

Comparative of Governance in Terrorism Policy Implementation in Indonesia and Philippines

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ABSTRACT

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In Southeast Asia, especially in Indonesia and the Philippines, the issue of terrorism has become a major concern because both countries have a long history of terrorism as well as similar geographical and political characteristics. The main objective of this research is to compare the implementation of terrorism policies in Indonesia and the Philippines. This research is a library research with research subjects in the form of research abstracts, articles, websites, books, policies, and other supporting sources. Data analysis refers to the Van Meter and Van Horn model with the stages of reduction, presentation, and conclusion drawing. The instrument used is analytical and descriptive information management so that the author analyzes, interprets, and combines information obtained from various reading sources. The results show that Indonesia combines the hard approach and soft approach, while the Philippines tends to emphasize the hard approach through military force in implementing its policies. Although both have legal frameworks and supporting institutions, there are still challenges in inter-agency coordination and human rights protection. This research concludes the importance of synergy between stakeholders and improvement of regulations in the implementation of terrorism policies between Indonesia and the Philippines that are more fair and preventive in order to increase the effectiveness of the law without violating human rights.

INTRODUCTION

Indonesia is one of the countries with a long history of terrorism. Acts of terrorism have occurred since the Old Order period, such as the action at Perguruan Cikini Jakarta on November 30, 1957 through the throwing of grenades on a charity night and the assassination plan on May 14, 1962 when Soekarno was praying Eid al-Adha but the action failed (Moersidin et al., 2022).

These events continued, including a series of bombings in 2000: on August 27, a grenade exploded in the compound of the Malaysian Embassy in Kuningan, Jakarta. Then on September 13, 2000 there was an explosion at the Jakarta Stock Exchange building in Sudirman that resulted in 10 deaths and 90 injuries. Various acts of terror continued until 2010 on the grounds of jihad and revenge (Fathun, 2021). The Indonesian government has responded with policies, from Government Regulation in Lieu of Law No. 1/2002 after the Bali Bombing, to Law No. 5 Year 2018 on the Eradication of the Crime of Terrorism. Indonesia as a maritime country has a greater vulnerability to the threat of cross-border terrorism. The UN Secretary-General's report (2008) in Oceans and the Law of the Sea emphasized the existence of seven maritime threat constructs, one of which is terrorism (Ali et al., 2021). Similar fragility is found in the Philippines, Southeast Asia's second-largest island nation, which has suffered attacks from the Abu Sayyaf group, the Communist Party of the Philippines (CPP/NPA), and Jemaah Islamiyah (JI) (Maulidita et al., 2024).

However, the gap analysis shows that there is a gap between the policy that has been designed and the reality of its

implementation. In Indonesia, there is fragmentation of inter-agency terminology such as the TNI using the term OPM (Free Papua Organization) and the Police using the term KKB (Armed Criminal Group) (Samosir, 2024). This reflects the different perspectives in handling terrorism. Meanwhile, in the Philippines, despite the Human Security Act of 2020, the use of military force without a clear legal basis still triggers protests of human rights violations. This condition shows that although the legal framework is in place, its implementation has not been optimal and has the potential to cause human rights violations and handling inefficiencies.

