

A Proactive Transparency in Indonesia and Its Challenges

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Abstract: Transparency does not only mean opening or providing information upon citizens' requests, but it also means providing public information in a proactive way. In the context of government agency and public rights to information, a proactive transparency can occur if the information and data management officials understand their obligations and the scope of public information, such as a.) the types of public information, b.) its categorization, c.) the working units that have such information, and d) data dan documentation management. This paper investigates whether proactive transparency is possible to happen in the context of Indonesia—as the country has been implementing the Public Information Disclosure Act since 2008. We conducted a focus group discussion with the Information and Documentation Management Officer (PPID), a working unit in a government agency that obliges to serve public information, in one of the ministries in Indonesia. The focus group's objective was to explore whether individuals in PPID understand the act, its scope, and consequences of the act on the PPID works. This study found that officials in PPID have limited understanding of the law and proactive transparency. In this case, the biggest challenge happened at the organizational level as well as at the individual level

1 INTRODUCTION

Indonesia's commitment to upholding transparency and clean governance began in the reformation era. Reformation is a historic moment for the Indonesian people to provide freedom of speech and information. The Government of Indonesia seeks to build transparency by opening access to information regulated in article 28 letter f of the 1945 Constitution, which states that:

Everyone has the right to communicate and obtain information to develop his personal and social environment, and has the right to seek, obtain, possess, store, process, and convey information with all types of available channels.

Ratification of Law Number 14 of 2008 concerning Public Information Openness Law (UU KIP) confirms the government's commitment to guarantee the right to public information. This law requires public bodies to create information systems for the public with the principle of fast, easy, and low cost. Article 1 number (3) of the Public Information Disclosure Act mentions the definition of a Public Body as follows:

Public Agency is an executive, legislative, judiciary body, and other bodies whose main

functions and duties are related to the administration of the state, which partly or wholly fund comes from the State Budget. And/or Regional Revenue and Expenditure Budget, or non-governmental organizations as long as the part or all of the funds are sourced from the State Revenue and Expenditure Budget and/or Regional Revenue and Expenditure Budget, community contributions, and/or abroad.

To encourage the implementation of information disclosure, the Central Information Commission does Monitoring and Evaluation (Monev) in every year. Then, they do an assessment and give rewards to the best public bodies in the implementation of information disclosure. Monev team form the Central Information Commission spreads Self-Assessment Questionnaire (SAQ) as one of the assessment stages.

After completing SAQ, the Public Body made a presentation before the judges consisting of professionals. The best public body in implementing information disclosure receives an award handed over by the Vice President. In the period of 2013- 2017, the classification of rank is in the form of the top 10 rankings, but in 2018 there were only 15 public institutions included in the informative category. The 15 public bodies are the Ministry of Finance, the Ministry of Communication and Information, Bank

Indonesia, the National Aeronautics and Space Agency, PT Pelabuhan Indonesia III, PT Kereta Api Indonesia, the Financial Transaction Reports and Analysis Center (PPATK), Batam Entrepreneurs Agency, Election Supervisory Agency, National Nuclear Energy Agency, Central Java Provincial Government, Bogor Agricultural University, DKI Jakarta Provincial Government, West Kalimantan Provincial Government, and West Java Provincial Government. Therefore, most public institutions are still lacking in providing information.

Regarding its relation with transparency, this is an important issue to be addressed because, basically, the concept of transparency in the Central Information Commission Law is not passive, but active. The activeness of public institutions on conveying information can be seen from the categories of information contained in the Act, which is compulsory information to be provided and announced periodically.

As the frontline guard of public information services, the Information and Documentation Management Officer (PPID) should have a strong understanding in terms of the type of information and their categories. Unfortunately, up until now, research in regards to an understanding of information management official is still exclusively being performed for internal organization assessment and is not published. The Public Information Commission, which is tasked to oversee the performance of government agencies in providing information, has not yet touched the individual level due to budget constraints. To fill this gap, the research team is interested in researching the understanding of the PPID regarding Information Disclosure based on Law Number 14 of 2008 concerning Public Information Openness.

2 LITERATURE REVIEW

2.1 Proactive Transparency

Open government is a concept that was born from the spirit of encouraging more democratic governance (Gunawong, 2014). The concept of open government is still relatively new, so scholars still associate it with concepts that differ from one another. Gunawong (2014) states that some scholars interpret open government as seen from transparency and public participation, where transparency is related to the open access to information owned by the government and public participation regarding the process of government policymaking.

