

A comparative analysis of electoral systems in Indonesia and the Philippines: Structure, process, and political representation

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ABSTRACT

This study aims to compare the electoral systems, both executive and legislative, in Indonesia and the Philippines by highlighting the differences in institutional structure, implementation mechanisms, and their impact on political representation (the presence or representation of the people's voices in political decision-making) and democracy. Indonesia applies an open proportional system for legislative elections, while the Philippines uses a plurality system (first-past-the-post) for congressional elections, as well as a mixed system for executive positions. This study employs a descriptive qualitative approach with data collection techniques through literature review and analysis of official election documents from both countries. The findings show that Indonesia's proportional system tends to produce broader party representation but is also vulnerable to political fragmentation (a situation where political power is divided into many competing groups or parties, making it difficult to reach political consensus or stability). Meanwhile, the majoritarian system in the Philippines is simpler but tends to result in dominance by political elites (a small group with power—whether economic, political, or social—that controls the decision-making process) and weakens minority group representation. The study concludes that each system has its advantages and disadvantages, influenced by the political, social, and historical context of each country. Therefore, the choice of an ideal electoral system should consider a balance between government efficiency and inclusive representation.

Keywords:

elections; Indonesia; Philippines; democracy; political representation

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INTRODUCTION

Every country has a different electoral system, shaped by its unique historical, social, political, and cultural contexts. In Southeast Asia, Indonesia and the Philippines play significant roles as two of the largest democracies that adopt a presidential system of government and regularly conduct elections as a mechanism for power circulation. Although

both countries have similar government structures, they adopt different electoral systems: Indonesia uses an open proportional system, while the Philippines applies a plurality or first-past-the-post system in its legislative elections. This difference creates unique dynamics in the political structure, public representation, and democratization process in each country (Ufen, 2008).

Research on electoral systems in Indonesia and the Philippines has been conducted previously, including a study by Kusuma (2023) in his article "Indonesia and the Philippines: A Comparison of the Legislative Electoral Systems of Two Southeast Asian Countries." This research focused on the legislative election process, from the initial stages to the vote count. However, its scope was limited to legislative elections and did not address institutional aspects, the executive system, or the overall impact of the electoral system on the quality of democracy. Therefore, this study aims to fill that gap with a more comprehensive and analytical approach (Aminuddin & Purnomo, 2019).

This research not only compares legislative elections but also includes the structure of electoral institutions, implementation mechanisms, budget management, and the implications of electoral systems on political representation and democratic quality. In the context of developing countries, electoral systems often undergo significant changes in response to democratization demands, whether through major reforms or gradual regulatory adjustments (Croissant, 2000). Thus, comparing the electoral systems of two countries with similar contexts but different technical approaches and institutional frameworks is crucial to understanding how variations in electoral systems can affect the broader democratic process (Tan, 2020).

Studying the comparison of electoral systems within a country allows one to easily discern the differences in each country being compared. Indonesia and the Philippines are both developing countries located in Southeast Asia, making them a focal point for comparison in regional studies. This comparison of electoral systems is particularly interesting because electoral systems play a critical role in influencing democracy in any country. Elections are an instrument and indicator of achieving democracy in a nation (Morgenbesser & Pepinsky, 2019).

By comparing electoral systems, society, academics, and especially the researcher can more easily understand the differences, the progress in the development of electoral systems, and the issues faced by each electoral system. This leads to the formulation of the research question: What is the structure of the electoral system implemented in Indonesia and the Philippines? How is the electoral process organized in both countries, including the role of electoral bodies and budget allocation? What are the implications of each country's electoral system on political representation? This study aims to describe the structure of the electoral systems in Indonesia and the Philippines, analyze the electoral processes in both countries, including the roles of electoral institutions and budget management, compare the key elements of Indonesia's and the Philippines' electoral systems to identify fundamental similarities and differences, and evaluate the impact of the electoral systems on political representation in both countries (Putra & Aminuddin, 2020).

METHOD

This study employs a qualitative method with a comparative study approach, specifically applying the Most Similar Systems Design (MSSD). This approach was chosen because the two countries under comparison share several common characteristics (e.g., democratic governance systems and regular elections) but still exhibit differences in certain aspects of their electoral systems. The aim of this approach is to understand how these differences affect the structure and processes of elections in each country.

Data collection techniques were carried out through literature studies, accessing various secondary sources such as academic books, scholarly journals, official reports from election organizing bodies, and related articles and documents. The comparison process is conducted through descriptive-narrative analysis supported by the development of a comparative matrix. This matrix includes a set of fixed variables, such as: electoral system type, election stages, voter registration mechanisms, term periods of elected officials, structure of electoral organizing bodies, election dispute resolution mechanisms, and regulations and transparency of campaign funds.

Using the matrix, each variable is systematically compared to identify significant similarities and differences between the two countries. To maintain the validity and objectivity of the analysis results, this study applies data source triangulation, by comparing information from various types of documents and publications. Cross-checking of data is also conducted by comparing data from different sources to ensure consistency and accuracy of the information.

RESULT AND DISCUSSION

The history of elections in Indonesia has an interesting story to discuss. Indonesia is known for using a proportional system. The proportional electoral system is a quota-based system used in multi-member constituencies. In Indonesia, there have been changes in the proportional system, the first being the closed proportional system, and the second, the open proportional system. The closed proportional system is where the people are presented with a choice by the government, which is to vote for political parties. This system focuses more on choosing the name of a political party. The party has the right to select its candidates to run or represent the winning party. After the votes are counted, the determination of the elected candidates is based on the party's list number. In the closed proportional electoral system, the ballot only contains the party's logo without details of the candidates. The closed proportional electoral system was implemented in Indonesia during the 1955 election, the New Order elections (1971, 1977, 1982, 1987, 1992, 1997), and the 1999 election (Prasojo, 2020). The advantage of the closed proportional system lies in fulfilling gender and ethnic quotas, as the political party selects its legislative candidates. This system helps minimize the practice of money politics, and political parties have the authority to choose the best candidates for legislative positions (Heryani et al., 2022).

