

PROMOTING REFORM IN COMPLAINT HANDLING BY STRENGTHENING INTERNAL AUDITORS AND CITIZEN PARTICIPATION



INDONESIA
CORRUPTION WATCH

Promoting Reform in Complaint Handling by Strengthening Internal Auditors and Citizen Participation

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The progress achieved in strengthening participatory oversight of public procurement sector, as demonstrated in this report, is a testament to the commitment, willingness, and dedication of all these stakeholders.

Executive Summary

Public procurement, a sector prone to corruption, can greatly benefit from public participation in providing oversight as a key to driving greater transparency and accountability. This report compares the effectiveness of Government Internal Auditors (APIP) in Maros Regency, Kupang City, and Semarang City in addressing citizen complaints. It also examines the transformation in internal auditors' complaint-handling performance in handling complaint before and after the adoption of a Standard Operating Procedure (SOP), developed with the support of ICW and local partners.

Indonesia Corruption Watch's analysis of the 2021-2022 public procurement complaint database revealed that 62.2% reports submitted by ICW and its CSO network were rejected by the National Public Procurement Agency (LKPP) due to insufficient data. This high rejection rate reflects a structural challenge: while the public is expected to provide evidence, they have very limited authority and access to relevant data. From the same database, 32.5% (40 reports) were escalated by LKPP to more than 15 internal auditor offices, as they were found to have sufficient supporting evidence. In addition, LKPP referred two reports to law enforcement agencies and closed two overlapping reports, while two others were being handled by different entities, according to LKPP statement.

Between 2023 and 2024, the quality of citizen reports improved significantly. A total of 104 citizens, including youth, women, and persons with disabilities, were trained to conduct procurement oversight using opentender.net. They prepared and submitted 19 complaints to LKPP, and **all of which were escalated to internal auditor offices**. The reports covered various aspects of procurement in the infrastructure sector and identified findings across 11 categories, including inconsistency between implemented works and planning documents, poor vendor track records, and suspected fictitious projects.

This report highlights how collaboration between civil society and regional government actors, particularly internal auditors, can accelerate complaint-handling response times. In Maros, response time improved dramatically **from 478 days to 152 days**. Similar progress, though constrained by ongoing technical challenges, was observed in Semarang, while Kupang showed the least improvement due to structural limitations, notably the shortage of financial and human resources in public service delivery.

Overall, there remains a lack of robust standards for complaint handling. The formulation of an SOP marks a positive next step, but its impact can only be sustained through institutional commitment, regular monitoring, and an accessible feedback mechanism for reporting entities. Systemic efforts to strengthen collaboration among the public, internal auditors, and LKPP, alongside enhanced data transparency, are key to building a credible public procurement system.

Background

Public procurement activities are a routine function for the government. The procurement of goods, services, and construction works takes place on a daily basis, often involving complex and lengthy procedures. This complexity hinders citizens' ability to oversee public procurement processes. Yet it is the citizens who are directly affected by poor work quality and project implementation by vendors. In the most severe cases, partly due to weak government oversight, poor performance can even result in fatalities.¹

Public participation is therefore essential to ensuring the quality and integrity of public procurement outcomes. The government can encourage such participation by providing effective reporting channels that citizens can use to raise concerns about procurement anomalies.

The complaint-reporting mechanism is regulated under Article 77(1) of [Presidential Regulation No.46 of 2025 \(PR 46/2025\) concerning the Second Amendment to Presidential Regulation No.16 of 2018 on Public Procurement](#). According to this regulation, citizens may submit written complaints to Government Internal Auditors (APIP, *Aparat Pengawas Intern Pemerintah*), supported by factual, credible, and authentic evidence. Furthermore, Article 77 paragraph (7) of PR 46/2025 mandates the National Public Procurement Agency (LKPP, *Lembaga Kebijakan Pengadaan Barang/Jasa Pemerintah*) to develop a system for responding to public procurement-related complaints.

With this mechanism in place, in 2023 Indonesia Corruption Watch (ICW) invited civil society actors, including activists, journalists, student press organizations, students, and individual citizens, to actively participate in procurement oversight activities. The aim was to build their knowledge of public procurement and strengthen their capacity in monitoring, report drafting, and case advocacy.

Reflecting on experiences from 2021-2022, ICW identified significant gaps in public knowledge and technical capacity in drafting a complaint report. As a result, of the 123 reports submitted to the LKPP, 62.6 percent were rejected due to insufficient supporting evidence.

Given this context, ICW sought to improve the quality of complaint-handling mechanisms in three regions: Maros Regency, Kupang City, and Semarang City. ICW collaborated with local partners in each region, [YASMIB](#), [Bengkel APPeK](#), and [PATTIRO Semarang](#), and engaged APIP in the respective local governments to advance policy reform in complaint handling for public procurement.

¹ Kurniawan, D. (2020, February 4). PNS Diknas Jadi Tersangka Korupsi SDN Gentong Pasuruan yang Ambruk [*Staff of Local Education Office Named Suspect of Corruption Offense After SDN Gentong Pasuruan Roof Collapsed*]. *liputan6.com*.
<https://www.liputan6.com/surabaya/read/4171160/pns-diknas-jadi-tersangka-korupsi-sdn-gentong-pasuruan-yang-ambruk>

Objectives

1. To analyze the practices of handling public procurement-related complaints by Government Internal Auditors (APIP) in three regions: Maros Regency, Kupang City, and Semarang City
2. To develop recommendations for national-level stakeholders (LKPP and the Ministry of Home Affairs) and regional-level stakeholders to improve APIP's public services in handling procurement-related complaints.

Scope

This study focuses on the practice of Government Internal Auditors (APIP) in handling citizen complaints across the three regions: Maros Regency, Kupang City, and Semarang City. It compares the situation before and after the adoption of the Standard Operating Procedure (SOP) on Handling Public Procurement-Related Complaints, which was developed with the support of Indonesia Corruption Watch (ICW) as part of efforts to improve complaint-handling system.

The findings of this study are intended to inform initiatives to strengthen cooperation between LKPP and APIP in responding to citizen complaints, particularly those submitted through the [e-pengaduan](#) platform. The Overview section provides a brief explanation of the institutional relationship between LKPP and APIP.

This report does not examine the institutional infrastructure available to APIP in managing complaints, such as budget allocation, staffing capacity, or local political dynamics. These topics are referenced only briefly, where relevant, to provide contextual information.