Transparency is not simply to open access to information or to provide information whenever people ask for it, but it must be done proactively. In 2010, the World Bank released a government working memo titled "Proactive Transparency: the future of the Right to Information?" In this memo, it was written that government agencies ideally publish information actively, either through websites official other information media (Derbishire, 2010), or actively open information without being asked.

The implementation of information transparency can be done at the institutional (macro) level, at the organizational (meso) and individual (micro) level (Meijer, 2013). At the macro level, transparency is related to the commitment of a government, the meso level is related to commitments at the organizational level, and the micro-level at the individual level that manages information.

A study conducted by Ruijter (2013) in the Netherlands and America shows that individuals who support the implementation of proactive transparency can provide better information, hide information less, and listen more to feedback and participation from the public. Besides, research in both countries also shows that individuals who support proactive transparency have a role in increasing transparency and public participation.

2.2 Understanding of the Information and Documentation Management Officer (PPID)

The implementation of proactive transparency at the individual level can only be achieved if the information and data management officer in a public institution understands the type of public information, its categorization, the work units that have information, and the management of information and documentation. Therefore, to find out the competence of PPID in supporting proactive transparency of public institutions in delivering public information, it is important to find out the extent of individual understanding of information management officials.

An understanding of the types of information can only be achieved if the individual has prior knowledge of the types of information. The simple definition of knowledge, as Dvořák said (in Ruijter, 2013), is whatever kind of information we know. Meanwhile, Ruijter (2013) concluded that the concept of knowledge is related to the understanding of information and other matters relating to that information. "Knowledge is conceptualized as codified information, including insight, interpretation, context, experience, wisdom, and so

forth, or knowledge can be thought of as information that is contextual, relevant, and actionable. (Knowledge is conceptualized as information that has gone through a process of meaning, including insight, interpretation, context, experience, policy, etc., or knowledge can be considered as contextual, relevant, and doable information, Ruijiner, 2013).

In terms of evaluating individual understanding in PPID, we use the "Knowledge Management Evaluation Method" (Jana, 2016). This method measures the effect of knowledge management on organizational performance and is divided into financial and non-financial indicators. In this study, we will use an approach with non-financial indicators that evaluate "the benefits of knowledge management to the organization's performance based on the answers of respondents at the interviews or via questionnaire surveys and relies to a large extent on respondents' perceptions of knowledge management (benefits of management knowledge for organizational performance based on respondents' answers during interviews or through questionnaire surveys, and very much depends on respondents' perceptions about knowledge management) "(Jana, 2016).

Our understanding is related to two things. The first thing is an understanding of the types of information, including in the category of public information and the list of excluded information. Second, the understanding of individuals in PPID the importance of citizens' rights to public information. By understanding these two things, it is assumed that the individual who is the spearhead of PPID can proactively carry out information transparency without being asked by the public.

2.3 Information and Documentation Management Officer (PPID)

The Information and Documentation Management Officer (PPID) is the spearhead in implementing information disclosure. Forming a PPID structure is a mandatory law for the Public Agency. Suprawoto (2018) argues that in order to create fast, accurate and simple services, according to Article 3 of the Public Information Openness Law that each Public Agency must: appoint PPID to make and develop a system of providing information services quickly, easily, and naturally in accordance with the technical guidelines for public information service standards nationally applicable; and PPID in carrying out their duties are assisted by functional officials.

According to Article 1 of the Public Information Openness Law, PPID is an official who is responsible

for the storage, documentation, provision, and/or information services in public bodies.

The position of PPID is made clear by Government Regulation Number 61 of 2010 concerning the Implementation of Law Number 14 of 2008 concerning Openness of Public Information. According to Article 12 paragraph (1) PP, No. 61 of 2010 states that Officers who can be appointed as PPID within the State Public Agency at the central and regional levels are officials in charge of public information.

Then explained again in Article 13

PP No. 61 of 2010 that "PPID is held by someone who has competence in the field of information and document management." In practice, the Public Agency attaches the function of PPID or Main PPID to Public Relations (PR). Other Work Units such as the Data and Information Center (Pusdatin) are placed as PPID Implementers.

Government Regulation Number 61 of 2010 concerning Implementation of Law Number 14 of 2008 concerning Information Disclosure also stipulates that PPIDs have the duty and responsibility in: provision, storage, documentation and security of information; information services in accordance with applicable regulations; fast, precise and simple public information services; stipulating operational procedures for disseminating public information; consequence testing; classification of information and/or alteration thereof; designation of exempt information which has exhausted its exemption period as publicly accessible information; and establishing written considerations for each policy taken to fulfil everyone's right to public information.

