



ENFORCEMENT OF INFORMATION COMMISSION DECISIONS IN LABOR SERVICE STANDARD DISPUTES: A CASE STUDY OF DECISION NO. 27/IV/KI-PROV.JATIM-PS-A/2024

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Abstract: *This article examines the legal status of labor inspection service standards requested by the East Java Labor Struggle Alliance and the enforceability of the East Java Information Commission Decision No. 27/IV/KI-Prov.Jatim-PS-A/2024. The study uses normative legal research with statutory and case approaches, supported by a conceptual reading of public information law and administrative adjudication. Primary legal materials consist of Law No. 14 of 2008 on Public Information Disclosure, Law No. 25 of 2009 on Public Services, relevant Information Commission regulations, Supreme Court Regulation No. 2 of 2011, the disputed service-standard decree, and the Information Commission decision. The analysis finds that a labor inspection service standard is open public information because it governs the delivery of a public service and falls within the category of regulations, decisions, or policies that must remain accessible. An exemption claim must also satisfy the statutory consequence-test mechanism, which was not substantiated in this dispute. The second finding concerns enforcement. The Information Commission has adjudicative authority and its final decisions are legally binding, but the Commission has no independent coercive apparatus comparable to a court bailiff. When a state public body does not voluntarily comply, enforcement must proceed through the State Administrative Court under Supreme Court Regulation No. 2 of 2011. The case therefore shows that the principal weakness lies not in the normative status of the requested information, but in the layered pathway required to convert a final disclosure order into effective administrative compliance.*

Keywords: *Public Information Dispute; Information Commission; Decision Enforcement; Public Service Standards; Administrative Transparency.*

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Introduction

Public access to government information is both a constitutional right and an institutional mechanism for controlling public administration. Article 28F of the 1945 Constitution protects the right to obtain and communicate information, while Law No. 14 of 2008 on Public Information Disclosure translates that guarantee into concrete duties for public bodies. Openness is therefore not an optional feature of administrative

practice. It is part of the legal architecture through which citizens can examine decisions, budgets, service procedures, and the conduct of officials (Constitution of the Republic of Indonesia, 1945; Republic of Indonesia, 2008).

Transparency, however, should not be treated as a slogan whose effects are always automatic. Comparative public-administration research shows that disclosure can improve accountability and perceived trustworthiness, yet its impact depends on the type of information, the institutional setting, and how citizens interpret what is disclosed (Bannister & Connolly, 2011; Cucciniello et al., 2017; De Fine Licht et al., 2014; Grimmelikhuijsen, 2012; Grimmelikhuijsen & Meijer, 2014; Grimmelikhuijsen et al., 2013, 2020). Indonesian studies similarly indicate that formal openness becomes meaningful only when public bodies maintain accessible information systems, respond to requests, and allow citizens to use disclosed information in monitoring government performance (Baharuddin, 2020; Noor, 2019; Ricky & Rahimallah, 2022; Setiaman et al., 2013).

These concerns are particularly important in labor administration. The Manpower and Transmigration Office of East Java Province performs functions that directly affect workers, employers, and labor organizations, including labor inspection and the follow-up of reported violations. Service standards in this field do more than organize internal workflow. They provide a benchmark against which the public can assess whether an inspection, notice, or administrative response has been processed within the period and procedure promised by the agency.

The dispute examined in this article arose when the East Java Labor Struggle Alliance (Aliansi Perjuangan Buruh Jawa Timur, APBJ) sought access to labor inspection service standards contained in Decree of the Head of the East Java Manpower and Transmigration Office No. 560/400/108.5/VII/2020, which amended Decree No. 560/244/108.5/IV/2018. APBJ needed the document in connection with its monitoring of labor inspection services. The public body initially declined to disclose it, and the disagreement developed into a public information dispute before the East Java Information Commission (Information Commission of East Java Province, 2024; Manpower and Transmigration Office of East Java Province, 2020).

The case raises two legal questions that are often blurred in practice. The first concerns classification: whether a service-standard decree can lawfully be withheld as exempt information. The second concerns enforcement: what happens after the Information Commission orders disclosure and the respondent does not immediately comply. Those questions belong to different stages of the public information regime, so they require separate doctrinal analysis.

Existing scholarship has addressed several parts of this regulatory system. Studies have examined the implementation of public information disclosure, the mediating and adjudicative role of Information Commissions, citizen participation, and the contribution of transparency to public accountability (Gunarta & Yanti, 2022; Hasan et al., 2023; Helmi, 2019; Tjoetra et al., 2020; Tjoetra & Triyanto, 2020). Other work has discussed the institutional position of auxiliary bodies and the legal responsibility attached to information-dispute resolution (Iswandi & Prasetyoningsih, 2020; Mahendrayana et al., 2024; Muhaimin, 2018). Less attention has been given to the post-adjudication stage in a concrete labor-service dispute, especially the transition from a final Information Commission order to judicial execution when the respondent is a government agency.