Overview

The public procurement sector is highly vulnerable to corruption. Indonesia Corruption Watch (ICW), in its 2023 report *Tren Penindakan Kasus Korupsi tahun 2023* (Law Enforcement Against Corruption Trend 2023), found that 39% of 791 corruption cases investigated by law enforcement authorities involved offenses related to public procurement.² Such a rampant rate of corruption often leads to poor quality in public service delivery. Citizens' oversight is therefore essential and can be exercised, among other means, through complaint reporting in case of suspected procurement fraud.

The government provides a clear legal basis for citizens to exercise their right to report irregularities in public services and to ensure that their report complaints are properly handled and resolved. Article 8 (2) of [the Public Services Act \(Law No. 25/2009\)](#) mandates that public service entities must manage citizen complaints. Each entity is responsible for providing reporting channels and assigning competent staff to manage it.³

Similarly, the right to report irregularities in the public procurement sector is protected under Article 77 (1) of Presidential Regulation No.46 of 2025 (PR 46/2025) concerning the Second Amendment to Presidential Regulation No.16 of 2018 on Public Procurement. This article explicitly stipulates that citizens may submit reports of irregularities to Government Internal Auditors (APIP), supported by factual, credible, and authentic evidence. APIP is the competent authority to follow-up on such reports⁴ and must submit its audit findings to the relevant minister/head of institution/head of local government⁵.

At the institutional level, the National Public Procurement Agency (LKPP) has established a dedicated public complaint channel to accommodate procurement-related complaints, as stipulated under Article 3 (3) of LKPP Regulation No. 6 of 2022 on the Public Procurement Complaint System. LKPP is responsible for forwarding citizen reports submitted through this channel to APIP, while APIP must provide summaries of their follow-up actions to the reporting entities.⁶

The following chart illustrates the institutional relationships and workflow in the public procurement complaint handling mechanism.

² Diky Anandya and Kurnia Ramadhana, "Laporan Hasil Pemantauan Tren Korupsi Tahun 2023" [*Trend of Law Enforcement Against Corruption 2023*] page 18, accessed from <https://antikorupsi.org/sites/default/files/dokumen/Narasi%20Laporan%20Hasil%20Pemantauan%20Tren%20Korupsi%20Tahun%202023.pdf>

³ Article 36, Law 25/2009

⁴ Article 77 paragraph (3) PR 46/2025

⁵ Article 77 paragraph (4) PR 46/2025

⁶ Article 7 letter c of LKPP Regulation 6/2022

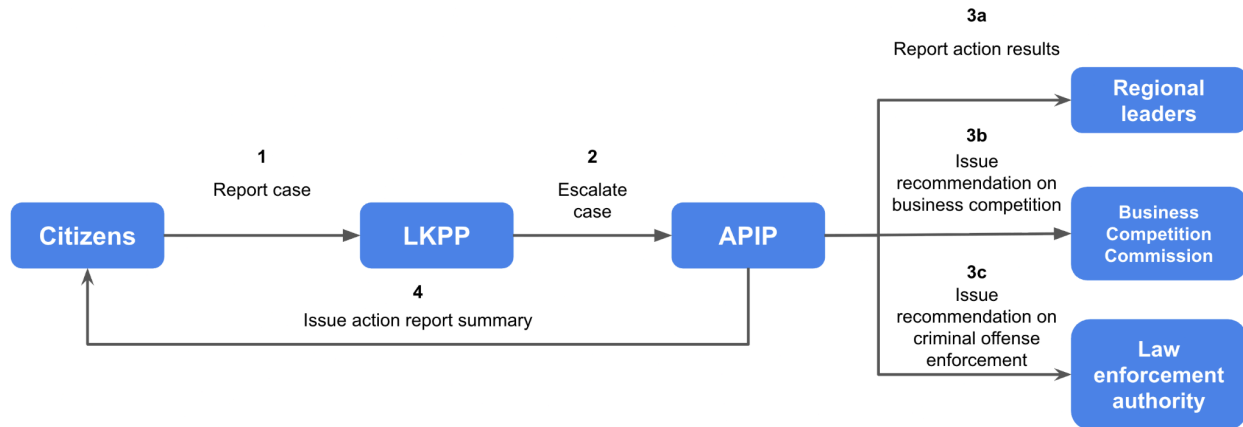


Figure 1. Flow of public procurement complaint handling⁷

With the workflow described in Figure 1 in mind, in 2021 and 2022, ICW began to engage members of the public to participate in public procurement oversight. ICW implemented two strategies.

First, it organised a Monitoring Marathon (Monithon), a 24-hour event that encouraged citizens to monitor potentially problematic public procurement projects across Indonesia. *Second*, focusing on civil society organizations (CSOs), ICW organized a similar activity that ran for a longer duration. In both events, participants learned about public procurement concepts and processes, monitoring techniques, and reporting strategies. They were also required to prepare and submit reports through LKPP's reporting channel at e-pengaduan.lkpp.go.id.

In total, 135 people submitted 123 complaint cases citing suspected procurement fraud. Of these, the National Public Procurement Agency (LKPP) found that 62.6% (77 cases) lacked sufficient evidence, and therefore were not forwarded to APIP. Reports deemed to have adequate proof amounted to 32.5% (40 reports) and were distributed to more than 15 APIP offices. Additionally, two reports were referred to law enforcement agencies, and two others were closed due to overlapping content. LKPP further stated that the two remaining reports were being handled by other agencies.

⁷ Source: [LKPP Regulation 6/2022](#)

