

**THE POWER TO REMOVE: A COMPARATIVE INQUIRY INTO RECALL MECHANISMS
IN INDONESIA AND THE PHILIPPINES**

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Abstract. This study investigates the implementation of recall mechanisms in Indonesia and the Philippines, highlighting their roles in fostering political accountability and public participation. Recall, as a democratic tool, allows citizens to remove elected officials before the end of their term, ensuring responsiveness and integrity in governance. Utilizing a comparative legal approach, this research examines the distinct frameworks and political contexts of recall in the two countries. In Indonesia, recall is centralized and primarily applied at the national legislative level, reflecting efforts to maintain institutional stability amidst complex political dynamics. Conversely, the Philippines adopts a decentralized approach, with recall mechanisms empowering local communities to hold their leaders accountable. While both systems aim to enhance accountability, significant differences exist in their processes, actors, and outcomes. Indonesia's model emphasizes party control and institutional safeguards, often limiting public participation, whereas the Philippines prioritizes citizen involvement, albeit at the risk of politicization and instability. This comparative analysis underscores the interplay between political systems, cultural dynamics, and democratic values, offering critical insights for policymakers and scholars seeking to refine accountability frameworks.

Keywords: recall; local government units; house of representatives

Introduction

Recall is the process by which an elected official is removed from office before the end of their term (E. Rappard, 1912; Twomey, 2011a, 2011b; W. Guthrie, 1912; Welp & Whitehead, 2020). This process is distinct from routine elections, where voters elect officials for a specific term and must wait until the

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end of that term to replace them. The significance of recall in a democratic context lies in providing voters with direct control over their government (Welp & Whitehead, 2020). Recall, as an integral part of the political system, plays a crucial role in regulating and overseeing political representation in various countries.

With the continuous evolution of political dynamics, establishing a deep understanding of how recall provisions are implemented and executed in various countries has become an urgent need. Democracy, as the foundation of a government based on public participation, continually evolves in the forms and mechanisms used to maintain the accountability of elected officials (Inoguchi & Blondel, 2012). In this context, recall emerges as an instrument of considerable interest, allowing voters to remove elected officials before the end of their term (Huda, 2011; Yahya & Huftron, 2023). This research focuses on recall provisions in Indonesia and the Philippines, two countries with different political contexts. Indonesia and the Philippines have adopted democratic political systems that enable public participation in determining the fate of the nation. One mechanism that garners significant attention in this context is the recall provision. Recall provisions establish the legal foundation for submitting requests to revoke the mandate of elected officials or replace them before their terms end. A comparison between Indonesia and the Philippines in the context of recall provisions becomes relevant given the significant differences in their histories, cultures, and political dynamics. Although both Indonesia and the Philippines underwent democratic transitions in the late 20th century, differences in colonial legacies, political systems, and economic development create unique contexts for recall provisions in each country.

In the history of Indonesian politics, significant changes occurred post-Reformation in 1998. This period was marked by a shift towards a multiparty democracy and greater political freedom (Liddle, 2013). After the 1998 Reformation, Indonesia experienced significant political changes (Aspinall, 2005). For more than three decades, Indonesia was ruled by an authoritarian regime led by President Soeharto. However, mass protests and international pressure forced Soeharto to resign in May 1998, paving the way for a new era in Indonesian politics (Lee, 2018). The Reformation also brought significant changes to Indonesia's electoral system. Since 1999, Indonesia has held direct elections for the president and legislative members. This has increased political legitimacy by allowing direct public participation in choosing their leaders. The Reformation movement also included constitutional amendments. One of the most important changes was the establishment of recall provisions. Although the political dynamics surrounding recall provisions have evolved, this indicates that legislative members cannot act arbitrarily or simply obey the ruling authority.

The Philippines has a longer history of democracy, reaching its peak after the 1986 EDSA Revolution that ousted the authoritarian regime of Ferdinand Marcos (Nadeau, 2020). Since then, the Philippines has undergone several political changes, but challenges such as corruption and inequality remain part of its political dynamics. Post-EDSA, the Philippines adopted a new constitution in 1987 that reflects democratic principles, including the separation of powers, the protection of human rights, and the empowerment of independent government institutions (George, 2016). The Philippines also stands as one of the democratic countries in Asia that regularly holds general elections, where presidential, parliamentary, and local officials are directly elected by the people. This has provided opportunities for broader political participation and strengthened government legitimacy. Consequently, there has been an increased awareness of the importance of accountability in governance. Recall provisions provide a means for the people to periodically evaluate the performance of elected officials and remove them if they are deemed not to have met expectations or to have engaged in inappropriate behavior. Recall provisions can serve as instruments to address issues of corruption and inequality that continue to challenge the Philippines post-EDSA Revolution. By empowering the people to directly remove corrupt or underperforming officials, these provisions can help enhance transparency, minimize abuses of power, and strengthen government legitimacy.

Indonesia and the Philippines were selected for comparative analysis in this study due to their distinctive implementations of the recall mechanism within their democratic frameworks, despite notable differences in the levels of government to which the mechanism is applied. In Indonesia, recall is applied to national-level officials, particularly members of the legislature, reflecting an institutional approach to

political accountability at the national government level. Conversely, in the Philippines, recall is restricted to local officials, such as governors, mayors, and barangay councilors, thus situating the mechanism within a more localized, community-centered context. This divergence in the levels of government at which recall operates presents an opportunity to explore how democratic values and accountability are institutionalized within different political structures.

The relevance of this comparison is further underscored by the contrasting yet complementary historical trajectories of democracy in the two countries. Indonesia, with its transition to democracy following the 1998 Reformasi, has placed significant emphasis on the decentralization of power and legislative empowerment. Within this context, the recall mechanism has emerged as an instrument for enhancing political accountability, particularly in counteracting the potential dominance of political parties or oligarchic forces. On the other hand, the Philippines, with its longer-standing democratic tradition rooted in the post-EDSA 1986 Constitution, illustrates how recall functions as a direct means for local constituents to express dissatisfaction with public officials. This historical and contextual variation provides valuable insights into the relationship between recall mechanisms and political dynamics at different levels of government, with implications for governance stability and efficacy.

