The Indonesia Public Information Disclosure Act (*UU-KIP*): An Effective Policy for Anti-Corruption?

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Abstract:

The Act No.14/2008 (UU KIP) of Information Public Disclosure is one of the regulations that can be regarded as the primary instrument to prevent corruption since it is mandated to enforce the necessity of public information disclosure in actualizing transparency and accountability in Public Administration. This article is a descriptive policy analysis oriented to evaluating the impact and benefits of the policy after it has been implemented (ex post analysis), with the before-and-after comparison approach. This preliminary research tries to investigate this policy for the purpose of ascertaining whether this policy is successful in meeting its objective (effective) in reducing corruption crime after its implementation. This study reveals that generally there has been a tendency of increasing number of criminal acts of corruption after the implementation of the UU-KIP/FoI Law in 2010, although there has been a downward trend in the number of corruption crimes in government agencies from 2018 to 2019. In fact, the increase in the number of corruption crimes is directly proportional to the increase in the number of informative/transparent public agencies.

Keywords: *Public Information Disclosure, Anti-Corruption, Effective Policy, Public Administration Ethics, Mental Health.*

I. INTRODUCTION

This article focuses on policy evaluation of the Act No. 14 of 2008 on Access to Public Information Act or Public Information Disclosure Act (*Keterbukaan Informasi Publik* or KIP in Indonesian) as being an instrument to eradicate corruption, since corruption behaviours relate to Public Administration issues, especially dealing with regulations and public servant ethics. As Perales (2016) pointed out, corruption is a mental health problem that affects the whole community and disrupts human development and economic growth. Therefore, he concluded that "we are convinced that the solution to the mental health problems–linked to the human and the people development--is not in the hands of the medical science but rather in the hands of the government political levels…". [1]

In April 2010, Indonesia implemented the act which has become a universal feature of good governance.

Improving the quality of public expenditure is one of the benefits of the KIP act, as public can access more detailed information for controlling the government spending. It will hopefully reduce the opportunity of corruption within public spending. So, it is can be the right tool for eradicating corruption and wrongdoings in the government. The citizen, especially investigative journalists and watchdog NGOs, can use this policy to find and expose wrongdoings and help root it out.

But can this policy work in eradicating corruption effectively? There are many factors that allow failure of policy implementation as stated by Hudson et al (2019) [2] that failure of policy implementation is possible due to various reasons such as overly optimistic expectations, inadequate collaborative policy making, implementation in dispersed governance, and the vagaries of the political cycle. Several authors have discussed this issue, especially evaluation on Freedom of Information (FOI) policy implemented by many countries, such as Vadlamannati and Cooray's research (2017) [3] on 132 countries during the 1990-2011 period, revealed that the perception of government corruption tends to decrease with the duration of adoption of the FOI Law. As Bennis et al. (2008) [4] affirmed that "claiming to be transparent is not the same as actually *being* transparent."

In contrary, there were also positive findings of the issue, such as studies conducted by Bertot et al (2010) [5] regarding the effectiveness of transparency through providing information/data openly through technology, such as e-government, OGD (Open Government Data) and social media. They were supported by Dong's finding (2008) that the statistical analysis revealed that e-government has been a consistently positive impact on reducing corruption, as well as anti-corruption factor traditionally. [6]

Nevertheless, we hope this writing can illustrate the special case of Indonesia FOI Act and the impact on corruption eradication. This paper aims to ascertain whether this policy is successful in meeting its objective (effective) in reducing corruption crime after its implementation. As Lubis et al. (2018) [7] had pointed out, Act No. 14/2008 is the answer to legal protection, government transparency, accountability, and public participation, and it has become the primary instrument to prevent corruption, information disputes and monopolistic practices. Hopefully, the effort is worth it if the problematic issues revealed and the solutions provided bear fruit and change it for the better.

