Transparency and Accountability in Public Services and Policies in Administrative Law: A Comparative Study of Indonesia and Norway

Prasetyo Isbandono, Dian Arlupi Utami, Agus Prastyawan, Gading Gamaputra, Yuni Lestari
Universitas Negeri Surabaya
Corresponding Email : prasetyoisbandono@unesa.ac.id

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Abstract
This study aims to compare the application of transparency and accountability principles in public services and policies between Indonesia and Norway within the context of administrative law, as well as to identify the supporting and inhibiting factors affecting their implementation in both countries. The research employs a normative legal method with statutory, comparative, and conceptual approaches to analyze regulations, legal doctrines, and administrative practices related to transparency and accountability in Indonesia and Norway through literature studies and qualitative analysis. The findings reveal significant differences in the implementation of transparency and accountability principles in administrative law between the two countries, both in regulations and practice. Norway has successfully built a transparent and accountable public administration system through strong regulations, independent oversight, and a legal culture that supports information openness and public official accountability. On the other hand, although Indonesia has enacted various regulations, such as the Public Information Disclosure Act and several oversight institutions, implementation still faces numerous challenges, including a lack of transparency in bureaucracy, low public awareness, and persistent corruption. The key factors supporting transparency and accountability effectiveness in Norway include a robust oversight system, digitalization of public services, and high levels of press freedom and public participation. Meanwhile, in Indonesia, the main challenges lie in weak law enforcement, political interference, and inconsistencies in implementing openness and accountability policies.

I. Introduction

Transparency and accountability are two main principles in state administrative law (HAN) which are the pillars in realizing an effective, efficient, and public interest-oriented government. Transparency relates to the government's openness in providing access to information, ensuring that the public can know and understand the policies and actions taken by state administrators.(Matheus et al. 2023) Meanwhile, accountability refers to the obligation of the government and public officials to be responsible for the policies and decisions that have been taken to the public and authorized supervisory institutions.(Irawati et al. 2024) These two principles serve as control mechanisms to prevent abuse of authority, strengthen government legitimacy, and build public trust in state administration.

In the context of state administrative law, transparency and accountability have a close correlation with the concept of good governance. Good governance is not only characterized by the effectiveness of public policies, but also by openness and responsibility in every process of governance. Countries in the world, both developing and developed, continue to strive to improve transparency and accountability in public administration in order to improve the quality of service to the community.(Suwanda and Suryana 2021) Indonesia and Norway are interesting examples to study in a comparative study on the application of transparency and accountability in public services and policies in state administrative law.

Indonesia as a democratic country with a presidential system of government faces various challenges in realizing transparency and accountability in public administration. Although it has regulations that support openness of information, such as Law Number 14 of 2008 concerning Openness of Public Information, its implementation still faces significant obstacles. The bureaucratic culture that is still hierarchical and closed often becomes a barrier in providing access to public information. In addition, the low awareness and understanding of the public regarding the right to obtain information is also an obstacle in itself in encouraging government transparency. On the other hand, accountability in state administration also still faces serious challenges, especially in the aspect of law enforcement against public officials who commit violations.(Jabar, Frinaldi, and Roberia 2024) The practice of corruption, collusion and nepotism (KKN) is still a problem that hinders the implementation of the principle of accountability in governance in Indonesia.

On the other hand, Norway as one of the developed countries in the world has succeeded in building a transparent and accountable state administration system. By implementing a strong principle of openness through the Freedom of Information Act and various regulations related to open government, Norway has created a system where the public has wide access to various documents and policies made by the government. In addition, independent supervisory institutions such as the Ombudsman play an important role in overseeing government performance and following up on public complaints regarding

public policies.(Ingrams, Piotrowski, and Berliner 2020) The administrative system in Norway is also supported by digitalization which allows public services to be carried out transparently and with minimal manual intervention, thereby minimizing the opportunity for abuse of authority.

The fundamental differences between Indonesia and Norway in terms of transparency and accountability lie not only in the regulations applied, but also in the legal culture and compliance with applicable rules. Norway has a political culture that supports openness and a high level of legal compliance, while in Indonesia, there are still challenges in building awareness and compliance with the principles of good governance. In the Indonesian context, the application of the principles of transparency and accountability often faces political interests that hinder public access to information that should be openly accessible. In addition, weak oversight mechanisms often mean that deviations in public administration do not receive strict sanctions.(Okafor et al. 2020)

One of the factors that makes Norway superior in implementing the principles of transparency and accountability is the existence of a strong and independent monitoring system. The existence of the Ombudsman, Auditor General, and the media that have full freedom to criticize government policies are the main factors that guarantee openness of information and accountability in public policy. In Indonesia, although there are institutions such as the Corruption Eradication Commission (KPK), the Ombudsman of the Republic of Indonesia, and the Audit Board of Indonesia (BPK), the effectiveness of these institutions is often hampered by political intervention and various bureaucratic challenges.(Rosyadi and Indiahono 2020)

In addition, the role of civil society and the media also has a significant influence in overseeing transparency and accountability of government in both countries. In Indonesia, civil society organizations such as Indonesia Corruption Watch (ICW) and Transparency International Indonesia (TII) are active in advocating for openness of information and eradicating corruption. However, their efforts often face various obstacles, including political pressure, threats against activists, and weak law enforcement against perpetrators of violations in public administration.(Yelli Diani and Kurniawan 2023) Meanwhile, in Norway, civil society has wider access to government information and is actively involved in the public policy-making process. Norway's high level of press freedom is also a key factor in maintaining government transparency, with the media playing a significant role in monitoring government performance and exposing practices that are contrary to the principles of good governance.(Schmager et al. 2024)

