Integration between information and documentation management official (PPID) and legal documentation and information network (JDIH) in state university public body to realize public information openness

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Abstract. One of the duties of the State University (PTN) Public Body is to establish an Information and Documentation Management Official (PPID) as stipulated in Law Number 14 of 2008. The objective is to secure the right of citizens to know public policy planning, public policy programs, the process of public decision-making, reasons for making decisions, as well as documentation about its legal products. On the other hand, the Legal Documentation and Information Network (JDIH) is regulated in Presidential Regulation Number 33 of 2012. One of its functions is to ensure the establishment of a unified and integrated system for managing legal documentation and information across various government agencies and other institutions. In carrying out their functions, PPID and JDIH of state universities with a legal entity (PTN-BH) often experience conflicts of interest in terms of human resources and scope, which causes the ineffective performance of PPID and JDIH of PTN-BH. Therefore, it is essential to harmonize the execution of their duties to optimize the objectives of establishing PPID and JDIH, specifically to achieve transparency in public information. This research uses a qualitative research methodology which refers to descriptive research analytics. The data was collected through observation, interviews, documentation, literature studies, and statutory regulations and then analyzed through data reduction techniques, data presentation, and verification/conclusion.

Keywords. PPID; JDIH; Public Information Openness; Public service

A. Introduction

Law Number 14 of 2008 concerning Public Information Openness (hereinafter referred to as UU KIP) is essential as a legal foundation for fulfilling citizens’ right to obtain various necessary information from a public body. The information that can be disclosed is open information, which is provided and accessible to the public. According to Article 2, the law is aimed: a. To secure the right of the citizens to know public policy planning, public policy programs, and the process of public decision-making, as well as the reason for the concerning public decision-making. b. To encourage public participation in the process of public policymaking; c. To increase the active role of the people in public policy-making and good
Public Body management; d. To materialize good governance, that is transparent, effective, efficient, accountable, and responsible. e. To know the rationale of a public policy that affects the life of the people; f. To develop sciences and to increase the knowledge of the nation; and/or g. To enhance the information management and service at Public Agencies, to produce good quality information service.

Regulations have been enacted to enforce Article 2 of the UU KIP, mandating every public body to establish and appoint an Information and Documentation Management Official (henceforth referred to as PPID), including within the state universities with a legal entity (PTN-BH). The PPID plays a crucial role in providing public information services.

According to UU KIP, Public Information is defined as information that is produced, stored, managed, sent and/or received by a Public Body relating to the organizer and the organizing of the state and/or the organizer and the organizing of other Public Bodies pursuant to this law and other information pertaining to the interest of the public. Hence, not all information falls within the scope of the PPID. In addition to PPID, the Integrated Service Unit (ULT) is also established to provide information services. However, this unit is primarily intended for students of the PTN-BH, providing mainly internal information such as leave procedures, tuition fee reduction applications, scholarship submissions, student ID services, diploma processing, etc.

The terms public information and information have different definitions. The Great Dictionary of the Indonesian Language (KBBI) defines information as a clarification, notification, news, or report about something; in this case, specifically related to PTN-BH information. The fundamental difference between public information and general information lies in the type of documents provided to the information requester. Requests for public information typically require supporting documents, whereas requests for general information usually involve oral or written explanations or guidance. Nonetheless, the PPID can handle both types of requests.

The Legal Documentation and Information Network (JDIH) facilitates the organized use of legal documents and provides comprehensive, accurate, and accessible legal information services. Historically, JDIH was established to uphold the rule of law amidst national legal development. Legal documents are legal products in the form of statutory regulations or other than statutory regulations, such as legal articles, legal books, legal studies, legal magazines, legal monographs, academic manuscripts, legal research, draft legislation, and jurisprudence. On the other hand, legal information refers to all data and information within the legal documents.

The PPID and JDIH serve as the foundational pillars of a state university’s efforts to implement and realize transparency. The urgency of implementing the transparency principle lies in its role as a state effort to expedite the realization of open governance and as a strategic measure in preventing practices of corruption, collusion, and nepotism, thereby fostering good governance. Public information openness is one of the hallmarks of a democratic state, considering that society can exert control mechanisms in responding to policies issued by the government in the administration of the state. Democracy holds significant importance as it

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represents the right of the community to determine the course of organizational life within a country.\(^4\)

However, there are several obstacles to carrying out the duties and functions of PPID and JDIH. One of the challenges is that some state universities still do not fully recognize the role of PPID and JDIH within an institution. Additionally, there are limitations in human resources to perform the duties and functions of PPID and JDIH. On the other hand, not all state universities are members of JDIH. One factor contributing to this situation is the lack of socialization and functional conflicts between PPID and JDIH. Essentially, PPID and JDIH have similar functions, with the former’s scope being broader. One of the goals of state universities achieved through PPID is to obtain an “informative” in public information services. This study investigates the extent to which PPID and JDIH perform their roles. The study was inspired by the essential similarities between the activities of PPID and JDIH, particularly in terms of information about legal products.

