These three principles are implemented within the framework of the implementation of the Action Plan. The community is actively involved in the process of planning, implementing and evaluating PK Actions. Civil society organizations are expected to play an intermediary role, which is between the community and the government to provide various inputs and strategies in achieving the ideals of eradicating corruption.

The model of civil society involvement in Stranas PK has been stated in principle in Presidential Regulation Number 54 of 2018 Article 9 which reads: *"in organizing PK stranas, the PK National Team involves the participation of other stakeholders starting from the stages of preparation, implementation, monitoring, evaluation and reporting of PK tranas, where the procedures for involving other stakeholders are regulated by the PK National Team"*. The regulation defines that other stakeholders are individuals, community groups, legal entities, business entities, practitioner organizations, academics, associations, development partners, and mass media related to the implementation of Stranas PK.

The mandate then becomes the legal basis for elements of the government and civil society organizations in collaborating that complement and complement each other in every process of drafting, discussing, implementing, monitoring and evaluating corruption prevention actions within the scope of Stranas PK. In practice, the involvement of civil society in the framework of corruption prevention programs is not only due to the right to participate in policy and development processes, but also as a joint awareness effort to support the achievement of corruption prevention targets more clearly and sustainably.

Based on the implementation report of Stranas PK for 2021-2022, it outlines that the process of involving civil society in corruption prevention actions since 2018 includes:

1. In 2018, at least 18 national CSOs have been involved in several meetings and coordination to discuss the formulation and preparation of PK Actions. Among the CSOs are TII, ICW, Partnership, Auriga, PWYP, Fitra, IBC, LeIP, MAPPI, CSGAR, CITA, Lakpesdam, IPW, IBL, Pattiro, PSHK, FWI, WRI.
2. In 2019-2020, dissemination and monitoring of the implementation of PK actions have also been carried out in the regions involving local NGOs, media, and academics in 27 provinces of Setnas PK. Then specifically, the Monev Team monitors the implementation of actions in the regions by collaborating with ICW and TII along with local CSO networks in several provinces, namely East Kalimantan, East Nusa Tenggara, Riau, East Java, and North Sulawesi.
3. In 2020, Setnas PK again collaborated with national CSOs such as TII and ICW as well as IAPI (Indonesian Procurement Experts Association) to measure outcomes for 7 PK actions.
4. In addition to CSOs, other stakeholders such as UNODC, UNDP, USAID, AIPJ2, GIZ, The Asia Foundation, and the World Bank are development partners who are actively involved in assisting and cooperating with Setnas PK. UNDP, UNODC, USAID, and AIPJ2 are actively involved in action monitoring activities in the regions. UNDP also actively cooperates with Stranas PK to prepare public communication instruments. UNODC, TAF, and the World Bank pay attention to advocating for Electronic-Based Planning-Budgeting actions, although until now only UNODC has concretely collaborated with Stranas PK. Meanwhile, GIZ actively participates in assisting Forest Area Determination and One Map Policy Implementation.

From this description, it can be seen that collaboration between civil society organizations and Stranas PK has begun to build. However, if we look further, the form of collaboration built between Ministries/Institutions and civil society is still not effective. Some of the findings in governance and collaboration in Stranas PK include:

1. Experts who are members of the Monev Setnas PK team have an important role in the implementation of PK Action but until now have not set SOPs for work standards and performance appraisals. Although it currently has performance appraisal indicators, it has never been used.
2. This problem of collaboration and synergy led to dominance by the KPK in the implementation of actions. Even TA Stranas PK often does work that is not the task and function of stranas PK. This is because Stranas PK is considered a unit under the KPK Korsupgah. Many strategic things can be done and cannot be done because Stranas PK also works on the KPK tupoksi.
3. Korsupgah under the KPK should not be equivalent to Stranas PK. Although in reality in the determination of actions Korsupgah analyzes and provides input on actions. Actually,

the position of Stranas PK is under the KPK so that corruption prevention is more focused and in rhythm, while the Ministry of Home Affairs is to make it easier to implement local governments. The RB Ministry related to regulations and civil servants, Bappenas related to planning, and KSP so that all problems analyzed are quickly informed to the President for decision.

When viewed from a number of information above, Stranas PK should be separate institutionally from the KPK, so that Stranas PK becomes a separate entity like in the implementation of SDGs. As an example of this miscoordination, in 2019, the KPK made a claim where the 9 billion budget for the implementation of Stranas PK was the budget of the KPK. In fact, the large budget comes from the budget collected from 5 K/L who are in charge of Stranas PK.