Furthermore, the digitalization of public services is also an important factor in increasing transparency and accountability of government. The Norwegian government has successfully integrated information technology into various aspects of state administration,

from the citizen registration system to digital health services that allow people to access personal health data online. This system not only increases the efficiency of public services, but also ensures that every decision and policy taken by the government can be easily accessed and monitored by the public. Meanwhile, in Indonesia, although there have been efforts to implement the digitalization of public services through the e-government system, there are still obstacles in terms of technological infrastructure, human resource readiness, and bureaucratic resistance to system changes.(Saldanha, Dias, and Guillaumon 2022)

Transparency and accountability are fundamental principles in state administrative law that determine the effectiveness and legitimacy of government. Although Indonesia and Norway have different backgrounds in terms of politics, economics, and legal culture, a comparison of the two countries can provide valuable insights into understanding the factors that support the successful implementation of the principles of transparency and accountability.(Ngatikoh, Kumorotomo, and Retnandari 2020) Therefore, this study is expected to contribute to strengthening good governance, especially in the Indonesian context, through the adoption of best practices from Norway that are relevant and can be adapted to local conditions. Based on the background explanation above, the author is interested in conducting a study entitled "Transparency and Accountability in Public Services and Policies in HAN: Comparative Study of Indonesia and Norway". The formulation of the problem in this study is:

1) How does the application of the principles of transparency and accountability in public services and policies compare between Indonesia and Norway in the context of state administrative law?
2) What factors support and hinder the implementation of transparency and accountability in public administration in Indonesia and Norway?

Transparency and accountability are two main pillars in realizing quality public services and good governance. Various studies have been conducted to explore the influence of these two aspects on public service performance, both in Indonesia and in other countries such as Norway. These studies provide valuable insights into the implementation of transparency and accountability in the context of state administrative law (HAN) and the factors that influence its effectiveness.

In Indonesia, several studies have highlighted the importance of accountability and transparency in improving the quality of public services. For example, a study by Kushartiningsih and Riharjo (2021) evaluated the influence of accountability, transparency, and supervision on public service performance in local government agencies in Surabaya. The results showed that the three variables had a positive influence on public service performance, emphasizing the importance of implementing accountability and transparency in public administration.(Kushartiningsih and Riharjo 2021)

Another study by Darlena, Susanti, and Noviantoro (2021) examined the effect of accountability and transparency on the quality of public services at the Bengkulu Province Regional Financial Management Agency Office. This study found that accountability and transparency have a significant effect on the quality of public services, indicating that improving both aspects can increase public satisfaction with government services.(Darlena, Susanti, and Noviantoro 2021) In addition, Widiastuti, Kurniawan, and Mulyana (2024) examined the effect of accountability and transparency on the quality of public services in the Tasikmalaya Regional Office. The results of the study showed that accountability and transparency have a positive and significant relationship to the quality of public services, both partially and simultaneously. This finding emphasizes the importance of both aspects in improving public service performance.(Widiastuti, Kurniawan, and Mulyana 2024)

Meanwhile, in Norway, transparency and accountability have become an integral part of the governance system. Norway is known as one of the countries with the lowest corruption rates in the world. According to the 2022 Corruption Perceptions Index by Transparency International, Norway is ranked 4th with a score of 84, indicating a very clean public sector.(Ligeti et al. 2024) The application of New Public Management (NPM) principles since the 1980s and 1990s has driven public sector reforms in Norway, with a focus on performance, efficiency and accountability. These reforms include performance-based management and decentralization, aimed at improving the responsiveness and efficiency of public services.(Indahsari and Raharja 2020)

In addition, accountability mechanisms such as the Norwegian National Audit Office (NAO) and the Norwegian Parliamentary Ombudsman play an important role in ensuring transparency and accountability in public administration. Both institutions serve as independent watchdogs that monitor government performance and follow up on public complaints regarding public policies.(Cordery and Hay 2016) Public participation is also supported by a strong legal framework, such as the Local Government Act and the Freedom of Information Act, which guarantee public involvement in decision-making processes and access to government information.(Hofer, Wicki, and Kaufmann 2024) The digitalization of public services in Norway has increased the efficiency and transparency of public administration. Digital platforms such as Ung.no provide broad access to information for the public, especially the younger generation, and facilitate interaction between government and citizens.(Aoun et al. 2024)

Overall, previous studies have shown that transparency and accountability play a crucial role in improving the quality of public services and public trust in government. Effective implementation of both aspects requires political commitment, a strong legal framework, independent oversight mechanisms, active public participation, and the use of information technology. A comparative study between Indonesia and Norway can provide

valuable insights into best practices that can be adapted to strengthen transparency and accountability in public administration in Indonesia.

2. Research Method

This research uses a normative legal research method, namely research that focuses on doctrinal studies of applicable legal norms and legal concepts. (Marzuki 2021) This research examines transparency and accountability in public service and policy within the framework of administrative state law (ASL). It uses a comparative approach to analyze legislation, legal doctrine, and administrative practices in Indonesia and Norway to achieve these principles. This approach will explore how legal norms in both countries are interpreted and applied in the context of public service and government policy.

The research employs several relevant approaches in normative legal analysis. The first is a statutory approach, used to examine regulations governing transparency and accountability in public service and policy in Indonesia and Norway. In Indonesia, this includes Law Number 14 of 2008 on Public Information Disclosure, Law Number 30 of 2014 on Public Administration, and regulations related to oversight and accountability in public service delivery. In Norway, the study will focus on the Freedom of Information Act, the Public Administration Act, and various government policies related to government openness and accountability.

The second approach is a comparative approach, aiming to compare how the principles of transparency and accountability are applied in the administrative state law of Indonesia and Norway. This allows the research to identify similarities and differences in regulations, oversight mechanisms, and the effectiveness of implementing transparency and accountability principles in both countries. This will provide insights into the strengths and weaknesses of each system and offer recommendations for Indonesia to improve its public service governance.

Furthermore, the research uses a conceptual approach to analyze the fundamental concepts of transparency, accountability, and good governance in administrative state law. This helps understand the legal theories underlying the application of transparency and accountability principles and how these theories have evolved in various legal systems.