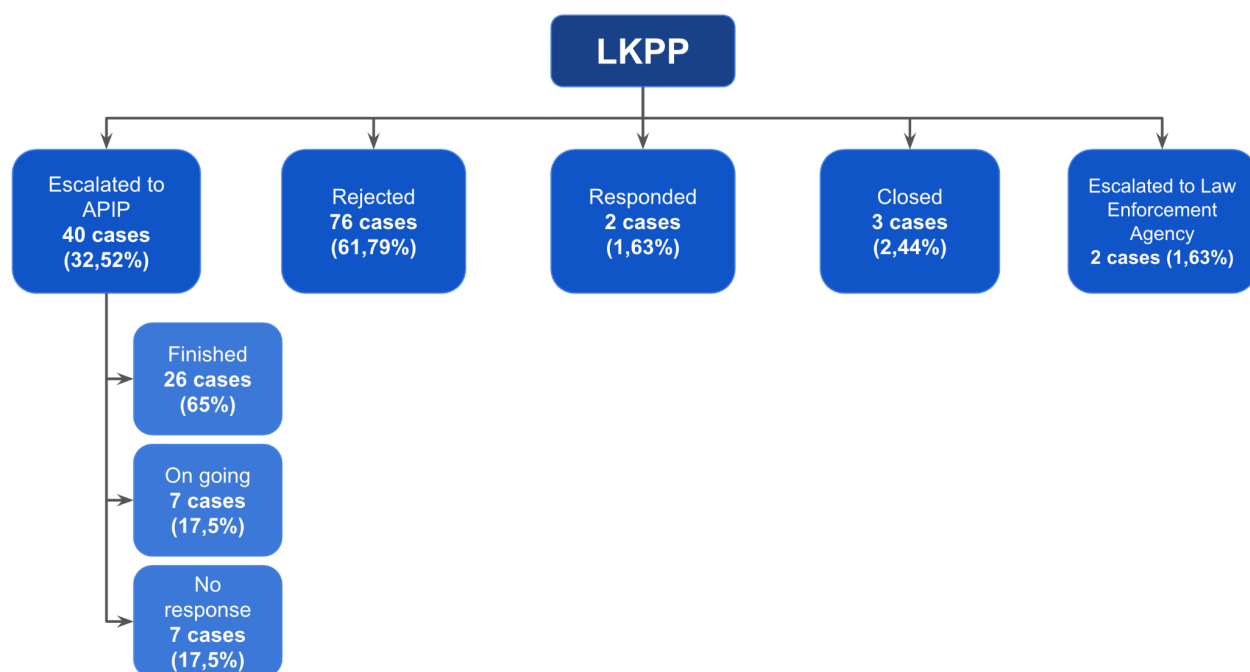


Figure 2. Public Monitoring Data 2021-2022⁸

Based on Figure 2, two lessons can be drawn from doing public monitoring activities.

First, the 62.6% of reports rejected by LKPP due to insufficient evidence suggest that citizens, as reporting entities, are required to meet a high evidentiary threshold before authorities can take action. However, ordinary citizens lack the authority and access needed to collect corroborating evidence.

Second, although LKPP escalated several reports, a number of them were not followed up on or addressed by APIP, even though citizens have the right to receive responses to their reports. Figure 2 indicates that seven reports were listed as “in process”, but without clear information on what this process entailed. Meanwhile, nine reports (22.5%) were not responded to by nine APIP offices across various administrative levels – ministerial, provincial, regency, and municipality.

As of November 2024, ICW data showed that 90 public procurement complaints were submitted to LKPP in 2021. These reports were acted upon by APIP in three ministries and in 13 regional governments. Response time ranged from 19 business days to 1,440 business days. In 2022, APIP’s response time ranged between 54 business days and 1,256 business days. The details are below.

⁸ Source: ICW analysis, 2025

Table 1. Monitoring of Public Procurement Complaint Handling by APIP in 3 Ministries and 13 Regional Governments 2021-2022⁹

No	Year	Number of Reports	Shortest response time (business days)	Longest response time (business days) per 6 August 2025	Average response time (business days)
1	2021	90 reports	19	1,440	388
2	2022	33 reports	54	1,256	361

Table 2. Monitoring of Public Procurement Complaint Handling by APIP in Maros Regency and Kupang City in 2023, source: ICW analysis, 2025

No	Year	Number of Reports	Shortest response time (business days)	Longest response time (business days) per 6 August 2025	Average response time (business days)
1	2023	4 reports	293	336	327

As shown in Tables 1 and 2, APIP required a significant amount of time to resolve complaints. Moreover, reporting entities did not receive updates on the follow-up progress. The failure to fulfil citizens' right to information, including information on complaint handling, constitutes a violation of public service principles. Article 37 (1) stipulates that the complaint management mechanism must be timely and that complaints must be properly resolved.

Given this context, ICW decided to prioritise two main objectives. *First*, to improve citizens' capacity in data collection and report drafting in order to increase the likelihood that LKPP would accept their reports. *Second*, to advocate for reform in the way APIP handles citizens' complaints.

To achieve these objectives, ICW engaged APIP in 3 (three) regions: Maros Regency, Kupang City, and Semarang City, and collaborated with its local partners located in these regions: YASMIB, Bengkulu APPEK, and PATTIRO Semarang, to facilitate and accelerate the reform process.

Reforming Complaint Handling

ICW encountered several challenges in partnering with government actors to advance reform in public procurement complaint handling. These challenges included frequent turnover of APIP personnel, which required some engagements to be restarted; the appointment of interim regional leaders with limited authority, as the project timeline coincided with the 2024 regional elections, and varying levels of political commitment among regional leaders.

⁹ Source: ICW analysis, 2025

APIP is not an independent entity within the bureaucratic structure but operates directly under the authority of regional heads. As a result, the buy-in of regional leaders was crucial to the reform effort initiated by ICW, and its local partners required formal approval from regional leaders, along with an official commitment to pursue reforms in complaint handling.

At the outset, ICW explored collaboration with 14 regional governments: Banda Aceh City, West Aceh Regency, Aceh Besar Regency, Central Java Province, Semarang City, Yogyakarta City, West Nusa Tenggara Province, North Lombok Regency, Mataram City, South Sulawesi Province, Maros Regency, Makassar City, East Nusa Tenggara Province, and Kupang City.

The process of shortlisting potential regions took place during the 2024 regional election period. In four regions, Banda Aceh, West Aceh, Aceh Besar, and Yogyakarta, the electoral process resulted in the appointment of interim leaders. During discussions, all indicated that they lacked the authority to sign cooperation agreements with third parties. In several other regions, regional leaders demonstrated limited political willingness to reform public procurement complaint-handling practices.

Ultimately, of the 14 potential regions, three regions agreed to collaborate with ICW and its partners to strengthen public procurement oversight and complaint handling. Leaders in Maros Regency, Kupang City, and Semarang City demonstrated political will to engage with civil society organisations on this issue, as formalised through cooperation agreements between ICW, the respective regional governments, and local partners.



Figure 3. Distribution of Potential Public Procurement Interventions in 14 Regions¹⁰

¹⁰ Source: ICW analysis, 2025

Following the signing of cooperation agreements, ICW and its partners implemented two main activities. *First*, ICW raised public awareness of public procurement through training programmes and empowered citizens to conduct monitoring activities. These efforts aimed to strengthen citizens' capacity to collect data and prepare complaint reports supported by sufficient evidence, thereby increasing the likelihood that complaints received by APIP would be acted upon and investigated.

The decision to prioritise citizen empowerment was informed by experiences from 2021 and 2022. The high rate of rejected complaints indicated that citizens required a different strategy to ensure that citizen complaints met evidentiary requirements, particularly as complaint handling increasingly relies on data-driven assessments.

Second, ICW and its partners worked closely with APIP to accelerate the complaint-handling process. Available data showed that some complaints submitted as early as 2021 had not received responses or follow-up actions, indicating weaknesses in existing mechanisms. These shortcomings may be attributed to limited budgetary and human resources, the low prioritisation of complaint handling, and the absence of a minimum service standard for complaint handling.