Therefore, in order to measure and assess the effectiveness of public participation in the national anti-corruption strategy, UNCAC and The Kuala Lumpur Statement have affirmed several important strategies and instruments in each of their notes on community engagement that have a key role in determining the quality of implementation of the national anti-corruption strategy.

This strategy is considered to be one of the useful tools to coordinate and collaborate government resources and other stakeholders to develop and implement monitoring of anti-corruption implementation. So it is important that these collaboration and coordination efforts must continue to be improved, both from planning, implementation, to monitoring and evaluation.

The idea and concept of community involvement in the National Strategy for Corruption Prevention has been regulated in principle since the issuance of Presidential Regulation No. 55 of 2012 concerning the Long-term Corruption Prevention and Eradication Strategy 2012-2025 and the medium term 2012-2014. The regulation defines community participation as the active role of individuals, community organizations or non-governmental organizations in the prevention and eradication of criminal acts of corruption.

Presidential Decree No.55/2012 Article 9 states that the implementation of Stranas PPK within the scope of Ministries/Institutions and Local Governments needs to involve community participation starting from the stages of preparation, implementation, monitoring and reporting. This process will adjust the mechanism for community participation to the characteristics of each ministry/institution and local government.

In its development, the provisions on community participation in Stranas PK were then expanded not only to target individuals, community organizations or non-governmental organizations but also to involve legal entities, business entities, practitioner organizations, academics,

associations, development partners and mass media related to the implementation of Stranas PK. The expansion is in line with the change in focus and target of Stranas from Corruption Prevention and Eradication to focus on Corruption Prevention. This change is stipulated in the revision of Presidential Regulation No.55/2012 to Presidential Regulation Number 54 of 2018 concerning the National Strategy for Corruption Prevention.

The changes in the above regulations also have an impact on the mechanism and pattern of community participation in Stranas PK. Although in substance the role and space of community participation mandated in the Presidential Regulation has not changed, technically the management has changed where in Presidential Regulation No.55/2012 the community participation mechanism is adjusted to each Ministry/Institution and Local Government in compiling, implementing and evaluating PK Actions that have been stipulated while in the provisions of Presidential Regulation No.54/2018 the community participation mechanism is regulated by the Stranas PK national team.

The mandate should be the legal basis for the government and civil society organizations in collaborating that complement and complement each other in every process of drafting, discussing, implementing, monitoring and evaluating corruption prevention actions within the scope of Stranas PK. In practice, the involvement of civil society in the framework of corruption prevention programs is not only due to the right to participate in policy and development processes, but also as a joint awareness effort to support the achievement of corruption prevention targets more clearly and sustainably.

In practice, changes in the mechanism turned out to be problematic as well. This is in accordance with the findings of Transparency International Indonesia regarding the implementation of Stranas PPK which found that the involvement of civil society in the regions has not been optimal. Local governments still regard the participation of civil society as a formality, so they tend to involve only limited social organizations that are actually irrelevant and incompetent.

Based on the results of self-monitoring of Stranas PK conducted by Transparency International Indonesia in four regions, namely Makassar, Malang, Semarang and Pekanbaru, it was also found that civil society participation was still considered very low. This is based on civil society's access to anti-corruption policies, Stranas PK is only 1.47 points and the capacity of civil society in its involvement is 2.41 points.

Furthermore, after the amendment of Presidential Regulation 54/2018, the mechanism for civil society involvement should be regulated by the PK National Team, but until now problems related to the model and mechanism for civil society involvement in the PK Stranas have not had

a clear mechanism. One of the reasons is that the standardization of operational procedures (SOPs) for community involvement models has not been established at every stage, namely the preparation, implementation and monitoring of PK Action evaluation.

In 2019, Transparency International Indonesia noted that it was still difficult for people to access Stranas PK documents. In addition, the goals and progress of anti-corruption strategies in the regions are also not proactively communicated to the public, thus failing to create constructive and sustainable political debate. On the other hand, civil society participation is only in the law enforcement and bureaucratic reform sectors. This is because the capacity of the community is considered to tend to be better when compared to the capacity of the community in the three focus sectors of the existing issue.

Therefore, based on the description above, it is important to look for models of civil society participation at all stages of management of Stranas PK. In principle, the civil society participation model developed must still be able to involve all elements of civil society with a variety of issues and approaches owned. This diversity of issues and approaches in combating corruption will enrich existing strategies.

In addition, this strategy must maintain and respect the independence of civil society groups. In this case, equal relations between the PK National Team, the PK Stranas Secretariat Team and civil society groups need to be maintained in order to ensure optimal real and constructive input from the community as part of the stakeholders in eradicating corruption.