In this normative legal research, the data used comes from primary, secondary, and tertiary legal materials.(Muhaimin 2020) Primary legal materials include the applicable legislation in Indonesia and Norway concerning transparency and accountability in public service and policy, as well as relevant court decisions or Constitutional Court rulings.

Secondary legal materials encompass legal literature, academic journals, previous research findings, and opinions from legal experts discussing transparency and accountability issues in administrative state law. This study will also refer to reports from international

organizations such as Transparency International and the Organisation for Economic Co-operation and Development (OECD), and government reports addressing public service and administrative state reforms in Indonesia and Norway.

Tertiary legal materials consist of legal dictionaries, encyclopedias, and other supporting documents used to clarify the legal concepts employed in this research.

The data in this study were collected through literature studies. (library research).(Sugiyono 2019) This technique is carried out by examining various legal sources that have been mentioned previously, including laws and regulations, court decisions, books, scientific journals, and reports from independent institutions and international organizations. Data collection is also carried out by accessing national and international legal databases to obtain the latest information regarding the development of state administrative law in Indonesia and Norway.

The data that has been collected is analyzed using qualitative analysis techniques.(J. Moleong 2017), This involves interpreting, examining, and comparing various legal sources and relevant literature. The analysis will utilize legal interpretation methods to understand how legal norms related to transparency and accountability are applied in administrative state practice. Furthermore, in the context of comparative study, the analysis employs a comparative legal method to identify similarities and differences in the regulation and application of transparency and accountability principles in Indonesia and Norway. The results of this analysis will be used to draw conclusions about the effectiveness of each system and provide recommendations for improving public service governance in Indonesia by adopting relevant best practices from Norway.

Using a normative legal research method based on comparative study, this research is expected to make a significant contribution to the development of administrative state law, particularly in strengthening transparency and accountability in public service and policy in Indonesia.

3. Results And Discussion

A. Comparison of the Implementation of the Principles of Transparency and Accountability in Public Services and Policies between Indonesia and Norway in the Context of State Administrative Law

Transparency and accountability are two core principles of good governance. Transparency ensures that public policies, regulations, and administrative actions of the government are conducted openly, allowing for public oversight. Accountability, meanwhile, requires public officials to be responsible for their decisions and actions.(Pratolo, Sofyani, and Maulidini 2022) In the context of state administrative law, the application of these principles is a key factor in realizing efficient, effective and public interest-oriented governance.

A comparative study of Indonesia and Norway regarding the implementation of transparency and accountability in public services and policies reveals fundamental differences in regulations, bureaucratic culture, and the effectiveness of public oversight. Indonesia, as a developing nation with a large population, faces significant challenges in ensuring open access to information and the accountability of public officials. (Jahani Chehrehbargh et al. 2024), Meanwhile, Norway as a developed country has a mature government system in implementing the principles of transparency and accountability. (Clark, Reed, and Sunderland 2018). The following is a comparative table of the application of transparency and accountability in public services and policies between Indonesia and Norway in the context of State Administrative Law:

Aspect	Indonesia	Norwegia
Transparency Regulation	- Law No. 14 of 2008 concerning Public Information Disclosure (UU KIP) - Law No. 25 of 2009 concerning Public Services	- Freedom of Information Act (Freedom of Information Act)
Accountability Regulation	- Law No. 17 of 2003 concerning State Finance - Law No. 15 of 2004 concerning Audit of State Financial Management and Accountability	- Public Administration Act (Public Administration Act) - Office of the Auditor General (Financial Supervisory Agency)
Implementation of Regulation	Still facing bureaucratic obstacles, lack of openness in some agencies, and resistance to information disclosure.	Regulations are implemented effectively with a high level of information transparency.
Availability of Public Information	There are still obstacles in accessing information, bureaucracy often makes it difficult to access public information.	All public information can be accessed openly, except for that which is a state secret.
Supervision Mechanism	Overseen by the Audit Board of Indonesia (BPK) and the Corruption Eradication Commission (KPK), but often faces political and administrative challenges.	Overseen by the Office of the Auditor General, an independent body with broad authority to audit public finances.
Bureaucratic Culture	Still tending to be closed, public administration culture does not fully support transparency.	Open, bureaucrats have a high awareness of transparency and accountability
Community Participation	Still low, community involvement in public policy is not yet optimal	High, the community can participate in policy making through public consultation.
Role of Media	The media has an important role but	Free and independent media

	still faces political pressure in some cases	plays a major role in monitoring public policy.
Accountability of Public Officials	There are still cases of impunity, public officials are often not responsible for the policies they make.	Public officials must provide clear reasons for every administrative decision, with a strict accountability system.
Corruption Level	Still quite high, even though the Corruption Eradication Committee (KPK) exists as an anti-corruption agency.	Low, strong financial oversight and transparency systems prevent corruption
Effectiveness of Public Services	There are still many bureaucratic obstacles that slow down public services.	Very effective, public services are easily accessible and efficient

This table clearly illustrates the differences in the application of transparency and accountability in Indonesia and Norway, with Norway possessing a more open, effective, and participatory system compared to Indonesia.