B. Research Methods

This research is a socio-legal study, which utilizes a methodology approach from social sciences in a broad context. According to Wheeler and Thomas, as cited in Banakar, socio-legal study is an alternative approach that examines doctrinal studies of law.\(^5\) The qualitative data analysis technique uses the Miles and Huberman model, which involves data reduction, data display, and drawing conclusions.\(^6\) Additionally, data collection techniques in this study utilize primary data collection methods (observation and interviews) and secondary data collection methods (documentary study and literature review).

C. Discussion

1. The function of PPID as an information service provider of PTN-BH

The core of public information openness extends beyond implementing the transparency principle; it also encompasses accountability and legal supremacy. Furthermore, information openness also fosters active participation of the community in every process of public policy conducted by PTN-BH. Several aspects related to public policy processes include every decision outcome of the public body (PTN) and its considerations, the policies adopted along with the rationale behind public policy decision-making, project procurement work plans in PTN, PTN budgeting, operational procedures to be undertaken by PTN, and up to the mandatory disclosure and accessibility of activity reports to the public, facilitated by mass/electronic media. It aims to facilitate public oversight for the realization of improved governance of PTN-BH. The implementation of public information openness serves as both a legal foundation and a strategy for fulfilling every individual’s right to access information. Based on Article 4 of the Commission Regulation Number 1 of 2010 concerning Public Information Service Standards, there are 10 functions of PPID related to the information service standards. First, establishing regulations regarding the Standard Operating Procedures for PTN-BH. The implementation of public information openness serves as both a legal foundation and a strategy for fulfilling every individual’s right to access information.


public information services. Fourth, providing facilities and infrastructure for public information services, including notice boards, information desks, and official websites of public agencies. Fifth, establishing standard copying fees for information. Sixth, determining and updating the list of public information accessible to the public regularly. Seventh, providing and delivering public information by the Right to Information Act and its implementing regulations. Eighth, responding to objections raised by requester of public information. Ninth, publishing reports on public information services by the Right to Information Act and providing copies of the reports to the Information Commission. Tenth, evaluating and supervising public information services within the institution.7

There are two approaches commonly used to implement PPID functionalities in a PTN:

a. Offline or face-to-face interaction with PPID officers; information requester visits the PPID office to request public information. Most PTNs provide service desks for assisting information requester.

b. Online, the requester submits information requests through electronic forms on the university’s PPID website; PPID applications on Google Play Store or the App Store; and sends emails to PPID (according to information needs).

The primary responsibility of PPID at PTN is to provide a Public Information List (DIP). The Public Information List comprises documents/letters held by the PTN that can be accessed by the public or stakeholders as mandated by the Public Information Openness Act (UU KIP). The Public Information List is divided into three categories: mandatory information; available-at-all-times information; and immediate information. However, not all information can be disclosed to the public. According to Article 17 of the UU KIP, certain criteria must be completed before information may be classified as exempt information.

Exempt information is information that cannot be accessed or disclosed to the public or other stakeholders. Such information is confidential and unavailable to the public unless they have a valid interest. Before classifying information as “exempt”, a consequence test must be conducted. The consequence test must be attended by the main PPID of the state university and the departments proposing or related to the information to be classified as exempt. Once the criteria outlined in Article 17 of the Public Information Disclosure Act (UU KIP) are met, the decision of the PPID is finalized to withhold the requested information, either in part or in its entirety.

Each PPID at PTN must innovate in implementing public information openness within their respective scope to facilitate easy, quick, and effective access to public information for the public, including individuals with disabilities. Therefore, PTN should aim to accommodate the needs of disabled individuals by providing various facilities, resources, and infrastructure.