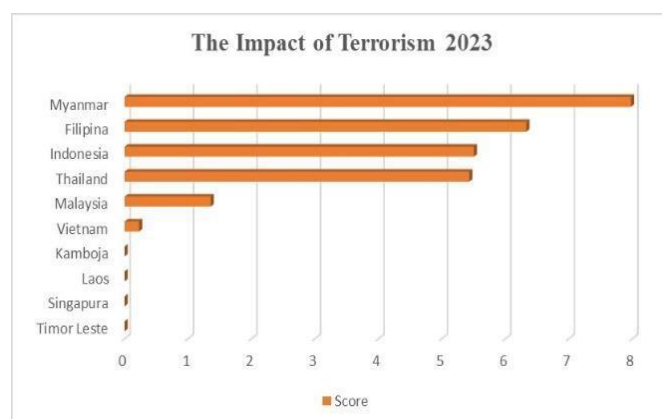


Figure 1. The Impact of Terrorism 2023

Source: Institute for Economics & Peace (IEP) *Global Terrorism Index 2023*

Based on data from the Institute for Economics and Peace (IEP) by collecting global terrorism index (GTI/Global Terrorism Index) scores on countries in ASEAN where the Philippines occupies the second position with an index score of 6.33 as a country affected by terrorism cases while Indonesia occupies the third position with an index score reaching 5.5 points where IEP calculates the GTI score based on indicators of deaths, injuries, number of incidents, and hostages caused by acts of terrorism (Santika, 2023). Policy implementation relates not only to the attitudes of the various responsible administrative bodies but also to the network of political, economic, and social forces directly or indirectly capable of influencing the actions of the stakeholders involved, and which will have both positive and negative impacts (Subianto, 2020).

A review of novelty shows that a number of previous studies have discussed terrorism management policies in Indonesia and the Philippines. First, a study by (Mullins, 2020) entitled "Twenty-Five Years of Terrorism and Insurgency in Southeast Asia" which examines the long history of terrorism and insurgency in the Southeast Asian region over the past 25 years by highlighting the continuing threat from groups such as Jemaah Islamiyah (JI), Abu Sayyaf Group, New People's Army in the Philippines. Furthermore, that despite numerous military operations, many militant groups remain resilient and able to transform over time. Second, research by (Hamzani et al., 2020) entitled "Trend to Counter Terrorism in ASEAN" shows that there is a paradigm of counter-terrorism policy in ASEAN from a penal to non-penal approach, including deradicalization and disengagement. However, the implementation of this program still faces challenges in terms of supervision, funding, and meaningful civil society involvement. Third, research by (Mathiyalagan & Padli, 2022) entitled "Impacts of Terrorism on Economic Growth and Foreign Direct Investment in Developing Asian Countries: Malaysia, Indonesia and Philippines" found that an increase in terrorism incidents has a negative impact on Foreign Direct Investment (FDI) and economic growth in developing countries such as Indonesia and the Philippines. This finding adds an important dimension that terrorism is not just a security issue, but also has long-term economic implications.

Furthermore, research by (Ramadhan, 2023) highlights Indonesia's focus on international cooperation and domestic policy reform, while the Philippines prioritizes military intervention and strict laws. Finally, research by (Anindya, 2024) with the title "Securitisation, National Action Plan, and Law on Terrorism in the Philippines and Indonesia: Questioning Comprehensive Approach" specifically addresses the issue of the implementation of the National Action Plan in Indonesia and the Philippines, and how the term 'comprehensive approach' is often used as a justification for a heavy-handed approach by the state. The research underscores the importance of non-state actors' involvement in policy-making as part of counter-terrorism strategies.

While existing research has made important contributions to understanding the dynamics of counter-terrorism policies in Indonesia and the Philippines, there is still a gap in studies that systematically compare policy implementation between the two countries. Most studies focus on normative analysis of the policies or separately examine the characteristics of each country. In fact, a comparative approach is essential to understand how the socio-political context, institutional

structure, and policy actors affect policy effectiveness on the ground.

This research will compare the implementation of terrorism policies between Indonesia and the Philippines more comprehensively, by considering policy dynamics, the role of state institutions, and responses to contemporary threats. By comparing the two largest archipelagic countries in Southeast Asia that have similar socio-political characteristics, this research is expected to contribute in formulating a more effective policy strategy for counterterrorism. Based on this description, the purpose of this study is to compare the implementation of policies on terrorism in Indonesia and the Philippines.

RESEARCH METHOD

The present study constitutes a library research, predicated on the aggregation of library data procured from assorted sources of library information pertinent to the subject of inquiry. These sources encompass abstracts of research results, journals, reference books, indexes, and reviews. The selection of the research method is grounded in the approach employed in the extant literature, which prioritizes the collection and analysis of data through literature reviews that are congruent with the subjects under study. The utilization of this literature method enables the author to seek out extant information from various sources, including articles, websites, books, policies, and other relevant materials, with the objective of identifying information that is congruent with the subject under study. The research method under scrutiny is characterized by its analytical and descriptive information management, whereby the author undertakes a meticulous analysis, interpretation, and synthesis of information derived from diverse reading sources.