Indonesia has adopted various regulations aimed at improving transparency and accountability in governance and public service. A key regulation is Law Number 14 of 2008 on Public Information Disclosure (UU KIP), which guarantees the public's right to access information related to public interest. This law requires public bodies to provide accessible information, except for information exempted to protect specific interests such as national security and individual privacy.(Febriananingsih 2012) Furthermore, Indonesia also has Law Number 25 of 2009 on Public Services, which regulates the standards of public service that must be met by service providers. This law mandates complaint and evaluation mechanisms for public services, aiming to improve the transparency and accountability of government agencies in providing services to the public.(Parebba et al. 2022)

In the area of state finance, Indonesia implements Law Number 17 of 2003 on State Finance and Law Number 15 of 2004 on the Examination of the Management and Accountability of State Finances. These two laws provide the legal basis for the examination and accountability of state financial management, involving institutions such as the Supreme Audit Agency (Badan Pemeriksa Keuangan or BPK) and the Corruption Eradication Commission (Komisi Pemberantasan Korupsi or KPK) as primary oversight bodies.(Budiyono, Yusdiyanto, and Riyanda 2023) However, despite having relatively comprehensive regulations, Indonesia still faces various challenges in implementing the principles of transparency and accountability. One major challenge is a bureaucratic culture that tends to be closed and resistant to openness. Many public officials remain reluctant to provide

information openly, due to political, bureaucratic, or personal interests.(Umasugi 2025)

Furthermore, mechanisms for public oversight still face obstacles, particularly regarding access to information and public legal awareness. Although the public has the right to access public information, in practice many public bodies do not proactively provide information or make access difficult with various administrative excuses.(Zuiderwijk, Chen, and Salem 2021) Unlike Indonesia, Norway is known as one of the countries with the highest levels of transparency and accountability in the world. Norway's administrative state system is based on the principles of openness and broad public participation in the decision-making process.(Gunawan, Dini, and Sugarda 2024)

One of the main regulations that ensures transparency in Norway is the Freedom of Information Act, which gives citizens the right to access public information. This law requires all government agencies to provide relevant information to the public openly, except in certain cases related to state security or personal data.(Nguyên-Duy 2015)

In contrast to Indonesia, where the implementation of information openness still faces bureaucratic obstacles, in Norway information openness has become a culture embedded in the government system.(Adnan, Hidayanto, and Kurnia 2021) In addition, the Public Administration Act in Norway regulates accountability mechanisms for public officials, including their obligation to provide clear reasons for every decision taken. The Act also stipulates that administrative decisions must be well documented and subject to review by the public or an independent oversight body.(Kruk et al. 2018)

Accountability in the management of state finances in Norway is also very strong. The Office of the Auditor General acts as an independent institution tasked with auditing the use of the state budget and ensuring that every expenditure can be accounted for. This audit process is carried out strictly and the results are published openly, allowing the public to directly monitor the management of the public budget.(Santiso 2015)

Another factor that supports transparency and accountability in Norway is the high level of public participation in the policy-making process. The public and non-governmental organizations have wide access to provide input on government policies through public consultation mechanisms. A free and independent mass media also plays an important role in monitoring government actions and informing the public about ongoing policies.(Pineda et al. 2022)

The comparison between Indonesia and Norway in the implementation of transparency and accountability shows that the main differences lie in the effectiveness of policy implementation and bureaucratic culture. In terms of regulation, Indonesia has a strong enough legal basis to guarantee openness of information and accountability of public services. However, in practice, there are still structural and cultural obstacles that hinder the effectiveness of the implementation of these regulations.(Salomo and Rahmayanti 2023)

Meanwhile, Norway has succeeded in building a government system based on strong transparency and accountability. This success is not only supported by good regulations, but also by an open bureaucratic culture and high public participation. In Norway, public officials are accustomed to working with openness and have a high awareness of the importance of accountability, while in Indonesia there is still a tendency to maintain a closed bureaucratic culture.(Malodia et al. 2021)

In terms of supervision, Norway has a more effective oversight mechanism than Indonesia. Independent oversight bodies such as the Office of the Auditor General have broad authority to conduct audits of the government, while in Indonesia, although the BPK and KPK have similar duties, they often face various political and administrative obstacles that hinder the effectiveness of their work.(Sumiyana et al. 2023) In addition, public participation in monitoring public policy is stronger in Norway than in Indonesia. This is due to the high level of legal awareness of Norwegian society and wider access to public information. In Indonesia, although there are regulations that guarantee openness of information, there are still many obstacles in its implementation, including the lack of public awareness of their right to access public information.(Dwivedi et al. 2022)

From the comparison between Indonesia and Norway, it can be concluded that although Indonesia has various regulations that support transparency and accountability, their implementation still faces major challenges. Norway, on the other hand, has succeeded in building a very transparent and accountable government system, supported by an open bureaucratic culture, high public participation, and effective oversight mechanisms. To improve transparency and accountability in public services and policies, Indonesia needs to strengthen the implementation of existing regulations, increase the capacity of bureaucratic apparatus, and encourage public participation in government oversight. By learning from the best practices implemented in Norway, Indonesia can accelerate state administration reform to achieve better governance that is responsive to the needs of the community.

B. Supporting and Inhibiting Factors of the Implementation of Transparency and Accountability in Public Administration in Indonesia and Norway

Transparency and accountability are two fundamental principles in public administration that aim to create a government that is open, responsive, and accountable to the public. Transparency demands that every decision, policy, and administrative action be accessible and known to the public, while accountability ensures that every public official is responsible for their performance and can be held accountable if there is any deviation.(Sari 2023) In the comparative context between Indonesia and Norway, the implementation of these principles has experienced different challenges and progress.

Indonesia, as a developing country with a bureaucracy that is still undergoing reform, faces various obstacles in building a fully transparent and accountable administrative system. Meanwhile, Norway, as one of the countries with a very low corruption perception index and a democratic and efficient government system, has succeeded in implementing transparency and accountability in its public administration.(Malodia et al. 2021) Therefore, it is important to review the factors that support and hinder the implementation of transparency and accountability in both countries to understand the differences more comprehensively.

Clear and comprehensive regulations are the main foundation in ensuring transparency and accountability in public administration. In Indonesia, regulations that support transparency include Law Number 14 of 2008 concerning Openness of Public Information (UU KIP) which gives the public the right to access information managed by public bodies. In addition, Law Number 25 of 2009 concerning Public Services provides guidelines for the implementation of more transparent and accountable public services.(Khadafi et al. 2024)

In Norway, regulations supporting transparency are more advanced and strict. The Freedom of Information Act provides the public with broad rights to access public documents, while the Public Administration Act stipulates the obligation of public officials to provide clear reasons for every decision they make.(Nguyên-Duy 2015) This regulation not only provides legal protection for the public in accessing information, but also creates a stricter oversight mechanism for public administration.