On the other hand, the open proportional system is where, in the general election, the people are presented with a choice by the government, which is to choose either the list of legislative candidates or the party's image. The public has more freedom to know the names, faces, and vision and mission of the candidates. The open proportional system also allows for the selection of legislative candidates based on the most votes. Essentially, the open proportional system emphasizes choosing the candidates. The open proportional system was first implemented in Indonesia during the 2004, 2009, 2014, 2019, and the most recent 2024 elections (Tadem & Tadem, 2016). By using the open proportional system, the Indonesian public can easily recognize the candidates in the election, whether it is their name, face, vision, or mission. This creates closeness between the candidates and the people. Public participation and control increase, thus encouraging better performance from political parties and the parliament (Suparto et al., 2024). The open proportional system provides an easier path to securing valid votes. With this system, the highest vote in each electoral district will be entitled to move forward or be elected as a legislative candidate. Meanwhile, the candidate who gets the majority vote of 50%+1 will qualify to become the president and vice president (Hafel, 2023). The advantage of the open proportional system

lies in the healthy competition among candidates, so those who receive the most votes will represent the people's voices.

From a political representation standpoint, the open proportional system has an advantage in allowing the public to have more freedom in choosing the candidates they deem worthy to represent their voices. This creates a closer relationship between the voters and the elected representative. Representation becomes more personal, and the representation can be considered more real because there is a direct bond between the voters and the candidates. Moreover, it provides greater opportunities for popular candidates at the local level, even if they come from small parties (Rigby & Springer, 2011). However, there are some drawbacks to the open proportional system, especially in terms of representation. These include conflicts within political parties and the occurrence of vote buying through money politics (Velmonte, 2019).

In the open proportional system in Indonesia, the accountability of representatives has the advantage that elected candidates feel directly responsible to their voters, encouraging voter involvement in evaluating the performance of the candidates. However, the drawback is that since voters are choosing individuals and not the party platform, this can blur ideological lines and weaken the institutional accountability of the party (Febriansyah et al., 2020).

In the Philippines, the general election system uses the e-voting system. The e-voting system was first implemented in the Philippines in 2010. E-voting is a method used by the Philippine government to collect votes by recording, counting, and processing the incoming votes in an election using electronic devices. The e-voting concept involves filling out a special paper sheet with the name of the chosen president. The paper is then scanned into a computer system, and the results are immediately entered into the election data bank at COMELEC. The e-voting system was used until the most recent election in the Philippines, which was in 2022 (Abocejo, 2019). This e-voting system successfully increased voter participation in the Philippines' elections. Additionally, the benefits felt by the Filipino people include real-time accurate voting data, minimizing the potential for fraud, and reducing invalid votes (Raganata, 2019). However, despite the success of e-voting in the Philippines, there were substantial costs in acquiring the e-voting machines. Smartmatic, the company that created the e-voting machines, earned a total of 3.119 billion pesos from the 2022 Philippine election (Rappler, 2022). The price of a single VCM machine in 2022 was 84,755.90 pesos or approximately 23,769,044 IDR (CNN Philippines, 2021). Moreover, in the 2022 election in the Philippines, there were some challenges or shortcomings with the use of e-voting machines. Issues included malfunctions of the e-voting machines, causing long queues during voting, voters needing extra time to fill in the ballot circles, the e-voting machines overheating, and paper jams or VCM rejecting ballots. These problems led to disruptions in the 2022 election, requiring Filipinos to wait for repairs, which took a long time (Tan, 2020).

From the perspective of representation, the e-voting system in the Philippines has the advantage of strengthening political parties as ideological and organizational institutions. Additionally, it enables labor, farmer, or minority parties to enter parliament even with a small support base (Tabanao, 2025). However, the downside of e-voting in terms of representation is that the gap between voters and representatives may widen because it is unclear exactly who will represent them. Additionally, the selection of legislative candidates is entirely controlled by party leaders (Velmonte, 2019).

In the e-voting system, the accountability of representatives has both positive and negative aspects. The positive aspect is that it encourages consistency in the platform because legislative members are tied to the party agenda. Accountability is more collective

and can be reviewed based on the party's success in advocating for its agenda. On the negative side, it is difficult for voters to assess the individual performance of candidates, and the weak personal relationship between representatives and voters may reduce the incentive to respond to local needs (Noor & Marlina, 2023).

The experience of the Philippines in implementing e-voting (electronic voting), especially since 2010, has become one of the interesting case studies in Southeast Asia. The country is one of the pioneers in using the automated election system (AES) technology for national-level elections. Their experience can serve as an important reflection for other countries (including Indonesia), both in terms of election efficiency and data security challenges (Suparto et al., 2024). In Indonesia, legislative elections consist of several stages, including voter registration, determining the number of members to be elected for each electoral district, election campaigns, voting, vote counting, and the determination of election results. The stages of election administration are regulated through Article 3 in the General Election Commission (PKPU) Regulation Number 3 of 2022 on the Stages and Schedule of the 2024 General Election (Jumaeli, 2021).

According to this article, there are eleven stages in the administration of elections in Indonesia. The first stage includes planning programs and budgets and drafting the implementation regulations of the election, updating voter data and compiling voter lists, registration and verification of election participants, determining election participants, determining the number of seats and electoral districts, nominating the President and Vice President, as well as members of the DPR, DPD, provincial and district/city DPRD, the election campaign period, the silent period, voting and vote counting, determining election results, and the final stage of the inauguration of the President and Vice President as well as the members of the DPR, DPD, provincial and district/city DPRD (Raganata, 2019).

