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OPEN DATA AND THE FIGHT AGAINST CORRUPTION IN INDONESIA

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EXECUTIVE SUMMARY



The research findings show that the government of Indonesia puts the disclosure of public information at the front and centre of both its open government and anti-corruption agenda, which is consistent with the first of the G20 Anti-Corruption Open Data Principles. The current legal frameworks lack the proactive disclosure and openness components advocated by the open data principles, however.

Apart from the more specific One Data and One Map, Indonesia does not have a clear general open data policy that can be implemented. There are structures in place through the Law on the Disclosure of Public Information (DoI) that can serve as proxies to support open data implementation once the government makes such an explicit commitment. The existence of conflicting regulations, a lack of clear procedures, an unclear strategy for data management practice and an inadequate number of trained staff often hinder effective efforts to provide public access to government data, however. Furthermore, each government agency is, effectively, working in isolation. Overall, these limitations affect Indonesia's performance in terms of data accessibility, timeliness, usability and interoperability.

Indonesia's Open Government Partnership (OGP) National Action Plan and the anti-corruption strategy both include public access to information as their key element. The use of public information for anti-corruption activities is part of the country's National Strategy on Corruption Prevention and Eradication (Nastra CPE). The current Nastra CPE also has objectives, activities and monitoring practices related to open government.

Domestically, there has been an effort to create enabling open data ecosystems, with civil society organisations (CSOs) and tech communities playing the leading role. The vision to encourage them to open up their data has not been translated into a real strategy, however. Internationally, the government of Indonesia is actively sharing open data anti-corruption technical expertise and experience with other governments and international organisations.

KEY FINDINGS



Based on the assessment of the extent to which the Indonesian government is meeting its commitments in the G20 Principles, the following are distilled as broad, cross-cutting findings.

- 1** Indonesia has comprehensive legal and institutional frameworks that guarantee citizen rights to access public information. Nevertheless, the lack of clear procedures and adequately trained staff and the existence of conflicting regulations hinder both access to and the reuse of public information.
- 2** Although there is a strong legal framework for public access to information, there are no comparable formalised mechanisms governing open data in Indonesia. The initiative that comes closest to meeting the criteria of an open data policy is the Indonesian One Data policy, including geospatial data with the One Map policy. It is not clear, however, whether the principle of open data will be integrated into the draft of the Presidential Regulation on E-Government, which will also include regulation on the One Data policy.
- 3** On the corruption prevention and eradication policy framework, the first and the second National Strategies acknowledged the importance of public access to information to support the fight against corruption. Apart from the budget, company register and public procurement data, however, access to key anti-corruption datasets remains limited.
- 4** Implementation of the National E-Government Master Plan and the five-year plan for ICT development (2015–2019) should help to address the data infrastructure gaps. In a similar way, the One Data policy will provide a common framework for data management guidelines for public institutions to improve data quality, interoperability and integration, including provisions on data licensing and formats.
- 5** The growing role of citizens and CSOs since the beginning of the reform era in 1998, may potentially have the greatest impact in reducing corruption. There is a need to establish guidelines for citizen participation and support the capacity development of the CSOs, however, so as to take full advantage of open data, anti-corruption activists in their advocacy work. There is also a need to explore the use of alternative channels for data and information sharing and to get citizens' feedback on published data.

PREFACE



In recent years there has been an increase in the availability of open data – data that can be freely used, modified and shared by anyone for any purpose.¹

Open government data is emerging as an important tool in the fight against corruption in that, by enabling increased transparency in terms of government activities, budgets and expenditures, it becomes an important ingredient in various accountability interventions. There is demand for government to open up more data and processes to improve information disclosure and transparency, to facilitate public scrutiny and to allow for information that is easier to work with and compare, which should reduce the mismanagement and misallocation of resources and help secure a fair deal for governments and citizens.

In 2015 the G20 Anti-Corruption Open Data Principles² (hereafter G20 Principles) were adopted as a first step towards leveraging open data as a crucial tool to enable a culture of transparency and accountability in order to address corruption. It was agreed to follow a set of principles, based on the International Open Data Charter,³ to enhance access to, and the release and use of, government data so as to strengthen the fight against corruption. As is the case with international standards, what is crucial now is to ensure that these G20 Principles do not solely remain lofty words on paper but are translated into national-level policy and practice across the G20 countries.

The purpose of this report is to assess the extent to which Indonesia is meeting its commitments to fighting corruption by applying and implementing the principles and actions set out in the G20 Principles. This is one of five reports; others have been compiled for Brazil, Germany, Indonesia and South Africa.

The purpose of the five-country study is to gain a better understanding of how different countries are performing in terms of implementing the G20 Principles, and to highlight how these principles can be implemented so that open data becomes an effective tool in the fight against corruption. It also seeks to present selected examples of good practice in the use of open data to combat corruption.

¹ See <http://opendefinition.org>.

² See www.g20.utoronto.ca/2015/G20-Anti-Corruption-Open-Data-Principles.pdf.

³ See <http://opendatacharter.net/history>.

METHODOLOGY OF THE STUDY⁴



This study establishes a baseline regarding the implementation of the G20 Anti-Corruption Open Data Principles, which were adopted in 2015. The main goals of the analysis are to find answers to the following questions. How much progress have G20 governments made in implementing open data as part of an anti-corruption regime? What are the main national government policies and practices for open data and anti-corruption? And where is there room for improvement in moving towards the Principles?

The G20 Principles commit governments to data that should be as follows:

1. Open by Default
2. Timely and Comprehensive
3. Accessible and Usable
4. Comparable and Interoperable
5. For Improved Governance and Citizen Engagement
6. For Inclusive Development and Innovation

For each principle, the specific global commitments made by the G20 have been turned into questions that can measure anti-corruption policies and practices. There are 35 questions in total, including both general questions and specific questions for ten datasets that have been identified as key to anti-corruption efforts. For the questions directed at anti-corruption datasets, binary responses have been created, enabling us to score performance.

The key anti-corruption datasets are the following:

1. Lobbying Registers
2. Company Registers
3. Beneficial Ownership Registers
4. Directories of Public Officials
5. Government Budget Records
6. Government Spending Records
7. Public Procurement Records
8. Political Financing Records
9. Legislative Voting Records
10. Land Registers

Five countries were selected; each has its own report and there is also a summary report. The five countries represented a variety of G20 economies from around the world but included countries whose international leadership has or will be in the spotlight, via the G20 presidency or the Open Government Partnership chair, for instance. For this reason, it can be expected that they have a keen interest in implementing open data for anti-corruption purposes.

To carry out these studies, consultant researchers with both open data and corruption expertise were hired for each country report. The research consists of both desk research and key informant interviews. The Web Foundation and Transparency International have guided the research process and provided relevant materials to support the process.