Information Services in the Public Information Openness Law require a period of response or fulfillment of information The public can request information, PPID has a time limit of 10 days to respond, and can request an extension of 7 working days. If you do not get a response or are not satisfied with the PPID answer, you can submit an objection to the PPID superior.

PPID supervisors have 30 working days to answer objections. If the public dissatisfied with the response from the PPID superior or PPID does not respond, then the public or information requesters can report a dispute to the central /provincial /regency/city information commission. The time limit is 14 (fourteen) working days after the time limit of 30 (thirty) working days expires for the PPID supervisor to respond to an objection. The flow of requests for information can be seen in the picture below.

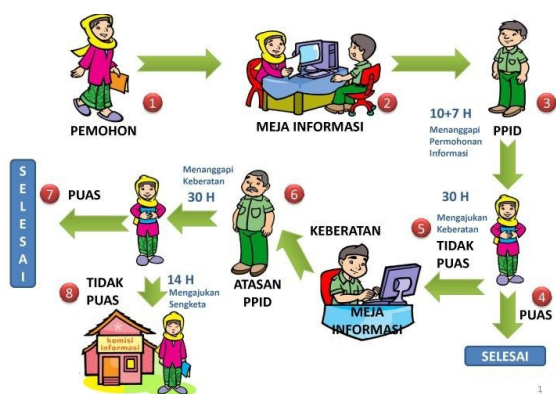


Figure 1. The flow of request for information process.
Source: East Java Information Commission

Information services existed before Law Number 14 of 2008 regarding Public Information Openness (UU KIP). However, there is no limit to how long requests for information must be responded to. Even people often get rejected due to state secrecy reasons. The Public Information Openness Law provides certainty in the time limit and procedures for submitting requests for information. Rejection of requests for information must be based on consequences that will arise if public information is opened.

Information services are not only meant as service delivery when the public or information requesters come to the information desk. Information services are also provided before requesting information. According to Ulum (2017: 40), information services which are not based on demand trigger Public Agency to provide information to the public by actively announcing information classified in the Public Information Openness Law as information that must be announced periodically and immediately.

2.4 The Openness of Information through the Implementation of Law Number 14 of 2008 Concerning Public Information Openness (UU KIP)

Information disclosure existed in Indonesia long before Law No. 14 of 2008 concerning Public Information Openness was passed. This is indicated by the existence of Regional Regulations (Perda) on information disclosure in several regions. For example, Perda No. 6/2004 concerning Transparency and Participation in Lebak Regency and Sragen Regency Decree No. 17/2002, which became the legal umbrella for the Integrated Service Office to

practice disclosure of information in terms of licensing, and so on.

According to the Indonesian Center for Environmental Law (ICEL), the concept of information disclosure begins by looking at the main principles of information disclosure contained in Article 2 of the Public Information Openness Law, namely:

1. Every information is open and can be accessed by every user of public information;
2. Excluded public information is strict and limited; Every public information must be obtained by every Applicant Public information quickly and on time, at a low cost, and in a simple way;
3. Exempt public information is confidential according to the law, propriety and public interest is based on testing the consequences that arise when information is given to the public, and after careful consideration, that closing public information can protect greater interests than opening it or vice versa.

These principles explain the extent of access to public information. The attempt to retrieve it is easy due to the principle of obtaining information that is fast, timely, low cost, and simple way. While exceptions to confidential information or information are strict and limited.

Government Regulation Number 101 of 2000 concerning Education and Training of Civil Servants (PNS), formulates the meaning of good governance as follows: "Governance that develops and applies the principles of professionalism, accountability, transparency, excellent service, democracy, efficiency, effectiveness, supremacy law and can be accepted by the whole community .

The openness of information opens opportunities for public participation in realizing good governance. Information disclosure is technically carried out by implementing Law Number 14 of 2008 on Public Information Openness (UU KIP), providing information services to the public as a form of public service.

Community involvement is a form of public participation so that the Public Agency is required to provide true and accurate information. According to Suryani (2018: 8) to oversee state administrators at various levels at both the central and regional levels, the community has the right to obtain information on the plan by submitting a request for information.

In addition to realizing good governance, disclosure of information can also prevent corruption. According to Dipopramono (2017: 238), corruption can flourish in a closed society and system.