The primary objective of this study is to critically examine the recall mechanism in both Indonesia and the Philippines, with a particular focus on its effectiveness as a tool for political accountability and how it reflects divergent democratic values in each context. Specifically, this research seeks to answer several key questions: To what extent does the recall mechanism strengthen political accountability in each country? How do differences in the levels of government at which recall is applied affect its implementation? What cross-national lessons can be drawn to enhance the efficacy of this mechanism? In addition, the study aims to elucidate the institutional differences and similarities in the design and implementation of recall in both countries, as well as the potential political and social consequences that may arise from its use.

This study involves legal research employing the conceptual, statute analysis, and comparative methodologies. The study aims not only to provide a descriptive account of recall regulations, but also to offer a critical assessment of the political implications stemming from the structural and contextual differences in their application. By doing so, the study aspires to contribute to a deeper understanding of the interplay between recall, political accountability, and democratic dynamics, while also providing a basis for informed policy recommendations relevant to both countries.

1. The legal framework of recall

In Indonesia, Article 22B of the Constitution of the Republic of Indonesia of 1945 (hereinafter referred to as the 1945 Constitution) provides the constitutional basis for recall (Yahya & Huftron, 2023). This article pertains to members of the House of Representatives (DPR), the legislative body representing the Indonesian people. It states that DPR members can be dismissed from their positions or impeached (Hilmy & Marfiansyah, 2021; Rudianto & Purwanto, 2021). Furthermore, the article emphasizes that the conditions for the dismissal of DPR members and the procedures to be followed for such dismissal will be further regulated by law. This indicates that the dismissal process will be governed by clear and specific provisions in more detailed legislation.

The law regarding recall in Indonesia underwent several changes after the reform era. Recall regulations were explicitly governed by legislation during the Soeharto administration. However, in practice, the recall mechanism was rarely utilized. This was largely due to the strong political control exerted by President Soeharto during the New Order regime, where state affairs were under his command. Such was the dominance of President Soeharto at that time that recall was used to eliminate his political opponents who did not comply with his authority. Explicit recall regulations were introduced in Article 16 of Law Number 10 of 1966 concerning the Position of the House of Representatives Assembly and the People's Representative Council of Mutual Cooperation (hereinafter referred to as Law No. 10/1966). In these regulations, it was stated that legislative members can be replaced if they: die; submit a written request to the leader of the Provisional People's Consultative Assembly or the People's

Representative Council of Mutual Cooperation; are replaced; are found to have violated their oath/promises as members of the Provisional People's Consultative Assembly or the People's Representative Council of Mutual Cooperation, by decision of the Provisional People's Consultative Assembly or the People's Representative Council of Mutual Cooperation; no longer meet the requirements as a member of the People's Representative Council of Mutual Cooperation; or are subject to a prohibition on holding office. Subsequently, although the substance of recall regulations did not change significantly, many believed that during the New Order era, these regulations were used as instruments to suppress and threaten legislative members.

After the reform era and amid numerous pressures to eliminate recall regulations, recall provisions were initially not regulated. The reason for this lack of regulation was that representatives felt they did not truly represent the people; instead, they viewed themselves merely as agents of political parties within the legislature. However, the absence of recall regulations led to issues where members of the DPR could leave their political party while remaining in the DPR, and could even become non-party members of the DPR. As a result, political parties faced difficulties in disciplining and guiding their members who served as legislative representatives. These factors provided the background for the reintroduction of recall regulations.

After experiencing ups and downs, the regulation of recall was finally formalized, and remains in Article 239(1) of Law Number 17 of 2014 concerning the People's Consultative Assembly, the People's Representative Council, the Regional Representative Council, and the Regional People's Representative Councils (hereinafter referred to as Law No. 17/2014). According to this article, a member of the DPR can cease to hold office for three main reasons. Firstly, if a DPR member passes away, they automatically cease to hold office. Secondly, a DPR member may also choose to resign from their position, in which case they must formally submit their resignation to the competent authority. Thirdly, a DPR member can be dismissed from office, with specific reasons outlined in paragraph (2) of the same article. Thus, this article provides provisions regarding the conditions under which a DPR member ceases to hold office before the end of their term, ensuring that the replacement process for DPR members is conducted according to the established mechanisms.

Article 239(2) of Law No. 17/2014 provides details on the conditions that can lead to the dismissal of a member of the DPR before the end of their term, as outlined in paragraph (1) subparagraph, First, if the DPR member is unable to perform their duties continuously or has persistent obstacles in carrying out their duties for three consecutive months without providing any explanation. Second, if the DPR member violates their oath or promises of office, as well as the DPR's code of ethics. Third, if the DPR member is found guilty by a court of committing a criminal offense punishable by imprisonment of at least five years, based on a final and binding court decision. A DPR member can also be dismissed if: this is proposed by their political party in accordance with legislation; they no longer qualify as a candidate for DPR membership; they violate prohibitions stipulated by law; they are dismissed from their political party; or they become a member of another political party. Article 239(2) of Law No. 17/2014 ensures that DPR members are accountable for the performance of their duties and that there are clear mechanisms to address violations or incapacity that may occur during their term of office.

In the Philippines, the regulation of recall differs significantly from that in Indonesia. The recall mechanism in the Philippines does not apply to members of the DPR, but rather to local/territorial officials as governed by Article 10 of the Philippine Constitution. Historically, similarly to Indonesia, the regulation of recall in the Philippines has experienced fluctuations. During the period of Spanish colonization in the Philippines, there was no regulation of recall. The governance system at that time was highly centralized and authoritarian. After the Philippines became a territory of the United States in the early 20th century, there were developments in governance and politics. The temporary government in the Philippines, known as the Philippine Commission, was established by the United States in 1900. However, the regulation of recall was still not part of this governmental structure. The Philippines gained independence from the United States in 1946. The struggle for independence involved various changes in the political and governance systems. However, the regulation of recall had not yet been formally adopted as part of the governmental system.

In 1987, the Philippines adopted a new Constitution after the authoritarian regime of Ferdinand Marcos was overthrown. This new Constitution provided the legal basis for various mechanisms of control and balance of power within the government. One provision of the Constitution is Article 10, which allows for the recall of local officials (Congress of the Philippines, Republic Act No. 9244, 2004). This means that in the Philippine political system, local officials can be removed from office if there are sufficient grounds and following the prescribed procedures. However, for such recalls to be carried out, specific procedures must be followed as stipulated in the Local Government Code, which has been amended. Officials subject to recall include provincial governors down to barangay council members. This encompasses local officials from the provincial level down to the lowest barangay level (Bueza, 2014).