⁴ For full methodology, please see <https://www.transparency.org/whatwedo/publication/7666>

ANTI-CORRUPTION DATASETS



For the purposes of this study, the following datasets are used as proxy indicators of whether anti-corruption commitments have been translated into open data practice.

- 1** Lobbying register: Containing a list of registered lobbyists, details of who they are lobbying, and who they are lobbying on behalf of.
- 2** Company register: Containing a list of every company legally registered to operate within a jurisdiction. It should include information on when companies were formed and whether they are still active, as well as including details of company directors.
- 3** Beneficial ownership register: Containing the natural person or persons who are the beneficial owner(s) of an asset, including at a minimum the beneficial ownership of companies or land.
- 4** Directories of public officials: Containing a list of all public officials above a certain level of seniority, along with details of their role.
- 5** Government budget: Including national government budget at a high level (e.g. spending by sector, department, sub-department, etc.).
- 6** Government spending: Records of actual national government spending at a detailed transactional level; at the level of month to month government expenditure on specific items (usually this means individual records of spending amounts under \$1m or even under \$100k).
- 7** Public procurement: Details of the contracts entered into by the national government.
- 8** Political financing: Containing data on the financial contributions received by a politician and/or a political party.
- 9** Voting records: Containing registers on individual votes in Parliament (including session, chamber and law category such as amendment, new bill, nomination, etc.).
- 10** Land register: Including national-level information on land ownership, tenure and location.

The findings for Indonesia are presented below, and are based on an assessment as outlined in the methodology.¹



INDICATOR	Dataset Online	Timeliness	Granularity	Formats	Openness	Accessibility	Open Standards	Metadata	Documentation	TOTAL DATASET SCORE
Lobbying registers	X	X	X	X	X	X	X	X	X	0
Company registers ^{II}	✓	X	X	✓	X	✓	✓	✓	X	5
Beneficial ownership	X	X	X	X	X	X	X	X	X	0
Public officials	X	X	X	X	X	X	X	X	X	0
Government budget ^{III}	✓	✓	✓	✓	X	✓	✓	X	✓	7
Government spending	X	X	X	X	X	X	X	X	X	0
Public procurement ^{IV}	✓	✓	X	X	X	✓	X	X	X	3
Political financing	X	X	X	X	X	X	X	X	X	0
Voting records	X	X	X	X	X	X	X	X	X	0
Land registers	X	X	X	X	X	X	X	X	X	0

I See <https://www.transparency.org/whatwedo/publication/7666>

II <http://data.go.id/dataset/direktori-perusahaan-industri-indonesia>

III <http://www.data-apbn.kemenkeu.go.id/Dataset/Details/1019>

IV <https://www.lpse.kemenkeu.go.id/eproc/lelang>



COUNTRY OVERVIEW

OPEN DATA AND CORRUPTION IN INDONESIA



Corruption

Corruption prevention and eradication (CPE) have become two of the main focuses of the government of Indonesia following the reform era. The determination to carry out CPE began with the establishment of new implementing agencies and the consolidation of government policies and through community awareness.

Taking bold action after ratification of the United Nations Convention against Corruption (UNCAC) in 2003,⁵ Indonesia enacted the Law no. 7 of 2006,⁶ which mandated the establishment of several implementing agencies and institutions in support

of CPE, including the Corruption Eradication Commission (KPK), the Financial Transactions Analysis and Report Center (PPATK) and the Witness and Victim Protection Agency (LPSK).

Since 2004 the government has formulated two National Strategies for Corruption Prevention and Eradication^{7,8,9} in order to provide direction for the various CPE efforts to all the stakeholders. The first Nastra CPE focused on prevention through the redesign and improvement of public service performance. The strategy also prioritised enforcement action in five development sectors that have been prone to irregularities: (1) business licensing; (2) taxes and custom; (3) land registration; (4) law enforcement; and (5) labour and employment. In the second Nastra CPE¹⁰ the long-term vision (2012–2025) is ‘to create an anti-corruption nation that is supported by a system of cultural values with integrity’.

5 United Nations Office on Drugs and Crime, *United Nations Convention against Corruption* (Vienna: United Nations Office on Drugs and Crime, 2004), www.unodc.org/documents/treaties/UNCAC/Publications/Convention/08-50026_E.pdf.

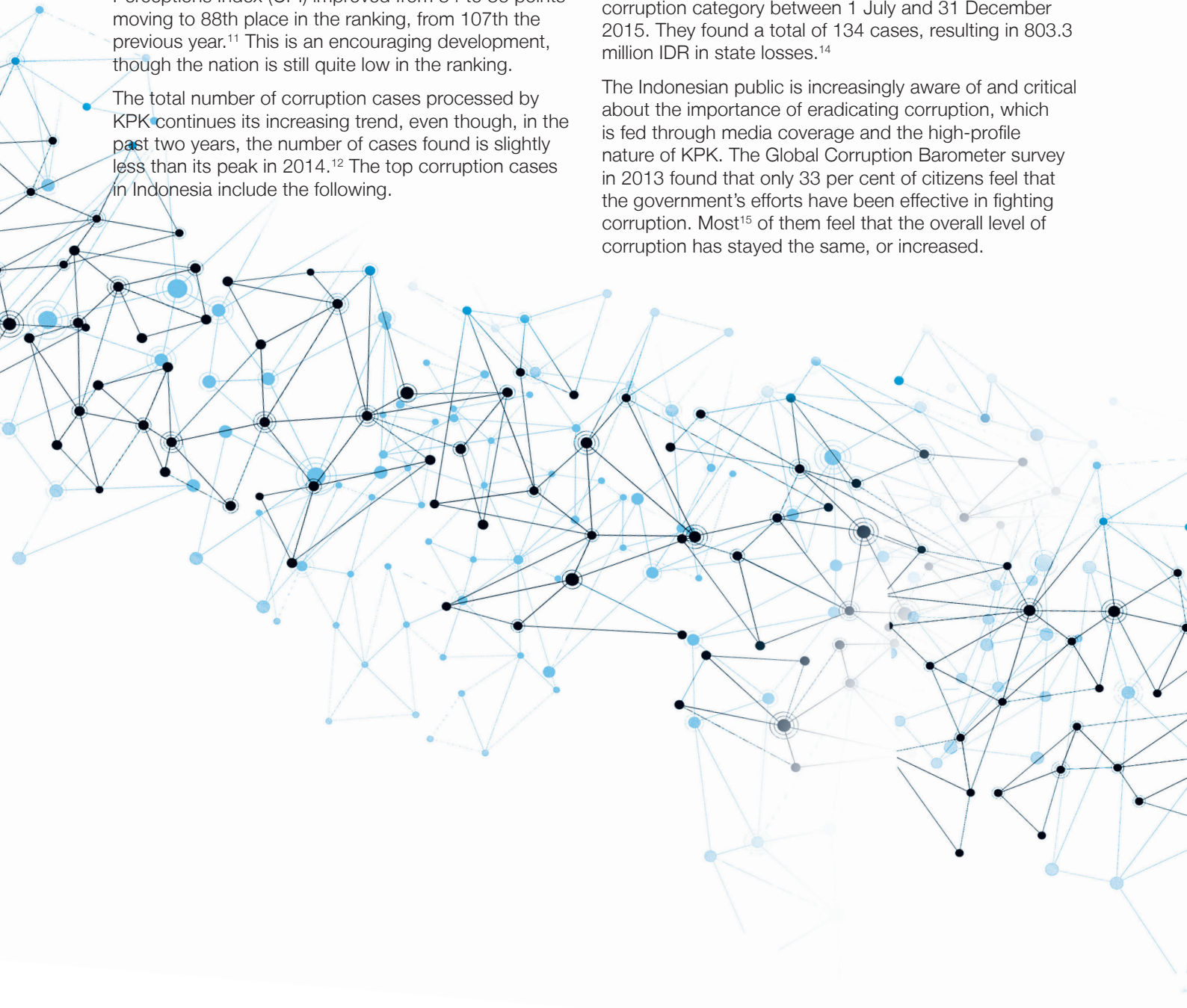
6 See www.kemendagri.go.id/produk-hukum/2006/04/18/undang-undang-no-7-tahun-2006.