The existence of a strong supervisory institution is also a major supporting factor in the implementation of transparency and accountability. In Indonesia, supervision is carried out by several main institutions, such as the Audit Board of Indonesia (BPK) which is tasked with auditing state finances, and the Corruption Eradication Commission (KPK) which has a mandate to eradicate corruption in the administration of government. In addition, the Ombudsman of the Republic of Indonesia (ORI) plays a role in receiving and following up on public complaints regarding public services.(Bima and Ramadani 2020) In Norway, oversight mechanisms are more integrated and independent. The Office of the Auditor General has broad authority to examine the use of public funds and audit government performance. Its audit reports are publicly released, enabling the public to oversee how the government manages the national budget.

Bureaucratic culture also plays a significant role in promoting transparency and accountability. Norway has successfully cultivated an open and accountable bureaucratic culture, where every public official understands the importance of transparency in carrying out their duties. This is reinforced by a strict meritocratic system in the recruitment of civil servants, ensuring that every individual working in the bureaucracy possesses high competence and strong professional ethics.(Jones 2021) Conversely, in Indonesia, despite

efforts at bureaucratic reform, obstacles remain in establishing a culture of transparency among civil servants (ASN). Many government agencies remain closed regarding the management of public information, thus hindering the implementation of information openness..(Turner, Prasojo, and Sumarwono 2022)

The level of public participation in monitoring public policy is also an important factor in promoting transparency and accountability. In Norway, the public has broad access to be involved in the policy-making process through public consultation mechanisms. In addition, the mass media and civil society organizations have a very strong role in monitoring government policies.(Waddington et al. 2018) In Indonesia, public participation in overseeing public policy is still developing. Several non-governmental organizations (NGOs) such as Indonesia Corruption Watch (ICW) play an active role in monitoring public policy and promoting transparency in various sectors. However, political pressure on the media remains an obstacle to the full implementation of transparency.(Prabowo and Cooper 2016)

Although Indonesia has various regulations supporting transparency, their implementation still faces significant obstacles. Many government agencies do not fully fulfill their obligations in providing public information. In fact, many public bodies still do not proactively provide information that should be accessible to the public according to the UU KIP (Law on Public Information Disclosure).(Fulazzaky 2014) In contrast, in Norway, regulatory implementation is more effective due to the existence of strict law enforcement mechanisms and a culture of transparency that is deeply rooted in its public administration system.(Alfarizi and Zalika 2024)

Corruption is one of the biggest obstacles to creating a transparent and accountable public administration system. In Indonesia, although the KPK (Corruption Eradication Commission) has been trying to eradicate corruption, many cases of budget misappropriation, bribery, and nepotism still occur in various government agencies. Low transparency in procurement of goods and services, and a lack of strict oversight, are major factors that allow corruption to occur.(Putra and Linda 2022) In Norway, the level of corruption is very low due to a strict oversight system and strong law enforcement. Any public official found guilty of corruption faces severe penalties, both legally and socially.(Singh 2022)

In Indonesia, bureaucracy is often influenced by political interests, which can hinder transparency and accountability. Changes in government often result in changes in policy and bureaucratic structure, sometimes hindering the continuity of reforms in public administration.(Guna, Suparno, and Kertati 2024) In Norway, a stable system of government and the independence of oversight institutions allow public policies to proceed consistently without too much political intervention..(Towah 2019)

Transparency and accountability in public administration are greatly influenced by factors such as regulations, oversight mechanisms, bureaucratic culture, and public

participation. Norway has successfully established a transparent and accountable system with strict regulations, independent oversight bodies, and an open bureaucratic culture. Meanwhile, Indonesia still faces various challenges in implementing transparency, particularly concerning bureaucratic constraints, political influence, and the prevalence of corruption cases. To enhance transparency and accountability in Indonesia, a more decisive bureaucratic reform, increased public oversight, and strengthened law enforcement mechanisms are required. By learning from best practices implemented in Norway, Indonesia can build a more open, accountable, and responsive public administration system to meet the needs of its citizens.

4. Conclusion

A comparison of the application of the principles of transparency and accountability in public services and policies between Indonesia and Norway shows significant differences in regulations, bureaucratic culture, and the effectiveness of policy implementation. Indonesia has various regulations, such as Law No. 14 of 2008 concerning Openness of Public Information and Law No. 25 of 2009 concerning Public Services, which guarantee the public's right to information and accountability of state administrators, but still faces bureaucratic obstacles that tend to be closed and low public awareness of the right to access information. In contrast, Norway implements the Freedom of Information Act and the Public Administration Act which require openness of information and require public officials to provide the reasons behind every administrative decision, which is reinforced by strict supervision by the Office of the Auditor General and active public participation in public policy. While Indonesia is still struggling with a bureaucracy that is not fully transparent and challenges in independent supervision, Norway has built an open and accountable administrative culture, thus creating more effective governance that is responsive to public needs.

Factors supporting transparency and accountability in public administration in Indonesia and Norway include strong regulations, effective oversight mechanisms, a professional bureaucratic culture, and public participation and press freedom. In Indonesia, the existence of the Law on Public Information Disclosure (Law No. 14 of 2008) and the role of institutions such as the BPK, KPK, and Ombudsman are the main drivers, although their implementation is still weak due to bureaucratic constraints and low public awareness. Meanwhile, in Norway, regulations such as the Freedom of Information Act and the Public Administration Act are strictly implemented, supported by the Office of the Auditor General and a meritocratic system that prioritizes transparency. However, inhibiting factors in Indonesia include weak implementation of regulations, high levels of corruption, and political influence in the bureaucracy that hinder the independence of oversight institutions. In contrast, Norway has succeeded in

reducing these obstacles through strong legal mechanisms and a culture of transparency that has been embedded in the government system, making it one of the countries with the lowest levels of corruption in the world.

