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# From Rights to Oversight: Coalition Competition and Institutional Design in *UU PDP* No. 27/2022

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**Abstract**

**Background:** This article analyzes why Indonesia's Personal Data Protection Law (*UU PDP*) produced a state-biased institutional design for its supervisory authority, despite rhetorically adopting a GDPR-style rights framework.
**Objective:** This study explains how coalition competition and institutional mechanisms produced this outcome.
**Methods:** Drawing on qualitative methods and primary data from the Working Committee meeting minutes of Commission I of the *DPR RI*, this article integrates the Advocacy Coalition Framework (ACF), selected because it captures how competing belief systems shape institutional outcomes, and complements it with three variants of new institutionalism as explanatory layers.
**Results:** The findings show that competition between a governmental-centralized coalition favoring ministry-based oversight and a semi-independent coalition favoring institutional distance from the ministry under presidential accountability produced an asymmetric compromise: a partial victory for the latter through separation from *Kominfo*, but persistent governmental dominance in the exemption dimension, explained by path dependency, the government's veto position, and mimetic isomorphism.
**Conclusion:** The article argues that meaningful data protection reform demands coalition reconfiguration, not statutory revision alone, particularly as Indonesia's data protection authority is being formed. Theoretically, it refines the ACF by showing that stable compromise emerges when coalitions share a commitment to executive control and that the absence of a coalition option is as informative as coalition competition itself.

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## INTRODUCTION

In digital governance, personal data has shifted from an object of individual privacy protection to a strategic resource contested simultaneously by states, corporations, and civil society. This contest intensified throughout the 2020s as cross-border data flows became a central arena of regulatory competition among major economic blocs (Bradford, 2020). This shift has not been uniform. European Union member states have built data protection regimes within a fundamental rights framework that positions individuals as the primary holders of sovereignty over their own information. This is exemplified by the GDPR's enforceable data subject rights and the substantial administrative fines imposed by independent supervisory authorities, such as Ireland's Data Protection Commission and Germany's data protection authorities, since 2018. By contrast, many developing Asian states have formally adopted rights-based language while maintaining institutional arrangements that reflect a much stronger logic of state control (Greenleaf, 2012; Li et al., 2025).

The urgency of a rights-based approach to data protection regulation is not merely a normative preference. Indonesia's Constitution, through Article 28G paragraph (1) of the 1945 Constitution (*UUD 1945*), recognizes the protection of personal data as part of a constitutional right, while Article 17 of the International Covenant on Civil and Political Rights, which Indonesia has ratified, affirms privacy as a right that must be protected from unlawful interference, including interference by the state. The UN Special Rapporteur on the Right to Privacy has consistently emphasized that effective data protection regimes must be grounded in a human rights framework rather than in state security interests as their starting point. A regime that inverts this hierarchy by placing state interests above data subjects' rights in its institutional design is structurally at risk of becoming an instrument that protects the state from data subjects rather than protecting data subjects from the state. This normative tension between rights protection and state interest is precisely what the Personal Data Protection (*UU PDP*) legislative process had to resolve, and its resolution through coalition competition is the empirical puzzle this article addresses.

Indonesia provides the most instructive case of this pattern, given its position as Southeast Asia's largest digital economy and one of the world's most data-breach-prone jurisdictions. After more than a decade of deliberations since the initial draft in 2012, Law Number 27 of 2022 on *UU PDP* was enacted in October 2022 amid public pressure triggered by a series of large-scale data breaches, including 279 million Social Security Agency on Health (*BPJS Kesehatan)* records and 91 million Tokopedia accounts (Surfshark, 2024). Yet the final product of this lengthy process revealed a striking contradiction: a law that rhetorically claimed the EU's GDPR as its model placed the personal data protection supervisory authority under the President, established broad exemptions for state security interests, and failed to provide realistic enforcement mechanisms for individuals. This gap has already been flagged in early assessments of the law's institutional design (Widiatedja & Mishra, 2023).

The contradiction between the rights-based rhetoric adopted and the institutional architecture produced is not merely a technical flaw in the legislation, a claim substantiated below through process tracing of the Working Committee's deliberations and the textual evolution of the bill. It reflects a political struggle that unfolded within the law-making process itself: a struggle between a coalition that promoted personal data as an object of individual rights and one that positioned data as an instrument of state sovereignty and security. The outcome was determined not only by argumentative quality but also by who held institutional resources in the legislative arena, how Indonesia's structural legacy of state regulation historically shaped design tendencies, and how international legitimacy pressures drove the symbolic adoption of GDPR language without genuine institutional transformation.

Most existing studies on *UU PDP* rely on legal-normative analysis that evaluates the law's provisions against international standards, particularly the GDPR, without examining the political process that produced those provisions (Rosadi & Pratama, 2018; Roselin & Putra, 2025). These studies identify regulatory weaknesses but do not explain why those weaknesses exist or why arguments for improvement failed during the legislative process, a process-level gap that this article directly addresses.

The main weakness of *UU PDP* lies in the lack of independence of its supervisory authority compared with practices in several other countries. For instance, Malaysia's Personal Data Protection Commissioner and Thailand's Personal Data Protection Committee Office both occupy formally distinct administrative statuses outside their respective communications ministries, an institutional separation that *UU PDP* does not replicate, even as *UU PDP* is positioned as part of digital governance transformation and the state's legal politics in the data economy era. This has been a central issue since the deliberation of the Personal Data Protection Bill (Hamonangan & Silalahi, 2025; Roselin & Putra, 2025; Widiatedja & Mishra, 2023). The absence of an independent authority represents a structural flaw that weakens the entire regime. Kurniyasih (2025) further demonstrates how progressive and conservative coalitions in the bill deliberation competed over problem definitions and value legitimacy through political advocacy and public pressure.