7 See www.hukumonline.com/pusatdata/detail/20071/node/632/inpres-no-5-tahun-2004-percepatan-pemberantasan-korupsi.

8 See www.setneg.go.id/index.php?option=com_perundangan&id=2818&task=detail&catid=5&Itemid=42&tahun=2011.

9 Ibid.

10 Ibid.



The administration of President Joko Widodo (Jokowi), elected in 2014, has reinforced Indonesia's commitment to CPE by issuing Presidential Instruction no. 10 of 2016 on the Prevention and Eradication of Corruption 2016–2017. The regulation includes 31 action plans within seven high-priority areas according to the president's programmes, namely: (1) public procurement; (2) extractive industry; (3) infrastructure; (4) the private sector; (5) state revenue; (6) commerce; and (7) state-owned companies.

Indonesia's score in the 2015 global Corruption Perceptions Index (CPI) improved from 34 to 36 points moving to 88th place in the ranking, from 107th the previous year.¹¹ This is an encouraging development, though the nation is still quite low in the ranking.

The total number of corruption cases processed by KPK continues its increasing trend, even though, in the past two years, the number of cases found is slightly less than its peak in 2014.¹² The top corruption cases in Indonesia include the following.

Bribery, especially in the extractive and infrastructure sectors,¹³ is the top corruption case in Indonesia.

Public procurement is a high-risk sector that is consistently among the top three cases handled by KPK; more than 30 per cent of the state budget is spent in the sector, which results in a significant loss of public money.

Budget mismanagement is also among the highest categories of corruption cases in Indonesia. A report compiled by Indonesian Corruption Watch (ICW) for all alleged cases being examined by the police, prosecutors and KPK shows budget mismanagement as the highest corruption category between 1 July and 31 December 2015. They found a total of 134 cases, resulting in 803.3 million IDR in state losses.¹⁴

The Indonesian public is increasingly aware of and critical about the importance of eradicating corruption, which is fed through media coverage and the high-profile nature of KPK. The Global Corruption Barometer survey in 2013 found that only 33 per cent of citizens feel that the government's efforts have been effective in fighting corruption. Most¹⁵ of them feel that the overall level of corruption has stayed the same, or increased.

11 See www.transparency.org/cpi2015/#results-table.

12 According to Law no. 30 of 2002, KPK is authorised to investigate, interrogate, and prosecute only those corruption offences that inflict a minimum of 1 billion IDR in state losses.

13 See <http://acch.kpk.go.id/id/statistik/tindak-pidana-korupsi/tpk-berdasarkan-jenis-perkara>.

14 See <http://nasional.kompas.com/read/2016/02/24/17044021/ICW.Sepanjang.Tahun.2015.Anggaran.Negara.134.Kali.Dikorupsi>.

15 73 per cent of the people, based on a survey for the period from 2007 to 2010.

Open data

While there is a strong legal framework for public access to information, there are no similar formalised mechanisms governing open data in Indonesia. In the absence of an independent national strategy and policy framework, open data has, instead, been framed within the broader agenda of the Law on the Disclosure of Public Information, the One Data policy and the Open Government Partnership (OGP), of which Indonesia was one of the eight founding members.¹⁶

- Law no. 14 of 2008¹⁷ on the Disclosure of Public Information (Dol) is the legal basis for ensuring citizens' right to access public information. This law was effectively implemented in 2010 with the issuance of Government Regulation no. 61 of 2010.¹⁸ The Dol law requires the establishment of Information Commissions at the national, provincial and district/municipal levels. It also mandates the appointment of information and documentation officers in charge of information services.
- The implementation of the One Data policy basically aims to improve internal data management practices, including geospatial data within government agencies, along with providing a guideline to the standardised publication of the data. It is not clear, however, whether the principle of open data will be integrated into the draft of the Presidential Regulation on E-Government, which will also include regulation on the One Data policy.

- The Indonesian OGP National Action Plan 2016–2017¹⁹ also focuses on increasing the availability and effective use of open datasets for the subnational governments. In addition to the existing national open data platform, which is one of the action plan commitments, some other subnational governments also have their own data portals.

Moreover, citizens' access to public information is also crucial to the CPE strategy. The first and the second Nastra CPEs have both emphasised empowering the community as part of the corruption eradication process by creating a culture that upholds the principle of 'the rule of law'. Current regulation gives certain rights to the public to obtain responses from the authorities in respect of complaints or information provided to the authorities. It also tries to give protection to citizens who offer information.²⁰

There are several encouraging signs of government and civil society readiness, helping propel Indonesia to the 40th position out of the 92 countries surveyed in the 2015 edition of the Global Open Data Barometer.²¹ The open data movement has started to gain some traction as a stand-alone concept in the country, even though the concept of open data is still relatively unknown to most Indonesians.²²

¹⁶ See www.opengovpartnership.org/country/indonesia.

¹⁷ See www.peraturan.go.id/uu/nomor-14-tahun-2008.html.

¹⁸ See www.setneg.go.id/index.php?option=com_perundangan&id=2582&task=detail&catid=3&Itemid=42&tahun=2010.