The recall process typically begins with an initiative from the community or specific groups dissatisfied with the performance of an official (Pastarmadzhieva, 2020; Qvortrup, 2011; Spivak, 2020; Welp & Whitehead, 2020). This often involves initiating a petition calling for the official's recall. However, for such a petition to be considered valid, a specified number of signatures from the total electorate in the area must endorse it. These signatures also need to be verified to ensure their validity. Once the petition is collected and verified, the subsequent process will depend on the regulations in that particular locality, which may vary depending on local policies. Generally, there will be a process involving gathering evidence and hearings related to the reasons for the recall petition. Subsequently, the authorized body or institution will decide whether the recall will proceed.

Thus, the regulation of recall in Indonesia has undergone a long journey, from initially vague provisions to becoming clear and specific stipulations in Law No. 17/2014. Meanwhile, in the Philippines, although the recall mechanism applies to local officials, the process also involves the community in initiating such recalls. This underscores the importance of active public participation in maintaining accountability and quality of service from leaders.

2. Recall mechanisms

The recall mechanism is an important procedure in maintaining accountability and representation in governance, both in Indonesia and the Philippines. In Indonesia, rules regarding recall are detailed in laws such as Law No. 17/2014 and Law No. 7/2017. This process involves various stages from petition submission to the appointment of replacements, aiming to ensure that the interests of the public are well represented in the DPR. Meanwhile, in the Philippines, the recall mechanism is regulated under The Local Government Code of The Philippines Book I. This democratic step provides voters with the opportunity to take action against officials deemed no longer to be representing their interests adequately. The process includes signature collection, document verification, and special elections to determine the fate of the challenged officials.

2.1. Recall mechanisms in Indonesia

The history and evolution of the recall mechanism in Indonesia is inextricably linked to the political dynamics that have shaped the country's governmental system, particularly following the 1998 Reformasi. Under the New Order regime, political accountability was frequently overlooked due to authoritarian dominance and the centralization of power under President Soeharto (Fikri, 2021). During this period, the recall mechanism was primarily symbolic rather than operational, often serving as a political instrument to manage opposition within the legislature. However, with the fall of the New Order regime, the Reformasi marked a critical juncture for political and legal transformation in Indonesia, including the redefinition of the recall mechanism (Fikri, 2021). The Reformasi era ushered in a wave of democratic ideals and decentralization, making the political accountability of public officials a central concern. The recall mechanism was subsequently restructured to ensure that public officials who no longer represented the interests of their constituents could be removed before the completion of their term of office.

The historical impetus for the development of the recall mechanism in Indonesia is closely tied to the necessity of establishing more transparent and accountable political institutions. During the New Order

period, the absence of effective accountability mechanisms often facilitated the abuse of power by public officials. In the wake of the Reformasi, the recall mechanism was reinstated within a legal framework designed to address the authoritarian legacy and to enhance the role of the public in the political decision-making process. Recall came to symbolize a shift from an elitist political system to one that is more participatory and responsive to popular demands. This mechanism was not only intended to empower citizens to evaluate and replace their representatives, but also to incentivize public officials to perform their duties with greater effectiveness and integrity.

The implications of implementing the recall mechanism in Indonesia can be analyzed from two main dimensions: political and institutional. Politically, recall offers the public a tool to monitor the performance of elected officials and ensures their ongoing commitment to the interests of their constituents (Dameanti *et al.*, 2024). However, this mechanism also presents the risk of politicization, particularly in the context of Indonesia's multiparty system. Recall could be exploited by political parties to exert control over legislators deemed disloyal, thus undermining the independence of legislators in fulfilling their representational responsibilities. Institutionally, recall reflects efforts to bolster the legitimacy of the legislature and to strengthen public trust in the political system. Despite these aims, the implementation of the recall mechanism faces significant challenges, including bureaucratic complexities and a general lack of public awareness regarding the procedural aspects of recall itself (Dameanti *et al.*, 2024).

As previously mentioned, the recall regulations are stipulated in Article 239(1) of Law No. 17/2014, where recall can occur due to death, resignation, or dismissal. Recall regulations can also be found in Article 426 paragraph (1) of Law No. 7/2017 on General Elections, where the reasons include: death; resignation; no longer meeting the qualifications to be a member of the DPR, Regional Representative Council (DPD), provincial Regional House of Representatives (DPRD), or regency/city DPRD; or being proven guilty of electoral crimes such as vote-buying or document forgery based on a court decision that has obtained legal force. The grounds for recall under Law No. 17/2014 and Law No. 7/2017 are substantively the same, albeit with different wording. The provision regarding death is one of the clearer and more commonly understood reasons for a DPR member to cease holding their position. When a DPR member passes away, it signifies the end of their career in the legislative body. This has significant implications, particularly concerning their role and contributions to the political decision-making process and service to constituents (Aliksan Rauf *et al.*, 2018).

Resignation is one way in which a member of the DPR can cease to hold their position. This phenomenon reflects various political dynamics and underlying individual factors. This provision indicates that despite being elected as representatives of the people, members of the DPR still retain sovereignty over their personal decisions. Resignation is a manifestation of individual freedom to choose the direction and priorities of life, including the decision to leave political office. Besides personal reasons, resignation can also be triggered by political considerations. For instance, a DPR member might resign in protest against party or government policies, or in response to scandals or increasing public pressure. Resignation in a political context often becomes a strong statement and can lead to significant changes in political dynamics.

The reasons for recall due to termination are regulated under Article 239(2) of Law No. 17/2014, which states that a member of the DPR shall be terminated at any time if:

- a. they are unable to perform their duties continuously or are permanently hindered as a member of the DPR for 3 consecutive months without providing any explanation;
- b. they violate the oath of office and the DPR code of ethics;
- c. they are declared guilty by a court decision that has obtained legal force for committing a crime punishable by imprisonment of 5 years or more;
- d. this is proposed by their political party in accordance with the provisions of the legislation;
- e. they no longer meet the requirements as a candidate for DPR members in accordance with the provisions of legislation regarding the general election of DPR, DPD, and DPRD members;
- f. they violate prohibitions as regulated in this Law;

- g. they are dismissed as a member of a political party in accordance with the provisions of legislation;
- h. they become a member of another political party.