Studies using political science frameworks to analyze digital policy processes in Indonesia remain limited, with existing applications of policy process frameworks in Indonesia concentrated in local legislative settings rather than digital governance (Alamsyah, 2019; Endarsiwi et al., 2025). The Advocacy Coalition Framework (ACF), developed by Sabatier and Weible (2007) as a framework for analyzing coalition competition in policy processes, has been widely applied to various policy issues in Indonesia, but its application to digital data governance and privacy protection has not been conducted systematically (Jenkins-Smith & Weible, 2025). Heinmiller (2021) found that public information policy change in Ghana was shaped by the dominance of shared beliefs and actor consolidation within the policy subsystem (Banda, 2026; Maor, 2026).

Similarly, the three variants of new institutionalism (historical institutionalism, which emphasizes path dependency and institutional legacies; rational choice institutionalism, which focuses on strategic actor calculations within institutional rules; and sociological institutionalism, which explains legitimacy pressures and normative isomorphism, as theorized by Hall and Taylor (1996) have long been productive in comparative policy analysis. However, their combination to explain the institutional design of Indonesia's digital regulation remains uncharted territory (Peters, 2026).

A methodological gap is equally critical. This article addresses that gap by treating the meeting minutes themselves, rather than the enacted text alone, as the primary unit of analysis. The Working Committee meeting minutes (*risalah rapat Panja*) of the House of Representatives of the Republic of Indonesia (*DPR RI)*, as primary data that directly document the dynamics of coalition competition, have never been systematically used in academic studies on *UU PDP*, even though these documents contain textual evidence of how each coalition's belief system was articulated, contested, and ultimately translated into binding institutional design choices. Alamsyah (2019) showed that the legislative process constitutes an arena of inter-coalition contestation involving differing interests and policy orientations.

This article fills these gaps by integrating ACF as the primary process framework and the three variants of new institutionalism as complementary explanatory layers for analyzing the legislative process of *UU PDP* No. 27/2022 (Indonesia, 2022). It combines these frameworks so that the analysis captures both the agency of competing coalitions and the structural conditions that channeled their competition toward a particular outcome. Within the ACF framework of Sabatier and Weible (2007), policy change is understood as a product of competition between advocacy coalitions, each holding a different belief system about policy problems and solutions (Jenkins-Smith & Weible, 2025). The coalition that succeeds in convincing relevant institutional audiences of its belief system is more likely to determine the final policy design. The question of why one coalition succeeds over another is then answered through three simultaneous institutional explanatory layers: historical institutionalism, through Pierson's (2004) concept of path dependency, explains the structural legacy that gives certain coalitions an initial advantage before the process begins; rational choice institutionalism explains how the government, as bill proponent, held a veto position that strategically constrained the negotiating space of the opposing coalition in the Working Committee (*Panja*); and sociological institutionalism, through DiMaggio and Powell's (1983) concept of mimetic isomorphism, explains why the winning coalition strategically adopted GDPR principles symbolically to gain international legitimacy, even as the resulting design did not fully align with the GDPR itself (Soliman, 2025).

The integration of these frameworks produces the research question driving this article: how did coalition competition in the legislative process of *UU PDP* No. 27/2022 produce a state-biased institutional design for the personal data protection supervisory authority, and what institutional factors explain the dominance of the state-centric coalition in that competition? This question is answered in two parallel layers: the first explains who competed and how each coalition's belief system was reflected in Working Committee deliberations, while the second explains the historical, strategic, and normative institutional mechanisms that advantaged the coalition that ultimately shaped *UU PDP's* institutional design.

This article contributes to three layers of academic discourse. Empirically, it produces a process-based explanation for the state-centric character of *UU PDP*, which has previously been explained only in normative terms. Theoretically, it demonstrates the analytical productivity of integrating ACF with the three variants of new institutionalism to explain the paradox between liberal regulatory rhetoric and etatist institutional design, a paradox relevant beyond the Indonesian context. Methodologically, it introduces the analysis of Working Committee meeting minutes as a replicable research approach for studying digital policy processes in Southeast Asia. Practically, the analysis offers policymakers, and reform advocates a diagnostic tool for anticipating which institutional design options are politically feasible before pursuing future regulatory revision.

## METHOD

This study employed a qualitative approach designed to explain the process of advocacy coalition competition, specifically through a single-case, within-case process-tracing design, in the formation of Law Number 27 of 2022 on Personal Data Protection (*UU PDP*) and its institutional consequences for the design of the supervisory authority. A qualitative approach was used because the object of inquiry (the production of policy beliefs, the contestation of ideas, and the distribution of institutional resources in the legislative arena) which process tracing identifies as the proper domain for within-case causal-mechanism analysis (Bennett & Checkel, 2014; Kaas et al., 2025), could not be measured quantitatively but had to be interpreted through deep textual and contextual analysis. The exploratory character of this research reflected the fact that integrating ACF with the three variants of new institutionalism to analyze Indonesia's digital data protection legislation had not previously been undertaken, thereby opening a new analytical territory that required a flexible approach attentive to the nuances of the process. Methodologically, this combination mattered because ACF alone identified who competed, while the institutionalist layers explained why one coalition's preferences, rather than another's, were ultimately encoded into law.

The research object was the legislative process of the Personal Data Protection Bill (*RUU PDP*) in Commission I of the Indonesian House of Representatives' Working Committee (*Panja*) from 2020 to 2022, with the unit of analysis being the dynamics of advocacy coalition competition and the belief systems contested in that arena. This context was selected because the Working Committee constituted a restricted deliberative arena in which the text of the law was shaped through direct negotiation between the government and the DPR, making it the space where each coalition's belief system was most directly reflected in documented statements and debates.

The actors analyzed included government representatives from the Ministry of Communication and Information Technology (*Kominfo*) as the primary bill proponent, selected on the basis of formal speaking rights within Working Committee sessions, which ensured that every actor included left a documented record of position-taking; members of the Working Committee from all factions in Commission I of the *DPR RI*; and, in certain sessions, representatives from academia, the National Cyber and Encryption Agency (*BSSN*), the Ministry of Administrative and Bureaucratic Reform, and the Ministry of Home Affairs. The decision to limit the analysis to the legislative process, without extending it to implementing regulations, was based on the consideration that the fundamental institutional design constituting this study's dependent variable was determined at the statutory level, not at the level of derivative regulations.