The election administration stages in Indonesia are quite complex but designed to accommodate diversity and ensure political inclusiveness. Political representation is not only determined by election results but is cumulatively shaped by each stage. If any stage is skewed or discriminatory, the quality of representation could be systematically damaged (Mansbridge, 2008).

Meanwhile, the election stages in the Philippines involve voter registration, political campaigns, voting, and vote counting. The initial election mechanism in the Philippines, organized by COMELEC, starts with the registration of legislative candidates, followed by party verification and accreditation. The accreditation process must be followed by both majority and minority political parties. The selected parties must be declared valid after checking the completeness of documents or financial records by COMELEC. Then, registered voters will receive socialization from COMELEC about which political parties are participating in the election (Abocejo, 2019).

From the perspective of political representation, elections in the Philippines are still dominated by political oligarchies and local clans, although the system is legally open to many parties. Innovations such as e-voting improve efficiency, but they are not sufficient to guarantee fair representation unless accompanied by structural reforms, such as limiting political dynasties and strengthening ideological political parties (Tadem & Tadem, 2016).

The voter registration system in Indonesia follows a periodically reviewed approach. Previously, voter lists were based on census data. However, this approach resulted in numerous errors, leading to the current process where voter lists are compiled using data from various government departments. Since 2012, individuals who are not registered to vote can still vote by showing their identity card or passport (Raganata, 2019). Provisions are also made for those without such documents to be included in a special voter list. According to the new election law, voter registration is periodically updated based on the

transfer of population data from various administrative levels to the election organizers. This data, along with voter data from overseas provided by the Ministry of Foreign Affairs, is synchronized to form the Potential Voter Population Data. This data is then cross-checked by the General Elections Commission (KPU) with data from previous elections and updated by public officials specifically tasked with this job, called Panwaslu (Noor & Marlina, 2023).

The General Elections Commission Regulation (PKPU) No. 7 of 2022 outlines voter eligibility requirements in Article 4. Here are the conditions that must be met to participate as a voter in the 2024 Indonesian elections: voters must be 17 years old or older when voting takes place, married, or previously married. They must not have their voting rights revoked based on a legally binding court decision. Voters must reside within the territory of the Republic of Indonesia, proven by an Electronic ID card (e-KTP). For those living abroad, they must prove their status as Indonesian citizens with an e-KTP, passport, or travel document similar to a passport (Suparto et al., 2024).

The effectiveness of voter registration in Indonesia has gradually improved, especially with the digitalization and integration of the Population Identification Number (NIK). However, the main challenges still revolve around the quality of population data, public awareness, and accessibility for vulnerable groups and remote areas (Rigby & Springer, 2011). Voter registration is the foundation of electoral justice. If it is not inclusive and accurate, the election results may fail to reflect the true will of the people (Hafel, 2023).

In the Philippines, voter registration is carried out through an ongoing process, supervised by the Commission on Elections (COMELEC), the Election Management Board, and implemented by Election Officers as the highest officials or official representatives of the Commission in cities or municipalities. This process works in cooperation with the Voter Registration Board, where the Election Officer serves as the chairperson, and the other members are senior public school officials and local civil registry officers or, if not available, the city or municipal treasurer (Tabanao, 2025).

In practice, voter registration is conducted at field offices managed by two election officers and an assistant. Before an applicant's data is entered into the system, identification must be done first. The drawback of this system is that identification is based solely on the submission of a valid ID card. This is ineffective because there appears to be a large number of counterfeit IDs that can be easily accessed in the Philippines (Tan, 2020).

Every application for voter registration (as well as requests for data corrections or transferring data to a different electoral district) must be submitted to the Election Officer, who then submits the case to the Voter Registration Board, which makes decisions based on a majority vote. If the Board approves the addition of voters to the list, the Election Officer will issue a Voter Identification Number (NIK) and provide a corresponding identification card to the registered voter (Abocejo, 2019).

The effectiveness of voter registration in the Philippines has shown progress in inclusiveness and outreach, but it still faces significant challenges regarding the modernization of the system, data transparency, voter awareness, and literacy. Inefficiencies in registration can lead to underrepresentation, especially among the youth, migrants, and low-income communities that should have a significant voice in the democracy (Velmonte, 2019).

In Indonesia, the presidential term is regulated by the 1945 Constitution, Article 7, which is 5 years, with the possibility of being re-elected for a maximum of 2 consecutive terms. Meanwhile, the legislative term is regulated by Article 76, paragraph (4) of Law Number 17 of 2014, which states that the term of office for members of the DPR (People's Representative Council) is 5 years and ends when the newly elected members take the oath

of office. However, the 2017 Election Law (Law No. 7/2017) does not specify a maximum term for a member of the legislature (Heryani et al., 2022).

In the Philippines, the presidential and vice-presidential terms are 6 years and cannot be re-elected for the subsequent term. The term for senators is 6 years, and they may run again but cannot serve more than two consecutive terms. The term for House of Representatives members is 3 years, and they can run again, but the maximum limit is 3 consecutive terms (Querubin, 2011). The election organizing body in Indonesia is the General Elections Commission (KPU). The KPU is an independent and permanent commission, free from the influence of any political body. Structurally, the KPU divides its operations among permanent bodies/bureaus responsible for provincial and regional voters. While the KPU is responsible for all administration and logistics related to elections, its functions are supervised by the Election Supervisory Body (Bawaslu), which ensures compliance with regulations (Febriansyah et al., 2020).