We understand that governance and corruption in Indonesia and many other countries have been the subject of much recent writing from various perspectives, such as law and economic growth. Dimant (2017) [8] suggested some factors that can be considered to be causes of corruption, namely: bureaucracy and inefficient administrative and political structure, lack of civil participation/press freedom, economic freedom, economic growth, ethnic diversity, gender, globalization, government size, natural resource endowment, political instability, poverty, property rights, transparency, urbanization, wages, e-government, internet, religion, contagion effects, etc

For example, from economic perspective, Pradiptyo (2015) [9] found that corruption has spread widely in Indonesia and a negative impact is inevitably linked with crime and eventually with the corruption of the judiciary. This research showed that most judges at all levels of the court did not follow the guidelines on the intensity of sentences strictly, as stated in the anti-corruption law 2000/2001. The inconsistency in determining the intensity of punishment has weakened the effect of punishment prevention. Generally, the value of financial penalties covers only 60% of the total social costs of corruption. This discrepancy cannot be redeemed by the criminal justice system and ultimately taxpayers must pay the burden incurred by corruptors. The analysis shows that for all types of punishment, the possibility of punishment does not match the social costs of corruption incurred by the perpetrators.

In the study of democracy, Setiyono (2015) [10] also found that despite the success stories of many democratic achievements, Indonesia continues to show poor performance in dealing with corruption. In the last 10 years after democratization began, Indonesia is still ranked lowest, along with the most corrupt countries in the world, according to TI's Corruption Perception Index (CPI). The score has never been far from the score achieved during the era of authoritarian rule. Although based on studies also conducted by TI in 2019, with a score of 40, Indonesia improved by two points on the CPI [11]. Studies conducted by Bhattacharyya and Hodler (2015) [12] supported Setiyono's finding, using panel data covering 126 countries from 1980 to 2007, that both democratization and media freedom have a negative effect on corruption.

II. PROBLEM SOLVING ANALYSIS

This is a preliminary research or a library research. We used existing literature in the terms of corruption, right to information (RTI/FOI), public policy analysis, policy documents, reports of corruption crime cases, and reports on UU-KIP implementation. There is a great deal of academic literature relating to assessing the effectiveness of actions. Generally, this field of study is referred to as a policy or program evaluation.

Is the policy achieving the objectives? That is the question for evaluating effectiveness suggested by Patton et el. (2016) [13]. Dunn (2018) [14] also proposed the similar question, "Has a valued outcome been achieved?" Those are the questions to policy effectiveness as a type of policy evaluation criteria, as it is applied retrospectively (ex post). As Pollit and Geert (2009) [15] put it, effectiveness can be defined as the degree/level that measures the extent of achieving the desired results (outcomes) of output. Therefore, we will seek the facts to determine whether the policy achieves its stated goals, which is eradicating or reducing corruption.

According to Senior (2006) [16], generally, the definition of corruption is only recognized in the economic sphere, while some others try to expose corruption as a moral deterioration, and it must be discussed in terms of philosophical ethics and religion. Moreover, Peters (2019) [17] and Scanlan (2004) [18] regard this issue as a potential human rights violation. In their view, this frame can contribute to closing the implementation gap of the international anti-corruption instruments and can usefully complement the predominant criminal law-based approach. Since this article tends to expose corruption as a moral deterioration, we will also expose some corruption cases in the light of criminal activities and public administration ethics.

Effectiveness evaluation aims to determine the extent to which certain actions have brought, or helped bring about, the desired results. Our research does not attempt to conduct a thorough evaluation of the impact of the policy on corruption. This research used the before-and-after comparison approach in an attempt to identify what changes might have been brought about by the policy [10]. We used some data from existing research and analysis of existing administrative data.

Based on those views, the analysis will be directed to the discussion of the following matters:

1. Describing the spread of corruption in Indonesia and its trend from the year 2004 to 2019 (before and after the UU-KIP implementation), and the most noted case of Criminal Acts of Corruption (*Tindak Pidana Korupsi*, TPK) in the State Civil Administration Servant that will be discussed in ethics term.