This article addresses that narrower gap through Decision No. 27/IV/KI-Prov.Jatim-PS-A/2024. It asks, first, how the disputed labor service standard should be classified under the Public Information Disclosure Law and its implementing rules. Second, it examines the legal route for enforcing the Information Commission decision and the institutional friction that can arise before the applicant actually receives the requested document. The analysis is intended to clarify the relationship between substantive openness, procedural adjudication, and effective execution without expanding the case beyond the facts and legal materials relevant to the dispute.

Method

This article employs normative legal research (doctrinal legal research) because it examines the interpretation and application of legal norms rather than social behavior. It uses a statute approach and a case approach. The statute approach reviews the 1945 Constitution, Law No. 14 of 2008 on Public Information Disclosure, Government Regulation No. 61 of 2010, Law No. 25 of 2009 on Public Services, relevant Information Commission regulations, and Supreme Court Regulation No. 2 of 2011. The case approach examines the legal reasoning and consequences of Decision No. 27/IV/KI-Prov.Jatim-PS-A/2024 in relation to the disputed labor inspection service standard (Ibrahim & Efendi, 2016).

Primary legal materials consist of legislation, implementing regulations, the Information Commission decision, and the decree governing the labor inspection service standard. Secondary legal materials comprise scholarly books and peer-reviewed journal articles on public information disclosure, administrative transparency, Information Commission authority, and auxiliary state bodies. The 2024 annual report of the Surabaya State Administrative Court is used only as supporting institutional documentation to verify the post-decision procedural record. The materials were collected through document study and library research; no interviews, surveys, or respondents were used.

The legal materials were analyzed prescriptively and qualitatively through grammatical and systematic interpretation, legal classification, and consistency analysis. The analysis first determines the legal status of the requested document, then assesses the exemption rules and consequence-test requirement, and finally examines the post-decision execution pathway under Supreme Court Regulation No. 2 of 2011. Conclusions are drawn deductively from the governing norms to the issues raised by the selected dispute. Accordingly, the study is doctrinal in scope and does not claim to measure the general institutional effectiveness of Information Commissions in Indonesia.

Discussion

Legal Status of Labor Inspection Service Standards as Public Information

Law No. 25 of 2009 requires public service providers to prepare and establish service standards as a reference for service delivery. A standard normally contains elements that allow users to understand procedures, requirements, timeframes, fees where applicable, service products, complaint mechanisms, and other performance commitments. Once such a standard governs how a public agency provides a service, its function is outward-facing even if the document was produced through an internal administrative process. In the labor inspection context, access to the standard enables workers and labor organizations to compare actual administrative conduct with the benchmark formally adopted by the agency (Republic of Indonesia, 2009).

The disputed document was established through Decree No. 560/400/108.5/VII/2020 concerning an amendment to the procedures for labor inspection in East Java. The case materials record a 77-day processing benchmark for specified inspection steps, subject to the availability of information from the complainant. APBJ requested the document after questioning delays in labor inspection follow-up. That factual setting matters because the requested material was not personal data, an investigative secret, or an internal note detached from public service delivery. It was a legal-administrative instrument used directly to regulate a public-facing service (Information Commission of East Java Province, 2024; Manpower and Transmigration Office of East Java Province, 2020).

The classification question is resolved most directly by the Public Information Disclosure Law. Article 18(1)(b) excludes from the exemption regime “stipulations, decisions, regulations, circular letters, or other forms of policy” issued by public bodies. Information Commission Regulation No. 1 of 2021 reinforces the same orientation by placing regulations, decisions, and policies among information that public bodies must make available at all times. A labor inspection service-standard decree therefore falls on the open side of the statutory framework unless a different part of the document

contains information that is independently protected by law (Information Commission of the Republic of Indonesia, 2021; Republic of Indonesia, 2008).

The fact that the standard was issued in the form of a decree rather than a regulation raises a different administrative-law question. Service standards have general effects on service users, and Law No. 25 of 2009 also emphasizes participation in their formulation. It is therefore legitimate to ask whether the chosen legal instrument and drafting process were ideal. That debate does not alter the document's disclosure status. Even if the instrument were later found procedurally imperfect, a decree or policy governing public service remains public information under Article 18(1)(b).

This distinction is important because it prevents two legal inquiries from being conflated. Whether an official selected the correct regulatory instrument concerns the validity or quality of administrative rulemaking. Whether citizens may obtain a copy concerns the openness regime. In Decision No. 27/IV/KI-Prov.Jatim-PS-A/2024, the Information Commission was therefore on firm legal ground when it treated the requested service standard as information that had to be disclosed.