Every year, PPID at public bodies will undergo monitoring and evaluation (Monev) to ensure compliance with the UU KIP and its implementing regulations. The Central Information Commission (KIP) conducts the monitoring and evaluation of public information openness in public bodies, including PTNs. According to Article 1, paragraph 4 of the UU KIP, the Central Information Commission is an autonomous organization responsible for developing technical guidelines for standard public information services and resolving public information disputes through non-litigious mediation and/or adjudication. The monitoring and evaluation mechanism

involves each PPID at PTNs registering, enrolling, and completing questionnaires through the e-Monev application provided by KIP. The results will be reviewed and assessed by the KIP. Subsequently, eligible PPID at PTNs will be asked to present in front of a panel appointed by KIP. The presentation results and questionnaire assessments will guide KIP in determining the categories of PPID at PTNs. The categories include informative, approaching informative, sufficiently informative, less informative, and non-informative. The following table presents the monitoring and evaluation reports from KIP:

<table>
<thead>
<tr>
<th>Category</th>
<th>Informative</th>
<th>Toward Informative</th>
<th>Fairly Informative</th>
<th>Less Informative</th>
<th>Uninformative</th>
</tr>
</thead>
<tbody>
<tr>
<td>State Higher Education (PTN)</td>
<td>25</td>
<td>12</td>
<td>4</td>
<td>8</td>
<td>100</td>
</tr>
</tbody>
</table>

*Source: Central Information Commission website*

As per the report, a total of 149 PTNs were included in the KIP, among which 84 PTNs participated in registration and enrollment through the E-Monev Application. Consequently, the remaining 65 PTNs were automatically categorized as uninformative.

The result above revealed that the participation of PPID from the total number of registered state universities is not particularly high, standing at 56.4%. Considering that there are no further provisions in the Freedom of Information Act and its implementing regulations regarding the non-participation of PPID in conducting Monev, this warrants attention from the Central Information Commission (KIP). If PTNs do not participate in the Monev, KIP cannot evaluate whether PPIDs from PTNs have complied with the standards of Public Information Openness set by KIP. Therefore, regulations are required to address the issue of PTNs’ non-participation in the Monev.

2. **The function of JDIH at the university**

   Amidst the rapid developments of globalization, information openness has become a crucial issue across various sectors, notably within the governmental domain. To make information more accessible, the government must foster transparency and openness. With the digitalization trend, the urgency of addressing information openness and transparency is further emphasized. Technology plays a pivotal role in state administration, wherein even the smallest pieces of information hold significant value and are deemed essential for public awareness.

   According to Article 1, paragraph 1 of the Public Information Openness Act, information is defined as:

   1. Information means the information, statement, ideas, and signs having a value, meaning, and message, be it data, fact, or clarification that can be seen, heard, and read and are presented in various packages and formats, in accordance with the development of the information and communication technology, both electronically and non-electronically.

   Information, whether visual or non-visual, is a crucial aspect of decision-making. This also applies in the legal, such as legislative drafting. Legislative planning and drafting must be

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based on normative and empirical studies, which can be sourced from well-managed legal databases. Establishing a legal documentation and information network is vital to support the local legislative process. This network encompasses legal regulations (central, ministry/non-ministry governmental agencies, state/regional bodies), legal libraries (articles, books, research findings, and legal studies), and jurisprudence. Therefore, a source of information that offers thorough and easily accessible legal materials is required. In this regard, JDIH serves as one of the sources of information related to legal information and materials.

JDIH is a network comprising information institutions that are in charge of managing legal documents and information. According to Article 1, Paragraph 1 of Presidential Regulation Number 33 of 2012 concerning the National Legal Documentation and Information Network (hereinafter referred to as the Presidential Regulation on JDIHN), the National Legal Documentation and Information Network is defined as “The National Legal Documentation and Information Network, hereinafter referred to as JDIHN, is a shared platform for the orderly, integrated, and continuous utilization of legal documents. It serves as a means to provide comprehensive, accurate, easily accessible, and prompt legal information services.”

JDIH represents one of the government’s efforts to realize good governance in information openness, aiming to foster quality public services. It was established to assist officials in decision-making, legal planning, and legislative drafting. According to Article 3 of the Presidential Regulation on JDIHN, there are four objectives for the establishment of JDIHN, including:

a. Ensuring the establishment of integrated and interconnected Legal Documentation and Information Management across various government agencies and other institutions;
b. Ensuring the availability of comprehensive and accurate legal documentation and information that can be accessed quickly and easily;
c. Developing effective cooperation between the central network and network members, as well as among network members themselves, in providing legal documentation and information;
d. Enhancing the quality of national legal development and public service as a manifestation of good governance that is transparent, effective, efficient, and accountable.