The intervention model developed by ICW targeted both civil society actors and government institutions, with the expectation that each group would contribute to building a credible public procurement system through an effective complaint handling mechanism.

ICW designed this model based on its assessment of the strategic roles of both actors. APIP plays a particularly critical role in public complaint handling: although complaints are initially submitted through LKPP's system, once verified, they are largely escalated to APIP. Only a small number of complaints are referred to other institutions, such as law enforcement agencies and the Indonesia Competition Commission (KPPU). Strengthening APIP's capacity and improving complaint-handling systems are therefore essential to effective oversight.

Citizens also play a strategic role as monitoring actors, as they are the ultimate beneficiaries of public procurement projects. Importantly, citizens help fill oversight gaps, given that the number of auditors is insufficient relative to the scale of procurement activities nationwide. The availability of the Opentender platform has made public monitoring more accessible. With increased awareness and engagement, citizens can make meaningful contributions to safeguarding the integrity of the public procurement system.

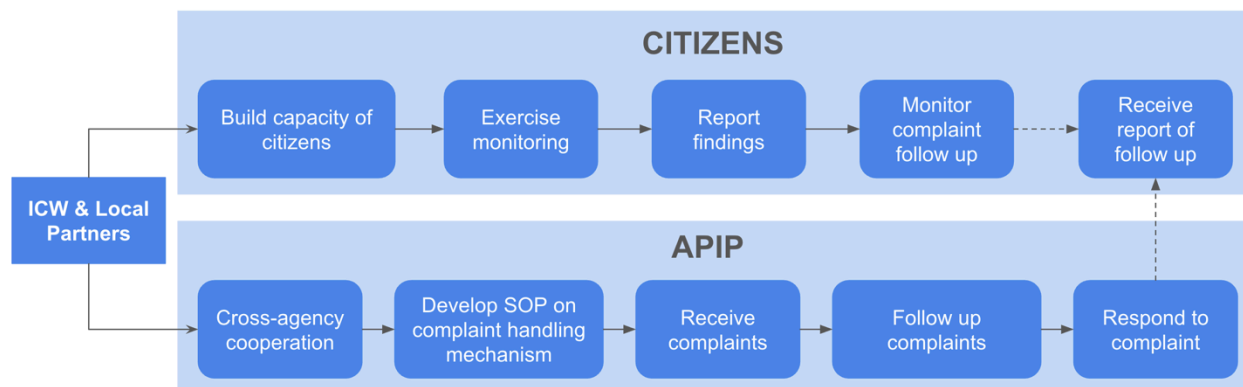


Figure 4. Intervention Model for the Public Procurement Complaint-Handling Mechanism¹¹

Empowering Citizens in Public Procurement Monitoring

Public procurement is complex and often difficult for citizens to understand. This challenge is intensified by the system's procedural complexity and frequent regulatory changes. Since 2003, the regulatory framework has undergone more than a dozen amendments, with the most recent being the Presidential Regulation No. 46 of 2025, issued on 30 April 2025.

In addition, public procurement information managed by LKPP is fragmented across multiple platforms. Information on procurement planning, for example, is available through the [procurement planning database \(Sistem Informasi Rencana Umum Pengadaan, SiRUP\)](#), while vendor performance data can be accessed via the [vendor performance database \(Sistem Informasi Kinerja Penyedia or SIKaP\)](#). Meanwhile, information on tender announcements and awards is published through individual e-procurement system platforms (Layanan Pengadaan Secara Elektronik or LPSE), which are embedded within decentralized government agencies and number approximately 670 platforms¹² nationwide. For citizens to effectively monitor public procurement projects, a solid understanding of procurement concepts and practices, as well as the technical ability to access and compile information, is essential.

The challenge extends beyond procurement literacy. Citizens must also be able to identify and flag irregularities. At any given time, the large volume of ongoing procurement projects creates an additional obstacle: citizens need not only the motivation to engage in oversight, but also the ability to prioritise which projects to monitor.

In 2013, in collaboration with LKPP, ICW developed [Opentender.net](#), a platform designed to support public oversight of procurement. Opentender includes a red-flag feature that identifies high-risk projects based on seven risk indicators, enabling users to focus on projects with a higher likelihood of irregularities.¹³

¹¹ Source: ICW analysis, 2025

¹² <https://inaproc.id/lpse?page=1>

¹³ <https://dev.opentender.net/method>

In 2023 and 2024, ICW and its local partners in three regions trained 104 citizens who represented diverse community groups, including youth, persons with disabilities, and women. Unlike the Monitoring Marathon format, training participants received intensive technical assistance. They were also given a one-month monitoring period, allowing sufficient time to collect data and prepare well-documented reports, thereby reducing the risk of complaint rejection by LKPP and APIP.

As a result, a total of 19 complaints were submitted through LKPP's e-pengaduan complaint channel, all of which were approved and escalated to APIP for further follow-up. The complaints covered nine road construction projects, three school construction projects, two irrigation system development projects, two textbook procurement projects, one housing facility construction project, one tourism site construction project, and one public facility construction project.

The issues identified in the 19 reports were classified into 11 categories of findings, as presented in Table 3 below.

Table 3. Classification of Public Procurement Monitoring Findings, 2023-2024¹⁴

No	Type of Finding	Number of Findings
1.	Suspected inconsistency between the implemented construction and the project planning	11
2.	Suspected poor track record of winning vendors	6
3.	Suspected deliberate delay in tendering	4
4.	Vendor unlocated at their stated address	4
5.	Project suspected to be unfinished or completed below specifications	4
6.	Suspected tender rigging	3
7.	Restricted access to tender information	3
8.	Suspected inconsistency of work site (fictitious project)	2
9.	Failure to communicate project activities to local communities	1
10.	Suspected budget inefficiency	1
11.	Suspected conflict of interest	1

Compared to complaints submitted in 2021-2022, citizens' complaints in 2023-2024 demonstrated significantly stronger evidentiary quality, including detailed documentations and photographic evidence from field observation. One key factor contributing to this improvement, relative to the 24-hour Monitoring Marathon format, was the extended monitoring period, which

¹⁴ Source: ICW analysis, 2025

enabled citizens to gather more comprehensive data and substantiate their findings more effectively.

Enhancing APIP's Effectiveness in Handling Complaints

Responding to and resolving public complaints is a formal mandate of regional governments. Article 23 (3) of the Ministry of [Home Affairs Regulation No. 8 of 2023 on Complaint Management in the Ministry of Home Affairs and Regional Governments](#) stipulates that complaints originating from monitoring activities must be forwarded to the Liaison Officer within the APIP office of the relevant ministry or regional government for follow-up.