The inability to perform duties continuously or the fact of becoming permanently hindered is one of the reasons that can lead to the termination of a member of the DPR from their position. A member of the DPR is elected by the people to represent their interests and aspirations in the DPR. Therefore, the consistent and sustained involvement of DPR members in carrying out their duties is crucial in order to ensure that the voices of constituents are heard and well represented in the legislative process. Consistent attendance and participation in DPR sessions, committees, and other working meetings is essential for effective legislative function. Members of the DPR who are regularly absent or inactive in the legislative process can hinder progress in discussions and decision-making that are crucial for the public. Thus, the consistent absence or lack of participation of DPR members can affect the decision-making process in the DPR. This can disrupt debate dynamics, hinder legislative progress, and reduce the quality of the outcomes of policy discussions. The consistent involvement of DPR members is also important for maintaining the accountability and credibility of the legislative institution. Constituents expect their representatives to be present and active in carrying out their duties as members of the DPR, and repeated absences can damage public trust in the institution.

The importance of maintaining integrity and ethics in performing duties as representatives of the people cannot be overstated. The oath of office and the DPR's code of ethics serve as binding foundations that compel DPR members to act with integrity and uphold democratic principles. Violations of the oath of office, the code of ethics, and the DPR's code of ethics are not just moral issues, but also have the potential consequence of causing dismissal for DPR members. The oath of office taken by DPR members affirms their commitment to acting with integrity and high ethical standards in carrying out their duties as representatives of the people. This includes obligations to comply with laws, uphold democratic principles, and act with honesty and fairness. In addition to the oath of office, DPR members are also expected to adhere to the code of ethics established by the legislative body. This code regulates the behavior of DPR members in various aspects, including conflicts of interest, bribery, protection of personal data, and others. Violations of this code of ethics can encompass various unethical or inappropriate actions or behaviors. Compliance with the oath of office and the DPR's code of ethics is key to maintaining public trust in the legislative institution and its representatives. If DPR members violate the oath of office, code of ethics, or DPR's code of ethics, it can undermine the integrity of the legislative institution and affect public trust in political representation. Violations of the oath of office, code of ethics, and DPR's code of ethics not only have moral and ethical consequences but also legal and political repercussions. DPR members who violate the code of ethics may face internal disciplinary sanctions, such as warnings, suspensions, or dismissal from their positions. Moreover, specific ethical violations may also trigger legal investigations or criminal charges against the concerned DPR member.

The importance of maintaining the integrity and credibility of the DPR as a representative institution of society cannot be overstated. One serious factor that can undermine this integrity is when a member of the DPR is involved in criminal activities, which in turn damages the image and reputation of the legislative institution as a whole. In this context, the step to dismiss a DPR member who is proven guilty from their position is not just an action, but a manifestation of the institution's commitment to upholding rules and principles of the rule of law. By ensuring that there are no exceptions in legal consequences, including for DPR members, the legislative institution reaffirms the principle of equality before the law. Furthermore, the process of replacing members involved in criminal activities with better and more trustworthy representatives is an effort to ensure that the interests of the public continue to be well-represented in the DPR, and to restore public confidence in the integrity of the legislative institution.

Proposal from a political party or violation of party rules is another reason that can lead to a member of the DPR being dismissed from their position (Evendia, 2015; Rumokoy, 2012; Huda, 2011). Members of the DPR are often affiliated with a particular political party and receive political support from the party during election campaigns. The relationship between a DPR member and their political party is crucial because the party provides organizational support, resources, and a political platform to its

members. Political parties also have policies and standards that must be adhered to by their members, including DPR members. These policies may encompass various aspects such as political ideology, party platform, and specific political agendas. DPR members are expected to comply with these policies and standards as part of their affiliation with the political party. Political parties play a significant role in monitoring the performance of DPR members they support. Political parties also typically evaluate the performance of DPR members based on several criteria, including adherence to party policies, effectiveness in legislative duties, and responsiveness to constituent needs. If a DPR member fails to meet the standards or policies of their political party, the party may propose corrective actions, including dismissing the member. These steps are taken to ensure that DPR members remain loyal to the vision and mission of their political party and effectively represent the interests of the party and their constituents.

Members of the DPR may also be dismissed for reasons such as not meeting the qualifications to serve as a DPR member and violating prohibitions stipulated in the law. It is important to ensure that elected DPR members meet all the qualifications established by law to serve as representatives of the people. This is a fundamental principle in maintaining the validity of representation in a democratic system, where the people elect their representatives to sit in the legislative body. Furthermore, the principle of equality before the law applies to all citizens, including DPR members. No one is exempt from the consequences of violating the law, and DPR members should be no exception. Violations of prohibitions stipulated in the law must be taken seriously by the competent institutions, and appropriate law enforcement measures should be taken to ensure that DPR members who violate the law are duly sanctioned according to the severity of their offenses. Transparency in the law enforcement process against DPR members who violate prohibitions stipulated in the law is crucial in order to ensure proper accountability.

Finally, members of the DPR may also be dismissed for being dismissed from their political party and joining another political party. Political parties have the authority to regulate and supervise their members. Within this framework, political parties have rules and codes of ethics that must be followed by their members. By dismissing a DPR member from party membership, the party affirms its internal discipline and indicates that the member is no longer considered to represent the party in actions or decisions. The connection between DPR members and political parties demonstrates a relationship of mutual trust and loyalty. Political parties expect their members to support the party's policies and goals and to act in accordance with the party's directives in carrying out their duties as DPR members. If a DPR member fails to comply with the rules or policies of their political party, their dismissal from party membership can be considered a consequential action.

Regarding party switching, when a DPR member switches to another political party, it can alter the political representation chosen by voters without further consultation or approval. This move can also shift the balance of political power in the DPR without corresponding changes in election results. This can result in an imbalance in political representation in the DPR. Elected DPR members representing a particular political party should be committed to that party's policies and the political platform they represent. Switching to another political party demonstrates disloyalty to the political party that supported them during the elections.