Data collection was conducted through a documentary study of two source categories, combined through source triangulation to strengthen validity. Operationally, triangulation was conducted by cross-checking each coalition's stated position in the meeting minutes against the same actor's formal ministerial or academic presentations and against the textual evolution of the corresponding provisions in the Academic Bill Manuscript and the Problem Inventory List (*DIM*). Therefore, a position was treated as established only when it converged across at least two independent document types. Primary data consisted of the Working Committee meeting minutes (*risalah rapat Panja*) of the *RUU PDP* in Commission I of the *DPR RI* as the main source of analysis, drawn from the complete set of Working Committee sessions convened between 2020 and 2022. Of these, the eight sessions cited directly below were selected because they contained the most explicit and analytically rich articulations of each coalition's belief system. Other primary sources included official ministerial and academic presentations delivered in meetings, the Academic Bill Manuscript (*Naskah Akademik*), the Problem Inventory List (*DIM*), and the relevant bill drafts.

Together, these primary documents enabled the tracking of coalition belief systems from multiple angles: meeting minutes recorded direct statements in debate, ministerial presentations formally reflected the government coalition's position, the Academic Bill Manuscript showed the normative framework that the proponent sought to establish, and the *DIM* revealed where tensions between coalitions were most intense. Secondary data were obtained from academic journal articles in political science, public policy studies, and data protection law, selected primarily from the 2012–2025 period to span the bill's full deliberation history and prioritized for direct relevance to ACF, new institutionalism, or Indonesian data protection governance. Selected online news coverage documenting key developments in the *UU PDP* legislative process was also used for contextual and chronological verification.

Data analysis proceeded with ACF and new institutionalism as interpretive foundations (Hall & Taylor, 1996; March & Olsen, 1989; Peters, 2026; Sabatier & Weible, 2007). All meeting minutes were read comprehensively to build a map of debate dynamics and identify the most analytically rich sessions. They were then coded based on ACF's distinctive belief-system structure, beginning with open coding to flag statements expressing positions on the institutional placement of the supervisory authority, followed by axial coding to group these statements into the two belief systems that emerged, and selective coding to link each belief-system statement to the specific provision it sought to shape. The coding also mapped the coalition resources available to each party, including formal legal authority, technical capacity, and institutional support. These were indicated, respectively, by statutory drafting authority over the bill text, in-house regulatory and technical expertise cited during deliberation, and the number of factions or external bodies publicly aligned with a given position. Changes in the text between the early draft and the final *UU PDP* were then traced in critical provisions, defined as provisions contested across multiple Working Committee sessions or recurring as flashpoints in floor debates, particularly those concerning the supervisory authority and the exemption regime, to establish the causal link between coalition dynamics and the final institutional design. Findings were then interpreted through the three variants of new institutionalism: historical institutionalism to explain the path dependency favoring the state-centric coalition, rational choice institutionalism to explain actors' strategic use of institutional positions, and sociological institutionalism to explain the symbolic adoption of the GDPR framework as an international legitimacy strategy. Overlap among the three perspectives was minimized by assigning each a distinct explanatory target; the origin of available options, the strategic use of those options, and their external legitimation, respectively. This ensured that no single empirical finding was attributed to more than one mechanism.

All data used in this study were derived from public documents available through the official websites of the *DPR RI*, the Ministry of Communication and Information Technology, and openly accessible academic publications. However, all data were collected in accordance with institutional ethical standards. Given that the study relied exclusively on publicly available legislative documents rather than human-subject data, no separate institutional ethical clearance was required. These standards included integrity in reporting findings, accuracy in source attribution, and transparency in analytical procedures, so that the research procedure could be replicated by other researchers. Coding consistency was checked through an iterative second pass over all transcripts, and document review continued until additional sessions no longer surfaced new belief-system statements, indicating thematic saturation. This procedure could not, however, recover informal negotiations conducted outside recorded sessions, a limitation revisited in the Conclusion.

## RESULTS AND DISCUSSION

### Results

Analysis of the *UU PDP* legislative process reveals the configuration of two main advocacy coalitions in the personal data protection policy subsystem. Direct evidence for this configuration, including quoted floor statements from each coalition, is presented in the Discussion section below, where the two coalition's positions are traced through the Working Committee record. The first coalition can be categorized as the governmental-centralized oversight coalition. Its influence on the final outcome is most visible in the government's explicit signaling of a presidential-level veto over institutional design, discussed in detail below. This coalition consisted of government elements, particularly the Ministry of Communication and Information Technology (*Kominfo*), the Ministry of Home Affairs (*Kemendagri*), and actors supporting a data oversight model that remained within the orbit of executive power, such as the Ministry of Administrative and Bureaucratic Reform (*KemenPAN RB*). This coalition held that personal data oversight should be placed within a centralized state coordination framework to maintain bureaucratic effectiveness, national digital governance integration, and national cybersecurity. In ACF terms, this reflects a policy core belief that positions the state as the primary actor in controlling digital data governance, a belief consistently coded across *Kominfo's* submissions and echoed in *KemenPAN RB's* interventions favoring bureaucratic consolidation.

Conversely, a semi-independent oversight coalition emerged, with the most proactive parliamentary representation traced to members of the PKB, PDI-P, and PKS factions, discussed individually below. This coalition comprised a majority of *DPR* factions, civil society organizations, digital rights communities, and academics advocating the formation of a supervisory body independent of the ministry. This coalition argued that placing the personal data protection authority under a ministry would create a conflict of interest, as the government would simultaneously serve as regulator, operator, and subject of oversight. Nonetheless, the deliberation results showed that demands for full independence did not gain dominant support. No faction or stakeholder formally tabled a full-independence model as an organized negotiating position, as elaborated below. The majority of factions in Commission I of *DPR RI* ultimately accepted a model of a body that was "independent" yet still established by the President and accountable to the President through a presidential regulation mechanism.