APIP's role in addressing public complaints is further reinforced under Article 77 (3) of [Presidential Regulation 46 of 2025](#), which requires APIP to follow up on complaints within their scope of authority, as referred to in paragraphs (1) and (2). In the context of public procurement, APIP's responsibilities are specified in Article 7(c) of [LKPP Regulation No. 6 of 2022 on the Public Procurement Complaint System](#), which mandates APIP to prepare a summary of follow-up actions and submit it to the reporting entity.

Response time is a key indicator of complaint-handling effectiveness. Delays or failures to respond undermine public trust in the complaint-handling system, as well as in APIP's capacity to address and resolve reported issues.¹⁵

APIP's limited responsiveness emerged as a significant challenge, as reflected in the 2021-2022 public procurement complaint handling data covering 16 APIP offices (Table 1). ICW identified two main factors contributing to delayed response: the absence of standardised operating procedures and limited capacity for complaint management.

In collaboration with its anti-corruption network, ICW worked with APIP offices in Maros Regency, Kupang City, and Semarang City from 2023 to 2024 to improve the effectiveness of complaint handling. ICW also assessed the impact of these interventions on APIP's responsiveness and overall complaint-handling performance.

Strengthening APIP's Internal Rules

In 2023, YASMIB and Bengkel APPEK conducted public monitoring activities on infrastructure procurement in Maros Regency and Kupang City. As a result, four complaints were submitted to LKPP through the *e-pengaduan* channel on 13 November and 17 November 2023. LKPP responded to these complaints on separate occasions, confirming that the reports had been escalated to APIP in the respective regions. LKPP's response time ranged from 1 to 25 calendar days.

¹⁵ Bunda, M. R., & Tjenreng, M. B. Z. (2025). Analisis Efektivitas Kebijakan Pengaduan Publik dalam Pelayanan Administrasi Publik [*Analysis on the Effectiveness of Public Complaint Policy in Administrative Public Services*]. SCIENTIFIC JOURNAL OF REFLECTION: Economic, Accounting, Management and Business, 8(1), 189-196.

However, LKPP's responsiveness was not matched by local APIP offices. APIP's failure to promptly address the escalated complaints pointed to capacity gaps between supervisory institutions and highlighted weaknesses in APIP's complaint-handling mechanisms.

Table 4. Public Complaint Handling in Maros Regency and Kupang City¹⁶

No	Procurement Package	Where	Date of Complaint Submission	Date of Escalation from LKPP to APIP	Date of Response	Total Response Time
1	New Construction of Subsidised Housing for Low-Income Households, House Reconstruction Program, General Allocation Funds 2021 of Kupang City	Kupang City	13 November 2023	14 November 2023	5 March 2025	477 days, or 1 year, 3 months, and 22 calendar days (resolved)
2	Road Improvement with HRS Base Construction in Kupang City, 2023	Kupang City	13 November 2023	29 November 2023	5 March 2025	462 days, or 1 year, 3 months, and 7 calendar days (resolved)
3	Road Maintenance, Batangase Road - Carangki	Maros Regency	17 November 2023	22 December 2023	5 September 2024	258 days or 8 months and 18 calendar days (resolved)
4	Road Improvement of Kuri Lompo - Kuri Caddi	Maros Regency	17 November 2023	22 December 2023	25 October 2024	308 days or 10 months and 8 calendar days (resolved)

The table shows that APIP's response times were significantly delayed, with 258 and 477 calendar days representing the fastest and longest response times, respectively. This indicates low institutional readiness to address public complaints in a systematic and timely manner, due in part to the absence of Standard Operating Procedures (SOPs) as internal technical guidelines.

¹⁶ Source: ICW analysis, 2025

Delays in response time have at least two serious implications. First, prolonged inaction risks eroding public trust in government institutions. The popular phrase “no viral, no justice” reflects this declining confidence, as minimum service standards for responding to public complaints are often unmet. Second, weak complaint handling undermines corruption enforcement and increases the risk of state losses. Public complaints can serve as early warning signals for APIP to scrutinise procurement projects. When complaint-handling mechanisms function effectively, APIP can promptly conduct inspections to confirm potential administrative or criminal violations, halt problematic projects, and prevent inefficient or redundant public spending. Ultimately, effective complaint handling enables APIP to safeguard public resources and ensure project quality.

Against this backdrop, ICW engaged APIP offices to develop complaint-handling SOPs aimed at addressing these shortcomings. Together with its partners, ICW supported APIP in strengthening complaint-handling effectiveness and providing greater assurance to reporting entities that their complaints would be acknowledged and acted upon.

The SOPs were developed using a participatory approach to ensure they reflected local conditions, including budget constraints, staffing capacity, and workload. ICW and its local civil society partners sought to ensure that SOPs were practical and relevant from the perspectives of both APIP and reporting entities. For example, response timelines were proposed and agreed upon collectively by APIP staff. Table 5 summarises the SOPs and their key features in Maros Regency, Kupang City, and Semarang City.

Table 5. Summary of SOPs in Maros Regency, Kupang City, and Semarang City¹⁷

Feature	Maros Regency (Endorsed 12 April 2024)	Kupang City (Endorsed 16 April 2024)	Semarang City (Endorsed 31 October 2024)
Response time	9 business days to decide whether to follow up or close the complaint. No timeline specified for follow-up or feedback to reporting. APIP believed that response timeline had to consider the complexity of audit subjects.	28 business days to follow up and provide feedback to reporting entities.	30 business days to follow up and provide feedback to reporting entities.
Procedure	<ol style="list-style-type: none"> 1. Document complaints 2. Summarize complaints (5W+2H) 3. Assign verification team 4. Review complaints 5. Assign follow-up team 	<ol style="list-style-type: none"> 1. Document complaints 2. Assign verification team 3. Review complaints (5W+2H) 4. Update action progress to reporting entities 5. Address complaint 6. Draft report 7. Submit report to regional head 8. Follow-up results communicated to reporting entities 	<ol style="list-style-type: none"> 1. Document complaints 2. Assign complaint verification team 3. Review complaints (5W+2H) 4. Address complaint 5. Draft report 6. Submit report to regional head 7. Follow-up results communicated to reporting entities
Information to reporting entities	The reporting entity DOES NOT RECEIVE any update from APIP on the progress or results of follow-up to their complaint.	Reporting entities RECEIVE UPDATES after complaint review from APIP and are informed of decisions to follow up or close complaints.	The reporting entity RECEIVE UPDATES from APIP post-complaint review but does not receive updates during the process.