In Indonesia, recall does not lead directly to replacement; instead, there is a preliminary application process that proceeds through several stages: the submission of an Early Replacement Application by the respective DPR leadership, the verification of the replacement candidate by the Election Commission (KPU), the appointment of the replacement candidate, and the swearing-in of the replacement. According to Article 6 of the General Election Commission Regulation Number 6 Year 2017 concerning Early Replacement (hereinafter referred to as PKPU No. 6/2017), the dismissal of DPR members is proposed by the DPR leadership. However, if a DPR member is dismissed upon the proposal of a political party or dismissed from political party membership, it is proposed by the party leadership to the DPR leadership with a copy to the President as regulated in Article 8 of PKPU No. 6/2017. Seven days after receiving the proposal for dismissal, the DPR leadership will submit the proposal to the President for official dismissal approval. If approved, the President will formalize it within 14 (fourteen)

days of receiving the proposal for dismissal from the DPR leadership. For the appointment of replacement candidates, Article 9 of PKPU No. 6/2017 states that replacement candidates are derived from the highest number of valid votes in the subsequent ranking on the list of vote acquisition from the same political party in the same electoral district. After the submission of the replacement candidate by the DPR or political party leadership, the KPU verifies the candidate's document requirements, then determines the eligible replacement candidate as stipulated. The final mechanism executed is the DPR leadership requesting the President to issue a Presidential Decree. The inauguration and oath-taking of the new DPR member will be conducted before the DPR leadership in accordance with Article 78 of Law No. 17/2014. The new officeholder will serve until the remaining term of the DPR ends at that time. However, it is important to note that if the remaining term is only 6 months, the recall process cannot be implemented.

The rationale underlying the recall mechanism in Indonesia is multifaceted, reflecting a blend of administrative requirements and the objective of enhancing political accountability. As outlined in Article 239 of Law No. 17 of 2014, the grounds for recall encompass a range of conditions, including the inability to perform duties for three consecutive months without justification, violation of the oath of office or the code of ethics of the DPR, resignation, death, a criminal conviction carrying a sentence of at least five years, and defection to another political party. This diversity of grounds suggests that the recall mechanism in Indonesia is not solely intended to address situations where public officials lose public trust, but also includes administrative and personal circumstances.

Administrative grounds such as death or resignation, while relevant within the context of legislative body management, do not fully capture the essence of recall as a mechanism for ensuring the accountability of public officials to their constituents. For instance, in the case of death, the termination of office occurs automatically due to the official's incapacity to continue their duties. Similarly, resignation is often motivated by personal or political factors, such as health issues, political pressures, or disagreements with party policies. These grounds are primarily administrative rather than political in nature, and are not directly tied to public dissatisfaction with an official's performance or actions.

In contrast, grounds such as violations of the code of ethics, breach of the oath of office, or the inability to fulfill official duties are more closely aligned with the principle of accountability. Violations of the code of ethics or the oath of office, for example, suggest an abuse of authority or behavior that deviates from the moral and legal standards expected of public officials. In this context, recall serves as a mechanism to preserve the integrity of the legislative institution and to prevent the erosion of public trust. Similarly, the failure to perform duties for three consecutive months highlights the importance of consistency and the active presence of officials in performing their representative functions, which are central to the legitimacy of their office.

Despite the emphasis on accountability, the implementation of recall in Indonesia is frequently influenced by the dynamics of political party interests. In practice, the recall process is often initiated by political parties against members perceived as disloyal or in disagreement with the party's policies. This introduces a tension between the representative function of officials as agents of the public and their obligations to their political parties. In some instances, the recall mechanism may be exploited as a political tool to exert control over legislative members, potentially compromising their independence in decision-making. While recall is theoretically designed to uphold accountability, its practical application can be shaped by the political interests of the parties involved.

An examination of the diverse grounds for recall in Indonesia reveals a fundamental distinction between recall as a form of forced removal and the administrative termination of office. Forced removal is typically predicated on serious violations that lead to a loss of public trust, such as corruption or a breach of the oath of office. In contrast, administrative terminations, such as resignation or death, do not involve the moral or political evaluation of an official's performance but are the result of unavoidable circumstances. This distinction underscores the dual functions of recall in Indonesia: as a mechanism to safeguard political integrity and as an administrative process to ensure the continuity of the legislative body.

This analysis suggests that the recall mechanism in Indonesia may benefit from legal reform to better emphasize the principles of accountability and to mitigate the potential for politicization. For example, more precise regulations regarding the grounds and procedures for recall could help to clearly differentiate between instances where recall is necessary to maintain accountability and cases where termination arises for purely administrative reasons. Moreover, a more transparent and participatory process could help ensure that recalls genuinely reflect the will of the public, rather than serving the interests of political parties. Additionally, providing constituents with the right to initiate recall, as is the case in the Philippines, could further enhance the democratic nature of the recall mechanism.

2.2. Recall mechanisms in the Philippines

In the Philippines, the development of the recall mechanism has distinct historical origins, reflecting the country's unique political and social trajectory. The recall process gained prominence following the 1986 EDSA Revolution, which culminated in the ousting of the authoritarian regime of Ferdinand Marcos. The 1987 Philippine Constitution incorporated democratic principles that emphasized the participation of the people and the accountability of public officials (Dachi *et al.*, 2024). Within this constitutional framework, the recall mechanism was introduced as a means to empower local communities in monitoring and holding their elected representatives accountable. The focus on local officials, such as governors, mayors, and barangay council members, highlights the relatively decentralized political structure of the Philippines in comparison to Indonesia. The recall mechanism in the Philippines was specifically designed to address local issues, including corruption, abuse of power, and failures in the provision of public services.

The recall mechanism in the Philippines is detailed in the Local Government Code of the Philippines Book I. The recall mechanism for elected officials in local government units (LGUs) due to loss of trust is a democratic process that allows voters in an LGU to take action against officials deemed to have not fulfilled their expectations or trust. The term elected officials refers to individuals chosen by voters to hold positions in provincial, city, municipal, or barangay (village) levels of government (Capuno, 2011). This recall process enables registered voters in the LGU to take steps to oust or remove officials who are perceived to no longer represent their interests adequately. This can occur in various situations, such as when officials are involved in corruption, abuses of power, or fail to perform their duties effectively.

Recall cannot be initiated during the first year of assuming office or within one year before the next election (see Article 74 of The Local Government Code of The Philippines Book I). This restriction is intended to provide stability to local government during the initial period of officials' terms (David & Legara, 2017). During the first year, newly elected officials typically need time to adapt to their responsibilities, implement their agendas, and build credibility with voters. Allowing for a recall process too early could disrupt stability and consistency in local government leadership. This restriction provides local officials with an opportunity to demonstrate their capabilities and performance to voters before they can be subject to recall. By giving officials the first year to show their commitment and ability in carrying out their duties, voters can make informed assessments of their elected officials'.