References

Adnan, Hafizh Rafizal, Achmad Nizar Hidayanto, and Sherah Kurnia. 2021. "Citizens' or Government's Will? Exploration of Why Indonesia's Local Governments Adopt Technologies for Open Government." *Sustainability* 13(20):11197. doi: 10.3390/su132011197.

Alfarizi, Muhammad, and Zela Zalika. 2024. "Modelling Comparative Money Laundering Potential." *AML/CFT Journal The Journal of Anti Money Laundering and Countering the Financing of Terrorism* 3(1):21–38. doi: 10.59593/amlcft.2024.v3i1.192.

Aoun, Alain, Nadine Kashmar, Mehdi Adda, and Hussein Ibrahim. 2024. "From Bottom-Up Towards a Completely Decentralized Autonomous Electric Grid Based on the Concept of a Decentralized Autonomous Substation." *Electronics* 13(18):3683. doi: 10.3390/electronics13183683.

Bima, Muh Rinaldy, and Rizki Ramadani. 2020. "Position of Supervisory Board Organ and Its Implications for the Institutional Corruption Eradication Commission." *LAW REFORM* 16(2):179–97. doi: 10.14710/lr.v16i2.33770.

Budiyono, Budiyono, Yusdiyanto Yusdiyanto, and Irdham Riyanda. 2023. "THE AUDIT AUTHORITY OF THE STATE AUDIT BOARD ON THE VILLAGE FINANCIAL MANAGEMENT IN SOLOK REGENCY." *Cepalo* 7(1):1–20. doi: 10.25041/cepalo.v7no1.2814.

Clark, Robyn, James Reed, and Terry Sunderland. 2018. "Bridging Funding Gaps for Climate and Sustainable Development: Pitfalls, Progress and Potential of Private Finance." *Land Use Policy* 71:335–46. doi: 10.1016/j.landusepol.2017.12.013.

Cordery, Carolyn J., and David Hay. 2016. "Supreme Audit Institutions and Public Value: Demonstrating Relevance." *SSRN Electronic Journal*. doi: 10.2139/ssrn.2895804.

Darlena, Darlena, Neri Susanti, and Rinto Noviantoro. 2021. "Pengaruh Akuntabilitas Dan Transparansi Terhadap Kualitas Pelayanan Publik Studi Kantor Badan Pengelolaan Keuangan Daerah Provinsi Bengkulu." *Jurnal Bisnis Mahasiswa* 1(1). doi: https://doi.org/10.60036/jbm.v1i1.2.

Dwivedi, Yogesh K., Laurie Hughes, Arpan Kumar Kar, Abdullah M. Baabdullah, Purva Grover, Roba Abbas, Daniela Andreini, Iyad Abumoghli, Yves Barlette, Deborah Bunker, Leona Chandra Kruse, Ioanna Constantiou, Robert M. Davison, Rahul De', Rameshwar Dubey, Henry Fenby-Taylor, Babita Gupta, Wu He, Mitsuru Kodama, Matti Mäntymäki, Bhimaraya Metri, Katina Michael, Johan Olaisen, Niki Panteli, Samuli Pekkola, Rohit Nishant, Ramakrishnan Raman, Nripendra P. Rana, Frantz Rowe, Suprateek Sarker, Brenda Scholtz, Maung Sein, Jeel Dharmeshkumar Shah, Thompson S. H. Teo, Manoj Kumar Tiwari, Morten

Thanning Vendelø, and Michael Wade. 2022. "Climate Change and COP26: Are Digital Technologies and Information Management Part of the Problem or the Solution? An Editorial Reflection and Call to Action." *International Journal of Information Management* 63:102456. doi: 10.1016/j.ijinfomgt.2021.102456.

Febriananingsih, Nunuk. 2012. "KETERBUKAAN INFORMASI PUBLIK DALAM PEMERINTAHAN TERBUKA MENUJU TATA PEMERINTAHAN YANG BAIK." *Jurnal Rechts Vinding: Media Pembinaan Hukum Nasional* 1(1):135. doi: 10.33331/rechtsvinding.v1i1.110.

Fulazzaky, Mohamad. 2014. "Challenges of Integrated Water Resources Management in Indonesia." *Water* 6(7):2000–2020. doi: 10.3390/w6072000.

Guna, Tedo Hindami, Suparno, and Indra Kertati. 2024. "Breaking down Barriers: Overcoming Silo Mentality in Bureaucratic Reform." *Journal of Sustainability, Society, and Eco-Welfare* 2(1):51–64. doi: 10.61511/jssew.v2i1.2024.884.

Gunawan, Florencia Irena, Alfatika Aunuriella Dini, and Paripurna P. Sugarda. 2024. "Sovereign Wealth Fund Development in Indonesia: Lessons Learned from Norway and Singapore." *Yustisia Jurnal Hukum* 13(1):89. doi: 10.20961/yustisia.v13i1.80717.

Hofer, Katrin, Michael Wicki, and David Kaufmann. 2024. "Public Support for Participation in Local Development." *World Development* 178:106569. doi: 10.1016/j.worlddev.2024.106569.

Indahsari, Charity Latanza, and Sam'un Jaja Raharja. 2020. "New Public Management (NPM) as an Effort in Governance." *Jurnal Manajemen Pelayanan Publik* 3(2):73. doi: 10.24198/jmpp.v3i2.25342.

Ingrams, Alex, Suzanne Piotrowski, and Daniel Berliner. 2020. "Learning from Our Mistakes: Public Management Reform and the Hope of Open Government." *Perspectives on Public Management and Governance* 3(4):257–72. doi: 10.1093/ppmgov/gvaa001.

Irawati, Syati, Atma Hayat, Asrid Juniar, and Sri Astuti Handayani. 2024. "Exploring Accountability and Transparency in Government Agency Management: A Literature Review." *Ilomata International Journal of Management* 5(3):743–62. doi: 10.61194/ijjm.v5i3.1189.