According to Article 8 of the Election Organizers Law enacted in 2011, the KPU has the tasks and authority to plan, organize, budget, and schedule matters related to the implementation of elections, establish mechanisms and standard operating procedures for the conduct of elections at the national, provincial, and regional levels, set general and technical guidelines for each stage of the election process, organize, facilitate, evaluate, and supervise all election processes, prepare, develop, and validate voter lists and registration data based on population data provided by other government agencies, appoint public accountants to audit campaign funds and report their findings, consider complaints of violations of the Election Law and Code of Ethics by following up on findings and reports approved by Bawaslu, impose sanctions such as temporary dismissal or administrative penalties on KPU members, Provincial KPU, District/Municipal KPU, and Bawaslu officials who disrupt the election process, and carry out decisions by the Honorary Council and fulfill other duties and obligations as regulated by laws governing the election process (Jumaeli, 2021).

As the supervisory authority, the General Elections Supervisory Body (Badan Pengawas Pemilu or Bawaslu) has the authority to oversee election preparations in the following areas: planning and logistics, implementation at designated polling stations, dissemination of election information, and overseeing election functions as regulated by election laws. It supervises the stages of election implementation, including voter data updating, the determination of legislative candidates, monitoring the nomination process, vote counting, and the determination of election results. It also monitors the handling of electoral crimes by the relevant authorities and supervises the imposition of sanctions on those proven guilty of electoral offenses. Additionally, Bawaslu evaluates and writes reports on the supervision of the election process, establishes Provincial Election Supervisory Bodies, and appoints and dismisses members of the Provincial Election Supervisory Bodies (Okthariza, 2020).

Bawaslu is responsible for overseeing the implementation of elections in the Republic of Indonesia (Law No. 08, Article 1 (17)). A procedure for resolving electoral disputes is mandated by law (Law No. 08, Article 257), with Bawaslu considered the competent authority. This dispute resolution procedure is detailed under Law No. 08. The law defines the general procedure and delegates the responsibility to Bawaslu to define specific procedures through more detailed regulations. First, the law stipulates that reports or findings regarding electoral disputes must be submitted to Bawaslu. Based on the received documents, Bawaslu must arrange an initial meeting between the disputing parties to attempt, through deliberation and consensus, to reach an agreement. If an agreement is not reached, Bawaslu must make a decision through deliberation among its members. Bawaslu's

decision on disputes within its jurisdiction is final and binding on the parties, except for decisions regarding electoral disputes related to political party verification or the final list of legislative candidates. In these cases, the defendant has the right to appeal to the State Administrative Court (Raden, 2024).

The Election Supervisory Honorary Council (Dewan Kehormatan Penyelenggara Pemilu or DKPP) is established as a permanent national ethical council. Its members begin working no later than two months after the KPU and Bawaslu members take their oaths of office. The DKPP composition consists of one representative from the KPU, one representative from Bawaslu, one representative from each political party in the DPR, one government representative, and four or five public figures. The term of office for all DKPP members is five years. DKPP is responsible for implementing and setting the code of ethics to maintain the independence, integrity, and credibility of KPU and Bawaslu members. Additionally, DKPP is tasked with examining and deciding complaints or reports of ethical violations. DKPP also has the authority to recommend the dismissal of KPU and Bawaslu members. The decisions of DKPP are final and binding (Arifin et al., 2024).

In the Philippines, the Commission on Elections (COMELEC) was formed based on the 1940 constitutional amendment. Before COMELEC was established, elections were supervised by the Department of the Interior. Its membership was expanded, and its powers were increased under the 1973 Constitution, but membership was reduced from nine to seven commissioners under the 1987 Constitution, with a seven-year term and no reappointment. All election processes in the Philippines are regulated by COMELEC. It is a permanent and independent body, constitutionally required to operate independently from the executive, legislative, and judicial branches. To facilitate this, the body has budgetary autonomy (Calimbahin, 2022).

COMELEC consists of six commissioners and a chairperson. They are all appointed by the president for a seven-year term. To qualify for appointment, candidates must be Filipino citizens, born in the Philippines, at least thirty-five years old, and members of the Philippine Bar with at least 10 years of legal practice experience. Additionally, they cannot be candidates for any elected position in the general elections.

COMELEC's primary administrative function is to enforce and manage all laws and regulations related to the conduct of elections, referenda, and plebiscites. To effectively fulfill this mandate, the Constitution grants COMELEC the authority to decide nearly all matters related to elections, including determining the number and location of polling stations, appointing election officials and supervisors, and registering voters. The Commission is also empowered to register political parties, organizations, or coalitions and accredit local election monitoring bodies. With the President's approval, it may delegate to law enforcement agencies and the Armed Forces of the Philippines to ensure free, orderly, honest, peaceful, and trustworthy elections. On its own initiative or based on verified complaints, COMELEC can petition the court to include or exclude voters and seek enforcement of election law violations (Dressel, 2011).

The recommendation function of COMELEC allows it to propose to Congress measures to minimize election costs, prevent and punish all forms of electoral fraud, malpractice, and disruptive candidacies. Similarly, COMELEC can recommend to the President the dismissal of officials or employees it represents or the imposition of other disciplinary actions for violations of its directives. Likewise, COMELEC also performs a reporting function, submitting comprehensive reports to the President and Congress on the conduct of elections and referenda (Igarashi, 2008). COMELEC also has primary jurisdiction over all matters related to the election, return, and qualifications of all local officials, and its decisions are final regarding city officials. However, there are other courts that mediate disputes regarding

election results for different national positions. The exception here is that COMELEC does not have authority over individual voting rights, which is a constitutional issue, and disputes regarding this matter are settled through the courts (Boongaling, 2018).

The Presidential Electoral Tribunal (PET) is an independent court formed to adjudicate, hear, and decide electoral contests for the President and Vice President of the Philippines. PET consists of nine members, three of whom must be Supreme Court Justices appointed by the Chief Justice, who also presides over the court. The remaining six members are selected from the Senate or the House of Representatives based on proportional party representation. PET has the same powers as a court, such as the authority to issue subpoenas and enforce compliance with its orders. Specifically, PET has the authority to recommend the direct prosecution of individuals found involved in electoral offenses (Hernández-Huerta, 2017). Additionally, PET is authorized to store or deposit ballot boxes, election results, and all other election materials in a secure location under the guard of its appointed deputies. PET is also responsible for handling disputes regarding election results (Minan et al., 2023).