The issue-based collaboration and Co-Creation model and action in the form of equal communication forums have proven to have a better impact. This model has been used by various other commitments such as Open Government Indonesia (OGI), Extractive Industries Transparency Initiative (EITI) and Sustainable Development Goals (SDGs). The establishment of working groups from various sectors will expand the contribution of various elements that will provide input to the achievement of targets and success indicators. In fact, on a more massive scale, a structured community participation model can certainly be used as a deliberative forum model that can be used for the context of Stranas PK.

In addition, in a broader context, efforts to eradicate corruption will be more effective if they get broad political support from the public. Likewise with Stranas PK and its action program. With the lack of public concern and low sense of "ownership" of Stranas PK's agendas and programs, it is unlikely that corruption prevention actions will be effective and have an impact on the community.

The experience of Transparency International Indonesia shows that corruption eradication programs that lack public attention and are separated from public unrest will not be effective. The anti-corruption program will only be technocratic work and have weak public accountability.

3.4.2 Preparation of Corruption Prevention Action Plan (Aksi PK)

The main key to successful collaboration and community participation in supporting the commitment to corruption prevention action is to be actively involved in the process of drafting actions. Because the preparation of actions is the first step in starting various activity processes during the collaboration process in Stranas PK.

Involvement in the preparation of actions will also determine the sustainability and direction of the creation process together with all other stakeholders. In addition, the role of each stakeholder will be more easily determined in managing available resources so that the preparation of PK Action should involve all stakeholders as mandated by Presidential Regulation 54/2018 in determining and mapping various important issues in the preparation of PK Action.

In practice, so far the process of preparing actions in Stranas PK has not optimized the mechanism of participation and collaboration with civil society groups. The drafting process in recent years has been dominated more by other parties. Moreover, realistic and concrete mechanisms and stages in proposing PK Action proposals are currently not available.

In 2018, civil society organizations such as Seknas FITRA and PATTIRO concerned with the issue of village fund corruption were invited by the Stranas PK Secretariat to discuss the issue but were not involved in the preparation of the action plan. In 2021, PATTIRO again received an invitation to prepare an action plan related to the use of LAPOR! on the Electronic-Based Government System (SPBE) as a citizen complaint where the RB Ministry as the implementer.

However, some of the proposed proposals are also unknown whether they are accommodated and included in the PK Action plan document because of the unavailability of a clear information disclosure mechanism to determine the extent to which the proposals of civil society organizations are accommodated.

On the other hand, in optimizing the proposed PK action plan, the civil society network initiates to absorb aspirations as material for the preparation of the PK action plan which then the proposed document from civil society will be submitted to the PK National Team (see table 1).

This initiative is not continuous and difficult to measure because it does not have a clear mechanism in the process of drafting Action in Stranas PK. This can be seen in the preparation of PK Action for 2023-2024. Where Stranas PK minimally involves the participation of civil society organizations in the preparation of their actions. Civil society organizations were only invited at the launch of the action plan and even at the time of the action launch, the PK Action plan document was still difficult to access.

To improve the mechanism for civil society participation in the preparation of PK Action, the Stranas PK Secretariat team needs to consider the implementation of the Anti-Corruption Strategy guidelines contained in the Kuala Lumpur Statement document which recommends broader stakeholder involvement so that stakeholder involvement can build ownership and help ensure acceptance and effectiveness of the adopted strategy.

State institutions (executive, legislative and judicial) at national and subnational levels, civil society organizations, private sectors, media, professional societies, trade and industry associations and labor unions, academic institutions, youth and cultural organizations, can serve as important partners in the development of anti-corruption strategies and can reduce the vulnerability of reform efforts to changes in political leadership.

In addition, optimization of the PK Action preparation mechanism can also be done through the adoption of an action preparation mechanism from several other similar action commitments, one of which is the Open Government Partnership. In the preparation of the OGI Action, a public participation mechanism has been prepared based on established SOPs where one of the provisions regulated is that all processes must be known to the public, starting from meeting minutes, meeting documentation must be published and there is a mechanism for publishing a draft action plan.

The stage is carried out by public screening by means of surveys, visits to regions, and meetings with civil society networks. The OGI Secretariat then publishes its action plan into 6 stages including submission of proposals, review, alignment of proposals, sharpening, writing and finalization. In addition, every stage of the community can provide comments or provide input through OGI's official website.

Optimizing collaboration and participation of civil society in the preparation of PK Action plans should begin with:

- Comprehensive, connected issue mapping with the Action to be performed. So that the continuity between the problem map and Action on achievement targets and success indicators can be measured in such a way as to bring results that are as expected.