The Consequence Test and the Limits of Exempt Information

The Public Information Disclosure Law adopts a presumption of openness and treats exemptions as limited exceptions. Article 17 identifies categories that may be withheld because disclosure could harm protected interests, including law enforcement, intellectual property, national defense and security, economic resilience, foreign relations, personal privacy, and certain confidential inter-agency communications. The list is not a general license for public bodies to withhold documents whenever disclosure is administratively inconvenient (Republic of Indonesia, 2008).

Article 19 adds an important procedural safeguard. Before classifying information as exempt, the Information and Documentation Management Officer (PPID) must conduct a careful consequence test and assess the harm that disclosure would cause. Government Regulation No. 61 of 2010 and Information Commission Regulation No. 1 of 2021 elaborate this duty by requiring written reasoning for the classification of exempt information. The consequence test must therefore precede a lawful refusal; it cannot be constructed after a dispute begins merely to defend an earlier decision (Information Commission of the Republic of Indonesia, 2021; Republic of Indonesia, 2010).

In the present dispute, the difficulty for the respondent was more fundamental than an inadequate consequence test. The requested material was a decision or policy governing labor inspection service standards, a type of document specifically protected from blanket exemption by Article 18(1)(b). The respondent would need to identify a

separable portion containing genuinely protected information before Article 17 could become relevant. A generalized assertion that the decree was not intended for public access could not satisfy that legal threshold.

For workers, this distinction has practical consequences. A service standard is useful only when service users can know the procedure against which administrative conduct is evaluated. If the agency can retain the standard while simultaneously using it as an internal benchmark, the public cannot identify delay, inconsistency, or departure from the stated procedure. Research on Indonesian information disclosure repeatedly shows that the value of transparency lies in usability and access, not in the mere existence of documents inside government repositories (Negara et al., 2022; Syeh et al., 2022).

The Commission's decision thus reflects both a textual and functional reading of the law. Textually, decrees and policies are generally open. Functionally, publication of a labor service standard makes administrative accountability possible. These reasons are independent but mutually reinforcing, which is why the dispute should have been resolved at the request stage rather than after formal adjudication.

Authority of the Information Commission and the Binding Character of Its Decisions

The Information Commission was created as an independent institution responsible for implementing the Public Information Disclosure Law, establishing technical standards for information services, and resolving public information disputes through mediation or non-litigation adjudication. In constitutional scholarship, bodies with regulatory, administrative, and quasi-judicial functions are often described as state auxiliary organs. That description helps explain the Commission's mixed institutional character, but its legal authority ultimately derives from the statute rather than from the label attached to the institution (Asshiddiqie, 2013; Iswandi & Prasetyoningsih, 2020).

Information Commission Regulation No. 1 of 2013 structures the dispute-resolution process from application through mediation or adjudication. When mediation fails or the dispute concerns information excluded from mediation, an adjudicative panel may issue a decision ordering disclosure. The decision is not merely advisory. The KIP Law provides mechanisms for objection to the competent court and, once the decision becomes final, for enforcement under the applicable procedural rules (Information Commission of the Republic of Indonesia, 2013; Republic of Indonesia, 2008).

In Decision No. 27/IV/KI-Prov.Jatim-PS-A/2024, the East Java Information Commission ordered the respondent to provide the requested document within ten working days after the decision obtained permanent legal force. The order addressed the substantive issue correctly: the service standard was open information and had to be handed over. The remaining problem was institutional rather than interpretive. The Commission can

decide the dispute, but it does not maintain its own bailiff or coercive execution apparatus to compel a resistant public body physically to obey the order.

That limitation should not be described as meaning that the Commission's decisions lack legal force. A more accurate formulation is that enforceability depends on a statutory and judicial pathway outside the Commission itself. Studies of Information Commission practice in several provinces show that this separation between adjudication and coercive execution can extend the time and effort required for applicants to realize rights they have already won (Aryandhana et al., 2025; Gunarta & Yanti, 2022; Helmi, 2019). The problem is consequently one of execution design in practice, not the absence of an adjudicative mandate.

Judicial Execution of a Final Information Commission Decision

Supreme Court Regulation No. 2 of 2011 provides the bridge between Information Commission adjudication and judicial enforcement. For disputes involving a state public body, objections are examined by the State Administrative Court; disputes involving non-state public bodies fall within the jurisdiction of the District Court. More importantly for a decision that has already become final, Article 12 allows the information requester to seek an execution determination from the competent court. The request must be submitted in writing with an official copy of the Information Commission decision (Supreme Court of the Republic of Indonesia, 2011).