The recall process is one of the mechanisms that allow voters to take action against elected officials deemed to no longer adequately represent their interests. This process begins with the collection of supporting signatures for the recall petition, followed by formal steps to submit the recall petition to the Commission on Elections (hereinafter Comelec). According to Article 70(B) of the Local Government Code of The Philippines Book I, the initial step in this process is the preparation of a written recall petition. This petition must contain clear and comprehensive information about the reasons for the recall, supporting evidence for these claims, as well as details about the targeted official and the relevant local government jurisdiction. Once drafted, representatives of the petitioners are appointed to sign the petition. These representatives may be individuals or representatives of groups or organizations supporting the recall petition. This signing is typically done officially in the presence of the election registrar or their representative to ensure the validity of the signatures.

After the recall petition is signed by the representatives of the petitioners, it is then submitted to the Comelec through its office in the relevant LGU. This means the petition is delivered to the authority responsible for processing recall petitions and overseeing elections at the local level. Upon receiving the petition, the Comelec will verify the submitted documents and review the claims made. This process may involve checking the validity of signatures, conducting further investigation into the reasons for the recall, and ensuring that the petition meets the legal requirements. If the recall petition meets the criteria, the Comelec will initiate a legal and democratic process to proceed further. This may include giving the targeted official an opportunity to respond, further investigation into the claims, and organizing a recall election to decide the fate of the official concerned.

As stipulated in Article 70 letter a of The Local Government Code of The Philippines Book I, the recall mechanism for elected officials at the provincial, city, municipal, or barangay levels is governed by percentage requirements that must be met by the petitioners submitting the recall petition. These requirements are designed to ensure that the recall petition is supported by a sufficient number of registered voters in the relevant LGU. For initial support in the form of a petition for recall, the rules are as follows:

- a. LGUs with voter populations less than 20,000: At least 25% of registered voters in the LGU. This ensures that the recall petition has significant support from voters in smaller LGUs.
- b. LGUs with voter populations between 20,000 and 75,000: At least 20% of registered voters, with the number of petitioners not less than 5,000. This sets a higher threshold for larger LGUs, while still allowing for a significant level of voter support for the recall petition.
- c. LGUs with voter populations between 75,000 and 300,000: At least 15% of registered voters, with the number of petitioners not less than 15,000. This sets an even higher threshold for larger LGUs, ensuring that the recall petition has substantial support before further processing.
- d. LGUs with voter populations more than 300,000: At least 10% of registered voters, with the number of petitioners not less than 45,000. This ensures that even very large LGUs must see a significant percentage of support for the recall petition.

In the recall process in the Philippines, there are two possible outcomes regarding the tenure of the incumbent official under scrutiny, commonly referred to as the incumbent. If the incumbent successfully garners the majority of votes in the recall election, then the recall process is considered unsuccessful. This means that the majority of voters choose to retain the incumbent in office, and they successfully maintain their position. In this case, the incumbent will continue to serve and will not be replaced by another candidate. However, if another candidate participating in the recall election receives the highest number of votes, then the recall process is considered successful. This means that the majority of voters choose to remove the incumbent from office and replace them with a new candidate. In this scenario, the candidate who receives the highest number of votes will replace the incumbent and assume the position.

2.3. A comparative analysis of recall mechanisms in Indonesia and the Philippines

Both Indonesia and the Philippines have mechanisms for recall to allow voters to take action against elected officials deemed to no longer represent their interests adequately. However, there are significant differences in the details and implementation of the recall mechanisms in both countries. In Indonesia, the recall mechanism is governed by different laws, primarily Law No. 17/2014 and Law No. 7/2017. Reasons for recall include death, resignation, and dismissal for various reasons such as inability to perform duties continuously, violation of oath/pledge of office, or involvement in criminal activities. The recall process begins with a submission of a petition by the leaders of the DPR or political parties to the President, followed by verification and the selection of a replacement candidate by the Komisi Pemilihan Umum (KPU), and finally the swearing-in of the replacement by the leaders of the DPR. This process aims to ensure the stability and credibility of the legislative institution and meet public expectations of accountability. Meanwhile, in the Philippines, the mechanism for recall is detailed in The Local Government Code of The Philippines Book I. The procedure begins with the collection of signatures supporting the recall petition, which is then submitted to the Comelec. The Comelec verifies

the documents and claims submitted in the petition, ensuring that the stipulated requirements, including the percentage of voter support, are met. If the petition passes verification, a recall election is conducted where voters decide whether the elected official should remain in office or be replaced by a new candidate.

The comparison of the recall mechanisms in both countries reveals several significant differences. First, the Philippines imposes strict time requirements before a recall can be initiated, whereas Indonesia lacks clear time restrictions. This reflects a stricter approach in ensuring stability and consistency in local government leadership in the Philippines. Second, the initiation and verification processes for recall also differ. In Indonesia, the process is initiated by the leaders of the DPR (House of Representatives) or political parties, whereas in the Philippines, it begins with the collection of signatures supporting the recall petition from voters. Verification of documents and claims is handled by the Comelec in the Philippines, whereas in Indonesia, it is done by the KPU. Third, the Philippines has a more formal and democratic election recall process, where voters decide the fate of elected officials through majority vote. In contrast, in Indonesia, the recall process is more centralized around decisions made by the leaders of the DPR or political parties, with the appointment of replacements more closely tied to internal political processes. While both countries share the same goal of enabling voters to take action against elected officials deemed not to represent their interests well, the differences in the details and implementation of the recall mechanisms reflect variations in political systems and democratic values between the two countries.

The differing levels of government at which the recall mechanism is applied in Indonesia and the Philippines illustrate divergent approaches to political accountability, shaped by each country's distinct historical and political contexts. In Indonesia, recall is applicable to members of the national legislature, reflecting the need to regulate the conduct of policymakers at the highest echelons of government. This focus can be understood in light of Indonesia's transition from an authoritarian regime to a democratic system, which necessitated mechanisms to ensure that the newly established parliament would function as a legitimate and accountable representative body. The implementation of recall at the national level also signifies efforts to balance power between the executive and legislative branches, while mitigating the potential for abuse of power among legislative members.

Conversely, in the Philippines, the recall mechanism is confined to local officials, underscoring a focus on enhancing accountability at the level of government closest to the electorate. This emphasis aligns with the Philippines' historical trajectory of decentralization, in which local governments possess a considerable degree of autonomy in managing their affairs. The application of recall at the local level is intended to empower citizens to directly influence the leadership of their communities and to ensure that local officials remain responsive to the needs and concerns of their constituents. This approach reflects broader efforts to promote civic engagement and democratic participation within a political system that has historically been dominated by national elites.