- Increase awareness in information gathering. This includes concrete activities to inform the public, other stakeholders and governments about the co-creation process, and how each stakeholder will be able to participate. It also includes activities to gather information from the public about the issues or themes they want the action plan to address.
- Define problems, identify solutions, and develop commitments. This includes activities to decide: how the problem will be defined, how the solution will be achieved, and how this proposed solution will be made developed into an action plan commitment. When commitments are developed, PK National Team and other stakeholders need to be involved to assess legal, technical, and political opportunities and constraints. This may require additional outreach efforts once the commitment development process begins.
- Provide feedback to all other stakeholders. This includes concrete activities that will inform those participating in the co-creation process about the results of their participation and how their ideas or suggestions will be addressed with in the development and finalization of action plan commitments.

3.4.3 Implementation of Corruption Prevention Action Plan (Aksi PK)

The lack of optimal participation of civil society in the preparation of PK Action certainly greatly affects the lack of space for public participation in the implementation of the corruption prevention action plan. So far, civil society organizations tend to be involved in the implementation of actions through several meetings with the Stranas PK team to find out the progress of the implementation of PK Actions. In addition, civil society participation in the implementation of PK Action is carried out through easy access to the JAGA.id application or the Indonesian Corruption Prevention Network application.

This application is a forum initiated by the KPK in information disclosure about monitoring corruption prevention efforts at the center to the regions that provides data and information on the results of the Integrity Assessment Survey (SPI) and other corruption prevention information. The aim is to increase public participation in corruption prevention efforts through SPI data analysis. Unfortunately, access to JAGA.id has not been accessible to civil society organizations since 2022.

In 2019, Transparency International Indonesia conducted two monitoring series. The results of the first monitoring (March to April 2019) found that the risk of corruption in the 3 focus areas of Stranas PK was still very high. Another finding is that the initial implementation of Stranas PK has not been followed by optimal community involvement, especially in accessing information about corruption prevention actions.

In the second monitoring, Transparency International Indonesia together with regional CSOs (October 2019 to February 2020) monitored the implementation of 4 of the 27 sub-actions of Stranas PK. The four sub-actions include sub-actions on the establishment of the Goods and / Services Procurement Work Unit (UKPBJ), Online Single-Submission (OSS) Acceleration, One Map Policy Implementation and Merit System Acceleration.

The results of the second monitoring found that the capacity of the monitored implementation units was generally inadequate. This conclusion was obtained using monitoring instruments prepared with reference to the components of UNCAC article 5 and The Kuala Lumpur Statement. In addition, the monitoring results confirm that an effective national anti-corruption policy should go beyond administrative work.

Unfortunately, the action plans contained in the framework of Stranas PK during 2019, still rely heavily on administrative targets to comply with the achievements of the document. In addition to the complexity of impact measurement and review, these targets do not directly contribute to the root of Indonesia's corruption problem, political corruption.

Therefore, to improve the effectiveness of community involvement in the implementation of Stranas PK, it is necessary to implement the anti-corruption strategy recommended by the Kuala Lumpur Statement which outlines that the mechanism for implementing corruption prevention actions needs to provide a clearly identified action plan, division of responsibilities and implementation schedule with a focus on results. At the local level, the implementation of PK Action needs special attention.

On the other hand, civil society and other stakeholders should be strategic partners in planning the implementation of actions so that civil society organizations and other stakeholders have common ownership of the implementation of commitments. During implementation, there are at least four important areas where collaboration between implementing agencies, support partners, and other stakeholders can be beneficial: planning implementation, activity implementation, monitoring, and assessment.

The implementation plan can be done separately for each commitment. The implementation plan may include identification of specific activities, resources needed, time frame, expected results, and responsible persons and ministries. It may also include the risks identified and how to manage them.

Key implementing agencies can be supported by other stakeholders, including civil society during the implementation process in the following ways:

- **Communication:** Building public awareness of new or amended policies or programs as a result of commitments;
- **Expertise:** Provide input on policy implementation
- **Service provision and/or co-production:** Implementing policies, partnering with governments
- **Enable usage and feedback:** Support intended users or beneficiaries of commitments to access new policies, programs, and services enabled by commitments and channel user or beneficiary feedback to implementing agency leaders

3.4.4 Monitoring and Evaluation of Corruption Prevention Action Plan (Aksi PK)

Based on the 2021-2022 Stranas PK implementation report, it is explained that in 2019-2020, dissemination and monitoring of PK actions have been carried out in the regions by involving local NGOs, media, and academics in 27 provinces of Setnas PK.