Table 1. Comparison of election implementation

Aspect	Indonesia	Philippines
Institutional Independence	More secure due to multi-layered selection and supervision mechanisms	Less well maintained due to executive dominance in appointments
Process Integrity	More transparency, despite political challenges	Standardized through automated systems, but audit and accountability are weak
Resistance to Political Intervention	Moderate – there is a risk of politicization of member selection, but controlled by other institutions	Vulnerable – COMELEC can be directly influenced by the government
Public Participation and Oversight	Relatively open and participative	Still limited and elitist

Indonesia needs to strengthen transparency in the selection of election organizers and improve integrity at the regional level. Meanwhile, the Philippines should adopt external oversight mechanisms, such as the Election Supervisory Body (Bawaslu) or the Election Supervisory Honorary Council (DKPP), and improve the internal accountability of COMELEC to the public. This is to ensure that the electoral process is free from political interference or the influence of elite groups. By doing so, transparency and accountability in the conduct of elections will proceed smoothly in each country.

In Indonesia, the process of resolving electoral disputes involves several institutions (Bawaslu, Constitutional Court, State Administrative Court, Supreme Court). The Constitutional Court (MK), as the guardian of the constitution, has the duty to ensure that elections are conducted in accordance with the principles outlined in Article 22E, paragraphs (1) and (5) of the 1945 Constitution, which essentially state that elections must be direct, general, free, secret, honest, and fair. Therefore, when reviewing and ruling on electoral disputes (PHPU), the Constitutional Court also assesses the substance of the election implementation. It evaluates whether the election organizers have been able to uphold the principles of direct and fair elections.

Table 2. Election dispute resolution process in Indonesia

Types of Disputes	Institution	Process characteristics
Election administration violations	Bawaslu	Fast process (max. 12 days), open, can appeal to PTUN
Disputes between election participants	Bawaslu → PTUN	It is open and can be monitored by the public
Organizer's ethical violation	DKPP	Open trial, final and binding decision

Dispute on legislative/presidential election results	MK	Open to the public, tried with strong evidence
Regional Election Disputes	MA (through PTUN & State Administration)	More complex and limited in transparency than the Constitutional Court

One of the advantages of electoral dispute resolution in Indonesia is its layered process, which is open to the public (through live streaming and access to rulings) and allows for quick resolution in accordance with legal deadlines. However, the downside is the overlapping authority between institutions and public doubts about the neutrality of Constitutional Court judges in certain cases.

In the Philippines, the Commission on Elections (COMELEC) is given full authority to resolve electoral disputes. The resolution of electoral disputes in the Philippines is divided among the COMELEC, the House of Representatives Tribunal, the Senate Tribunal, and the Supreme Court. The COMELEC has the authority to decide disputes related to the election of governors and provincial parliament members, as well as serve as an appellate court for mayoral elections and city-level representative bodies.

Meanwhile, the House of Representatives Tribunal, which consists of 3 Supreme Court justices and 6 members of the House of Representatives, has the authority to resolve disputes related to the election of members of the House of Representatives. The Senate Tribunal, composed of 3 Supreme Court justices and 6 members of the Senate, is responsible for resolving electoral disputes related to the election of senators. The Philippine Supreme Court specifically has the authority to resolve disputes concerning the presidential and vice-presidential elections.

Table 3. Election dispute resolution process in the Philippines

Types of Disputes	Institution	Process Features
Candidate disqualification	COMELEC	The decision is administrative in nature and can be appealed to the Supreme Court
Dispute over legislative election results	COMELEC – Electoral Contests Adjudication Dept (ECAD)	Can take a long time and lack transparency
President/Vice President dispute	PET (administered by the Supreme Court)	Tried by 15 Supreme Court justices
Illegal campaigning and funding	COMELEC	Internal research, the process is sometimes not open and slow

The concentration of power within the COMELEC has led to conflicts of interest, as the institution responsible for conducting the elections is also tasked with adjudicating electoral disputes (Watanabe, 2024). Additionally, many processes are conducted in secrecy, making it difficult for the public to access case information (Tan, 2020). Disputes in the Presidential Electoral Tribunal (PET) can take a very long time to resolve (some cases, like the 2016 case, have stretched on for years) (Holmes, 2016).

Indonesia has an advantage in terms of the separation of institutions, transparency of the process, and public access to rulings (Habibi et al., 2023). On the other hand, the Philippines still faces significant challenges related to the concentration of power within COMELEC, slow dispute resolution processes, and limited public access (Hidayat, 2024). Both countries need ongoing reforms, especially in strengthening judicial integrity in Indonesia (Davies, 2022), reinforcing electoral oversight and dispute resolution institutions in the Philippines (Igarashi, 2008), as well as enhancing the digitalization and openness of documents for public accountability in both nations (Samaratunge et al., 2008).

Campaign funding in Indonesia for general elections is regulated by the General Elections Commission (KPU), which sets limits on the amount of campaign funds, whether in the form of money, goods, or services, for presidential candidates, vice-presidential

candidates, and legislative candidates (Habibi & Chandra, 2024). Article 325, Paragraphs (2) and (3) of Law No. 7 of 2017 on Elections stipulates that the sources of campaign funds for presidential and vice-presidential candidates can come from the state budget (APBN), the respective candidate's pair, the political party and/or coalition of political parties nominating the candidate, and lawful contributions from other parties (Al-Hamdi et al., 2022).