These differences can be explained by a combination of historical, political, and institutional factors. In Indonesia, the legacy of centralized power under the New Order regime created a pressing need for robust accountability mechanisms at the national level. In contrast, the Philippines' long-standing tradition of local democracy and decentralized governance has contributed to the prioritization of local officials in the recall process. Additionally, these variations reflect practical challenges inherent in the implementation of recall. In Indonesia, the application of recall at the local level may face significant logistical and administrative challenges, given the country's vast territorial expanse and cultural diversity. In the Philippines, the implementation of recall at the national level may be less feasible due to the high financial costs and procedural complexities involved.

A comparative analysis of the recall systems in Indonesia and the Philippines offers a comprehensive understanding of how this institutional mechanism operates within distinct political and governance frameworks. The primary criteria for evaluating the effectiveness of these systems include the protection of officials subject to recall, the extent of public participation, and procedural efficiency. Although both countries share the overarching goal of ensuring the accountability of public officials, the

implementation of the recall process in each context reflects divergent democratic values and encounters unique challenges.

In Indonesia, the recall system is characterized by a more centralized structure, with significant control exerted by political parties and legislative authorities. This centralized approach affords greater protection to officials subject to recall, as the process involves stringent verification procedures, and the final decision rests with executive authorities. Such an arrangement serves to mitigate the potential for the recall mechanism to be exploited for short-term political advantage or as an unfair instrument for the removal of officials. However, this heightened protection is accompanied by notable limitations, particularly regarding public participation. The public has limited direct involvement in the recall decision-making process, as the procedure is largely controlled by political parties or legislative bodies. This restricted participatory dimension undermines the sense of public ownership of the recall process and diminishes its political legitimacy.

Conversely, the recall system in the Philippines places greater emphasis on citizen participation. The process is initiated by a citizen-led petition for recall, which is subsequently verified by the Comelec. This system enhances public involvement by enabling citizens to directly evaluate the performance of their elected officials. However, the Philippine system is not without its shortcomings, particularly with respect to the protection of officials subject to recall. Due to the flexible nature of the recall process, which allows for recall based on general public dissatisfaction without the need for specific justifications, officials are often vulnerable to political pressure and partisan attacks. This situation can lead to political instability, particularly in regions marked by political polarization.

In terms of procedural efficiency, Indonesia benefits from a more structured and clearly defined recall process, with distinct stages and relatively well-controlled timelines. In contrast, the Philippine recall system may be more cumbersome, with the potential for prolonged and costly procedures, particularly when special elections are required. Furthermore, the flexibility afforded to citizens in initiating recalls in the Philippines introduces the possibility of unnecessary political disruptions, which can impede local governance and stability.

While Indonesia's recall system is more effective in ensuring institutional stability and safeguarding officials from undue political influence, it offers limited opportunities for direct public engagement. The Philippine system, in contrast, is more participatory and democratic but is vulnerable to politicization and instability. The effectiveness of the recall systems in both countries is contingent upon the specific priorities they seek to uphold – whether the protection of institutional stability or the promotion of greater public involvement. Ideally, integrating the most effective elements of both systems could yield a balanced recall mechanism that enhances the protection of public officials, increases public participation, and improves procedural efficiency.

3. Participation and the actors involved in recall mechanisms

Political participation is a crucial aspect of democracy that allows citizens to actively engage in the decision-making process (Karp & Banducci, 2008), both in general elections and in other mechanisms such as recall. In the recall mechanisms of Indonesia and the Philippines, there is a deep understanding of how political participation can be reflected in the process of removing elected officials who are perceived to no longer represent the interests of the public well. These mechanisms illustrate how the reasons for recall are closely related to performance and integrity.

In Indonesia, ethics and integrity are crucial because they form the moral foundation for every member of the DPR in carrying out their duties. In this context, there is a strong expectation from the public that representatives will act according to high moral and ethical principles, and will represent public interests with integrity (Finn, 1993). Therefore, when there is an ethical violation or abuse of power by a member of the DPR, the recall mechanism becomes an important tool to uphold moral and ethical standards in governance. The recall mechanism also reflects the need for accountability and transparency in the political system. By allowing citizens to take action against DPR members deemed to violate ethical

codes or engage in unethical behavior, the recall process strengthens the concept of accountability among elected leaders. This creates moral pressure on representatives to maintain integrity in their duties, knowing that ethical violations can lead to their removal from office. Furthermore, the importance of transparency and accountability in the replacement process of dismissed DPR members highlights a commitment to democratic principles and has significant implications for political participation in Indonesia. Transparency in each stage of the replacement process ensures that decisions can be understood and monitored by the public. This not only enhances the public's trust in political institutions, but also gives them confidence that political processes are not conducted covertly or behind closed doors.

The importance of transparency and accountability in the replacement process for dismissed DPR members not only reflects a commitment to democratic principles, but also strengthens the role of political parties within Indonesia's political structure. This provides a more comprehensive understanding of how political participation is realized through the recall process, linking moral and ethical aspects, transparency, and the role of political parties, which should not be overlooked. Political parties have the authority to propose the dismissal of DPR members and are responsible for overseeing their performance. In this context, political parties are not only vehicles for individual or constituent aspirations, but also guardians of integrity and accountability within legislative bodies. The involvement of political parties also reflects the close connection between individual political participation and the broader political structure. In representative democracies like Indonesia, political parties serve as intermediaries between the public and the government. Therefore, when political parties engage in the recall process, they indirectly facilitate public political participation through established and constitutionally recognized channels.

In the Philippines, the recall mechanism is also regulated by law, which establishes the procedures to be followed and certain limitations, such as time constraints before a recall petition can be filed. This mechanism provides a clear overview of the process of filing a recall petition, starting from the collection of signatures to verification by the Comelec. The imposition of time limits in the recall mechanism in the Philippines underscores the need for strict regulation in political participation. Setting these time limits is not merely an administrative obligation, but also a strategic step to maintain political stability and provide opportunities for newly elected officials to prove themselves. These time limits create a clear and structured framework in the recall process. By setting clear time limits, the recall process becomes more organized and avoids unnecessary delays or manipulations. This allows all parties involved, including voters and elected officials, to have a clear understanding of the stages of the process. Furthermore, time limits provide an opportunity for newly elected officials to establish themselves before facing scrutiny from voters. This creates a healthy dynamic in the political process where elected officials have the chance to work and make a positive impact before being evaluated by the electorate. Thus, time limits not only protect political stability, but also safeguard the rights and opportunities of all parties involved in the political process.