Furthermore, the Monev Stranas PK Team monitored the implementation of actions in the regions by collaborating with ICW and TII along with local CSO networks in five provinces, namely East Kalimantan, East Nusa Tenggara, Riau, East Java, and North Sulawesi. Furthermore, in 2020, Setnas PK again collaborated with national CSOs such as TII and ICW as well as IAPI (Indonesian Procurement Experts Association) to measure outcomes for 7 PK actions.

The Kuala Lumpur Statement recommends that monitoring and evaluation is an integral part of the national anti-corruption strategy. Elements of evaluation and data collection systems should be built into the strategy from the design phase. Some important things that need to be considered in the monitoring and evaluation mechanism are:

1. **Clear Indicators and Targets:** Measurable indicators, with a set baseline and monitoring mechanism, are required to determine whether targets are being achieved.
2. **Data Generation Tool Needs:** Requires effective monitoring and evaluation of reliable data generated based on multiple sources.
3. **Regular Reporting:** Regular monitoring and reporting enables authorities to measure progress in implementation and achievement of results in the fight against corruption.
4. **Programme Management Evaluation:** It is important to distinguish between monitoring programme management (activities/outputs) as opposed to evaluation (outcomes/impact) and between implementation responsibilities as opposed to monitoring and oversight responsibilities.
5. **Responsible Body:** National bodies should be entrusted with responsibility for regular monitoring, implementation and reporting and provided with ongoing institutional and

financial support. Independent evaluations should ensure accurate monitoring and reporting on a regular basis.

If we reflect on the implementation of OGI Action in Indonesia, to streamline the monitoring process of corruption prevention actions, it is necessary to encourage the establishment of an **Independent Reporting Mechanism (IRM)** to monitor all action plans and ensure that the government implements their commitments properly. IRM reports become part and parcel of the government's commitment to ongoing collaboration with other stakeholders and participation during the implementation process is highly correlated with high completion rates and stronger outcomes.

Continued engagement can help maintain momentum for implementation after the publication of the action plan. This may include the involvement of relevant ministries, civil society, as well as other stakeholders in the implementation, monitoring, communication, and coordination activities necessary for successful completion of commitments.

Engaging relevant ministers or other high-level representatives at least once a year during implementation to discuss progress, delays, and opportunities to address challenges can also help maintain political support for commitments. Engagement and dialogue during implementation can help stakeholders hold governments and other implementing partners accountable for outcomes and enable the adoption of corrective actions only, should priorities or circumstances change.

3.5 The Ideal Model of Synergy and Community Participation in Stranas PK

As mentioned above, regarding the institutionalization model of community participation in Stranas PK, one of them can take the example of the Open Government Partnership initiative in Indonesia, especially to improve the quality of the achievements of Stanas PK. Indonesia in 2011 became part of 8 pioneer countries of multilateral voluntary initiatives for democracies, namely the Open Government Partnership.

In its development, Open Government Partnership practitioners learned what exactly is the definition of this variety of OGP practices in various member countries, which currently reach 76 countries and 106 regions at the local jurisdiction level. Open Government Partnership can be defined as the existence of **partnerships** between government and civil society in terms of government **institutions and mechanisms**, namely transparency (the public can understand the work of their government), **citizen involvement** (the public can influence the work of their government by being involved in decision-making processes and public service programs), and

accountability (the public can ask the government to account for policy and service performance his public).

In its declaration, OGP also recognizes that the main legal basis is in addition to the UN general declaration on Human Rights, also the UN Convention Against Corruption (UNCAC) and other legal bases relevant to Human Rights and Good Governance. Open governance can also be interpreted as the **relationship** between citizens and their governments as well as the processes in their interaction are transparent, accountable, participatory, and allow the perspectives, needs and rights of all citizens to be fulfilled, including those who are most marginalized in power relations.⁹ OGP's emphasis is not only on transparency, participatory, accountable and innovative, but also inclusive, collaborative with civil society called **co-creation**.

The OGP governance model requires the participation of civil society organizations from decision making to programs that can be felt directly by the community. In the synergy model in Stranas PK, the participation of civil society organizations in the form of co-creation can be started from the determination of civil society organizations that are members of the National Team because the highest decision making lies with the National Team. Civil society organizations can be selected from anti-corruption activist organizations, and universities.

So that the direction of the action plan can also be determined jointly by civil society. Also, this institution is bound in an action plan that not only involves the local government or related ministries but is also carried out jointly by civil society organizations that propose or are relevant to cooperate during implementation. During the preparation of the plan, as much as possible involve civil society, both local and national, to further sharpen the contribution of the action plan to corruption prevention targets.