¹⁹ OGP, 'Open Government Indonesia Action Plan 2016–2017', www.opengovpartnership.org/sites/default/files/Indonesia_Annex-I_NAP_2016-2017_ENG.pdf.

²⁰ See Law no. 31 of 1999 (later replaced by Law no. 20 of 2001), which was further elaborated in Government Regulation no. 71 of 2000 on Procedures for Implementation of Public Participation and Provision of Appreciation in the Prevention and Eradication of the Criminal Act of Corruption.

²¹ See <http://opendatabarometer.org/data-explorer>.

²² World Wide Web Foundation, *Open Government Data: Readiness Assessment Indonesia* (Washington, DC: World Wide Web Foundation, 2013), http://labs.webfoundation.org/wp-content/uploads/2014/12/OGD_Indonesia.pdf.



OPEN DATA PRINCIPLES

IMPLEMENTATION OF THE G20 PRINCIPLES



Along with the other G20 countries, in 2015 Indonesia adopted the G20 Principles, which recognise open data as a crucial tool to enable a culture of transparency, accountability and access to information and to prevent corruption more effectively. The G20 Principles are based on the International Open Data Charter,²³ which Indonesia has not yet adopted.

The following assessment provides an overview of country progress on setting out policies that support the commitments contained within each of the six G20 Principles. A common methodology²⁴ has been used that looks at the different elements contained within each of the principles.

Principle 1: Open Data by Default



The ‘open by default’ principle commits each G20 government to proactively disclose government data unless certain exceptions apply. The principle goes beyond transparency, as it requires the proactive provision of reusable data from its source in order to increase access in equal terms for everyone while at the same time assuring the necessary protection of personal data in accordance with existing laws and regulations.

²³ See <http://opendatacharter.net>.

²⁴ The methodology was developed by the Web Foundation and Transparency International: see <https://www.transparency.org/whatwedo/publication/7666>

Existing open data policies

Although Indonesia has a robust legal and policy framework concerning public access to government data, some provisions in the law still limits proactive disclosure of key anti-corruption datasets.

Apart from One Data and One Map, Indonesia does not have a clear open data policy that can be implemented. There are structures in place, however, through the disclosure of public information law, that can serve as proxies to support open data implementation (once the government makes such an explicit commitment). In fact, article 9 of the DOI law mandates public institutions to publish information concerning their activity and organisational performance at least once every six months.

As a result, this common information is widely available. The DOI law does not specify other details, however, such as the formats or licensing policy for the published data, leading to different practices and regulations among the agencies that are not always compatible with the open data principles. The development of the One Data policy is aimed at addressing these issues.

Exceptions to the ‘open by default’ principle

To some extent, the classified information specified in the DOI law covers a broad range of issues, and is therefore open to different interpretations.

Article 17 of Indonesia’s DOI law specifies a broad list of classified information that cannot be disclosed due to security or law enforcement concerns. The list refers to public information that, when opened up and supplied to the public,

1. could obstruct the process of law enforcement;
2. may disturb protection of the right to intellectual property and protection from unhealthy business competition;
3. may be hazardous to the defence and security of the state;
4. could reveal the natural wealth of Indonesia;
5. may be harmful to national economic security;
6. may be detrimental to diplomatic relations;
7. may reveal the contents of an authentic personal deed and the last will or testament of an individual; or
8. may reveal a personal secret.

Other information that can also be considered classified is

9. a memorandum or letters between the public agencies or among the public agencies that, based on their nature, are confidential, except for decisions by an Information Commission or the courts; and
10. information that may not be disclosed under the law.

The list of categories above shows that classified information covers a broad range of issues and is, therefore, prone to different interpretations. For example, there could be different interpretations as to whether a procurement contract should be considered classified information or not, since it may be regarded as an ‘agreement between a public agency and a third party’, but the content of the contract may be a violation of the right of intellectual property, which then should be considered as classified information.

Open data practice

There are several encouraging signs of government readiness for open data, despite the lack of progress in terms of implementation.

Indonesia has a national open data portal (data.go.id) coming from one of the commitments included in the National Action Plan for the Open Government Partnership. The portal currently publishes data from 32 government agencies. Progress in making truly open data available online and in machine-readable and reusable format remains slow, however.

There are also a number of open data initiatives launched by city or provincial governments. Notably, Jakarta, the capital city, now has an open data portal (data.jakarta.go.id). Similarly, the cities of Banda Aceh (<http://data.bandaacehkota.go.id/>) and Bandung (<http://data.bandung.go.id/>) also have their own open data catalogues. Other cities, such as Bandung and Bojonegoro do not have their own open data portals yet, but have published their data directly on the national one.

ICT infrastructure to support the publication of and access to government data

The availability of good and reliable information and communication technologies (ICT) infrastructure to facilitate data-sharing and information exchanges varies between government institutions and regions.

The availability of good and reliable ICT infrastructure to support data management, including data-sharing and publication, is still limited. A survey²⁵ conducted by the Ministry of Communication and Informatics in 2013 showed that only 40 per cent of the national government agencies have a data centre. Many of these data centres are decentralised, even within a single ministry.

Another challenge faced by Indonesia regarding the promotion of online access to government data is responding to the digital divide in the country. According to the International Telecommunication Union, in 2015 internet penetration in Indonesia stood at only around 22 per cent of the total population.²⁶ In addressing this issue, the five-year plan for ICT development (2015–2019) focuses on broadband access, and aims to connect 100 per cent of public institutions and 71 per cent of households by the end of 2019.

Open data for anti-corruption skills at the national level

There is no specific open data training programme available for government staff, much less anything specifically tailored for anti-corruption activities.

There are, however, some more general training programmes and initiatives related to data management and analytics. For example, the One Data team provides training on data discovery with a series of sessions focused on how to identify and prioritise data release, with the participation of the ministries and local governments that are publishing on the national open data portal.²⁷

Subnational anti-corruption awareness programmes

Corruption cases in local government remain high, suggesting that the necessary steps have been taken to increase awareness of anti-corruption at the subnational level.

According to the report²⁸ published by KPK for the period from 2004 to November 2015, 17 governors and 49 mayors and regents were arrested for corruption activities. Several preventive mechanisms have been implemented to prevent future corruption activities.

Besides the CPE strategy at the national level, the subnational governments have developed action plans based on the National Strategy for Corruption Prevention and Eradication. Some of these plans highlight innovative actions and policies to curb corruption activities at the local government level.²⁹

Finally, in relation to its supervisory role, KPK also has a mentoring programme for the subnational governments. In 2016 the programme³⁰ focused on the three provincial governments with the highest number of corruption cases: Banten, Riau and North Sumatra. KPK has also published a handbook³¹ on corruption prevention for the subnational governments.