The meeting minutes and legislative deliberation dynamics show that the institutional question of the personal data protection authority became the main point of conflict in the RUU PDP deliberations. This was most concretely visible in the contest over the institutional placement provisions that became Articles 58–59 and the exemption scope of Article 15, both of which are examined in detail below. The government initially tended to maintain an oversight design under the ministry, while some *DPR* members opposed this model because it was seen as reducing the independence of personal data oversight. Nevertheless, the political compromise reached did not produce a fully independent body like the data protection authority model in the European Union. The final design of *UU PDP* instead reflects an institutional compromise that maintains executive dominance in national data governance. This is most directly evidenced by the government's own acknowledgment, recorded in the meeting minutes, that any substantial change to the supervisory body's institutional position required clearance from the highest executive level.

These findings reveal a tendency toward path dependency in Indonesia's bureaucratic governance, which has historically maintained executive dominance over information control and digital regulation. This tendency is historically grounded in the consistent placement of digital regulatory authority under the executive since Law No. 11 of 2008 on Electronic Information and Transactions and in the 2017 formation of the National Cyber and Crypto Agency (*BSSN*) directly under the President rather than as an independent body, a pattern examined further in the Institutional Dynamics discussion below. Concurrently, the adoption of modern data protection principles, such as data subject rights, consent, and data controller, shows a process of institutional isomorphism influenced by the development of global data protection norms, particularly the EU's GDPR model. This is identified empirically through the near-verbatim adoption of GDPR-derived terminology and rights categories into the bill's text, even if it was not fully followed by the formation of an independent supervisory authority.

Additionally, the legislative dynamics reveal strategic calculations among political actors to maintain the distribution of institutional authority. This is most explicitly evidenced by the *Kominfo* Director General's statement, examined in the Discussion below, signaling that any institutional change required presidential-level clearance. In this context, the government sought to preserve control over national digital governance, while the *DPR* chose the institutional compromise considered most realistic to avoid a legislative impasse. The formation of *UU PDP* was thus shaped not only by advocacy coalition dynamics, as explained in ACF, which identifies who competed and over what beliefs, but also by the institutional legacy of the state, global legitimacy pressures, and rational actor choices in the political arena of Indonesia's digital policy legislation.

The finding of institutional compromise in *UU PDP's* institutional design produces a theoretical proposition that refines the standard ACF model. This proposition departs from prior applications by treating compromise itself, rather than a coalition's eventual dominance, as the explanatory endpoint. Most ACF studies frame policy outcomes as coalition victories or defeats in competition over belief systems. Yet the *UU PDP* case shows that, under certain conditions, distinct from those in Heinmiller's (2021) Ghana case, where one coalition's belief system displaced the other outright, particularly when two competing coalitions both operate within the spectrum of executive control and no coalition advocates full independence, the resulting outcome is a compromise reflecting negotiation within that spectrum, not the victory of one end of the spectrum over the other (Banda, 2026).

This is an important analytical distinction. Sabatier and Weible (2007) acknowledge that coalitions can achieve policy-oriented learning and negotiation, but the ACF literature tends to position compromise as a transition toward a new stable condition in which one coalition dominates (Jenkins-Smith & Weible, 2025). The *UU PDP* case shows that compromise can become a stable outcome when two coalitions share a fundamental commitment to executive control, even as they differ in degree and modality. This configuration is likely to recur in other developing-state digital governance debates where reform is driven primarily by international legitimacy pressure rather than by a domestic constituency demanding full independence. Equally important analytically is the finding that the full-independence model never received organized coalition representation in the Panja arena. This absence was not coincidental; it reflects limits already formed before negotiations began, as the existing political configuration offered no traction for options that fundamentally departed from the logic of executive control. For policymaking, this implies that future reform advocates must first build an organized coalition explicitly committed to full independence before such a model can plausibly enter the legislative agenda. Absent that prior coalition-building work, subsequent revisions of *UU PDP* are likely to reproduce the same executive-centric compromise.

**Table 1.** Coalition Actors, Belief Systems, and Policy Outcomes in the *UU PDP* Legislative Process

| **Coalition** | **Key Actors** | **Policy Core Belief** | **Institutional Resources** | **Final Outcome in UU PDP** |
|---|---|---|---|---|
| Governmental-Centralized Oversight | *Kominfo; Kemendagri; KemenPAN RB* | Oversight should remain within centralized executive coordination for bureaucratic effectiveness and national cybersecurity | Veto position as bill proponent; in-house technical and regulatory expertise | Supervisory authority established by, and accountable to, the President; broad security exemptions retained (Art. 15) |
| Semi-Independent Oversight | Majority *DPR* factions (PKB, PDI-P, PKS); civil society; digital rights groups; academics | Ministry-based oversight creates a conflict of interest; the supervisory body should be distanced from *Kominfo* | Numerical majority across DPR factions; public and civil-society advocacy pressure | Formal separation from *Kominfo* achieved, but accountability routed through presidential regulation rather than full independence |

Source: Authors' coding of Working Committee meeting minutes and related primary documents, 2020-2022

## Discussion

### *Coalition Configuration and Competing Belief Systems*

The first orientation can be described as the governmental-centralized oversight coalition, a classification substantiated below by Director General Samuel Abrijani Pangerapan's explicit statement that institutional changes required clearance from the presidential level. This coalition sought to keep the personal data protection supervisory authority within the government structure, close to the technical ministry, particularly the Ministry of Communication and Information Technology (*Kominfo*) as the bill proponent. Its core arguments centered on three principles, each directly traceable to Samuel Abrijani Pangerapan's three-point defense of the *Kominfo*-based model recorded below: cross-sector coordination efficiency, because personal data protection is directly related to digital infrastructure managed by the ministry; coherent digital governance integration, to avoid overlapping mandates between technical regulators and data supervisors; and bureaucratic effectiveness in enforcement, which requires direct access to state apparatus capacity and resources. The government, through *Kominfo's* representatives, was the primary driver of this orientation, with the consistent secondary belief that placing the authority outside established bureaucratic channels would create inefficiency and coordination fragmentation.