¹⁷ Source: ICW analysis, 2025

As shown in the table, each region’s SOP differs in terms of response timelines and procedural design. Among the three, Kupang City’s SOP is the most progressive, particularly in its clear timelines and structured communication with reporting entities.

In Maros Regency, the SOP does not clearly define a timeline for resolving complaints. While it specifies a nine-business-day period for deciding whether to follow up or close a complaint, it does not establish deadlines for follow-up actions or for communicating outcomes to reporting entities. According to APIP in Maros, this flexibility reflects the varying complexity of audit subjects. While this rationale is understandable, APIP must nevertheless proactively provide progress updates. Without a communication mechanism, accountability and transparency in complaint handling are weakened, and the risk of maladministration increases.

By contrast, Kupang City and Semarang City established clearer timelines for complaint resolution. Kupang defined a 28-business-day period for follow-up and feedback, while Semarang adopted a 30-business-day timeline. Procedurally, Kupang’s SOP is the most responsive, requiring APIP to communicate with reporting entities at two key stages: after complaint review and after completion of follow-up actions. Semarang’s SOP mandates only final communication, while Maros’ SOP does not require any communication with reporting entities after submission.

From a regulatory and accountability perspective, Kupang City is the most progressive in developing complaint handling SOP. These findings indicate that Maros Regency and Semarang City still have room to improve their SOPs to ensure more effective complaint handling, enhance APIP performance, and ultimately strengthen public trust in public procurement oversight.

Analysis of SOP Implementation

Beyond supporting the design of complaint-handling SOPs, ICW and its local partners also tested their implementation across all three regions. To this end, in 2024, ICW and civil society groups conducted public procurement monitoring and report-back. In total, civil society actors in Kupang City, Maros Regency, and Semarang City prepared 15 complaints with the assistance of YASMIB, Bengkel APPeK, and PATTIRO Semarang. Table 6 presents details of these complaints and corresponding response times.

Table 6. Public Complaints Submitted through YASMIB, Bengkel APPeK, and PATTIRO Semarang in 2024¹⁸

No	Procurement Package	Region	Date of Submission	Date of Escalation from LKPP to APIP	Date of response	Total response Time (update per

¹⁸ Source: ICW analysis, 2025

						6 August 2025)
1	Monitoring of Improvement Project in Jalan Cumi-Cumi Raya Kel. Bandarharjo FY 2022	Semarang City	4 September 2024	24 September 2024	In progress (per 6 August 2025)	336 business days
2	Road Construction to Jangli Campus, UNDIP Higher Education Institution, FY 2022	Semarang City	5 September 2024	17 October 2024	14 May 2025	251 business days (resolved)
3	Improvements and Repair of Residential Infrastructure and Facilities in Muktiharjo, Kidul, Semarang City	Semarang City	10 September 2024	25 September 2024	16 June 2025	279 business days (resolved)
4	Construction of Agro Sodong Pool Facility, FY 2023, Semarang City	Semarang City	12 September 2024	26 September 2024	16 May 2025	246 business days (resolved)
5	Classroom Rehabilitation, SD N 02 Tandang FY 2022 Semarang City	Semarang City	13 September 2024	26 September 2024	In progress (per 6 August 2025)	327 business days
6	Construction of Computer Lab in SMPN 19, Kupang City	Kupang City	19 November 2024	6 December 2024	In progress (per 6 August 2025)	260 business days
7	Construction of Water Distribution Network from Dendeng River, Alak Subdistrict	Kupang City	19 November 2024	5 December 2024	In progress (per 6 August 2025)	260 business days
8	School textbook Procurement in	Kupang City	19 November 2024	9 December 2024	In progress (per 6 August 2025)	260 business

	Kupang City, East Nusa Tenggara					days
9	School textbook Procurement (Regional Budget/APBD) Project of Education and Culture Office, Kupang City 2023	Kupang City	19 November 2024	9 December 2024	In progress (per 6 August 2025)	260 business days
10	Construction of Water Distribution Network from Dendeng River in Kota Raja Subdistrict	Kupang City	27 November 2024	9 December 2024	In progress (per 6 August 2025)	252 business days
11	Construction of Pangisoreng - Batu Putih Bridge, Mallawa Subdistrict (Continued)	Maros Regency	15 Januari 2025	7 February 2025	18 June 2025	154 business days (resolved)
12	Hotmix Work in Ladange – Mallawa + Abbalu – Takkehatu Sites, Mallawa Subdistrict	Maros Regency	15 Januari 2025	7 February 2025	18 June 2025	154 business days (resolved)
13	Construction of Pattiro Bridge in Tompobulu Subdistrict (Phase IV)	Maros Regency	15 Januari 2025	7 February 2025	18 June 2025	154 business days (resolved)
14	Construction of Public Camping Facility	Maros Regency	15 Januari 2025	7 February 2025	18 June 2025	154 business days (resolved)
15	Construction of Pakalu Simbang Bridge	Maros Regency	15 Januari 2025	7 February 2025	18 June 2025	152 business days (resolved)

The table shows that APIP in Semarang City resolved three of the five complaints submitted by PATTIRO Semarang and civic groups within 246 to 279 business days. Two reports remained

pending due to an administrative archiving issue, where one complaint was registered under two different identification numbers.

In Kupang City, Bengkel APPEk and its civic group partners submitted five complaints to the APIP office. However, as of the time of writing (October 2025), APIP had not taken follow-up action on any of the complaints. Bengkel APPEk undertook multiple advocacy efforts, including written correspondence, in-person meetings with the Assistant Inspector of Kupang City, resubmission of printed complaints, and a formal hearing with the Mayor of Kupang. While APIP committed to following up, it also indicated that other priorities took precedence and that complaint handling would need to be deferred.

By contrast, in Maros Regency, YASMIB submitted five complaints to APIP, all of which were followed up on and resolved. Response times ranged from 152 to 154 business days, representing a notable improvement compared to 258-308 business days in 2023.

Table 7. Comparison of Complaint Handling 2023-2024 in Maros, Kupang, and Semarang, source: ICW analysis, 2025

No	Year	Number of complaints	Response Time (in business days)	Longest response time (in business days)	Average response time (in business days)
1	2023	4 complaints	293	336	327
2	2024	15 complaints	152	336	233

Overall, Table 7 demonstrates that collaboration between civil society organisations and regional governments in Maros, Kupang, and Semarang contributed to improved complaint-handling effectiveness by APIP. The shortest response time decreased from 293 business days in 2023 to **152 business days in 2024**, representing a **48 percent improvement**. Despite this progress, ICW conducted further analysis to assess the extent to which APIP complied with the SOP timelines. Table 8 summarises the findings.