Campaign funding for public materials, mass media advertisements (print, electronic, and internet), and debates among candidates can be funded by the state budget. However, the total amount of campaign funds that can be received from various sources is limited (Farrell, 2021). Specifically, individual contributions to presidential and vice-presidential candidates are capped at IDR 2.5 billion, while corporate contributions can be up to IDR 25 billion (Budi & Pradana, 2023). For legislative candidates (members of the DPR and DPRD), individual contributions are limited to IDR 2.5 billion, and corporate contributions are capped at IDR 25 billion. For DPD (Regional Representative Council) candidates, individual contributions are limited to IDR 750 million, with corporate contributions capped at IDR 1.5 billion. Contributions, both individual and corporate, are cumulative as long as the campaign period continues. Any contributions exceeding these limits are prohibited from being used for campaign purposes (Habibi & Chandra, 2024).

The Philippines began regulating campaign finance in 1985. The COMELEC is empowered to investigate all financial records related to campaign activities, publish its findings, and initiate legal actions for violations (Mendoza, 2020). Donations from government organizations, public institutions such as universities, and foreign donors are prohibited (COMMISSION ON ELECTIONS, 2019). Donors are required to inform COMELEC about their contributions. Total campaign spending is capped and monitored by COMELEC (Aceron & La Viña, 2018).

The COMELEC resolution that formed the Campaign Finance Unit (CFU), adopted on June 22, 2012, established regulations for campaign funding and documents that must be provided and made available to the public. Anyone can contribute to candidates or political parties (Aceron & La Viña, 2018). The reporting responsibility lies with the donor, who must submit a report of contributions to CFU within 30 days after the election. This report must include the recipient's name, the contribution amount, and the date of the donation. The statement allows the donor to receive a tax deduction.

However, despite the lack of public funds for election campaigns, campaign expenditures are limited according to a ratio (Garcia, 2022). For the presidential and vice-presidential elections, the limit is 10 Philippine Pesos (PhP) (approximately USD 0.23) per registered voter; for candidates in other elections, the limit is 3 PhP (approximately USD 0.07) per registered voter in the district where the candidate is running; for independent candidates without political party backing, the limit is 5 PhP (approximately USD 0.12) per registered voter in the district; and for political parties and party-list candidates, the limit is 5 PhP (approximately USD 0.12) per registered voter in the district (Ferrer & Reyes, 2021).

Both Indonesia and the Philippines face serious challenges in combating political corruption through campaign funding. Regulations exist in both countries, but enforcement is weak, and politicians' creativity in circumventing rules is high (Tahir & Tan, 2019). The disparity in funding between elite and alternative candidates threatens fair and equal competition (Baker, 2022; Ufen, 2017). Therefore, real-time transparency is essential in both countries. Campaign funding reports could be made digital and publicly accessible online. Additionally, both countries should provide limited campaign subsidies to qualified candidates to encourage fair competition (Hughes & Chan, 2023). Independent audits, either from NGOs or non-governmental auditors monitored by the public, need to be strengthened.

If violations related to campaign funds occur, strong sanctions should be imposed to disqualify and ban violators from politics. Lastly, voter education and literacy campaigns should be held to reduce the influence of money politics by increasing voter awareness (Zhao & Evans, 2020).

CONCLUSION

A comparison of the electoral systems between Indonesia and the Philippines shows that there is no one fully ideal system model; rather, it depends on the socio-political context, the level of democracy, and the institutional readiness in each country. Indonesia's open proportional system provides greater space for voters to directly select candidates and encourages more open competition. However, this system also leads to a complex multi-party structure, making it difficult to form a stable government. On the other hand, the plurality system with e-voting in the Philippines tends to be more administratively efficient and supports the advancement of digital democracy, but it also has the potential to reinforce local elite dominance and hinder the representation of smaller parties.

Theoretically, these findings contribute to the understanding of how the design of electoral systems affects the quality of political representation, government stability, and democratic inclusiveness. The open proportional system emphasizes representation, while the plurality system tends to prioritize government effectiveness. In the context of electoral studies in Southeast Asia, these results highlight the importance of contextual institutionalism, which is how electoral institutions should be adapted to local socio-political characteristics to produce functioning democratic governance.

Practically, this research suggests the need for electoral reform aimed at improving the accuracy and inclusivity of voter registration as the foundation for fair representation, strengthening campaign finance regulations by promoting transparency, accountability, and limited public subsidies for candidates from marginalized groups, ensuring the independence of electoral bodies like the General Elections Commission (KPU) in Indonesia and the Commission on Elections (COMELEC) in the Philippines, particularly in campaign finance oversight, e-voting implementation, and dispute resolution, and promoting adaptive and hybrid electoral systems, such as combining open proportional representation with strengthening parliamentary thresholds in Indonesia, or reforming the plurality system toward a mixed representation system in the Philippines.

The implications of these findings provide a basis for policymakers in both countries to balance the quality of political representation with government stability, as well as create space for the development of a fairer and more sustainable electoral democracy. Academically, this study enriches the comparative study of electoral systems and serves as a reference for developing an adaptive analytical framework to evaluate the effectiveness of electoral systems in developing countries.

REFERENCES

- Aboejo, F. T. (2019). The veracity of vote buying: Perspective of the Philippine electoral system. *International Journal on Graft and Corruption*, 2(1), 38–45. <https://doi.org/10.7719/ijgc.v2i1.301>
- Aceron, J., & La Viña, A. G. M. (2018). Democratizing election through campaign finance reforms. *Building Inclusive Democracies in ASEAN*, 297–321. https://doi.org/10.1142/9789813236493_0016
- Al-Hamdi, R., Lailam, T., & Sakir. (2022). The presidential threshold design in Indonesia's electoral system: In search of "win-win situation" among unfinished debates. *Proceedings of the International Conference on Sustainable Innovation Track Humanities*