The second orientation is the semi-independent oversight coalition, here defined as formally separated from any line ministry yet still established by, and accountable to, the President, in contrast to the full independence model discussed below, which would remove the body from the presidential orbit entirely. This coalition is distinguished from the governmental-centralized coalition by its insistence on formal distance from the line ministry, even though both share an underlying acceptance of presidential accountability. This coalition sought to ensure that the supervisory body would not fall under the technical ministry, in order to avoid conflicts of interest, while remaining within the President's orbit. The key argument was that a ministry cannot simultaneously serve as both regulator and supervisory body, as this would potentially create bias and conflicts of interest in overseeing itself and its business partners, while accountability to the President remains necessary to ensure coordination with broader state interests. This model offered a compromise acceptable to actors who wanted at least formal distance between the supervisor and the supervised, without having to accept the full independence model, which was considered too far removed from executive control.

An important observation from this two-coalition mapping is what was systematically absent from the negotiation arena. The full independence model outside the President's orbit, as practiced by the Corruption Eradication Commission (*KPK*), the Financial Services Authority (*OJK*), or Data Protection Authorities in Europe, appeared in the deliberations only as a comparative reference in individual Working Committee members' arguments, not as an organized and consistent coalition platform. The absence of a coalition actively pursuing this model is itself a finding, confirmed by the absence of any faction, ministry, or civil-society bloc formally tabling the *KPK/OJK*-style model as a negotiating position across the Working Committee sessions reviewed, in contrast to the semi-independent position's explicit multi-faction sponsorship documented below. It shows that the limits of political consensus available in the DPR–Government configuration at the time did not provide space for full independence as a negotiable option, as identified empirically through the systematic coding of every coded statement on institutional placement, none of which proposed removing the body from the President's orbit entirely. The real debate took place within the spectrum of executive control, spanning from direct ministerial placement at one end to presidentially accountable separation at the other, with no organized actor positioned beyond either pole.

Analysis of the Working Committee meeting minutes identifies the semi-independent oversight coalition as an orientation proactively represented by at least three actors from different factions, demonstrating that it was not merely an individual position but a patterned orientation. Drs. H. Taufiq R. Abdullah of the PKB Faction stated the most assertive position. He described the independence of the supervisory body from direct executive handling as absolutely necessary, arguing that when the government directly manages data oversight, any controversial decision would trigger public accusations of collusion between the government and business actors (DPR RI, 2021).

Taufiq framed this as a legitimacy argument: a body formally separated from the government would produce a healthier situation because it would not place the executive in direct confrontation with data subjects when problems arise. Krisantus Kurniawan of the PDI-P Faction took a more moderate position, acknowledging that five of the seven international agreements and standards relevant to personal data protection require the formation of an independent supervisory authority, while noting the tension with the government's ongoing bureaucratic simplification agenda (DPR RI, 2021).

H. Sukamta of the PKS Faction raised the conflict-of-interest problem directly, questioning whether it was appropriate to grant supervisory authority to *Kominfo* when it simultaneously served as a data controller. The Gerindra Faction, through Sugiono, took the opposing position, stating that a dedicated independent body or commission was not yet needed and preferring to rely on existing law enforcement mechanisms (DPR RI, 2021).

The presence of the semi-independent coalition across three different factions demonstrates that the pressure for institutional design further from the technical ministry was not merely an isolated voice, as substantiated by Krisantus Kurniawan's observation, noted below, that five of the seven relevant international agreements and standards require an independent supervisory authority. Moreover, their arguments consistently operated within the logic of sound governance, conflict of interest, and public legitimacy, not within the logic of individual rights. This argumentative choice explains why the compromise they accepted still placed the body within the President's orbit. The coalition's primary concern was distance from the technical ministry, not independence from the executive.

Competition between the governmental-centralized and semi-independent coalitions did not take place on equal terms. This asymmetry stemmed from two sources: agenda control as the sole drafter of the bill text, and a hierarchical reporting line that allowed the government to invoke presidential-level authority to foreclose options the semi-independent coalition might otherwise have pressed. The government, as the sole bill proponent, held control over the draft text and, as revealed in the meeting minutes, held a veto position (operationalized as the government's capacity to require any provision affecting the supervisory body's institutional placement to be escalated for clearance beyond the Working Committee, effectively setting the outer boundary of what the semi-independent coalition could realistically obtain) extending to the highest executive level:

> *"If it involves substance, it must be reported to the palace. That is why I also have to think about what can be achieved. we can discuss it."* (Samuel Abrijani Pangerapan, Director General of *Aptika*, *Kominfo*, Working Committee Meeting Minutes, 13 January 2021)

This statement reveals the limits of the available negotiating space. A parallel example appears below, where security-sector framing further narrowed what the semi-independent coalition could realistically press for. Substantial changes, including the possibility of placing the supervisory authority outside the President's orbit, required approval from a level far above what could be negotiated in the Working Committee room. Under these conditions, the semi-independent coalition faced a strategic choice: push for full independence and confront an almost certain veto, or accept placement under the President as the minimum concession obtainable from the government in exchange for support on other provisions.

The military and national security dimension emerged as a factor that indirectly reinforced these negotiating limits. Once data oversight was framed as touching on national security, the question of institutional placement ceased to be a purely administrative matter and became entangled with the constitutionally distinct chain of command governing defense and intelligence, a domain in which civilian institutional independence carries far less precedent in Indonesia. Mayjen TNI Mar. (*Purn.*) Sturman Panjaitan of the PDI-P Faction explicitly pushed for defense and intelligence perspectives to be integrated into the deliberations:

> *"What about the military perspective? Intelligence? Does this include those areas? ... TNI, BIN, BSSN. We need to involve them together."* (Sturman Panjaitan, PDI-P Faction, Working Committee Meeting Minutes, 13 January 2021)

This call placed personal data within the domain of security and defense, implicitly reinforcing the argument that oversight could not be separated from the executive chain of command. The semi-independent coalition could not dismiss this framing, as it came from an actor with strong institutional legitimacy in national security matters. The cumulative effect was to narrow the negotiating space further: the semi-independent position under the President became the upper bound of what could be achieved, rather than the lower bound being pushed for.

From the perspective of the governmental-centralized coalition (consistent with the Director General's own statement, quoted above, that the government could accept discussion so long as substantive changes were reported to the presidential level) accepting the semi-independent model under the President was a tolerable concession because it preserved what was most essential: the vertical accountability chain to the executive. Formally removing oversight from the technical ministry could even benefit the government in the long run by reducing the reputational risk of a conflict of interest, while substantive control over the supervisory body's agenda remained intact through the accountability mechanism to the President.