2. Comparing the UU-KIP Implementation and The Dynamics of Corruption crime through the years.

III. RESULT AND DISCUSSION

3.1 Number of Criminal Acts of Corruption (*Tindak Pidana Korupsi, TPK*) Before and After UU-KIP Implementation

Every year the Corruption Eradication Commission (*Komisi Pemberantasan Korupsi*, KPK) reports online the Corruption Crime Recapitulation that has made it easier for us to follow the development of corruption cases in Indonesia. The report is divided into five categories, namely the TPK category by Agency, TPK based on Case Type, TPK based on Profession/Position, TPK based on legally binding case, and TPK by Region [19]. First, we present TPK based on the agency with the aim to see its distribution in three branches of government (legislative, executive, and judiciary). Second, we compare it with the monitoring-evaluation result of the KIP implementation in public agency.
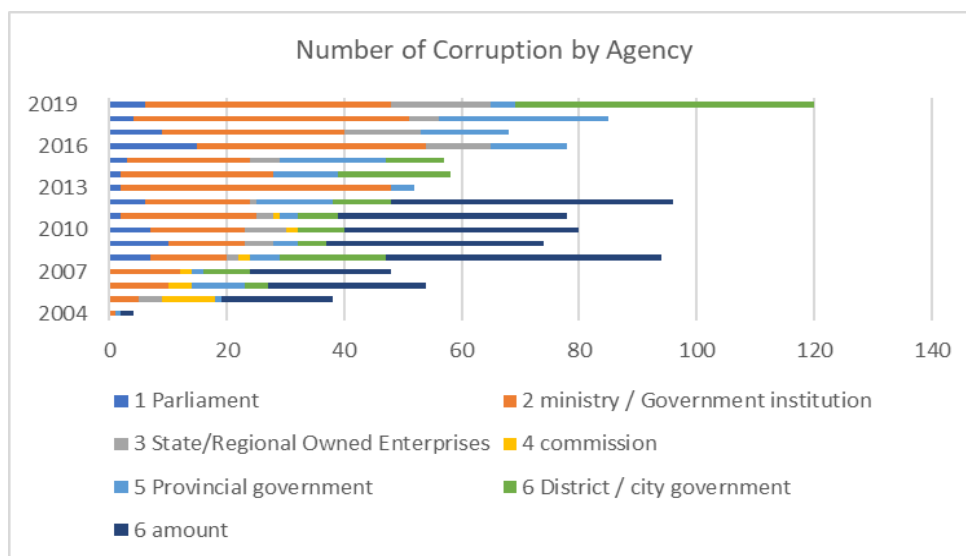

Figure 1. Number of Corruption by Agency
Source: Corruption Eradication Commission (KPK) Report, 2019.

The figure illustrates the map of corruption in public institutions from year to year and its trends. What stands out from the data is that the city/district government ranks highest in the number of TPK cases, although from 2018 to 2019 there was a drastic decline from 114 to 51 cases. The second rank is the TPK at the ministry level which reached 42 cases, although it dropped 5 points from 2018. The Commission Institution occupies the top position as the cleanest public institution from 2012 to 2019, which is zero percent. There is a downward trend in the number of corruption crimes in government institutions in 2019. But on the whole there is a tendency for an increase in the number of criminal acts of corruption after the enactment of the FOI Law in 2010, although there is a downward trend in the number of corruption crimes in government institutions from 2018 to 2019.