In addition, there needs to be a multi-stakeholder forum at least 2 times in 1 action plan period involving all ministries, institutions and local governments of the action plan focus area, universities, and civil society organizations anti-corruption activists who have been involved in the action plan. So in addition to reminding about the target of the action plan to be carried out, it also asks each point of contact from K / L or local government or CSOs to explain the progress of the program. several other important issues related to outreach to the regions as well as other important matters that are important to be decided together will be discussed in the Multi Stakeholder Forum.

⁹ Rosie McGee and Duncan Edwards, Introduction: Opening Governance – Change, Continuity and Conceptual Ambiguity, in IDS Bulletin Vol. 47 No. 1 January 2016: 'Opening Governance' iii–viii, p. 14.

Any information in the process at Stranas PK needs to be published on the website proactively and other information channels. And in the action plan evaluation process, representatives from universities who are not involved in the implementation process can be involved to directly monitor the results of Stranas PK how much it contributes to corruption prevention targets. The National Team can convey to the president and the public regarding achievements and challenges during the implementation of the action plan from external evaluations of universities.

This increased participation is expected to increase breakthroughs in the quality of corruption prevention action planning and implementation, as well as better public support and understanding of corruption prevention actions, and improve the culture of supervision up to the local community level.



CHAPTER IV

CLOSING

Stranas PK's weak policy to respond to rampant corrupt practices is unfortunately exacerbated by the proliferation of influence trading in the political system and government. At the same time, supervisory instruments are generally unable to perform their functions optimally from the expansion of executive discretion.

For example, today it seems natural to see public officials who have several robes at once: rulers and businessmen, political parties with family flavors, overlapping positions, or even members of the military who enter civilian positions. Gradually, this intertwined conflict of interests will only harm the interests of society because the distribution of welfare only revolves around a few elites. Unfortunately, regulations that regulate and respond to the risk of conflicts of interest are completely absent until now.

This legal crisis is also exacerbated by the increasingly blockage of the deliberative critical functions of the House of Representatives due to the inferiority of the opposition, the non-optimal role and function of the Corruption Eradication Commission due to institutional, ethical and leadership complications from two years of the enactment of Law Number 19 of 2019, and the increasingly squeezed spaces of civil liberties.

The weak function of balancing power in Indonesia's democratic system has also become more complete when the phenomenon of attacking the independence of Aswanto Constitutional Court judges through a smooth mid-road stop. There are almost no longer any dividing lines that respect the principle of limitation of power. These dangerous signs have been consciously breached and have the potential to continue to erode the basic rights of citizens ahead of the 2024 electoral process.

The shifting political pendulum of corruption eradication law also comes from the discordant tone of corruption prevention policies. The implementation of Presidential Regulation Number 54 of 2018 concerning the National Strategy for Corruption Prevention approximately four years ago, in fact, did not contribute to boosting the Corruption Perception Index score. This policy seems to be "negotiating" and tends to avoid deep-rooted problems that actually have a major impact on corruption in Indonesia, namely political corruption.

Broadly speaking, this policy is actually stuck maintaining the status quo of corruption itself. There is a prominent mismatch between the main problem of corruption, namely the political problem, and the technocratic solutions offered, ultimately generating more questions than

results. The incomplete diagnosis between the causes and symptoms of corruption, followed by the rhetoric of participatory surveillance, is just one example of what makes this prevention policy package only partial and seems to add to the long series of red-tape chains in the bureaucracy.

Departing from the picture of the legal crisis above, it is fitting that Stranas PK is able to prevent the mixing of power. One of the crucial steps that needs to be taken immediately is the re-strengthening of supervisory institutions that are currently in limbo, both in terms of authority, resources and independence.

In addition, the Government can take advantage of the presence of the Corruption Perception Index to pave the way, not just reflecting, but also providing an overview of who the real 'enemy' is, the modalities of resistance possessed and strategic steps that can be taken. It is certain that in the midst of the ongoing corruption law disaster, rhetorical ideas and policies will not produce far results. It takes leadership and progressive breakthroughs to prevent a prolonged collapse of the law.

4.1 Conclusion

Results of Institutional Aspect Analysis

The Stranas PK institution in Presidential Regulation 54/2018 does not involve stakeholders in the legal sector, in this case the Ministry of Coordinating and Human Rights and the Ministry of Law and Human Rights. Even though the two ministries have tasks directly related to the legal field.

Stranas PK institutions need to be more independent so that the effectiveness of the PK National Team coordination can be guaranteed. Setnas PK does not have experts as permanent staff, because all are consultants held for a one-year working period. As a result, the sustainability and continuity of the program is not guaranteed. Stranas PK's budget also has no certainty, because it is a crowdfunding from K/L members of the national team.