The sharpest confrontation in the *UU PDP* institutional design deliberations occurred between the government, which defended the *Kominfo*-based model, and nearly all DPR factions, which demanded freedom from the technical ministry. This confrontation centered specifically on the institutional placement provisions that became Articles 58–59 of the enacted law. Samuel Abrijani Pangerapan, as Director General of *Aptika*, *Kominfo*, built his defense on three arguments. First, *Kominfo* already had two directorates performing data protection functions, so what was needed was statutory strengthening, not a new body. Second, checks-and-balances mechanisms were already available through *DPR* oversight of the executive and the Ombudsman for public services. Third, an independent commission without investigators and forensic capacity would not be able to operate effectively, as seen in the condition of many quasi-governmental commissions already in existence.

The semi-independent coalition from various factions countered with three lines of argument that the government's operational logic could not overcome. On the conflict-of-interest line, Sukamta of the PKS Faction questioned whether *Kominfo*, which simultaneously served as a data controller, could fairly oversee other data controllers, while Yan Permenas Mandenas of the Gerindra Faction emphasized that *Kominfo*, as a ministry, was oriented vertically upward in its hierarchy, making its horizontal authority over peer-level institutions inherently weak. Junico BP Siahaan of the PDI-P Faction added a power-concentration dimension: if the national data center fell under *Kominfo* and its enforcement rules were also controlled by *Kominfo*, this combination could constitute an abuse of power.

On the political-will line, Sukamta stressed that technical capability is useless without the courage to act against institutions in the same circle, and that such courage cannot be guaranteed by a body that lacks political independence. On the public-legitimacy line, Rachel Maryam Sayidina of the Gerindra Faction summarized her coalition's position; all *Kominfo's* arguments failed to address the public's need for assurance that the supervisory body would be free from political pressure.

**Table 2.** *Kominfo's* Defense and the Semi-Independent Coalition's Counterarguments on Institutional Placement

| Line | ***Kominfo's* Defense (Samuel Abrijani Pangerapan)** | **Semi-Independent Coalition's Counterargument** |
|---|---|---|
| Capacity | Two existing *Kominfo* directorates already perform data protection functions; statutory strengthening, not a new body, is what is needed | Conflict of interest: *Kominfo* cannot fairly oversee data controllers when it is itself a data controller and is hierarchically oriented upward, weakening its horizontal authority (Sukamta, PKS; Mandenas, Gerindra; Siahaan, PDI-P) |
| Oversight | Check-and-balance mechanisms | Political will: technical capability is |

| Line | *Kominfo's* Defense (Samuel Abrijani Pangerapan) | Semi-Independent Coalition's Counterargument |
|---|---|---|
| | already exist through *DPR* oversight of the executive and the Ombudsman RI | meaningless without the independence to act against institutions in the same governmental circle (Sukamta, PKS) |
| Effective-ness | An independent commission without investigators or forensic capacity would be ineffective, as seen in existing quasi-governmental commissions | Public legitimacy: *Kominfo's* arguments fail to assure the public that the supervisory body would be free from political pressure (Rachel Maryam Sayidina, Gerindra) |

Working Committee Chair Abdul Kharis Almasyhari of the PKS Faction noted that nearly all factions supported the independent model and proposed the concept of a Personal Data Protection Authority (*Otoritas Perlindungan Data Pribadi*) as a state institution operating independently and autonomously. Lodewijk F. Paulus of the Golkar Faction summarized the impasse most plainly: the DPR wanted independence, while the government wanted the authority placed under the Ministry of Communication and Information Technology (*Kominfo*). The OPDP proposal ultimately failed to be adopted because the *DPR's* numerical and rhetorical majority could not substitute for the government's formal veto over the bill text; without the government's consent as the sole proponent, no provision establishing full independence could be inserted into the law, regardless of how many factions voiced support for it.

In the public hearings (*Rapat Dengar Pendapat Umum*, *RDPU*), several stakeholders from the digital industry sector reinforced arguments for separating personal data protection oversight from the technical ministry. Bima Laga, Deputy Chairman of idEA, explicitly recommended forming an independent commission with a multi-stakeholder composition that accommodated government elements, such as *Kominfo* and *BSSN*, alongside non-government parties, including business actors, associations, and civil society organizations, on the grounds of maintaining checks and balances and supervisory independence.

Landry Haryo Subianto of the US-ASEAN Business Council provided a more fundamental conceptual justification by stressing the need to distinguish cybersecurity issues, which focus on infrastructure, from privacy issues, which concern the legal framework for responsible and constructive data use for innovation. This distinction implicitly undermined the argument that personal data protection oversight should be housed under the same roof as cybersecurity authority. Budi Gandasoebrata of AFTECH took a more moderate position, proposing a specialized or independent unit within *Kominfo* composed of various experts and stakeholders. Despite differing in their degree of independence, these three voices from the industry sector shared the same secondary belief; effective oversight requires distance from the interests of a single ministry and the involvement of actors outside the government bureaucracy as conditions for enforcement legitimacy and effectiveness.

From this impasse, the position ultimately reflected in the final text of *UU PDP* can be understood, in ACF terms, as a negotiated settlement between two belief systems that diverged on ministerial proximity but converged on executive accountability. A body accountable to the President but not under any ministry represented a minimum compromise: it removed the supervisory body from *Kominfo*, as demanded by the semi-independent coalition, while preserving the accountability chain to the executive, as maintained by the government.

The final text of *UU PDP* reflects two distinct outcome dimensions of coalition competition: an institutional dimension, discussed first below, and a rights-exemption dimension, discussed second, each yielding a different balance of victory between the two coalitions. On the institutional dimension, Articles 58–59, which establish the supervisory body as accountable to the President but not under any ministry, represent a compromise between the two coalitions. This formulation reflects the position of the semi-independent coalition. There is formal distance from *Kominfo* as the largest source of conflict of interest, but accountability to the executive is maintained. For the governmental-centralized coalition, this was the minimum acceptable concession because executive control remained intact within the presidential chain of command.