How can corruption grow rapidly? We can argue that besides Indonesian collectivism culture being the causes of the spread of corruption as discussed by Jackson (2016) [20] and Hofstede (2017) [21], the phenomena also can be understood from the theory that corruption has contagion effects (Dimant, 2017) [8].
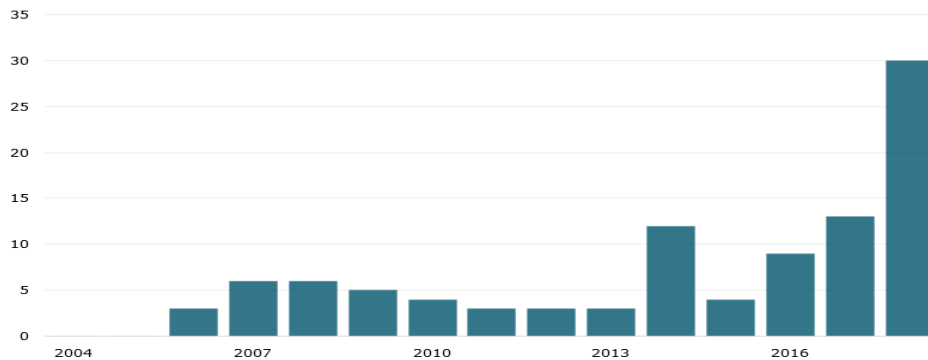
Figure 2. Number of Regents/Mayors entangled in Corruption Cases (2004-2018)
Source: Corruption Eradication Commission (KPK), 2019.

Since its establishment in December 2002 until October 2019, the KPK noted that it had processed 119 regional heads who had stumbled into corruption cases. Although there was a tendency to decrease in number from 2008 to 2013, in subsequent years until 2018, there was an increase in the number of regents/mayors conducting corruption.

The KPK has collected data on a number of agencies and anti-corruption activists [22]. Ministry of Internal Affairs data, for example, shows that the mode of corruption committed by regional heads relates to bribery, budget misuse, misappropriation in the procurement of goods and services, and licensing. In addition, according to the ministry, the cause of regional heads to commit corruption is the behaviour of regional heads and the high cost of local elections. To become a mayor or a regent, it costs Rp20-30 billion, while to become a governor, it ranges from Rp20-Rp100 billion. Research results from the Financial and Development Supervisory Agency (BPKP) in 2016 mentioned the causes of Regional Heads of corruption namely monopoly power, weak accountability, expensive direct local election costs, policy discretion, lack of understanding of regulations, lack of competence in regional financial management, and finally understanding of wrong cultural concept.

3.2 The Most Noted Case: Corruption of State Civil Administration Servants

After the formation of the KPK in 2002, Indonesian government began to show its seriousness to eradicate corruption. Under the leadership of several influential figures who were appointed as chair of the KPK, the organization succeeded in exposing and imprisoning state officials and state servants involved in corruption cases. Among them is the case of Gayus Tambunan who managed to embezzle state's money which incidentally is public money with a fantastic amount. As we know, Gayus is a state civil administration servant (ASN) serving in the Ministry of Finance, specifically in the Directorate General of Taxation where this directorate has the greatest amount of performance allowances compared to other ministries based on Presidential Decree No. 37 of 2015. This is because the government wants to give rewards and appreciation for the achievements of the work of tax employees who have worked with the set tax targets.

The corruption committed by Gayus seized the attention of various groups, ranging from the elite to the lower classes. Gayus who is an ASN with IIIa grade within the Director General of Taxation certainly has more than enough salary and

performance allowances, but he still committed fraud and added to his income in a way that is not commendable. This has led to various speculations whether the fraud committed by Gayus is purely on his own initiative or is there a suggestion from the dominating party? From this case, we can see how the actual quality of human resources in Indonesia, especially ASN human resources who have a major role in realizing good governance in this country?

According to Jackson (2016) [20], Indonesia has a paternalistic culture that thrives in the environment which is then referred to as collectivism. The similar things stated by Hofstede Insight (2017) [21] that Indonesia is identified as a country that has a collectivist culture rather than individualistic. In this research, Indonesia has a low individualistic level (14 out of a scale of 100). In other words, collectivists are the way Indonesians socialize. On the other hand, in the same research, Indonesia has a fairly higher power distance (78 out of a scale of 100). These findings illustrated that the power gap between powerful and powerless parties is still quite big.