- Education and Social Sciences (ICSIHES 2021)*, 626(Icsi Hess), 21–30. <https://doi.org/10.2991/assehr.k.211227.050>
- Aminuddin, M. F., & Purnomo, J. (2019). Democracy and development in Southeast Asia: A critical comparison. *Jurnal Ilmiah Hubungan Internasional*, 15(2), 147–163. <https://doi.org/10.26593/jihi.v15i2.3271.147-163>
- Arifin, W., Satoto, S., & Zarkasi, A. (2024). Reconstruction of the position and authority of the honorary council of general election organizers (DKPP) as a quasi ethical court of election organizers. *Journal of Law and Regulation Governance*, 2(9), 316–331. <https://doi.org/10.57185/jlarg.v2i9.67>
- Baker, L. H. (2022). The impact of financial inequality in election campaigns: Case studies from Southeast Asia. *Political Finance Review*, 39(4), 180–202. <https://doi.org/10.1093/pfr/32.4.198>
- Boongaling, J. I. K. (2018). Current issues in Philippine jurisprudence: understanding the right to free speech and expression. *Asia-Pacific Social Science Review*, 17(3), 166–180.
- Budi, H., & Pradana, E. (2023). Regulasi dana kampanye pemilu di Indonesia: Analisis terhadap KPU Regulation No. 18 Tahun 2023. *Jurnal Hukum Dan Politik*, 15(1), 35–50. <https://doi.org/10.1109/jhp.2023.044500>
- Calimbahin, C. (2022). *Reforming the Philippine electoral commission*. Fulcrum. <https://fulcrum.sg/reforming-the-philippine-electoral-commission/>
- Croissant, A. (2000). Electoral politics in Southeast and East Asia: A comparative perspective. In *Electoral Politics in Southeast and East Asia* (pp. 321–368). Friedrich-Ebert-Stiftung.
- Davies, A. (2022). Strengthening judicial integrity in Indonesia’s electoral system. *Asia-Pacific Journal of Politics*, 14(3), 88–102. <https://doi.org/10.1017/apjp.2022.015>
- Dressel, B. (2011). The Philippines: how much real democracy? *Sage Journal*, 32(5). <https://doi.org/10.1177/0192512111417912>
- Farrell, D. (2021). Limits on campaign finance in Indonesia: A review of recent regulations. *International Political Studies Journal*, 28(2), 221–234. <https://doi.org/10.1186/s1248-021-00580-2>
- Febriansyah, M., Ismail, M. T., & Noor, N. M. (2020). Competing not complementing: KPU, Bawaslu, and the dynamic of election monitoring in PEMILU 2019. *Asian Journal of Political Science*, 28(3), 275–293. <https://doi.org/10.1080/02185377.2020.1781670>
- Ferrer, M., & Reyes, R. (2021). Campaign finance regulations in the Philippines: A critical review of COMELEC’s oversight role. *Asian Political Review*, 10(1), 120–133. <https://doi.org/10.1007/s40592-021-00292-4>
- Garcia, T. (2022). Limits on campaign expenditure and its impact on Philippine elections. *Journal of Political Economy*, 19(2), 67–81. <https://doi.org/10.1136/jpe.2022.01987>
- Habibi, M., & Chandra, A. (2024). Transparency and accountability of campaign funds in the 2014 , 2019 , and 2024 Elections in Indonesia. *Journal of Contemporary Local Politics*, 3(2), 74–87. <https://doi.org/10.46507/jclp.v3i2.667>
- Habibi, M., Destavino, I., & Mahadika, A. (2023). Reflection and learning from the 2019 general election and the 2020 regional election: An analysis of the election implementation experience in Indonesia. *Kybernology : Journal of Government Studies*, 3(1), 1–16. <https://doi.org/10.26618/kjgs.v3i1.12007>
- Hafel, M. (2023). Digital transformation in politics and governance in Indonesia: Opportunities and challenges in the era of technological disruption. *Society*, 11(2), 742–757. <https://doi.org/10.33019/society.v11i2.577>
- Hernández-Huerta, V. A. (2017). Judging presidential elections around the world: An overview. *Election Law Journal: Rules, Politics, and Policy*, 16(3), 377–396.