Table 8. Analysis of APIP compliance with SOP in 2024¹⁹

No	Region	Response Time in SOP	Shortest Response Time	Longest Response Time	Gap between SOP and actual response time
1	Maros Regency	9 business days	152 business days	154 business days	143-145 business days
2	Kupang City	28 business days	252 business days	260 business days	224-232 business days
3	Semarang City	30 business days	246 business days	336 business days	216-306 business days

¹⁹ Source: ICW analysis, 2025

As shown in Table 8, despite overall improvements, APIP response times remain far from compliant with the timelines stipulated in their respective SOPs. Furthermore, the SOPs have not yet effectively addressed key issues in complaint handling, particularly regarding feedback to reporting entities. All three APIP offices demonstrated non-compliance with their own SOP provisions.

These findings indicate that an SOP alone is not a silver bullet for governance reform. Its effectiveness depends on the presence of the enabling factors, including strong leadership commitment, adequate budget allocation, manageable workloads for APIP staff, and robust monitoring and evaluation systems. In addition, SOPs should be made publicly accessible through regional government websites to ensure transparency and allow citizens to understand and monitor complaint-handling procedures.

At the same time, SOPs provide an important entry point for governance improvement. Citizens can use SOPs as a reference to monitor compliance and request updates on their complaints. The potential value of SOPs is reflected in the shorter response times observed in 2024 compared to 2023, demonstrating that even partial implementation can contribute to improved complaint-handling performance.

APIP Budget Analysis: Maros, Kupang, and Semarang

Budget availability is critical to optimising APIP’s performance as internal auditors within government institutions. Budgeting for the exercise of the monitoring function is regulated under the [Ministry of Home Affairs Regulation Number 15 of 2023 on Regional Budget and Expenditure Planning for 2024](#). The regulation stipulates that monitoring activities should receive at least

- one percent (1%) of total spending allocation in regencies/municipalities with budgets up to IDR 1 trillion (USD 60 million);
- 0.75% in regencies/municipalities with budgets between IDR1-2 trillion (USD 60-120 million); and
- approximately 0.5% in regencies/municipalities with over IDR 2 trillion (USD 120 million).

The regulation further specifies that these funds should be dedicated exclusively to oversight activities and must be separate from personnel expenditures. However, it does not explicitly earmark budget allocation for complaint handling as a distinct component of monitoring activities.

Table 9. Required Share of Monitoring Budget by Regional (Local Government) Budget Size²⁰

APBD (Regional Budget Size)	< IDR 1 trillion (approx USD 60 million)	IDR 1-2 trillion (USD 60 - 120 million)	> IDR 2 trillion (USD 120 million)

²⁰ [Ministry of Home Affairs Regulation Number 15 of 2023](#)

Monitoring budget (%)	1%	0.75%	0.5%
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ICW, in collaboration with YASMIB, Bengkel APPeK, and PATTIRO Semarang, collected budget data from Maros Regency, Kupang City, and Semarang City. In 2024, Maros Regency managed a Regional Budget of [IDR 1.6 trillion](#) (USD 95 million)²¹, Kupang City [IDR 1.26 trillion \(USD 75 million\)](#)²², and Semarang City [IDR 5.46 trillion](#) (USD 325 million)²³.

Based on the ministerial regulation, both Maros Regency and Kupang City were expected to allocate 0.75% of their budgets to monitoring activities equivalent to IDR 12.07 billion (USD 718 thousand) and IDR 9.5 billion (USD 565 thousand), respectively. Semarang City, with a larger budget, was required to allocate 0.5%, amounting to IDR 27.3 billion (USD 1.6 million).

An analysis of regional budget documents shows that Semarang City allocated IDR [27.56 billion \(USD 1.6 million\)](#)²⁴ for monitoring, slightly exceeding the mandatory minimum. By contrast, Maros Regency allocated [IDR 11.15 billion \(USD 663 thousand\)](#)²⁵ from IDR 12.07 billion (USD 718 million), while Kupang City allocated only IDR [6.94](#) billion (USD 413 thousand)²⁶, well below the required IDR 9.5 billion (USD 565 thousand).

Table 10. Analysis on Monitoring Budget Allocation in Maros Regency, Kupang City, and Semarang City²⁷

Region	APBD (Regional / Local Government Budget)	% of budget allocated	Ideal monitoring budget	Actual budget	Actual budget in percentage to APBD
Maros Regency	IDR 1.6 trillion (USD 95 million)	0.75	IDR 12.07 billion (USD 718 thousand)	IDR 11.15 billion (USD 663 thousand)	0.69
Kupang City	IDR 1.26 trillion (USD 75 million)	0.75	IDR 9.5 billion (USD 565 thousand)	IDR 6,94 billion (USD 413 thousand)	0.55
Semarang City	IDR 5.46 trillion (USD 325 million)	0.5	IDR 27.3 billion (USD 1.6 million)	Rp27,56 billion (USD 1.6 million)	0.5

This analysis shows that only Semarang City complied with the monitoring budget allocation mandated under Ministry of Home Affairs Regulation No 15 of 2023. In contrast, Maros Regency

²¹ [Article 2 of Maros Regency Regulation Number 9 of 2023 on Regional Budget and Expenditure in Fiscal Year 2024](#)

²² [Annex I to Kupang City Regulation Number 9 of 2023 on Regional Budget and Expenditure in Fiscal Year 2024](#)

²³ [Article 6 of Semarang City Regulation Number 9 of 2023 on Regional Budget and Expenditure in Fiscal Year 2024](#)

²⁴ [Annex II page 7 of Semarang City Regulation Number 9 of 2023 on Regional Budget and Expenditure in Fiscal Year 2024](#)

²⁵ [Annex II page 7 of Maros Regency Regulation Number 9 of 2023 on Regional Budget and Expenditure in Fiscal Year 2024](#)

²⁶ [Annex II page 6 of Kupang City Regulation Number 9 of 2023 on Regional Budget and Expenditure in Fiscal Year 2024](#)

²⁷ Source: ICW analysis, 2025

and Kupang City failed to allocate sufficient resources to support monitoring activities. These funding gaps are likely to constrain APIP's ability to carry out effective oversight, particularly in responding to and following up on public procurement complaints.