The procedural design produces a two-stage reality. The applicant may first prevail before the Information Commission, yet effective access can still depend on the respondent's voluntary compliance. If compliance does not occur, the applicant must then return to a judicial institution to activate coercive execution. The Surabaya State Administrative Court's 2024 annual activity report records Decision No. 27/IV/KI-Prov-Jatim-PS-A/2024 among the execution applications received during that year, confirming that the execution mechanism was not merely theoretical in this dispute (Surabaya State Administrative Court, 2025).

The case materials also record that copies of the requested documents were ultimately handed over on 25 April 2024. Read together with the court record, that event should not be used to suggest that the execution framework worked without friction. Rather, it shows how a right that was clear at the substantive level still required additional procedural pressure before the information was effectively delivered. The distinction between eventual compliance and efficient enforcement is central to evaluating the case.

The layered process has costs for both applicants and institutions. Citizens who have already completed the request, objection, and Information Commission stages may

have to prepare another application for execution. Public bodies, meanwhile, still expend resources defending non-disclosure positions that could have been resolved through accurate classification at the PPID level. Simplifying compliance therefore does not require transforming the Information Commission into a court; it requires stronger institutional routines that connect final disclosure orders with prompt administrative implementation.

Article 52 of the Public Information Disclosure Law provides criminal liability for specified unlawful failures to provide information, but criminal enforcement is not a substitute for execution of an adjudicative order. A police report and criminal investigation pursue a different legal objective and impose different evidentiary requirements. Treating penal provisions as the ordinary route to obtain a service-standard document would make the information-access system unnecessarily punitive and slow. The preferable model is rapid administrative compliance, with judicial execution available when a final order is ignored.

Implications for Public Information Governance in Labor Services

The case offers a practical lesson for public bodies that manage labor services. Documents that determine service procedures, processing periods, complaint routes, inspection steps, or official responsibilities should be mapped from the outset as proactively accessible information. Publishing them regularly through the PPID website reduces uncertainty for service users and lowers the likelihood that routine document requests will escalate into formal disputes. This approach is consistent with the service-standard obligations of Law No. 25 of 2009 and the information-service framework of Information Commission Regulation No. 1 of 2021.

Better publication also improves the quality of oversight. Workers can distinguish between a lawful extension of a procedure and an unexplained delay only when the governing standard is visible. Employers gain the same benefit because inspection expectations become predictable. The effect of transparency is therefore not limited to exposing administrative failure; it can also reduce unfounded allegations by making the applicable procedure easier to verify.

Institutionally, provincial Information Commissions need sufficient administrative support while preserving independence in dispute adjudication. Their secretariats may rely on regional-government budget and administrative structures, yet adjudicative credibility requires safeguards against actual or perceived interference when the respondent is itself a regional public body. Scholarship on auxiliary institutions and public-information dispute resolution supports clearer institutional separation between logistical support and decision-making authority (Mahendrayana et al., 2024; Muhaimin, 2018).

The more immediate reform need, however, concerns execution discipline. A final order to disclose an ordinary service-standard document should not routinely require prolonged follow-up before compliance. Public bodies can reduce this problem by establishing internal protocols that automatically route final Information Commission decisions to the responsible PPID and agency head, set a short compliance calendar, record the handover, and notify the applicant. Judicial execution under Supreme Court Regulation No. 2 of 2011 should remain an enforceable safeguard, but it should function as a last step rather than the normal way to obtain information that was open from the beginning.

Conclusion

The labor inspection service standards disputed in Decision No. 27/IV/KI-Prov.Jatim-PS-A/2024 constitute open public information. Their legal function is to guide the delivery of a public service, and Article 18(1)(b) of Law No. 14 of 2008 expressly places decisions and other forms of public policy outside the ordinary exemption category. Information Commission Regulation No. 1 of 2021 further requires regulations, decisions, and policies to be available at all times. Any attempt to withhold a separable part of such a document would still require a legally grounded exemption and a consequence test under Article 19.

The case also demonstrates that the weakness of the system lies largely in enforcement. The Information Commission can issue a binding adjudicative order, yet it has no independent coercive apparatus to execute that order. For a state public body, a final decision may therefore require an execution application to the State Administrative Court under Supreme Court Regulation No. 2 of 2011. The official record of the Surabaya State Administrative Court confirms that this decision entered the execution pathway in 2024, while the case record indicates eventual handover of the documents on 25 April 2024.

Improvement should focus on preventing unnecessary disputes and shortening the distance between a final decision and compliance. Labor agencies should publish service standards proactively, PPIDs should apply the exemption regime narrowly and document consequence tests, and regional public bodies should establish internal procedures for immediate implementation of final Information Commission decisions. At the institutional level, execution links with the State Administrative Court should remain clear and accessible, while the administrative support of provincial Information Commissions should be organized in a way that protects their adjudicative independence.

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