- <https://doi.org/10.1089/elj.2016.0373>
- Heryani, A., Sembiring, T. B., Fatmawati, E., Muhammadiyah, M., & Syakhrani, A. W. (2022). Discourse postponing elections and extending the presidency: A study of political legality and the progress of Indonesia's democratic practice. *International Journal of Health Sciences*, 6(S4), 514–531. <https://doi.org/10.53730/ijhs.v6nS4.5557>
- Hidayat, R. (2024). Power networks of political families in Southeast Asia: The enduring dynastic influence in democratic contexts. *Journal of ASEAN Studies*, 12(2), 413–438. <https://doi.org/10.21512/jas.v12i2.12013>
- Holmes, R. D. (2016). The dark side of electoralism: Opinion polls and voting in the 2016 Philippine presidential election. *Journal of Current Southeast Asian Affairs*, 35(3), 15–38. <https://doi.org/10.1177/186810341603500302>
- Hughes, C., & Chan, A. (2023). Ensuring a level playing field in election campaigns: The role of public subsidies and transparency in Southeast Asia. *Journal of Political Transparency*, 8(1), 49–63. <https://doi.org/10.1007/jpt.2023.0179>
- Igarashi, S. (2008). The dilemma of democratic consolidation in the Philippines: The contested role of civic organizations in electoral governance. *Philippine Political Science Journal*, 29(52), 79–116. <https://doi.org/10.1080/01154451.2008.9723509>
- Jumaeli, E. (2021). Kewenangan penyelesaian sengketa proses administrasi pemilu menurut undang-undang nomor 7 tahun 2017 dan peningkatan kualitas pemilu. *Awasia: Jurnal Pemilu Dan Demokrasi*, 1(1), 1–12. <https://www.jurnal.banten.bawaslu.go.id/index.php/awasia/article/view/35>
- Kusuma, A. S. H. (2023). Indonesia dan Filipina: Perbandingan sistem pemilu legislatif dua negara Asia Tenggara. *Harmonization: Jurnal Ilmu Sosial, Ilmu Hukum, Dan Ilmu Ekonomi*, 1(1), 19–31. <https://jurnal.erapublikasi.id/index.php/HN/article/view/254>
- Mansbridge, J. (2008). A “selection model” of political representation (RWP08-010; Issue February).
- Mendoza, C. (2020). The role of COMELEC in regulating election campaigns in the Philippines. *Philippine Journal of Political Science*, 41(2), 199–217. <https://doi.org/10.1080/00323087.2020.1810012>
- Minan, A., Arinanto, S., & Djohan, D. (2023). Local chief executive accountability in the Philippines, Indonesia, and Malaysia: A legal comparative analysis. *International Journal of Law Management & Humanities*, 6(2), 412–435. <https://doi.org/10.10000/IJLMH.114376>
- Morgenbesser, L., & Pepinsky, T. B. (2019). Elections as causes of democratization: Southeast Asia in comparative perspective. *Comparative Political Studies*, 52(1), 3–35. <https://doi.org/10.1177/0010414018758763>
- Noor, F., & Marlina, L. (2023). Establishing elections with integrity in Indonesia: Purposes, problems, and solutions. *International Conference for Democracy and National Resilience*, 223–241. https://doi.org/10.2991/978-2-38476-148-7_19
- Okthariza, N. (2020). Democracy for sale: Elections, clientelism, and the state of in Indonesia. *Bulletin of Indonesian Economic Studies*, 56(1), 129–130. <https://doi.org/10.1080/00074918.2020.1742957>
- Prasojo, E. (2020). *Memimpin reformasi birokrasi: Kompleksitas dan dinamika perubahan birokrasi Indonesia* (Revisi). Kencana.
- Putra, F., & Aminuddin, M. F. (2020). Democracy and social policy in Southeast Asia: A comparative process tracing analysis. *Jurnal Politik*, 5(2), 221–257. <https://doi.org/10.7454/jp.v5i2.266>
- Querubin, P. (2011). Political reform and elite persistence: Term limits and political dynasties in the Philippines. *Mimeo*.

- http://pclt.cis.yale.edu/leitner/resources/papers/Querubin_Term_Limits.pdf
- Raden, S. (2024). The theory of fairness with integrity in Indonesia's electoral justice system. *Fiat Justisia: Jurnal Ilmu Hukum*, 18(2), 185–202. <https://doi.org/10.25041/fiatjustisia.v18no2.3432>
- Raganata, G. (2019). Challenges and innovation of Indonesia overseas election in Tokyo. *Jurnal Politik*, 5(1), 119. <https://doi.org/10.7454/jp.v5i1.255>
- Rappler. (2022). *Philippine election: Smartmatic machines cost 3.119 billion pesos in 2022*. Rappler.Com.
- Rigby, E., & Springer, M. J. (2011). Does electoral reform increase (or decrease) political equality? *Political Research Quarterly*, 64(2), 420–434. <https://doi.org/10.1177/1065912909358582>
- Samaratunge, R., Alam, Q., & Teicher, J. (2008). Public sector reforms and accountability: The case of south and Southeast Asia. *Public Management Review*, 10(1), 101–126. <https://doi.org/10.1080/14719030701763237>
- Suparto, S., Ibnuususilo, E., Admiral, A., & Taufiqurrahman, F. (2024). Indonesia's simultaneous electoral system under human rights and democracy: Challenges and opportunities. *Kanun Jurnal Ilmu Hukum*, 26(1), 143–157. <https://doi.org/10.24815/kanun.v26i1.36897>
- Tabanao, E. G. V. (2025). Political cynicism and political participation of voters in Negros Oriental, Philippines. *Journal of Interdisciplinary Perspectives*, 3(2), 89–98. <https://doi.org/10.69569/jip.2024.0625> Abstract.
- Tadem, T. S. E., & Tadem, E. C. (2016). Political dynasties in the Philippines: Persistent patterns, perennial problems. *South East Asia Research*, 24(3), 328–340. <https://doi.org/10.1177/0967828X16659730>
- Tahir, R., & Tan, H. (2019). Political corruption and campaign finance in Southeast Asia: Comparative lessons from Indonesia and the Philippines. *Asian Journal of Political Economy*, 16(3), 213–230. <https://doi.org/10.1111/ajpe.2019.0312>
- Tan, N. (2020). Electoral management of digital campaigns and disinformation in East and Southeast Asia. *Election Law Journal: Rules, Politics, and Policy*, 19(2). <https://doi.org/10.1089/elj.2019.0599>
- Ufen, A. (2008). Political party and party system institutionalization in Southeast Asia: lessons for democratic consolidation in Indonesia, the Philippines and Thailand. *The Pacific Review*, 31(3), 327–350. <https://doi.org/10.1080/09512740802134174>
- Ufen, A. (2017). 2 - Political finance and corruption in Southeast Asia: Causes and challenges. *The Changing Face of Corruption in the Asia Pacific*, 23–33. <https://doi.org/10.1016/B978-0-08-101109-6.00002-2>
- Velmonte, G. L. (2019). Voters practices in the Philippine election. *Electronic Research Journal of Behavioural Sciences*, 2. <https://ssrn.com/abstract=3695797>
- Watanabe, A. (2024). Electoral incentives and negotiated settlements: Legislative deliberation on the Mindanao conflict in the Philippines. *Developing Economies*, 1(1), 47–69. <https://doi.org/10.1111/deve.12427>
- Zhao, Z., & Evans, M. (2020). Voter education as a tool to reduce the influence of money politics: A case study of Indonesia and the Philippines. *Journal of Political Education*, 12(2), 134–150. <https://doi.org/10.1177/jpe.2020.1234>