The data was obtained from the policies and information published by the governments of Indonesia and the Philippines regarding the implementation of terrorism policies in both countries. The present study's restriction is focused on the elements of policy implementation regarding policy size and objectives, sources of policy, inter-organizational communication and implementation activities, characteristics of implementing agencies, attitudes of implementers, and external environment by both countries. It is imperative to draw conclusions from the findings on the results of the analysis with reference to the focus of the research.

The present study aims to examine the implementation of policies established by the governments of Indonesia and the Philippines in addressing cases of terrorism. Furthermore, the present study seeks to elucidate the parallels and divergences in the methodologies employed by the two nations in ascertaining the efficacy of the policies selected to address the prevailing challenges.

RESULTS AND DISCUSSION

3.1 Terrorism Policies in Indonesia and the Philippines

3.1.1 Positive Law

Positive law is a set of written laws that officially regulates the handling of terrorism crimes in each country. Both Indonesia and the Philippines have quite strict regulations, but have different approaches in the definition and scope of terrorism.

Table 1 Positive Law Comparative

Aspects	Indonesia	Filipina
Key Regulations	Law No. 5 of 2018 on the Eradication of the Crime of Terrorism	Anti-Terrorism Act of 2020 (Republic Act No. 11479)
Definition of Terrorism	Scope: recruitment, training, dissemination of documents, support to violent organizations	Scope: acts causing death, major damage, creating fear, disrupting socio-political-economic stability, incitement through media and symbols
Additional components of the law	Chemical, biological and radiological weapons arrangements	Including threats, proposals, training and incitement through speeches, writings, banners, etc.
Child Involvement	Child offenders receive an additional sentence of one-third of the sentence	Not specifically mentioned

3.1.2 Law Enforcement

Law enforcement refers to the institutions and strategies used to deal with terrorism cases. Indonesia uses a human rights-based legal approach, while the Philippines tends to take a more militaristic and repressive approach.

Table 2 Law Enforcement Comparative

Aspects	Indonesia	Filipina
Enforcement Agency	Special Detachment 88 (Densus 88)	Anti-Terrorism Council
Special Authority	Focus on human rights protection, procedural and coordinative	Anti-Terrorism Council can designate individuals/groups as terrorists, including requests from other countries and the UN
Dominant Approach	Judicial and human rights	Militaristic and national security

3.1.3 Deradicalization Enforcement Approach

This approach shows the state's strategy in preventing radicalization before it becomes an act of terror. Indonesia uses an inclusive and social approach, while the Philippines focuses more on military operations with limited social program elements.

Table 3 Comparative of Deradicalization Enforcement Approaches

Aspects	Indonesia	Filipina
General Strategy	Deradicalization, rehabilitation, reconciliation, dialogue-based, education, and community	Military and security emphasis to deal with extremist groups
Holistic Approach	Involving civil society, religion, education, and local government	Not dominant, but starting to lead to strengthening communities in recognizing radicalism
Legal Basis	PP No. 77 of 2019 on Prevention of Criminal Acts of Terrorism and Protection of Law Enforcement Officials	No comprehensive derivative regulations, more emphasis on security practices
Weaknesses	Implementation still faces challenges in program	Too focused on the military so that the soft approach has not been maximized

3.1.4 Terrorism Sanctions

This section shows how harsh or lenient the penalties are for terrorism offenders. Both countries impose severe penalties, but the Philippines has more repressive rules, even without parole.

Table 4 Terrorism Sanctions

Aspects	Indonesia	Filipina
Main Sanction	5-20 years imprisonment, life imprisonment, or death penalty	Life imprisonment without parole
Conspiracy/Planning	Set out in many articles in Law No. 5/2018, with sanctions equivalent to main perpetrators	Life imprisonment
Assistance/Contribution	3-15 years imprisonment, even for foreign perpetrators	Treated the same as main perpetrators
Incitement/provocation	Limitedly regulated	Including incitement through media, writings, symbols, speeches, etc., considered a main crime

3.1.5 The Process of Law Implementation

Explains how the legal mechanism is carried out from the arrest process, investigation, to trial. Indonesia is relatively procedural and due process-based, while the Philippines allows for warrantless arrests and lengthy detention periods.