Open/transparent conditions will make it difficult for policymakers (including lawmakers) and stakeholders in government to manipulate, deviate, and corrupt.

3 METHODS

This research uses a qualitative approach. Qualitative research aims to explain phenomena profusely through deep data collection (Kriyantono, 2006: 56-57). Data collection was carried out in three ways, namely study documentation, interviews, and Forum Group Discussion or FGD. In the documentation study, researchers collected material on organizational governance and internal regulations regarding Information Openness at the Ministry of SOEs. After that, researchers conducted interviews with PPID and the Ministry of SOEs information service officers. One week after the interview, the researcher conducted an FGD.

FGD is a research method in which researchers choose people who are representing a number of different public groups or populations (Kriyantono, 2006: 63). The researcher invites representatives of the Work Unit / Division related to information management, services, and documentation, and who have served requests for information or faced information disputes.

a. To obtain data on the proactive transparency of the Ministry of SOEs PPID, the researchers compiled questions.

1. What types of information are in the Public Information Openness Law, and how does your Public Agency classify information?
2. How are PPID's Standard Operating Procedures (SOP) in making information exceptions / compiling information excluded?
3. How does your Public Agency deliver information regularly, available at any time, and must be announced immediately?

b. To find out the extent of PPID's understanding of citizens' rights to obtain information contained in the Public Information Openness Law, questions are asked:

1. What is the PPID's strategy in building information and documentation service systems to serve the people who submit information requests?
2. Has PPID ever refused a request for information because the person has no right to access the information requested?

c. To find out the competence of PPID management officials in supporting the proactive

transparency of public institutions in conveying public information, then asked questions:

1. What are the obstacles faced by your Public Agency in building information and documentation management systems?
2. How do you overcome these obstacles?

The FGD was held on Thursday, August 8th, 2019 and was attended by eight informants, consisting of representatives from the Bureau of Law, Public Relations & Protocol, IT, HR Services, the General

Bureau and Public Relations. One of the three researchers becomes a facilitator who raises questions above as discussion material such as problem, case, and incident about information disclosure. The FGD produced data and information regarding the understanding of PPID Public Agency on information disclosure and the obstacles faced by PPID so far in building information and documentation management systems.

The results of the interviews, FGDs, and documentation are collected, then analyzed. The data is then classified into certain categories. After being classified, the researcher interprets the data. In carrying out this interpretation, researchers are required to theorize to explain and argue.

4 RESULTS AND DISCUSSIONS

The Ministry of State-Owned Enterprises (SOEs) is a ministry that handles government affairs in the context of sharpening coordination and synchronizing Government programs in the field of SOEs development. Based on the Minister of SOEs Regulation No. Per-10 / MBU / 07/2015 concerning the Organization and Work Procedure of the Ministry of SOEs, the task of the Ministry of SOEs is to organize government affairs in the field of SOEs development to assist the President in organizing a government.

The ministry began implementing information disclosure by forming a PPID) in 2014 through SOE Ministerial Regulation Number Per-08 / MBU / 10/2014 concerning Guidelines for Information and Documentation Management within the Ministry of SOEs. One year later, it experienced a slight change with the SOE Ministerial Regulation Per-12 / MBU / 10/2015

Concerning Amendments to the SOE Ministerial Regulation No. Per-08 / MBU / 10/2014 concerning Guidelines for Information and Documentation Management in the Ministry of SOEs.

Ministerial regulates that PPID superiors are Echelon II Officials who carry out public relations

affairs and are tasked with supervising PPID performance. PPID superiors held by the Head of General and Public Relations also play a role as the final determinant of policymaking if problems arise in the management and implementation of Information services, including in determining whether the information is excluded or not. Whereas the PPID, which is held by the Head of the Public Relations and Protocol Section, coordinates the collection, data collection, provision, and information services of PPID. To carry out this task, PPID compiles a List of Public Information and an Exempt Information List in the PPID Decree Number KEP-01 / PPID.MBU / 12/2018

Concerning List of Public Information in Information and Documentation Management in the Ministry of SOEs and KEP -02 / PPID.MBU / 12/2018 concerning List of Information Excluded in the Management of Information and Documentation within the Ministry of SOEs.