Thus far, JDIH serves as a central access point for legal information on various matters, ranging from providing information related to positive law to informing policymaking and/or decision-making in the legislative process. Given that accurate, credible, and comprehensive legal information is indispensable in the legislative process, legal documentation and

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10 Ahmad M. Ramli, “Peran Jaringan Dokumentasi Dan Informasi Hukum Nasional Dalam Meningkatkan Akses Informasi Hukum Dan Pentingnya Etika Berinternet” (The paper was presented at the 19th Periodic Meeting of the Legal Documentation and Information Network, held in Batam on July 20-22, 2010.)
11 Isra Ismail, “Peran Jaringan Dokumentasi Dan Informasi Hukum Dalam Pembentukan Peraturan Daerah”, (The paper was presented at the 16th Regukar Meeting on the Implementation of the National Legal Documentation and Information Network System, in Banjarmasin from June 23rd to 26th, 2007).
13 Isra Ismail, Op.Cit., p. 4
information can be regarded as fundamental sources for deliberation, legal foundations, and the formulation of substantive content. Consequently, JDIH plays a crucial role in enlightening the public, particularly concerning their understanding of the law.

Legislative regulations play a vital role in governing national life, particularly in Indonesia as a rule-of-law state. The existence of positive law serves to limit, regulate legal subjects, and establish order. Such conditions can be achieved when legal information is openly accessible to the public, rapid, accurate, precise, inexpensive, and easily obtainable, as mandated by the UU KIP. Easy access and transparency to legal information can also enhance legal compliance, uphold the supremacy of law, and preserve legal culture in Indonesia, as the entire society can easily know and access relevant legal products, particularly legislative regulations. The openness and transparency of legal information assist the public in knowing the applicable legislative regulations, their effective dates, the status of related regulations (revoked or amended), the regulated subjects, and so forth.

The primary responsibility of JDIH is the joint utilization of legal documents and information in a comprehensive, fast, accurate, and easily accessible manner for the public. JDIH consists of the JDIH Center and JDIH Members as regulated in Article 4 of the Presidential Regulation on JDIH. The JDIH Center is the National Legal Development Agency of the Ministry of Law and Human Rights. It is the Provincial Legal and Human Rights Bureau that serves as the JDIH Center in its respective region, tasked with guiding, monitoring, and evaluating JDIH Members. In practice, the monitoring and evaluation indicators for JDIH Members at the district/city level are formulated by the Provincial JDIH, which comprises the Provincial Legal and Human Rights Bureau, the Provincial Regional House of Representatives Secretariat, and the Provincial Department of Communication and Information. The implementation of Monev for the management of JDIH is a tangible manifestation of guidance, development, monitoring, and evaluation of JDIH management carried out by its members. Generally, Monev encompasses assessments of internet networks, office conditions, service locations, service provision to the public, and the optimization of legal product input into the website. The Monev aims to enhance public service, ensuring that they can easily and quickly access accurate, legal information.

On the other hand, members of JDIH consist of three parts. First, the legal bureaus and/or work units responsible for organizing activities related to legal documents in State Ministries, Secretariat of State Institutions, Non-Ministerial Government Institutions, Provincial Governments, Regency/Municipal Governments, and the Secretariat of Provincial and Regency/Municipal Regional People’s Representative Councils. Second, law libraries at State Higher Education Institutions (PTN) and Private Higher Education Institutions (PTS). Third, other institutions in the field of legal documentation and information development as designated by the Minister.

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The tasks and functions of the JDIHN Center are regulated in Article 8 of the JDIHN Presidential Regulation:

(1) The JDIHN Center is responsible for providing guidance, development, and monitoring of JDIHN Members, which includes:
   a. Organization;
   b. Human Resources;
   c. Collection of Legal Documents;
   d. Technical Management;
   e. Facilities and Infrastructure;
   f. Utilization of Information and Communication Technology.

(2) In carrying out the tasks as referred to in paragraph (1), the JDIHN Center performs the following functions:
   a. Formulating policies for the guidance and development of JDIHN;
   b. Preparing and/or refining guidelines/standards for the technical management of legal documentation and information;
   c. Providing consultation on issues faced by JDIHN members;
   d. Socializing policies and technical management of legal documentation and information to JDIHN members;
   e. Guiding human resources in the management of legal documentation and information network;
   f. Serving as a reference center for legal documentation and information; and
   g. Conducting regular monitoring and evaluation every six months regarding the implementation of tasks and functions of JDIHN members.

(3) Further provisions regarding the preparation and/or refinement of guidelines/standards for the technical management of legal documentation and information as referred to in paragraph (2) letter b are regulated by a Ministerial Regulation.

The tasks and functions of JDIHN Members are regulated in Article 10 of the JDIHN Presidential Regulation as follows:

(1) JDIHN Members are tasked with managing the documentation and legal information published by their respective institutions.

(2) In carrying out their tasks as referred to in paragraph (1), JDIHN Members perform the following functions:
   a. Collecting, managing, storing, preserving, and utilizing legal document information published by their institutions;
   b. Developing a technology-based legal information system that can be integrated with the JDIHN central website;
   c. Guiding and developing human resources in the management of legal documentation and information networks within their environment;
   d. Providing facilities and infrastructure for managing legal documentation and information networks within their environment;
   e. Conducting evaluations of the management of legal documentation and information networks within their environment at least once a year; and
   f. Submitting an annual report to the JDIHN center every December.