Data protection laws

At present, there is no data protection law established in Indonesia.

Nevertheless, a draft version of a personal data protection law was introduced in 2015.³² The draft is still under an ongoing public discussion coordinated by the Ministry of Communication and Informatics. The final draft of the law is expected to be sent to parliament in 2017.³³

Currently the policy to promote data protection is spread between other various laws and regulations. In general, the state constitution of 1945 guarantees the human rights of the citizen of Indonesia.³⁴ In addition, the disclosure of public information law includes personal data in the list of exemptions of public information (article 17).³⁵

25 I. D. Anggono, 'eGovernment Indonesia Update: 2015–2019', www.unosd.org/content/documents/1114eGovernment%20Indonesia%20update%20for%20UN%20-%20Seoul%2024-28%20Maret%202015.pdf.

26 See www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx.

27 See <http://data.go.id/konten/one-data-adakan-forum-data-indonesia>.

28 See <http://kpk.go.id/id/publikasi/laporan-tahunan/3369-laporan-tahunan-kpk-2015>.

29 See, for example, the actions of the city government of Bandung (in Indonesian): <https://portal.bandung.go.id/storage/konten-lama/download/4a.tw1.pdf>.

30 See www.kpk.go.id/id/tentang-kpk/9-uncategorised/3549-renaksi-2016.

31 See <https://acch.kpk.go.id/id/documents/10180/11263/Buku%20Putih%20Kepala%20Daerah-KPK.pdf/25a65bce-12bd-4801-ae6f-5b30fa814b9e>.

32 See www.elexica.com/en/legal-topics/data-protection-and-privacy/31-indonesia-data-privacy-regulation-is-on-its-way.

33 See www.mediaindonesia.com/news/read/58592/dpr-sambut-ruu-perlindungan-data-pribadi/2016-07-28.

34 See <http://peraturan.go.id/uud/nomor-tahun-1945.html>.

35 See <http://peraturan.go.id/uu/nomor-14-tahun-2008.html>.

Moreover, the collection and use of personal data are also regulated by other laws for some specific sectors, such as in the case of telecommunication and information technology.^{36, 37}

Right to information legislation

Law no. 14 of 2008 on the Disclosure of Public Information (Dol) guarantees the right of citizens to access public information.³⁸

Indonesia's Dol law applies not only to any governmental organisation (executive, legislative, judiciary or others) but also to all non-governmental ones that receive funds from the state budget and/or the regional budget, as well as foreign contributions. According to the Global Right to Information (RTI) rating, Indonesia ranks 31st out of 111 countries globally, scoring 101 points out of a possible total of 150, though there are still various issues when it comes to implementation.

As mandated by the law, dedicated agencies called the Information Commissions are to be established at all government levels³⁹ to adjudicate in disputes regarding requests for information. The Dol law also mandates the appointment of an information and documentation officer (PPID) in charge of information services for each public institution. Progress has been slow, however; only five provinces out of the total of 34 have already established their Information Commission⁴⁰ and only around two-thirds of the total national and subnational agencies have established PPID offices so far.

Principle 2: Timely and Comprehensive Data



Principle 2 of the G20 Principles commits a government to identify and publish key high-quality and open datasets. Publication of the data should be informed by actual demand and identified through ongoing public consultation. The principle also encourages a government to apply a consistent dataset management strategy according to the open data principles. Such data openness, it is suggested, will allow a better understanding of government processes and policy outcomes in as close to real time as possible.

Online availability of key anti-corruption datasets

The findings show that only three out of ten key anti-corruption datasets are available online in some form. These three are the company register, the government budget and public procurement.

Data on the company register is available from several sources. Industrial enterprises are available from the website of the Ministry of Industry⁴¹ and the national open data portal. The website of the Ministry of Trade also provides a basic list of publicly traded companies⁴² but a more comprehensive one is available on the website of the Indonesia Stock Exchange (IDX).⁴³ The website now provides a list of the 537 publicly traded companies registered on IDX, including details on contact, directors, commissioners, shareholders and financial reports. The Directorate General of General Law Administration⁴⁴ also provides a database of all registered limited companies, but complete registration, with an access fee, is required.

36 See <http://peraturan.go.id/uu/nomor-11-tahun-2008.html>.

37 See www.setneg.go.id/index.php?option=com_perundangan&id=3777&task=detail&catid=3&Itemid=42&tahun=2012.

38 See <http://peraturan.go.id/uu/nomor-14-tahun-2008.html>.

39 Case reviews can still be carried out by the provincial Information Commissions, so establishing Information Commissions at the city level might not be necessary on all occasions.

40 See www.komisiinformasi.go.id/category/view/ki-provinsi.

41 See www.kemenperin.go.id/direktori-perusahaan.

42 See www.kemendag.go.id/id/perdagangan-kita/company-directory/data-center-collection.

43 See www.idx.co.id/id-id/beranda/perusahaantercatat/profilperusahaantercatat.aspx.

44 See <https://ahu.go.id/pencarian/profil-pt>.

Government budget data is available from the website of the Ministry of Finance (MoF).⁴⁵ The same data is also available via the open data budget portal,⁴⁶ launched as recently as September 2016, including thematic budget data for various sectors as well as infographics.

Finally, citizens can find information about public procurement through various online systems. Information about procurement plans is available on the Public Procurement Planning System⁴⁷ (SiRUP). Information on any available open tender is also available at INAPROC,⁴⁸ the national open tender portal, which links to a specific e-procurement system maintained by each of the units at local governments or ministries.⁴⁹ This e-procurement system provides a summary of information about the tender announcement and the contract award.

Timeliness of available key anti-corruption datasets

Among the three available datasets, the government budget and public procurement data are the only ones that appear to be published in a timely manner.

Budget data is regularly updated and posted on the Ministry of Finance's website at the beginning of each fiscal year, while all procurement-related data is updated in real time.

In contrast, there is no indication that any updating process is regularly conducted for the company register dataset. The Ministry of Trade and the Ministry of Industry websites both fail to provide any evidence of a regular updating process.

Granularity of the data

Only one of the three currently available key anti-corruption datasets provides granular data.

Only the government budget data is available at the finest level of granularity, though admittedly it is a critical one, given that budget mismanagement is among the top three corruption categories according

to KPK. The available budget data includes information on tax and non-tax revenues, and budget allocation per organisation, function and sub-function. It also provides the total amounts of budget transfers to local governments, including the total budget for the village fund.⁵⁰ In a similar way, monthly reports of government spending are also available, however, not at a detailed transactional level. Interviews with KPK⁵¹ and CSOs⁵² reveal that the granularity of the spending data is not enough for preventing corruption activities.