J. Moleong, Lexy. 2017. *Metodologi Penelitian Kualitatif*. Bandung: PT Remaja Rosdakarya.

Jabar, Syabran, Aldri Frinaldi, and Roberia. 2024. "Akuntabilitas Dan Transparansi Dalam Perspektif Hukum Administrasi Negara." *GJMI: Gudang Jurnal Multidisiplin Ilmu* 2(12). doi: https://doi.org/10.59435/gjmi.v2i12.1196.

Jahani Chehrehbargh, Fatemeh, Abbas Rajabifard, Behnam Atazadeh, and Daniel Steudler. 2024. "Current Challenges and Strategic Directions for Land Administration System Modernisation in Indonesia." *Journal of Spatial Science* 69(4):1097–1129. doi: 10.1080/14498596.2024.2360531.

Jones, Stephen W. 2021. *Dentification of Cultur Identification of Cultural Diff Al Differences and Their E Ences and Their Effects on Ects on International Relations: A Novel Approach*. The University of Southern Mississippi.

Khadafi, Rizal, Achmad Nurmandi, Effiati Juliana Hasibuan, Muhammad Said Harahap, Agung Saputra, Ananda Mahardika, and Jehan Ridho Izharsyah. 2024. "Assessing the Indonesian Government's Compliance with the Public Information Disclosure Law in the Context of COVID-19 Data Transparency." *Frontiers in Political Science* 6. doi: 10.3389/fpos.2024.1339506.

Kruk, Margaret E., Anna D. Gage, Catherine Arsenault, Keely Jordan, Hannah H. Leslie, Sanam Roder-DeWan, Olusoji Adeyi, Pierre Barker, Bernadette Daelmans, Svetlana V Doubova, Mike English, Ezequiel García-Elorrio, Frederico Guanais, Oye Gureje, Lisa R. Hirschhorn, Lixin Jiang, Edward Kelley, Ephrem Tekle Lemango, Jerker Liljestrand, Address Malata, Tanya Marchant, Malebona Precious Matsoso, John G. Meara, Manoj Mohanan, Youssoupha Ndiaye, Ole F. Norheim, K. Srinath Reddy, Alexander K. Rowe, Joshua A. Salomon, Gagan Thapa, Nana A. Y. Twum-Danso, and Muhammad Pate. 2018. "High-Quality Health Systems in the Sustainable Development Goals Era: Time for a Revolution." *The Lancet Global Health* 6(11):e1196–1252. doi: 10.1016/S2214-109X(18)30386-3.

Kushartiningsih, Renita, and Ikhsan Budi Riharjo. 2021. "PENGARUH AKUNTABILITAS, TRANSPARANSI DAN PENGAWASAN TERHADAP KINERJA PELAYANAN PUBLIK." *JIRA: Jurnal Ilmu Dan Riset Akuntansi* 10(3).

Ligeti, Miklós, József Péter Martin, Adél Tilistyák, Judit Zeisler, and Judit Zegnál. 2024. *Transparency International Hungary Report*. Transparency International Hungary Foundation.

Malodia, Suresh, Amandeep Dhir, Mahima Mishra, and Zeeshan Ahmed Bhatti. 2021. "Future of E-Government: An Integrated Conceptual Framework." *Technological Forecasting and Social Change* 173:121102. doi: 10.1016/j.techfore.2021.121102.

Marzuki, Peter Mahmud. 2021. *Penelitian Hukum: Edisi Revisi*. Jakarta: Kencana.

Matheus, Ricardo, Roel Faber, Elvira Ismagilova, and Marijn Janssen. 2023. "Digital Transparency and the Usefulness for Open Government." *International Journal of Information Management* 73:102690. doi: 10.1016/j.ijinfomgt.2023.102690.

Muhaimin. 2020. *Metode Penelitian Hukum*. Mataram: Mataram University Press.

Ngatikoh, Siti, Wahyudi Kumorotomo, and Nunuk Dwi Retnandari. 2020. "Transparency in Government: A Review on the Failures of Corruption Prevention in Indonesia." in *Proceedings of the Annual Conference of Indonesian Association for Public Administration (IAPA 2019)*. Paris, France: Atlantis Press.

Nguyên-Duy, Iris. 2015. "The Norwegian Freedom of Information Act – A Not so Transparent Act ?" *Revue Internationale Des Gouvernements Ouverts* 2.

Okafor, Oliver Nnamdi, Festus A. Adebisi, Michael Opara, and Chidinma Blessing Okafor. 2020. "Deployment of Whistleblowing as an Accountability Mechanism to Curb Corruption and Fraud in a Developing Democracy." *Accounting, Auditing & Accountability Journal* 33(6):1335–66. doi: 10.1108/AAAJ-12-2018-3780.

Parebba, Zainal Arifin, Hamsina, Badu Ahmad, and Edhib Harits Anugrah. 2022. "Public Services

Bureaucracy Performance (Case Study Of Public Relation, Information And Public Communications in South Sulawesi Province)." *Journal of Governance and Administrative Reform* 3(2):106–22. doi: 10.20473/jgar.v3i2.39590.

Pineda, Elisa, Maartje P. Poelman, Anu Aaspõllu, Margarida Bica, Cristina Bouzas, Elena Carrano, Pilar De Miguel-Etayo, Sanne Djojosoeparto, Mojca Gabrijelčič Blenkuš, Pedro Graca, Karin Geffert, Antje Hebestreit, Anni Helldan, Sigrun Henjum, Camilla Sanne Huseby, Maria João Gregório, Carlijn Kamphuis, Tiina Laatikainen, Anne Lene Løvhaug, Clarissa Leydon, Aleksandra Luszczynska, Päivi Mäki, J. Alfredo Martínez, Susanna Raulio, Piotr Romaniuk, Gun Roos, Clara Salvador, Franco Sassi, Marco Silano, Ingrid Sotlar, Maria Lucia Specchia, Miguel Telo de Arriaga, Laura Terragni, Liv Elin Torheim, Josep A. Tur, Peter von Philipsborn, Janas M. Harrington, and Stefanie Vandevijvere. 2022. "Policy Implementation and Priorities to Create Healthy Food Environments Using the Healthy Food Environment Policy Index (Food-EPI): A Pooled Level Analysis across Eleven European Countries." *The Lancet Regional Health - Europe* 23:100522. doi: 10.1016/j.lanepe.2022.100522.