Returning to the discussion of organizational culture belonging to the Indonesian state, this organizational culture indeed plays a very large role in making a person or a group behave in daily activities within their organization and it will be clearly seen when making a decision. Organizational culture is the basic pattern accepted by the organization to act and solve problems, shape employees who are able to adapt to the environment, and unite members of the organization. For those reasons, Schein (1992) [23] suggested it must be taught to members, including new members, as a correct way to study, think and feel the problems faced. When a person enters an organization and grows in that organization, that person will behave in accordance with the culture developed in the organization. From there, the quality of human resources can be seen. If an organization leader has good intentions to develop his organization, is charismatic, has good characters, is smart and has a personality as a

leader, then the human resource (HR) under his leadership will have good qualities too. On the contrary, if a leader does not have positive things in leading, his human resources will have poor quality.

In addition to the paternalistic culture that influences someone to commit fraud, there are several other cultures that develop by themselves and do not have an explicit legal basis, but they apply as well as positive law. Becoming an ASN is an ideal thing to be for most people in Indonesia because most ordinary people think that by becoming an ASN, they will be able to have a secure life to their old age, even though at the beginning they will not necessarily get income and position in line with expectations. Starting from this, an instant culture develops that sweeps most ASNs in government agencies. They will try to take the short path to achieve high positions and earn lucrative income, so that cases of fraud emerge not only in the financial sector, but also in other fields. They do not take education to improve their quality, but they will take instant ways that will set them off to reach their goals quickly.

That is part of the portrait of ASN's human resources in our country that the main trigger for committing fraud is the adoption of a negative organizational culture that has taken root. For this reason, a new breakthrough is needed that will restore the roles, duties and functions of the state servant in order to become a valuable asset who will make Indonesia become a country with better governance.

The problem of corruption that arises and occurs among the state servant is also seen as an ethical deviation or moral degradation. From the morality standpoint, that fraud is carried out by state officials where they have the position of responsibility for the welfare of the people they lead, where they are supposed to fight for the country's economy for the welfare of its people. Instead, they steal people's property. This corruption has taken root and is ingrained from the lower level of apparatus to the

apparatus of policy makers.

Meanwhile, Hoggard (2004) [24] saw the issue from the perspective of public participation. In his research in Colombia, he asserted that access to government information is crucial for civil society participation. Unfortunately, the dissemination of important information by public officials is often limited, and the participation in the process becomes meaningless. Aside from fears of retaliation, there was evidence that lack of information and the government's failure to educate people about surveillance methods hamper the role citizens can play in preventing corruption. Similar thing happened in Nigeria (Suntai & Targema, 2018) [25] although the residents of the surveyed population are aware of the existence and stipulations of the FoIA, the Act has not been effectively utilized to eradicate corruption due to fear of harassment and intimidation. Not to mention corruption among journalists who are after 'brown envelope' and personal interests.

3.3 UU-KIP Implementation and The Dynamics of Corruption

The implementation of UU-KIP is considered important to be monitored and evaluated with the aims, among others, to realize good governance, which is transparent, effective and efficient, and accountable. As Roge and Lennon (2018) [26] found in a Danish Municipalities case, that there was an inadequacy of implementing the Performance Measurement System (PMS) in the public sector, and it should stress the importance of practitioners who take measurement of efficiency and effectiveness seriously if PMS is intended to provide internal transparency, and how important it is to fight corruption through the role of information.

For that reason, each year the Information Commission (*Komisi Informasi*) organizes a ranking of public agency performance based on the results of monitoring and evaluation of UU-KIP implementation. The commission began evaluating

and ranking public bodies since 2011, a year after the FOI Law implemented [27]. Until 2015, public bodies ranking 1 to 10 will be announced and given awards. The categories of public bodies are divided into six types, namely: 1) Ministry Public Agencies Category, 2) Public Agencies/Institutions Category, 3) Provincial Public Agencies Category, 4) State-owned enterprises (BUMN) Category, 5) National Political Party Category, 6) Category of State Universities.