As previously explained, JDIH plays an important role in State and Private Higher Education Institutions. Legal documentation and information are crucial as they serve as
references for implementation within Higher Education Institutions. Some legal products in Higher Education Institutions include Decrees of the Directorate-General, Regulations of the Directorate-General, Decrees of the Secretary/Director, Regulations of the Board of Trustees (MWA), Regulations of the Senate, Decrees on the Authorization to Open Study Programs at PTS, Decrees on the Authorization to Open Study Programs at PTN, Decrees on the Authorization to Change the Name of Study Programs at PTS, Decrees on the Authorization to Establish PTS, Decrees on the Authorization to Change PTS (Mergers, Consolidations, Form Changes, etc.), Decrees on the Revocation of Authorization to Open Study Programs at PTS, Decrees on the Authorization to Change the Name of Study Programs at PTN, Decrees on the Revocation of Authorization to Open Study Programs at PTN, Ministerial Regulations, Regulations of the National Accreditation Board for Higher Education (BAN-PT), Regulations of the Health Education Accreditation Board (LAMPT-KES), Regulations of the Engineering Education Accreditation Board (LAMTEKNIK), Regulations of the Social Sciences and Humanities Education Accreditation Board (LAMSAME), Regulations of the Information and Communication Technology Education Accreditation Board (LAMINFOKOM), Regulations of the Business and Management Education Accreditation Board (LAMEMBA), and so forth. These legal products regulate various aspects such as institutional management, governance, learning and student affairs, resources, and research and community service.

However, the effectiveness of JDIH in managing legal documentation and information at Higher Education Institutions has not been properly integrated, given that not all of them are integrated into the JDIH data system. At the level of Higher Education Institutions, until December 2023, there were 265 Institutional Regulations, 91 Institutional Decisions, 67 Institutional Circulars, 1 Institutional Instruction, and 5 Higher Education Institution Cooperation Agreements. According to legal document data in the JDIH, there are 18 legal products related to state universities with a legal entity (PTN-BH). On the other hand, legal products related to Public Service Agency State Universities (PTN-BLU) and Work Unit State Universities (PTN-Satker) are still unavailable.

The data shows nonoptimal integration into the JDIH, as evidenced by the disparity between the data in the JDIH and the actual number of Higher Education Institutions in Indonesia. Therefore, it is necessary to optimize the integration of documentation, information, and legal products in both state and private Higher Education Institutions through Higher Education Service Institutions. Besides, JDIH has not been effectively implemented in higher education institutions, both public and private, due to overlapping duties and functions with the PPID; which involves managing and documenting information, including legal products in Higher Education Institutions. However, JDIH has a broader scope, including Private Higher Education Institutions in legal product information management, which distinguishes it from PPID, which only involves Public Higher Education Institutions.

D. Closing

In public bodies, PPID is crucial for achieving information transparency for the public. PPID plays a significant role in providing information services and documenting all information, including legal products issued by state universities with a legal entity (PTN-BH). Specifically, documenting legal products is also a primary function of JDIH. JDIH focuses on creating a single integrated portal for all legal products issued by PTN-BH. The main goal is to make it easier for the public to obtain and access the necessary information about a public body. PPID and JDIH serve as information providers, whereas PPID has a broader scope than JDIH. As a result, in practice, the human resources within JDIH in a public body (PTN-BH) are often
also part of the PPID organizational structure. Consequently, this dual role often leads to overlapping functions, which require harmonization.

As a PTN-BH, organizational efficiency is crucial. Harmonizing the roles and functions between PPID and JDIH is necessary, especially since both manage and document information (legal products). PPID is responsible for verifying either open to the public or restricted information. On the other hand, JDIH is tasked with integrating all open legal products within a PTN-BH public body. When publishing legal products, JDIH will always consider the Decree on the results of the consequence test from PPID. Given this context, the following recommendations can be made: First, there needs to be synchronization between the Central Information Commission and the Ministry of Law and Human Rights regarding information services. Second, the organizational structure of PPID should include elements of JDIH. Third, this structure should be formalized in a regulation by the Central Information Commission. These steps will encourage the PTN-BH public body to actively become members of JDIH. Currently, the number of PTN-BH members in JDIH is still relatively low. Implementing these recommendations is expected to enhance information transparency for the public and stakeholders.

References
A. Book

B. Paper/Article/Proceeding/Research


C. Internet


D. Law