Overall, the evaluation of SOP implementation across the three regions demonstrates that the formulation of a standard procedure is an important first step in reforming complaint handling. SOPs provide guidance for APIP in carrying out their duties and offer citizens a reference point when submitting complaints. However, SOPs alone are insufficient to guarantee effective public service delivery. They must be supported by institutional preparedness, clear oversight chains, adequate budget allocation, and functional feedback mechanisms that ensure reporting entities receive timely information on complaint follow-up. The disparities observed among APIP offices in Maros Regency, Kupang City, and Semarang City underscore an important lesson that bureaucratic reform cannot stop at policy documentation. It must also drive changes in organisational culture and be embedded with the broader governance system to be effective and sustainable.

Conclusion

Since 2021, ICW and its local partners have advocated for improvements in the handling of public procurement complaints in three regions. These efforts have included public monitoring activities, capacity-building initiatives, and direct collaboration with APIP offices to develop standard operating procedures (SOPs) for complaint handling. From this process, several key findings emerge:

1. Citizen empowerment improves complaint quality.

Training and technical assistance aimed at strengthening public participation in procurement monitoring proved effective in improving the quality of complaints submitted to LKPP and APIP. The acceptance rate of reports by LKPP increased from 62.6% in 2021-2022 to 100% in 2023-2024.

2. The absence of SOPs contributed to delayed responses.

The lack of formal complaint-handling SOPs contributed to prolonged response times by APIP, with some complaints taking more than one year to be addressed. Collaborative efforts between civil society organisations and regional governments in Maros Regency, Kupang City, and Semarang City led to improved responsiveness. Response time is shorter, from a minimum of 293 business days in 2023 to 152 business days in 2024, representing 48% improvement within one year.

3. Feedback mechanisms remain uneven across regions.

Of the three regions where complaint-handling SOPs have been adopted, two regions include provisions for communicating outcomes to reporting entities. However, Kupang City is the only region that mandates not only post-follow-up notifications but also progress updates during the follow-up process. The SOPs

of Maros Regency and Semarang City lack this feature, despite its importance in ensuring transparency and accountability in complaint handling.

4. Budget compliance varies, bundling funding is not the sole determinant of performance.
Only one of the three regions complied with the monitoring budget allocation requirements stipulated in the Ministry of Home Affairs Regulation No. 15 of 2023. Insufficient funding may constrain APIP's ability to respond to public complaints. However, ICW's findings indicate that budget availability is not the only factor influencing performance. For instance, although Maros Regency did not fully meet its budget allocation mandate, its APIP office demonstrated the shortest response time in resolving complaints.
5. SOPs must be supported by broader institutional reforms.
The adoption of SOPs must be accompanied by reforms in other areas, including strong leadership commitment to enhance APIP's oversight capacity, institutional readiness, adequate budget allocation, and the availability of competent staff to manage complaints effectively.
6. Variation in implementation underscores the importance of political will.
Differences in the level of SOP implementation across the three regions indicate that SOPs alone are insufficient. Effective reforms require political will, consistent leadership, and adaptive institutional management to ensure that procedures are implemented as intended and sustained over time.

Recommendations

National Public Procurement Agency (LKPP)

1. Strengthen system interoperability and service standards.
Ensure that the *e-pengaduan* system is interoperable with APIP's internal systems and governed by a clear Service Level Agreement (SLA) supported by technical guidelines. The SLA should serve as a service quality benchmark for APIP, specifying response times and maximum complaint-handling durations to ensure transparency and accountability.
2. Enhance transparency for reporting entities.
Integrate a tracking feature in *e-pengaduan* that allows reporting entities to monitor the progress of their complaints once escalated to APIP, including visibility over APIP's response time and follow-up actions.
3. Expand system coverage across APIP offices.
Ensure that all APIP offices are connected to *e-pengaduan* to streamline complaint submission and follow-up. This would eliminate the need for citizens to submit complaints manually or in person, reducing time and financial burdens.

4. Strengthen inter-institutional collaboration.

Collaborate with other government institutions, such as the Ministry of Home Affairs, the Ministry of State Apparatus Empowerment and Bureaucratic Reform, and the Indonesian Ombudsman, to improve the effectiveness and credibility of public complaint-reporting mechanisms.

Ministry of Home Affairs

1. Develop a national SOP for complaint handling.

Establish a standard complaint-handling SOP as a reference for subnational APIP offices. A national SOP would ensure timely procedures and consistent communication with citizens, as reporting entities. Citizens should also be able to report instances of non-compliance. The SOPs developed and implemented in Maros Regency, Kupang City, and Semarang City, along with their evaluations, can serve as a baseline for this national framework.

2. Oversee subnational budgeting for monitoring functions.

Strengthen oversight of subnational budget formulation processes, particularly allocations for monitoring and oversight activities, to ensure APIP offices are adequately funded and that local governments comply with annual budgeting mandates.

3. Monitor APIP complaint-handling performance.

Systematically monitor APIP's performance in handling public complaints to ensure that all reports are addressed, followed up, and resolved in accordance with applicable standards.

Subnational Governments and APIP

1. Ensure adequate budget allocation.

Allocate sufficient funding for monitoring functions in line with the Ministry of Home Affairs' budgeting guideline to enable APIP to perform public services, including complaint handling, without financial constraints.

2. Integrate systems with LKPP's e-pengaduan.

Connect APIP's internal systems with *e-pengaduan* to ensure seamless access to complaints submitted through the platform.

3. Strengthen SOP implementation and oversight.

Monitor complaint follow-up processes to ensure consistent implementation of SOPs and adherence to prescribed timelines.

4. Institutionalise SOP training.

Provide regular training for all APIP staff on complaint-handling SOPs to ensure shared understanding of procedures and effective communication with reporting entities.

5. Set clear performance benchmarks.

Establish clear deadlines for complaint handling and adopt response time and case resolution rates as key performance indicators (KPIs) for APIP.

6. Embed a feedback mechanism.

Incorporate mandatory feedback provisions in SOPs to ensure reporting entities receive timely updates on the status and outcomes of their complaints.

7. Leverage open data and digital tools

Use open-source platforms and digital tools, such as opentender.net, to support verification and preliminary analysis of complaints.

8. Build technical capacity.

Invest in technical training for APIP staff on analysing public procurement data and formulating evidence-based recommendations derived from complaint audits.

Civil Society Organizations

1. Sustain citizen engagement and capacity building.

Continue working closely with citizens to strengthen their ability to produce data-driven, evidence-based procurement monitoring reports.

2. Monitor SOP implementation.

Develop mechanisms to track SOP compliance, document response delays, and assess their impacts on public trust.

3. Strengthen checks and balances.

Engage oversight bodies, particularly the Indonesian Ombudsman, to report instances where APIP fails to follow up on public complaints.

4. Promote transparency through data publication.

Encourage APIP to publish aggregated complaint-handling data, including trends, response and resolution times, and follow-up outcomes, to enhance public accountability.