Results of Community Participation Mechanism Analysis

The participation of civil society organizations in the preparation, implementation, monitoring, monitoring and evaluation of PK Action is still partial and does not have a clear mechanism in accordance with the mandate of Presidential Regulation 54 of 2018 Article 9 concerning the involvement of their roles and stakeholders.

4.2 Recommendations

Improved Institutional Governance

1. The institution of Stranas PK needs to be changed to include Kemenkopolhukam and Kemenkumham as members of the PK National Team
2. There needs to be a coordinator for the PK National Team, ideally from the Ministry of Coordinating and Political Affairs
3. Need permanent staff seconded from PK National Team members
4. Need for transparency of Stranas PK budget

Improvement of Community Participation Models and Schemes

To strengthen the participation of civil society organizations in PK Action, it is necessary to establish clear mechanisms and standard operating procedures (SOPs) on concrete forms of involvement at every stage of PK Action preparation. In addition, a clear form of Co-Creation between civil society organizations and the Stranas PK Team will also be further developed if civil society organizations that focus on anti-corruption issues become an institutionalized part of the PK National Team or Stranas PK so that civil society organizations and other stakeholders have an attachment to the PK Action commitment that has been set. This needs to be included in the revision of the Presidential Regulation in the form of additional membership of the PK National Team from civil society elements.

The synergy model for the involvement of civil society participation to improve the quality of Stranas PK's achievements can take the example of collaboration in the form of co-creation of the Open Government Partnership initiative in Indonesia. Rare co-creation can start from the involvement of civil society organizations from the highest decision-making level as members of the PK National Team to implementation, monitoring, and evaluation.

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II. Tables

Table.1 Civil Society Proposals in the Preparation of PK Action Plan for 2019-2020

No	Action Focus	Actions	Input	Participating CSOs
1.	Licensing and Commerce	Service Improvement, Licensing Compliance, and Investment	<ol style="list-style-type: none"> 1. The Business Domicile Certificate does not have a centralized legal umbrella, so it is necessary to study the level of effectiveness of the removal of the Business Domicile Certificate on the impact that will be caused. 2. Business Domicile Certificate is a prerequisite in obtaining a number of permits, such as: Business Entity NPWP, Banking Credit, Notary Recording etc. So it is also necessary to have an integral arrangement. 3. Relevant agencies need to be added: Director General of Taxes, Notary, Banking, etc 4. Success Criteria need to be added about: (1) Corporate Accountability after the abolition of SKDU; (2) Alternative replacement of Business Domicile Certificate as part of the prerequisites for business management and responsibility of business entities. 5. It is necessary to map post-registration coordination 	PWYP, WALHI, KPPOD and TII

			<p>problems, because there are several regional roles in Online Single Submission</p> <p>6. It is necessary to involve the Ministry of Energy and Mineral Resources as the person in charge.</p>	
		<p>Improved data governance and compliance in extractive, forestry and plantation sectors</p>	<ol style="list-style-type: none"> 1. Success criteria do not yet describe the form of accountability, ease of doing business, and also community participation in supporting the achievement of success measures. 2. The supply chain of the extractive industry needs to be traceable. 3. As the party in charge, it is necessary to involve the Ministry of ATR/BPN 4. Relevant agencies need to involve the Ministry of Transportation, the Ministry of Trade. 5. The role of the community as one of the stakeholder groups, especially affected communities in the extractive sector needs more attention, especially to answer public accountability for the performance of the extractive sector. 6. There needs to be a review and evaluation of the current forest area designation so that the 90% target in 2020 is 	

			<p>not an effort that actually encourages the marginalization of community participation, especially attention to indigenous peoples.</p> <p>7. In the action, three sectors were mentioned, but the plantation sector has not received attention to the action plan.</p> <p>8. Need the involvement of the Ministry of Energy and Mineral Resources as a related agency The provision / publication of data recommended is data that is processed image, and data quality that meets the rules of data openness.</p> <p>9. On the measure of success it is necessary to include the level of Beneficial Ownership compliance in companies in the extractive, forestry and plantation sectors</p> <p>10. On the measure of success, there needs to be certainty of accessibility of Beneficial Ownership data and information in companies in the extractive sector for Law Enforcement Officers, CSOs and Employers' Associations</p> <p>11. Government commitment to the principle of Open Beneficial Ownership in</p>	
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			accordance with G20 standards is needed	
		Strengthening Farmer Database Management	<ol style="list-style-type: none"> 1. It needs criteria about a "reliable database" so that qualitatively the database can be utilized and become a measure of success that can be used and processed by various parties. 2. There needs to be a correlation between farmers' actions and the food sector, especially in terms of farmers' protection mechanisms and local food, not just import-oriented 	
		Integration and Synchronization of Strategic Food Import Data	There needs to be a correlation between farmers' actions and the food sector, especially in terms of farmers' protection mechanisms and local food, not just import-oriented	
		Implementation of Anti-Bribery Management in the Private Sector	<ol style="list-style-type: none"> 1. In the measure of success, it should no longer be a trial stage but has entered the percentage of the implementation of anti-bribery management in the government, local governments, SOEs and the private sector. 2. Optimization of the roles and functions of the National Advocacy Committee and Regional Advocacy 	