With the DIP and DIK, PPID has information guidelines that can be announced and made available to the public as well as information that must be kept confidential. PPID Ministry of SOEs formed a team consisting of PPID of the Ministry of SOEs as PPID responsible, legal, data, and information technology (IT) division. Information services are at one door, only through PPID, which in the last 3 (three) years, the number of information services performed varies. In 2017 PPID of the Ministry of SOEs received 30 requests for information; in 2018, the number dropped to 28 applicants for information, and until the second quarter of 2019, this PPID received 15 requests for information. Of this amount, about 70% of them are misinformed requests due to a public perception that the Ministry of SOEs has all the information of SOEs. Applicants request information about certain SOEs so that the PPID of the SOE Ministry asks them to request directly from the SOE concerned. Based on the documentation study on the collection of Information Dispute Decisions on the Central Information Commission website, there are 2 (two) information dispute cases involving the Ministry of SOEs, namely Decision Number 066 / V / KIP-PS-AMA / 2014 submitted by Sutarno bin Martowiharso and Decision Number 015 / I / KIP-PS-A / 2015 submitted by SM Hasan Saman.

The Board of Commissioners of the Central Information Commission won the Information Applicant's lawsuit in both information disputes by canceling the consequences test results and ordering the Ministry of SOEs to provide the requested information. Information requested in these cases are:

1. Letter of the State Secretary to the Ministry of SOEs and the disposition of the Minister of SOEs to the SOEs Energy, Electricity, and Transportation (ELP) Division for settlement with D'GAJARA (North Koja Citizen Delegation). These documents are needed by the information applies to resolve the D'GAJARA problem with Pelindo II. D'GAJARA was fighting for compensation payments for the eviction as a result of the construction of the Koja Container Terminal in 1994.
2. PPD Public Budget Plan for 2010, 2011, and 2012 according to the original document. The applicant needs this information to fight for the legal process of his rights as a person who had worked at the PPD Public Corporation but was dismissed without a clear reason on September 22, 1988, and did not get severance pay and pension.

The information that must be given to the applicant in the second case is not information about the Ministry of SOEs. In the FGD, the Ministry of SOEs considers that information related to SOEs should be requested from the SOEs concerned. Because the Ministry of SOEs does not have absolute authority and does not have the authority to intervene in the business of each SOEs. Also, information about the Work Plan and Budget, according to the Ministry of SOEs, is strategic information which, if requested by people who do not have good intentions, will hamper the operation of SOEs itself. The Ministry of SOEs claimed to be disappointed with the decision of the Central Information Commission.

On the contrary, according to Article 1 number (2) states the definition of Public Information is information that is produced, stored, managed, sent, and/or received by a public body relating to the organizers and the administration of the state and/or other organizers and organizing public bodies accordingly with this Act and other information relating to the public interest. Referring to the understanding of public information, the Ministry of SOEs, although not producing information, is still obliged to provide if they receive or store documents/information originating from these SOEs.

Substantially, the Work Plan and Budget information are included in proactive information, which in Law Number 14 of 2008 on Public Information Openness (UU KIP) is referred to as information that must be provided and announced periodically. Article 11 of the Information Commission Regulation No. 1 of 2010 concerning Public Information Service Standards states that each

Public Agency must periodically announce Public Information consisting of at least: (d) summary of financial statements consisting of at least: 1. budget realization plans and reports 2. Balance sheets 3. Cash-flow statements and notes to financial statements prepared in accordance with applicable accounting standards 4. List of assets and investments.

PPID of the Ministry of SOEs criticized the definition of a Public Body according to the law, which, according to them, is not in the definition that SOEs are a Public Body. There is only one mention in Article 14 that mentions Public information that must be provided by State-Owned Enterprises, Regional-Owned Enterprises, and/or other business entities owned by the state. They consider that actually, SOEs do not need PPID to serve the community, but customer service because SOE serves consumers.

However, they considered that nowadays, the information had become the needs of the community so that the implementation of information disclosure is important. Therefore, the Ministry of SOEs continues to form PPID. PPID unite DIP and DIK together with the Work Unit, but they do not yet have an understanding of the information that must be announced periodically and the information that must be announced immediately.

When asked about the two information, the FGD participants paused and mentioned that the information was already on the website. When asked among various periodic information, there is information that must be updated by the Work Unit. They recognize that there is a lack of understanding of the Work Unit regarding periodic and necessary information that must be proactively conveyed to the public.

One participant answered that many requests for information had come in, one of them was from the Infobank print media who requested information on the State Enterprise Financial Report. Infobank had requested and given the previous year, but this year was not given due consideration for asking for LKPN details. The Ministry of SOEs receives the data from SOEs, but Infobank should ask the Ministry of Finance because the data also already exists in the Government Goods / Services Procurement Policy Institute.