Feedback loops

At present, there is no formal mechanism to provide feedback on any official data published by government.

Some regulations at the local level, such as the Jakarta Governor Regulation no. 181 of 2014, have mandated the formation of data forums, including government officials in charge of data management, experts, practitioners, CSOs and the private sector. The forum members can provide suggestions on how to improve data management practices within the local government agencies. There is no clear evidence as to whether these actions have been implemented.

Data management

Currently there is no official strategy for the management of government data in Indonesia.

There are no standard data management practices applied across government agencies in Indonesia at present. Making matters worse, each agency works in isolation, developing its own data management practices, given the lack of a clear strategy for data-sharing and collaboration. The implementation of the One Data policy aims to improve internal data management practices by providing guidelines for the standardised publication of the data.

45 <http://www.kemenkeu.go.id/katalogdata>

46 <http://www.data-apbn.kemenkeu.go.id/>

47 See <https://sirup.lkpp.go.id/sirup>.

48 See <https://inaproc.lkpp.go.id/v3>.

49 See, for example, www.lpse.kemenkeu.go.id/eproc.

50 To learn more about the village fund, see, for example, <http://asiafoundation.org/2016/02/17/indonesias-village-law-a-step-toward-inclusive-governance>.

51 Interview with KPK data and information team, 25 October 2016.

52 Interview with Transparency International Indonesia, 2 November 2016.

Principle 3: Accessible and Usable Data



Principle 3 seeks to address the challenges that users face in locating, accessing and using data. It commits G20 governments to increase data accessibility and usability by lowering unnecessary entry barriers, and by publishing data on single-window solutions, such as a central open data portal. Principle 3 also requires governments to promote open data initiatives to raise awareness and increase data literacy and capacity-building among potential data users.

Open data catalogue

Indonesia's national open data portal (data.go.id), launched in September 2014, provides centralised access to the published data, free of charge.

Currently there are over 1,200 datasets published on the portal, where potential users can download and use them without any restrictions, but very few of them are anti-corruption-related data. For the three key anti-corruption datasets in our study that are available online, only the company register can be found on the national open data portal.⁵³

Legal requirements for the publication of anti-corruption data by companies

There is a legal mandate for some companies to release anti-corruption-related data to the public. It applies only to state-owned companies, however, and other companies that meet certain criteria.

Publicly traded companies are also required by law⁵⁴ to provide access to adequate information for their investors and stakeholders, including a profile of the company, directors and the board of commissioners, working guidelines and information related to the general meeting of shareholders, such as notifications, calls, detailed agendas, minutes and historical dividends.

Machine-readable, open and multiple formats

Datasets are available in different formats, but they are not always machine-readable.

As an example from the datasets in our study, the companies register can be found on the national open data portal in CSV format, while the budget dataset is also available in PDF and CSV on the MoF website, but in XLS format on the ministry's open data budget portal. On the other hand, public procurement data is available only in HTML format online.

Access costs and licensing

Most of the available datasets are free for download, but they lack licensing information.

The budget and company register datasets are available for download without any cost, except for the dataset of limited companies available at the Ministry of Justice and Human Rights. Nevertheless, there is no information on the licensing associated with the datasets, which creates uncertainty as to their potential reuse.

Registration to access data

Registration is not required to access most of the available key datasets.

There is no mandatory registration to access the datasets on the government budget or the company register, except for the data from the Ministry of Justice and Human Rights. Here, users will need to enter their contact details and the rationale for their data request, following the usual DoI procedure. Access to procurement data related to the bid request and award announcements is also available without any registration.

⁵³ See <http://data.go.id/dataset/direktori-perusahaan-industri-indonesia>.

⁵⁴ Financial Services Authority Regulation no. 31, 22 December 2015.

Open data awareness, data literacy and capacity-building

There is no evidence that government is actively promoting the use of open data through regular engagement with civil society.

The government of Indonesia plays some supporting role in terms of engagement with civil society, but it is usually limited to facilitating and sponsoring tech events such as hackathons, data meetups or data training programmes.

In contrast, there have been major efforts from CSOs in recent years to engage with open data. Organisations such as Perludem⁵⁵ and Open Data Lab Jakarta⁵⁶ are doing work in connection with open data advocacy, research and training. Moreover, a variety of sectors are covered by CSOs, examples including the work conducted by Publish What You Pay (PWYP) Indonesia on extractives open data or by Indonesian Corruption Watch (ICW) and Indonesian Procurement Watch (IPW) on open data in public procurement.

Furthermore, the past two years have witnessed increasing participation by the tech communities. As an example, Hackathon Merdeka⁵⁷ was arguably the largest hackathon in the world. The participants came from 28 cities in Indonesia and several cities overseas.

Principle 4: Comparable and Interoperable Data



Enabling the comparability of datasets and allowing for the traceability of data from numerous anti-corruption-related sources increases the possibility of detecting patterns, trends or anomalies that could be used to expose or counter corrupt practice.

This principle commits governments to implement open standards, and ensures that open datasets include consistent core metadata as well as adequate descriptions and documentation. It also specifies that governments will engage and collaborate with existing anti-corruption standards bodies, identify gaps and encourage interoperability.

Open standards

The lack of a strategy for data management practices also affects the standardisation of published data in Indonesia.

There is no common standard regarding the formats of published data. Some generic open formats, such as CSV, were found, for example, in the case of the company register and the government budget datasets, but it appears that they are not widespread. Furthermore, no evidence of the use of any standards for the data structure was found.

Metadata

There are no standard processes to ensure that consistent metadata is applied to all published datasets.

No consistent metadata was found for those datasets that have been published through the national open data portal, such as the company register dataset. In the case of datasets published via other governmental websites, such as the budget data published on the MoF website, there is no metadata at all.

⁵⁵ Perludem won the second prize in the OGP Awards 2016 with its API Pemilu (Election Programming Interface) Initiative.

⁵⁶ See <http://labs.webfoundation.org>.

⁵⁷ See <http://hackathonmerdeka.id>.

Documentation

There are varying practices in providing accompanying documentation for the published datasets, but they are usually insufficient or incomplete.

The MoF's website, for example, provides some background information to help users understand the budget data. The website also presents some infographics in order to make budget allocations more comprehensible for the general public. In contrast, other datasets, such as the company register or the procurement ones, do not provide sufficient documentation.

Data and transparency standards

Indonesia is engaged in the adoption of some global standard to improve data interoperability in the fight against corruption.