On the rights-exemption dimension, the picture is significantly different. Article 15, which governs exemptions to data subject's rights for reasons of national defense and security, law enforcement, public interest, the financial sector, and statistics and scientific research, was not immediately agreed upon in Commission I's working sessions but was referred to the Working Committee for further deliberation, indicating substantive debate over the scope of those exemptions. Tracing the historical trajectory of this provision reveals a consistent pattern: the early 2019 *RUU PDP* draft already contained broad formulations covering national defense and security interests, law enforcement, and public interest in state administration, and this broad formulation was retained in the final version despite redactional changes.

During deliberations, civil society groups pressed for limiting exemptions through the principles of necessity and proportionality, as recognized in international human rights regimes and the GDPR. They argued that Article 15 was too broad and potentially constituted a blank check for the state to restrict privacy rights in the name of national security. However, this effort failed to become institutionalized in the body of the law, and the final formulation maintained that exemptions are carried out only within the framework of statutory provisions. The mechanism for limiting rights was thus legitimized by the mere existence of a statutory basis, rather than being tested through substantive proportionality standards.

Ironically, arguments for more measured exemptions emerged from within the public hearing (*RDPU*) process itself. Prof. Dr. Budi Sampurno of the Indonesian Hospital Association (*Perhimpunan Rumah Sakit Seluruh Indonesia*, PERSI) cited Article 17(2) of the GDPR, which limits the right to erasure for purposes of scientific, historical, and statistical research and public interest, as grounds for requesting a domain-specific exemption for medical records. This argument indirectly confirmed that GDPR standards, including measured, purpose-based exemption mechanisms, were acknowledged as legitimate references even by those supporting exemptions. The fact that supporters of exemptions also invoked the logic of GDPR proportionality strengthens the conclusion that Article 15, which produced national security exemption clauses without equivalent testing mechanisms, went beyond the justifications advanced by its own supporters.

The government's position on Article 15 was maintained even when the provision was reviewed by the Constitutional Court, where the government argued that Article 15 was already constitutional because rights limitations may only be imposed based on statute, not through discretionary power alone (Mahkamah Konstitusi RI, 2023). This argument effectively closed the path for constitutional correction by making the existence of a formal statutory basis the sole condition for the validity of an exemption.

Taken together, these two dimensions reveal the asymmetric character of the compromise reached. On the institutional dimension, the semi-independent coalition achieved a partial victory, with the supervisory body placed outside *Kominfo*. On the exemption dimension, the governmental-centralized coalition maintained its position far more fully: the broad exemption scope without a proportionality test limiting state discretion remained intact. This asymmetry reflects differing distributions of negotiating power across the two issues. The institutional issue touched cross-factional interests cohesive enough to drive compromise, while the national security exemption issue lay in a domain where the governmental-centralized coalition faced no equivalent counter-coalition pressure, and even arguments from exemption supporters were insufficient to push stricter limitation mechanisms into the statutory text. For ACF literature, this asymmetry suggests that aggregate measures of coalition victory can obscure issue-specific power distributions; the same two coalitions can hold opposite relative positions on different provisions within a single bill, refining ACF's typically issue-undifferentiated treatment of coalition success.

### ***Institutional Dynamics in the UU PDP Legislative Process***

Historical institutionalism provides the most fundamental explanation for why the full-independence model failed to gain traction in the *UU PDP* legislative process, substantiated by the historical record of digital regulatory authority detailed below, not because no actor desired it, but because Indonesia's institutional landscape did not provide precedents that would facilitate its adoption in the digital regulation domain. Path dependency, indicated empirically by the absence of any prior fully independent digital-sector regulator in Indonesia and by the recurring placement of new digital authorities directly under the President rather than as autonomous bodies, in Pierson's (2004) sense operates through self-reinforcing mechanisms, whereby existing institutions create expectations and costs that make deviation from established trajectories increasingly costly over time (Soliman, 2025).

Indonesia's digital regulation since *UU ITE* No. 11 of 2008 has consistently positioned *Kominfo* as the sole authority without independent oversight mechanisms. When *BSSN* was established in 2017, it was also placed directly under the President, not as an independent body. This pattern created an institutional template that served as a default assumption: digital authority belongs within the executive chain of command. Within this framework, the semi-independent model under the President was not merely a temporary political compromise but the logical continuation of the existing template. Full independence, by contrast, would have required creating a new template with implications for the entire digital regulatory ecosystem, a coordination cost far exceeding the negotiating capacity of a single legislative process.

Rational choice institutionalism then explains the concrete mechanism that shaped the form of compromise reflected in the final text. These calculations were inferred not from actor's stated intentions alone but from the observed gap between the semi-independent coalition's initial rhetorical demands and the concessions it ultimately accepted once the government's veto signal became explicit in the record. The government, as the sole bill proponent, held two distinct types of power in the negotiation process: agenda-setting power through control over the draft text and veto power through access to the highest level of executive decision-making. This combination meant that the effective negotiating space for the semi-independent coalition was defined by the government, not by the ideal standards that the coalition sought.

Under these conditions, the rational calculation for the semi-independent coalition was to accept placement under the President as the maximum achievable outcome at a manageable transaction cost. Pushing for full independence would have required elevating the issue far beyond the negotiating capacity of the Working Committee and confronting a veto that Samuel had already explicitly signaled in the meeting minutes. By contrast, maintaining arguments about the need for distance from the technical ministry was a position with traction because even government representatives could not convincingly deny that a ministry overseeing itself was problematic.

The finding extends the rationality model typically used in ACF analysis. Whereas Heinmiller (2021) found Ghanaian information-policy actors pursuing their stated beliefs largely unmediated by *ex ante* feasibility calculations, the UU PDP case shows actors pre-adjusting their public positions to anticipated institutional constraints. In standard ACF, actors are seen as optimistic about their ability to change policy if their arguments are strong enough (Banda, 2026). Rational choice institutionalism shows that sophisticated actors instead calculate the limits of what can be achieved before entering the fight, adjusting their publicly advocated positions to realistic estimates. The semi-independent coalition in the *UU PDP* case displayed this behavior: they did not push for full independence not because they did not want it, but because they calculated that it could not be obtained in the available political configuration.