Since 2016, the commission has changed the measurement method. The ranking is divided into five categories namely: informative agencies or green zones, towards informative agencies or around yellow, less informative agencies or red zones and not informative agencies or black zones [28]. Evaluation and ranking of Public Information Openness in its assessment uses indicators namely the implementation of four obligations mandated by laws and regulations related to public information disclosure, namely the obligation to publish public information, the obligation to provide public information at any time, the obligation to form and support the existence of Information and Documentation Management Officials (PPID), and the obligation to formulate and implement operational standards for public information services. Therefore, we cannot present the time series data as the same as figure 1 (data of the Number of Corruption by Agency) from 2011 to 2019 because the commission presented different measurement method.

Table 1. Ranking of Public Agencies in UU-KIP Implementation

No.	Public Agency Category	2016	2017	2018	2019
1	Informative agency	1.56%	3.33%	14.42%	27.20%
2	Towards informative agency	56.25%	48.33%	34.62%	30.40%
3	Quite informative agency	18.75%	38.33%	50.96%	42.40%
4	Less informative agency	17.19%	8.33%	0%	0%
5	Uninformative agency	6.25%	1.68%	0%	0%

Source: Analyzed from Information Commission Data.

The table shows that, in general, in the last four years, the public bodies have moved forward to become a more informative or transparent government. Even in 2018 and 2019 there were no more public agencies that were categorized as uninformative or black zones. Most have reached the "towards informative" and "quite informative" levels, while public agencies that have reached the "informative" level have been increasing in the last four years.

Although it is difficult to determine trends due to fluctuations each year over a long period of time as shown in figure 1, we can conclude there has been an increasing tendency number of criminal acts of corruption after the enactment of the FOI Law in 2010, while on the other side there has been an increase in the number of informative/transparent public institutions.

This finding confirms other earlier studies conducted by other researcher in other countries like, Vadlamannati & Cooray (2017) [3], Hoggard (2004) [24], and Suntai & Targema (2018) [25] that FOI failed to be an effective tool for anti-corruption. As Lindstedt and Naurin (2010) [29] have affirmed, just making information available is not a guarantee in preventing corruption if conditions of publicity and accountability, such as education, media circulation, and free and fair elections are weak. So, there are many factors that can hinder the successful implementation of FOI policy in eradicating corruption as stated by Hudson et al (2019) [2] such as overly optimistic expectations, implementation in dispersed governance, inadequate collaborative policy making, and the vagaries of the political cycle.

IV. CONCLUSION

As another sad case of corruption, Indonesia FOI policy (UU-KIP) does not work effectively in eradicating corruption. Although there is a tendency to decrease in the number of corruption crimes in government agencies from 2018 to 2019, we cannot conclude that it is influenced by the KIP policy. Various reasons might hinder the success of this policy in reducing corruption, such as contagion effects and collectivism culture.

But, of course, further testing is still needed through various studies to confirm this finding. Evaluation on the policy's content, implementation, or impact can improve the existence of the KIP as a public policy and builds the evidence base for continuing to use the policy as an anti-corruption promotion strategy. In order to make the UU-KIP policy work effectively in tackling corruption, the policy analysts may wish to give some recommendations along the following lines:

1. Performing measurement and comparison before andr after the implementation of the UU-KIP in the dynamics of corruption behaviours. The approach could be quantitative (to ensure the influence of UU-KIP on eradicating corruption) or/and qualitative such as expert interviews, asking those who designed, implemented, and evaluated the policies as well as those who benefited from them.

2. Various other regulations are expected to support the eradication of corruption such as, among others, Government Regulation No. 72 of 2019 regarding Amendment, to Government Regulation 18 of 2016 concerning Regional Apparatuses, which attempts to strengthen the Government's Internal Supervisory Apparatus (APIP) in carrying out its functions. This regulation can also strengthen regional corruption prevention systems. APIP's accountability will be increased. APIP at the district or city level is responsible to the governor, whereas those at the provincial level to the Ministry of Home Affairs.

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