The government of Indonesia is committed to the adoption of some existing global standards that can contribute to the fight against corruption. For example, in the extractive sector, Indonesia has been an active member of the Extractive Industries Transparency Initiative (EITI) standard since 2010, and was granted compliant status by the EITI international board in 2014. Moreover, the government has also joined the Automatic Exchange of Information (AEOI),⁵⁸ a new global standard to reduce the potential for tax evasion. It provides for the exchange of non-resident financial account information with the tax authorities in the account holder's country of residence.⁵⁹

Principle 5: Data for Improved Governance and Citizen Engagement



Open data empowers citizens and enables them to hold government institutions to account. Open data can also help citizens to understand, influence and participate directly in decision-making processes and in the development of public policies in support of public sector integrity. This can be an important process in building trust and strengthening collaboration between government and all sectors of society.

This principle commits governments to promote the use of online collaboration to engage with anti-corruption organisations, and to equip government officials so that they may use open data effectively. It stipulates that governments will improve mechanisms and procedures, and report regularly to the public, in order to improve strengthen ties between citizens and the public sector.

Data needs

The government of Indonesia is using various feedback mechanisms for public engagement in CPE activities, but not specifically to detect data needs.

To date there is limited evidence that such platforms have also been used to gather feedback regarding data needs. So far the closest thing to a mechanism available to determine data needs comes through the use of non-digital media. For example, users can share and provide suggestions for improving the quality of published data by participation in the data forum. There is no evidence that the data forum is being implemented effectively, however.

⁵⁸ See www.kemenkeu.go.id/SP/automatic-exchange-information-aeoi.

⁵⁹ See www.oecd.org/tax/transparency/automaticexchangeofinformation.htm.

Toolkits

Some key reference studies and reports have been shared, but they are only external materials and they have not been adapted to the country's needs.

The One Data team has published several guidelines on data.go.id.⁶⁰ The toolkit aims to provide information regarding the One Data policy, together with a brief introduction to open data.

The scoping study conducted by the World Wide Web Foundation found that most civil servants in Indonesia are not familiar with the concept of open data.⁶¹ Training on open data for the civil servants is conducted by CSOs such as Open Data Lab Jakarta⁶² and Perludem.

Research

At present there are no research studies or reviews on the issue of using open data to prevent corruption that have been published by the government. A comprehensive review that links the two domains is still not available.

Reporting

Only KPK provides regular updates on its activities, through the ACCH website.⁶³

The annual Independent Report Mechanism (IRM) of the Open Government Partnership should provide a review of Indonesia's progress with respect to implementation of the open data and anti-corruption commitments included in the National Action Plan.

Interaction

There is limited evidence of systematic national outreach or proactive engagement by the government through regular public consultations.

Engagement with the national government was usually in the form of occasional events or research projects. There is little evidence of regular national outreach events to promote open data or proactive government engagement by means of frequent public consultation. The One Data team at the Executive Office of the President, responsible for the national open data portal, is actively engaged with CSOs through formal and informal discussions, however.

Civic engagement with anti-corruption open data

The government and civil society continue to identify opportunities for co-creation as part of the CPE activities.

CSOs and tech communities continue to lead the open data movement in Indonesia. In recent years a wide range of sectors have been covered by these organisations. Some new sectors have also emerged, such as open data in procurement and open data in extractives. For example, the open data procurement portal opentender.net has been launched, created by ICW with data provided by the Indonesia's National Public Procurement Agency (LKPP). The portal contains sections on news, databases and analysis of Indonesian government contracting information. At the time of the research it contained data from 476,980 procurement bids from 2008 onwards.

⁶⁰ See <http://data.go.id/toolkit>.

⁶¹ See <http://webfoundation.org/about/research/open-government-data-readiness-assessment-indonesia>.

⁶² See <http://labs.webfoundation.org/projects-2>.

⁶³ See <http://acch.kpk.go.id/home>.

Principle 6: Data for Inclusive Development and Innovation



Principle 6 of the G20 Principles commits governments to support other G20 open data work and encourage civil society, the private sector and multilateral institutions to open up data. It specifies that governments will engage in new partnerships with anti-corruption stakeholders and share technical expertise and experience with other governments and organisations.

Government's anti-corruption agenda

The second version of Nastra CPE⁶⁴ specifically includes access to budget information in the strategy for corruption prevention and access to information related to CPE activities as important for the review mechanism.

Nevertheless, access to other anti-corruption key datasets remains limited. To address this issue, the next draft of the third Nastra CPE could emphasise access to the other key anti-corruption datasets, particularly datasets related to the seven high-priority sectors as stated in the National Action Plan 2016–2017. These sectors are (1) public procurement; (2) the extractive industries; (3) infrastructure; (4) the private sector; (5) state revenue; (6) commerce; and (7) state-owned companies.

Anti-corruption data ecosystem

The vision of encouraging citizens, civil society and private sector organisations to open up their data during their participation in the data forum has not been translated into reality.

Neither the OGP national plan nor the Nastra CPE address this issue. The effort to encourage other stakeholders, including the private sector, to publish their data remains elusive, with data security and economic aspects as the key hindering factors. Nonetheless, there is an isolated case in PETA Jakarta,⁶⁵ a flood monitoring system whose researchers publish their data in an open format.

Partnerships

There has been some effort to create enabling open data ecosystems, with the CSOs and tech communities playing the leading role.

The government of Indonesia has been active in establishing some collaborations with relevant stakeholders, both domestic and international. This includes sharing anti-corruption technical expertise and best practices.

KPK has established bilateral cooperation with at least 26 anti-corruption institutions in an equal number of countries in order to streamline the corruption eradication programme, domestically as well as internationally. An annual Indonesia Anti-Corruption Forum,⁶⁶ organised by KPK in cooperation with UNODC, Bappenas and Transparency International Indonesia, also provides a medium for knowledge dissemination among all anti-corruption stakeholders.

⁶⁴ See <https://goo.gl/sYjJbb>.

⁶⁵ See www.petajakarta.org/banjir/en.

⁶⁶ See <http://indo-acf.org>.

Networks

Indonesia shares open data anti-corruption technical expertise and experience with other governments and international organisations.

Indonesia has been an active contributor to the G20 Anti-Corruption Working Group and has published data related to its extractive industries collected through its membership of the Extractive Industries Transparency Initiative.


The country is also a member of Asia/Pacific Group on Money Laundering (APG), which is a part of the Financial Action Task Force of Money Laundering (FATF), an intergovernmental body developing and promoting policies to combat money-laundering and terrorist financing. In June 2015 the FATF officially removed Indonesia from its black list because of the country's overall progress in preventing terrorist-related financial crimes.⁶⁷

Tools

Some tools have been developed to take advantage of government data, though there is no evidence yet that they cover specific anti-corruption issues.