Prabowo, Hendi Yogi, and Kathie Cooper. 2016. "Re-Understanding Corruption in the Indonesian Public Sector through Three Behavioral Lenses." *Journal of Financial Crime* 23(4):1028–62. doi: 10.1108/JFC-08-2015-0039.

Pratolo, Suryo, Hafiez Sofyani, and Ririn Wulan Maulidini. 2022. "The Roles of Accountability and Transparency on Public Trust in the Village Governments: The Intervening Role of COVID-19 Handling Services Quality." *Cogent Business & Management* 9(1). doi: 10.1080/23311975.2022.2110648.

Putra, Nandha Risky, and Rosa Linda. 2022. "IMPACT OF SOCIAL CHANGE ON SOCIETY FROM THE CRIME OF CORRUPTION." *Integritas : Jurnal Antikorupsi* 8(1):13–24. doi: 10.32697/integritas.v8i1.898.

Rosyadi, Slamet, and Dwiyanto Indiahono. 2020. *Administrasi Publik New Normal*. Purwokerto: SIP Publishing.

Saldanha, Douglas Morgan Fullin, Cleidson Nogueira Dias, and Siegrid Guillaumon. 2022. "Transparency and Accountability in Digital Public Services: Learning from the Brazilian Cases." *Government Information Quarterly* 39(2):101680. doi: 10.1016/j.giq.2022.101680.

Salomo, Roy Valiant, and Krisna Puji Rahmayanti. 2023. "Progress and Institutional Challenges on Local Governments Performance Accountability System Reform in Indonesia." *Sage Open* 13(4). doi: 10.1177/21582440231196659.

Santiso, Carlos. 2015. "Why Budget Accountability Fails? The Elusive Links between Parliaments and Audit Agencies in the Oversight of the Budget." *Revista de Economia Política* 35(3):601–21. doi: 10.1590/0101-31572015v35n03a12.

Sari, Ade Risna. 2023. "The Impact of Good Governance on the Quality of Public Management Decision Making." *Journal of Contemporary Administration and Management (ADMAN)* 1(2):39–

46. doi: 10.61100/adman.v1i2.21.

Schmager, Stefan, Charlotte Husom Grøder, Elena Parmiggiani, Ilias Pappas, and Polyxeni Vassilakopoulou. 2024. "Exploring Citizens' Stances on AI in Public Services: A Social Contract Perspective." *Data & Policy* 6:e19. doi: 10.1017/dap.2024.13.

Singh, Danny. 2022. "The Causes of Police Corruption and Working towards Prevention in Conflict-Stricken States." *Laws* 11(5):69. doi: 10.3390/laws11050069.

Sugiyono. 2019. "Metode Penelitian Kuantitatif, Kualitatif, Dan R&D." *Bandung: CV. Alfabeta*.

Sumiyana, Sumiyana, Hendrian Hendrian, Kelum Jayasinghe, and Chaminda Wijethilaka. 2023. "Public Sector Performance Auditing in a Political Hegemony: A Case Study of Indonesia." *Financial Accountability & Management* 39(4):691–714. doi: 10.1111/faam.12296.

Suwanda, Dadang, and Dodi Suryana. 2021. "Human Resource Development in Local Governments: Increased Transparency and Public Accountability*." *Journal of Asian Finance, Economics and Business* 8(1). doi: http://dx.doi.org/10.13106/jafeb.2021.vol8.no1.1063.

Towah, William Deiyan. 2019. *The Impact of Good Governance and Stability on Sustainable Development in Ghana*. Walden University.

Turner, Mark, Eko Prasojo, and Rudiarto Sumarwono. 2022. "The Challenge of Reforming Big Bureaucracy in Indonesia." *Policy Studies* 43(2):333–51. doi: 10.1080/01442872.2019.1708301.

Umasugi, Mohbir. 2025. "Bureaucratic Reform and Public Policy Dynamics: Evaluation Study of One Data Indonesia Program." *International Journal of Community Service (IJCS)* 4(1):01–21. doi: 10.55299/ijcs.v4i1.1279.

Waddington, Hugh, Jennifer Stevenson, Ada Sonnenfeld, and Marie Gaarder. 2018. "PROTOCOL: Participation, Inclusion, Transparency and Accountability (PITA) to Improve Public Services in Low- and Middle-income Countries: A Systematic Review." *Campbell Systematic Reviews* 14(1):1–69. doi: 10.1002/CL2.205.

Widiastuti, Ika, Luluh Abdilah Kurniawan, and Agung Putra Mulyana. 2024. "PENGARUH AKUNTABILITAS DAN TRANSPARANSI TERHADAP KUALITAS PELAYANAN PUBLIK DI DINAS DAERAH TASIKMALAYA." *Social Sciences Journal* 2(4).

Yelli Diani, and Teguh Kurniawan. 2023. "OPEN GOVERNMENT INDONESIA (OGI) IN CORRUPTION ERADICATION: A LITERATURE STUDY." *GOVERNABILITAS (Jurnal Ilmu Pemerintahan Semesta)* 4(1):press. doi: 10.47431/governabilitas.v4i1.256.

Zuiderwijk, Anneke, Yu-Che Chen, and Fadi Salem. 2021. "Implications of the Use of Artificial Intelligence in Public Governance: A Systematic Literature Review and a Research Agenda." *Government Information Quarterly* 38(3):101577. doi: 10.1016/j.giq.2021.101577.