			Committee initiated by the KPK.	
2.	State Finance	Improved system of planning, budgeting, management (including procurement) and electronic-based reporting	<ol style="list-style-type: none"> 1. The planning flow in each K / L is different, so it is necessary to standardize the planning system. 2. On the success criteria, it is necessary to ensure access to the public, at the same level of information, in accordance with the Information Commission Regulations. 3. Standardization of open data accessibility should be in accordance with, for example: G20, Open Data Principles, etc. 4. The measure of success of the trilateral meeting needs to be measured more advanced, considering that currently the trilateral has been running. 	FITRA, IBL, IBC and TII
		Increased professionalism and modernization of Procurement of Goods and Services	<ol style="list-style-type: none"> 1. LKPP needs to be encouraged to make an instrument measuring the maturity or health of procurement, it can be: Procurement Health Index. With this instrument, it is expected to encourage K/L and local governments to reduce corruption risks in the BJP sector 2. Need to mitigate the risk of conflicts of interest in the e-catalog system 	

			<ol style="list-style-type: none"> 3. Need to conduct regular evaluations of the e-catalog system and publish the results openly 4. Need to include vendor integrity checklist principles and also encourage data disclosure and beneficial ownership information 5. Encourage procurement efficiency up to 100% to all K/L and Provincial Government by the end of 2020 	
		Optimization of state revenue from tax and non-tax revenues	<ol style="list-style-type: none"> 1. The need for evaluation and review of the success of the tax amnesty program. 2. The importance of action towards optimizing state revenue from the non-tax sector 3. On the measure of success it is necessary to include the company's obligation to apply the principle of country by country assessment report disclosure 	
3.	Law Enforcement and Bureaucratic Reform	Strengthening the Implementation of Bureaucratic Reform	<ol style="list-style-type: none"> 1. It is necessary to deepen the mapping of problems on the issue of bureaucratic reform, so that the existing problems are sought for solutions that have a significant impact, for example about cultivating an anti-corruption culture and empowering / advocating the community to participate in 	ICJR, ICW, LeIP and TII

			<p>supervising the merit system in job selection</p> <ol style="list-style-type: none"> 2. Success criteria need to be detailed again and a road map to the target / target is made. 3. There needs to be a study or evaluation of the existence of Integrity Zones in Ministries/Institutions/Regions related to corruption prevention efforts 4. It is necessary to standardize the Integrity Zone and Whistle Blowing System which is not limited to ceremonial, but has entered into integrity enforcement 5. The need for competency standardization for Gratification Service Units, and Whistleblowing Systems in each government agency 6. The need to standardize the protection of Witnesses and Victims 	
		<p>Implementation of the Grand Design of village supervision strategy</p>	<ol style="list-style-type: none"> 1. It is necessary to provide a measuring instrument in the form of an integrity index to measure the success of improving the integrity of the local government 2. Involvement of civil society in the process of preparation, planning, implementation, money to accountability of 	

			<p>the village development process</p> <ol style="list-style-type: none"> 3. Optimization of the performance of the Village Fund Task Force and the publication of reports and follow-up results. 4. Need to be encouraged to test the competence of village financial operators 	
		Improved Governance of the Integrated Criminal Justice System	<ol style="list-style-type: none"> 1. There needs to be standardization of case handling in the National Police, the Prosecutor's Office, and the KPK 2. It needs to be double-checked, whether currently the Attorney General's Circular (SEJA) regarding the guidelines for typicality already exists, if so, what is needed is to measure the level of compliance of a number of typicor cases with the SEJA. 3. There needs to be active participatory coordination between the Police, the Prosecutor's Office, the Court and the Ministry of Law and Human Rights on the principles of punishment and practice, so that fundamental problems are found in the latest prison situation. 	

Source: Processed from Stranas PK working paper, Transparency International Indonesia 2018



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