Sociological institutionalism provides an additional explanatory layer beyond domestic calculations. Whereas historical institutionalism explains why full independence was unavailable and rational choice institutionalism explains how the compromise was negotiated, sociological institutionalism explains why the compromise needed to appear independent at all. Placing the supervisory body under the President but not under the ministry was not only a product of coalition negotiation but also a response to international legitimacy pressures pushing Indonesia to demonstrate that its data protection system had some element of independence from day-to-day regulatory implementers. Through DiMaggio and Powell's (1983) mechanism of mimetic isomorphism (visible empirically in the *UU PDP's* adoption of GDPR-derived terminology such as data controller, data processor, and data-subject rights, alongside a supervisory architecture that does not replicate the GDPR's independent-authority model) formal separation from the technical ministry met the minimum requirement for claiming that Indonesia's personal data protection supervisor was not entirely merged with what it supervised (Powell & DiMaggio, 2023).

This is a more subtle form of decoupling than is typically analyzed in the literature, consistent with Bradford's (2020) observation that jurisdictions frequently adopt the language of stringent foreign regulatory models without importing their enforcement architecture, not only decoupling between rights language and institutional substance but also decoupling within institutional design itself (Bradford, 2020). Formally, there is separation between the supervisor and the technical regulatory implementer. Substantively, the vertical accountability chain to the President ensures that formal separation does not produce meaningful functional independence. Greenleaf (2012) warned of the pattern of symbolic GDPR norm adoption in Asia, and this case shows that symbolic adoption operates at a more detailed level than mere language adoption; it operates at the level of institutional design itself, producing a form that appears independent from a distance but is not independent in its operational substance (Li et al., 2025).

The three institutional mechanisms analyzed together produce a more nuanced understanding of the liberal-etatist paradox in the *UU PDP.* This paradox is not merely about adopting GDPR rights language while rejecting the GDPR's institutional substance. It operates at a deeper level, where even institutional choices that appear as concessions toward independence, separating the supervisor from the technical ministry, remain within an unchanged logic of executive control. The compromise reached between the governmental-centralized and semi-independent coalitions is a compromise within limits already set by path dependency and veto position, while mimetic isomorphism allowed the compromise outcome to be packaged in a narrative legitimate enough to be presented to the international community as evidence of supervisory independence.

These findings have significant implications for understanding institutional reform in developing countries facing simultaneous pressures from international norms and domestic control interests. Vietnam's 2023 Personal Data Protection Decree, which places enforcement under the Ministry of Public Security's cybersecurity department rather than an independent authority, and Thailand's Personal Data Protection Committee Office, which retains close coordination with the Digital Economy ministry despite its nominally separate status, both suggest that semi-independence under continued executive coordination is a recurring institutional response to the same cross-pressure across Southeast Asia. The resulting model, semi-independence under the President, is a solution theoretically reproducible by other countries facing similar pressure configurations. This is not merely an *ad hoc* adaptation but a model that systematically optimizes two apparently conflicting interests: the interest in international legitimacy requiring the appearance of independence and the domestic control interest requiring an accountability chain to the executive. That this model does not meet the independence standards needed for effective rights enforcement is a calculated consequence of the compromise, not an unintended side effect.

For digital policy studies in Indonesia and Southeast Asia, these findings show that reform efforts for the *UU PDP* focused only on improving specific provisions will continue to face the same structural obstacles. Those obstacles do not lie in a lack of knowledge about best-practice models; full independence has long been known and advocated in academic literature and civil society documents. The obstacles lie in the coalition configuration that systematically excludes the full-independence model from the effective negotiating arena, a configuration shaped by historical path dependency and reinforced by the veto position inherent in the government's role as bill proponent. Meaningful reform therefore requires change at the level of coalition configuration itself. In practice, such reconfiguration could proceed through deliberate coalition-building before the next legislative window, by formally organizing the multi-stakeholder model already floated by industry actors such as idEA into a standing advocacy bloc, by aligning future deliberations with electoral or cabinet transitions when the government's veto position is least entrenched, and by documenting the operational costs of the current semi-independent arrangement to weaken the path-dependent default favoring ministerial proximity, not only at the level of statutory text.

## CONCLUSION

This study demonstrates that the legislative process of Indonesia's Law Number 27 of 2022 on Personal Data Protection was not merely a technical exercise in regulatory drafting but a political-institutional contest between a governmental-centralized coalition and a semi-independent oversight coalition. By integrating the Advocacy Coalition Framework with new institutionalism, the study explains how competing beliefs, strategic interests, executive dominance, historical path dependency, and institutional veto positions shaped the law's final design. The outcome was an asymmetric compromise: the supervisory authority was formally separated from the technical ministry, yet remained accountable to the President and embedded within a state-centric governance structure. Thus, the law established a model of semi-independence rather than full supervisory autonomy, reflecting the political limits of Indonesia's existing institutional configuration.

The study contributes empirically by reconstructing coalition dynamics from Working Committee records, theoretically by showing that stable compromise may arise when competing coalitions share a deeper commitment to executive control, and methodologically by demonstrating the value of legislative minutes for policy-process research. However, the analysis is limited to the legislative phase, relies primarily on official records, and was not independently cross-coded, leaving informal negotiations and post-enactment dynamics unexplored. Future research should examine implementation, judicial review, and comparative developments in Southeast Asia. For policymakers and reform advocates, the central implication is that meaningful reform requires not only statutory amendment but also a durable cross-faction coalition capable of challenging executive veto power and advancing genuine institutional independence.

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## AUTHOR CONTRIBUTION STATEMENT

Aurellia Shinta Purnamasari contributed to the research conception, data collection, coding, analysis, and initial manuscript drafting. Arry Bainus contributed to the theoretical framework, methodological supervision, and critical review, while Caroline Paskarina contributed to data interpretation, manuscript refinement, and final validation. All authors reviewed and approved the final version of the manuscript.

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