The percentage support requirements in the recall mechanism process in the Philippines reflect an approach towards broad and inclusive political participation. These requirements not only place responsibility on individuals or small groups petitioning for recall, but also emphasize significant support from the broader community. The percentage support requirements ensure that the recall petition has strong legitimacy. In a democratic context, political legitimacy is crucial to prevent the misuse of political processes. By establishing significant support requirements, the recall process is better protected from unreasonable or opportunistic attempts to remove elected officials. Substantial support from the community also indicates a genuine need or strong desire to initiate the recall process, rather than merely impulsive actions from a small faction. The percentage support requirements reinforce the principle of majority decision-making in democracy. In the context of the recall mechanism, significant support requirements affirm that a decision to remove an elected official is indeed supported by the majority of registered voters. This helps ensure that the political process aligns with the will of the majority and is not influenced by small groups or individual interests.

The recall process in the Philippines highlights the essence of democracy as the primary foundation for political decision-making. These democratic principles ensure that the voice of the people holds significant power in determining the political direction and fate of elected representatives. The recall mechanism provides a means for the public to express satisfaction or dissatisfaction with the performance of elected officials. In a healthy democracy, it is crucial for citizens to have mechanisms that allow them to correct or amend political decisions deemed inadequate or detrimental to public interests. The recall process provides a democratic platform for voicing these views and taking appropriate action. By placing the final decision in the hands of voters through elections, the recall process reinforces the principle of popular sovereignty. In representative democracies, representatives are elected by the people to represent their interests and aspirations (Garsten, 2010; Putri, 2020; Zhou, 2024). However, if these representatives fail to meet expectations or violate the trust bestowed upon them by the people, the recall process provides a means for the public to take action and rectify these mistakes through a democratic mechanism. The democratic process in recall elections emphasizes the accountability of elected leaders to the people (Jiménez, 2011; Qvortrup, 2011; Serdült, 2015; Welp & Castellanos, 2020).

The recall procedures in Indonesia and the Philippines exhibit notable differences in terms of stages and public participation. In Indonesia, the recall mechanism is more centralized, involving internal authorities such as the leadership of the DPR and the President. This reflects a more institutional approach to the oversight of legislative officials. In contrast, the recall process in the Philippines places a greater emphasis on direct public participation, from the initiation of petitions to the conduct of special elections. This approach highlights the Philippines' focus on participatory democracy at the local level. Although the recall process in the Philippines grants more power to the public, it also faces challenges, such as the potential for misuse by certain groups for political gain. On the other hand, the recall system in Indonesia, while more structured, tends to limit direct public involvement in the process. This presents its own challenges in fostering a sense of public ownership and engagement with the political accountability mechanism.

Another key difference lies in the flexibility of grounds for recall. In Indonesia, the grounds for recall are detailed in the law and encompass violations of ethics, incapacity, or criminal conduct. In contrast, the recall process in the Philippines is more flexible, as it allows the public to initiate recall petitions based solely on dissatisfaction with an official's performance. This approach reflects a divergence in the political cultures of the two countries. In Indonesia, recall serves to maintain the integrity of legislative institutions, whereas in the Philippines, it is designed as a mechanism to ensure the responsiveness of local officials to the needs of the public. The recall procedures in both countries reflect the unique characteristics of their respective political systems. In Indonesia, recall emphasizes institutional stability and legislative oversight, while in the Philippines, it functions as an instrument of direct democracy that provides greater space for public participation. These differences underscore the fact that recall is not merely a legal mechanism, but also a reflection of the differing democratic values and accountability norms in each country. Further research could focus on evaluating the effectiveness of each approach in enhancing public trust in their political systems.

Political participation is not just a right, but also a responsibility that requires active involvement from every citizen in overseeing and ensuring the integrity and accountability of elected representatives. The recall election process not only reaffirms the essence of democracy as the primary foundation for political decision-making, but also strengthens the principle of popular sovereignty and maintains a high level of accountability between leaders and the populace.

Conclusion

The recall mechanisms in Indonesia and the Philippines illustrate that, while both countries pursue the shared objective of enhancing public accountability, the approaches and implementation reflect distinct structural, political, and cultural dynamics. In Indonesia, recall at the national level is characterized by a structured and legally codified framework; however, the process is predominantly governed by political parties and legislative authorities. This arrangement ensures greater institutional stability but limits direct public participation in the recall process. In contrast, the Philippine recall system, primarily implemented at the local level, enables direct public engagement, as the process is initiated by community-driven petitions. This approach reflects a more participatory democratic ethos, albeit with a heightened susceptibility to politicization and political instability.

Indonesia's recall mechanism, with its focus on national legislators, underscores the imperative of maintaining legislative integrity amidst complex political dynamics. Nevertheless, the dominance of political parties in the process risks compromising legislative independence, rendering the mechanism vulnerable to partisan interests. Conversely, the Philippine recall system empowers the public with a more direct means to assess the performance of local officials. However, the procedural flexibility in initiating recalls may exacerbate political instability, particularly in regions characterized by significant polarization. Advancing the efficacy of recall mechanisms necessitates achieving an equilibrium between institutional stability, public participation, and accountability. Ideally, the strengths of both systems could be synthesized to create a more comprehensive and balanced recall framework. Indonesia could benefit from the Philippines' emphasis on public engagement, while the Philippines might consider integrating safeguards to protect officials subject to recall, thereby mitigating potential abuse of the mechanism.

In the Philippine context, exploring the feasibility of extending the recall mechanism to the national level – such as for members of parliament – merits further investigation. A rigorous analysis is essential to evaluate the potential advantages and challenges of such an expansion, including its implications for political stability and civic participation. In Indonesia, reforms aimed at increasing public involvement in the recall process could enhance the mechanism's legitimacy. Integrating mechanisms such as open consultations or referenda into the process could amplify public input while maintaining institutional stability. Future scholarly inquiry could focus on assessing the impacts of recall mechanisms on political accountability and public trust in both jurisdictions. Comparative studies that examine recall systems in other countries could yield valuable insights into best practices and innovative approaches to the design of such mechanisms. By adopting a more inclusive and evidence-driven perspective, recall mechanisms have the potential to serve as more effective instruments for fostering democratic governance and accountability, not only in Indonesia and the Philippines but also in other nations considering the adoption of similar institutional arrangements.

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