A mobile application called JAGA (translation: 'Watch'), soft-launched by KPK in July 2016, is an example of an attempt to foster open data innovation, providing new mechanisms for data-sharing and receiving citizens' feedback on published data. JAGA is an Android-based mobile application that integrates different sources of data in a single platform. For example, with JAGA Sekolah (School Watch) the public can check the profile of existing school facilities, including their budgets. In addition, people can file a complaint or start a discussion in the available discussion forum, which is connected with social media.

67 See <http://blogs.wsj.com/riskandcompliance/2015/06/29/indonesia-dropped-from-money-laundering-blacklist>.

An aerial photograph of a city. The foreground is filled with a dense, low-rise residential area with many small houses and buildings. In the background, a modern city skyline is visible with several tall skyscrapers. The sky is a clear, pale blue. The text 'SECTORAL USE CASE' is overlaid in the center in a large, white, sans-serif font. Two horizontal lines of small blue dashes are positioned above and below the text.

SECTORAL USE CASE

CASE STUDY: Indonesia

Public procurement

PUBLIC PROCUREMENT IN INDONESIA accounts for approximately 30 per cent of Indonesia's national budget. It has been estimated that 60 per cent of foreign development assistance is spent on the procurement of goods and services.⁶⁸ The system is often marred by inefficiencies and a lack of accountability and transparency, however, resulting in an estimated loss of \$15 billion annually.⁶⁹

An electronic procurement system (SPSE) was adopted at the national and subnational levels as part of the government reform effort in the early years of the twenty-first century. Deployment of the SPSE is overseen by the electronic procurement service unit (LPSE), which is a working unit established in the ministries and agencies at national, provincial and local levels. At the time of writing a total of 635 LPSEs had been created, covering all 34 provinces in Indonesia and serving 731 government agencies.⁷⁰ The adoption of the SPSE is much slower than expected, however, with only around 30 per cent of the total procurement budget currently being managed through the e-procurement system.

To push towards more transparency and efficiency and to expedite government procurement of goods and services, an e-catalogue⁷¹ system was launched in 2013, allowing the direct purchase of articles available in the system, with more than 66,000 registered items.

Citizens can also access online data and information associated with several procurement phases, including planning,⁷² formation and award⁷³ and performance,⁷⁴ but none of the data is available in machine-readable and reusable formats. CSOs and journalists have also been critical of the lack of access to several high-interest procurement documents, such as bidding and contract documents or implementation details.

The government has also launched some initiatives to encourage public participation in strengthening the accountability of public procurement. The e-Pengaduan portal allows the public to submit complaints regarding either the process or the outcome of a procurement activity. The National Public Procurement Agency is also establishing a mechanism for data-sharing with several anti-corruption CSOs, including Indonesia Corruption Watch. As a result, ICW's Open Tender platform analyses the data from major public procurement data shared by the LKPP and conducts a rudimentary analysis to detect potential fraud.

68 M. Buehler, *Public Procurement Reform in Indonesian Provinces and Districts: The Historical Institutional Context and Lessons Learned from Analytical Work*, working paper (London: School of Oriental and African Studies, 2012).

69 See http://mca-indonesia.go.id/wp-content/uploads/2013/12/Factsheet_PM_EN.pdf.

70 See <http://report-lpse.lkpp.go.id/v2/beranda>.

71 See <https://e-katalog.lkpp.go.id>.

72 See <https://sirup.lkpp.go.id/sirup>.

73 See <https://inaproc.lkpp.go.id/v3>.

74 See <http://monev.lkpp.go.id>.

CONCLUSIONS AND RECOMMENDATIONS



Conclusions

For open data to make a significant impact on anti-corruption activities in Indonesia, there must be a concerted effort to build a dynamic open data environment for the anti-corruption ecosystem. Such an effort will require addressing the following areas.

Legal and policy environment

Indonesia's legal framework for the Law on the Disclosure of Public Information is robust, but more must be done to streamline DoI implementation to make sure that citizens receive timely responses and are encouraged to submit more requests. The availability of data in open formats, without any costs and under open licences, will strengthen the case for data-driven advocacy in anti-corruption activities.

Institutional framework

The establishment of the PPID offices and Information Commissions is a critical step towards increasing the transparency of national and local governments but some issues remain in terms of implementation. On the supply side, there are few clear procedures to decide what constitutes public information, some other conflicting regulations and the fact that only around two-thirds of PPIDs have been adequately trained. On the demand side, in order to promote wider access to information, the government needs to revisit the requirements for providing personal identification, as well as the need to provide a rationale for information requests.

Indonesia's technology infrastructure

The Indonesian E-Government development index is among the lowest in the Association of Southeast Asian Nations countries, indicating how slow public institutions are at adapting to the digital era. The government must commit to connecting 100 per cent of public institutions through broadband access by 2019 and complete development of the National E-Government Master Plan for all public institutions, together with its timeline, key performance indicators and budget.

Government data management

The One Data and One Map policies aim to address the lack of a standardised data management process across all government agencies. The new policy is expected to provide a common framework for data management, along with guidelines for public institutions, to limit redundant efforts and improve data quality, interoperability and integration, including also data licensing and formats.

Citizen engagement and capabilities

Innovative solutions using open anti-corruption key datasets, such as opentender.net and Info Anggaran, have opened up a promising path for evidence-based advocacy. The challenge now is to scale these efforts up so as to include more CSOs across different sectors. Another challenge is that the open data community need to get involved in more practical activities, such as hackathons and data meetups, unlike the anti-corruption community, which tends to engage with official feedback channels only.

KEY RECOMMENDATIONS



As Indonesia already has a robust legal and policy environment for public disclosure, arguably, the biggest gaps remaining lie in strengthening the institutional framework, improving data governance and management practices and engaging citizens in the process. Below are several recommendations to address these areas.

- 1 Integrate open data principles** within DoI implementation and in the draft One Data policy.
- 2 Strengthen the role of PPIDs and their standard operating procedures**, including a mechanism for monitoring and evaluation and ensuring the establishment of PPID offices in all public institutions.
- 3 Improve data management and governance practices by strengthening the role of the data and information centre (Pusdatin) across all line ministries and subnational governments**, in addition to developing and overseeing the implementation of a data-sharing and collaboration standard.
- 4 Ensure the availability of high-value anti-corruption key datasets in machine-readable and reusable standard formats** for the focus sectors defined by the National Action Plan on CPE and the G20 Anti-Corruption Action Plan.
- 5 Build a culture that supports open data principles** among civil servants to create an understanding of the value of open data in public sector activities.
- 6 Establish clear guidelines for citizen participation in anti-corruption data forums.** For example, the government could develop a Code of Practice on Citizen Consultation to delineate the role of public consultation in the process.
- 7 Contribute to building the capacity of CSOs, particularly outside Jakarta**, to create a culture of innovation through public data and engage them in open data based anti-corruption advocacy.

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