Regarding requests for information made by the mass media, the Ministry of SOEs is not aware of a Memorandum of Understanding (MoU) between the Central Information Commission and the Press Council that the submission of information by the Press refers to Law Number 40 of 1999 concerning

the Press. This is the case with the information requested by other institutions, not using the Public Information Openness Law. The Public Information Openness Law only regulates information requests made by the public.

No participant answered about knowledge of the information that must be announced periodically and immediately. They answered that the periodic information had been conveyed on the PPID Ministry of SOE's website, and if there were people who requested information outside the website, it could be suspected that there were certain interests or intentions. The Research Team found out

that the website contained information that had to be made available and announced regularly, such as profiles, visions and missions, Performance Accountability Reports (LAKIP), and so on. But there is still a lot of information scattered on the minisite that should be on the PPID website as part of periodic information, for example, information about the list of regulations is on the Legal Documentation and Information Network, the Whistle-Blowing System is on a minisite separate.

Not all Work Units have updated information that must be provided and announced periodically. Updating information can only be done by certain personnel; it has not been done systematically and procedurally because there is no Standard Operating Procedure (SOP) for the management and service of public information. Even though each work unit has login access to update information, PPID also acknowledged that in this case, the Working Unit also did not understand how the provisions regarding information that must be provided and announced periodically, one of which update was at least once every 6 months. Information that must be announced immediately does not exist on the website.

The Request for information from the Ministry of SOEs enters through a single door, PPID. However, the work unit is still needed as a supporting system, one of which is when information updates that must be provided and announced periodically. It is recognized that the work unit also does not know the details regarding the information that must be provided and announced periodically information that must be available at any time and information that must be announced immediately. So far, the PPID's tasks have been carried out based on the Commitment and awareness of each individual.

Individual (micro) problems in the form of a lack of understanding of this proactive information cannot be separated from the competencies they have. The PPID Team placement is not based on their competency. Training on competency improvement

in Human Resources is carried out in the occupational fields that are their main tasks and functions ("tupoksi") structurally. For example, in the Information System Section, they will take part in Information Systems training, even though their duties are also related to information service systems related to the Public Information Openness Law.

Organizationally ("meso"), besides the absence of SOP on Management and Information Services, the PPID Team is also a functional position attached to a pre-existing structure. The main duty of the PPID Team is not to become the Employee Performance Target (SKP) for the structural position, and there is no activity fee. Information management becomes an organizational problem that results in a lack of competence and an understanding of proactive transparency.

5 CONCLUSIONS

Transparency is not merely to open access to information or to provide information when requested, but it must be done proactively. In Indonesia, the implementation of proactive transparency is under the umbrella of Law Number 14 of 2008 concerning Public Information Openness (UU KIP). Proactive transparency in the FOI Law is mentioned as information that must be provided and announced periodically and information that must be announced immediately.

The implementation of proactive transparency at the individual level can only be achieved if the information and data management officer in a public institution understands the types of public information, its categorization, the work units that have information, and the management of information and documentation. Therefore, to find out how the competence of PPID management officials in supporting proactive transparency of public institutions in delivering public information, it is important to know the extent of individual understanding of information management officials.

In evaluating individual understanding in PPID, the Research Team used the approach of the "Knowledge Management Evaluation Method" (Jana, 2016). This method measures the effect of knowledge management on organizational performance and is divided into financial and nonfinancial indicators. Data collection was carried out using the FGD method at the Ministry of SOEs.

The results of the FGDs showed that the individual (micro) understanding of proactive transparency was insufficient. PPID already has a

Public Information List (DIP), and an Excluded Information List (DIK), but not all work units have updated information. The information update can only be done by certain personnel, and it has not been done systematically and procedurally because there is no Standard Operating Procedure (SOP) for the management and service of public information. This is inseparable from the competencies they have. The PPID Team placement is not based on their competency. Training in increasing HR competencies is not in their capacity as a PPID Team but according to structural positions.

Organizationally (meso), besides the absence of SOP on Management and

Information Services, the PPID team is also a functional position attached to a pre-existing structure. The main duty of the PPID Team is not the aim of the Employee Performance Target (SKP) for the structural position, and there is no activity fee. Information management becomes an organizational problem that results in a lack of competence and an understanding of proactive transparency.

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