Table 5 The Process of Law Implementation

Aspects	Indonesia	Filipina
Procedural Basis	Based on KUHAP and Law No. 5 of 2018	Based on Anti-Terrorism Act 2020
Law Enforcement Model	Crime control model (investigation), due process model (prosecution)	Based on Anti-Terrorism Act 2020
Detention without warrant	Warrant Not regulated	Can be done up to 14 days, extended 10 days
Suspect Supervision	Suspect's rights are protected by Human Rights Law and KUHAP	Can be supervised up to 60 days, extended 30 days
Legal Protection	Available for suspects and victims (restitution, compensation, rehabilitation)	More limited protection, especially in conflict areas such as Mindanao

3.2 Analysis of Results based on Van Meter and Van Horn Policy Implementation Theory

3.2.1 Policy Measures and Objectives

Currently, Law No. 5/2018 on the Amendment to Law No. 15/2003 on the Stipulation of Government Regulation in Lieu of Law No. 1/2002 on the Eradication of the Criminal Acts of Terrorism into Law is in force in Indonesia. The changes to the law are clearer, and provide more legal certainty. The definition of terrorism in the latest law is expanded to include elements of ideological motives, economic disruption, and politics (Article 1 paragraph (2)) so that the definition of terrorism is now more explicit than the previous law. Article 28 paragraph (1) also allows the arrest of people suspected of committing terrorism crimes based on preliminary evidence. Protection for victims through the Witness and Victim Protection Agency (LPSK) is also added in Article 35A. Then, a year after the law was enacted, the number of acts of terrorism has decreased from 2019 to the present, especially throughout 2023 Indonesia is not colored by acts of terrorism (zero terrorist attacks).

However, beneath the surface there is an increasing trend of consolidation and radicalization processes. Throughout 2023, BNPT of the Republic of Indonesia found 2,670 digital contents indicating the spread of radicalism and terrorism propaganda contents. Therefore, a multi-dimensional approach is needed, not only focusing on law enforcement but also involving educational, social and economic aspects. The goals and objectives of the policy should not be multi-interpreted and cause conflicts among implementation agents. Conflicts between implementation agents occurred when the Philippines' Human Security Act of 2007 came into effect because the procedural provisions were very strict but the

definition of terrorism was not specific and too broad, which was feared to be misused by interested parties. Thus, the HSA 2007 policy was amended and replaced by the Anti-Terrorism Act of 2020.

The new Anti Terrorism Act of 2020 is clearer, stricter, and expands the reach of government power than the previous one. The definition of terrorism in the law is also more comprehensive as it clearly outlines what constitutes terrorism (Article 4). The ATA creates an Anti-Terrorism Council appointed by the president to designate individuals as "terrorists" and is one of the preventive and responsive measures of the law. Thus, it can be said that the regulations in Indonesia and the Philippines are quite good. The Anti Terrorism Act of 2020 is considered to be stricter but there are potential human rights violations such as giving excessive power to the government and the supervision carried out by the ATC is considered to eliminate the legal protection usually provided by the judicial system, which can increase the risk of abuse of power.

Meanwhile, Indonesian Law No. 5/2018 on the Amendment to Law No. 15/2003 on the Stipulation of Government Regulation in Lieu of Law No. 1/2002 on the Eradication of the Criminal Acts of Terrorism into Law seeks to maintain a balance between security and human rights, so it is considered less effective in law enforcement, as in the government's inability to deal with or stop the movement of extremist groups in various regions. Therefore, it is important for civil society and other international organizations to monitor the current laws in both Indonesia and the Philippines.

3.2.2 Sources of Wisdom

National Counterterrorism Agency (BNPT) in Indonesia.

Resources relate to quality which depends on skills, dedication, professionalism, and competence in the field, while quantity relates to a sufficient number of human resources. Without the support of resources, a policy will only be a document that does not function to solve problems in society (Surani & Prathama, 2024). In addition, human resources play a dominant and active role in every organizational activity, because humans are the planners, determinants, and actors in the creation of an organization's goals (Manalu & Thamrin, 2024).

The National Counterterrorism Agency (BNPT) is a non-ministerial agency tasked with formulating, implementing, and coordinating counterterrorism policies, strategies, and programs in Indonesia. In carrying out its duties, BNPT requires qualified and adequate human resources, as well as a sufficient financial budget. The current number of BNPT human resources may not be sufficient to fulfill all the needs in countering terrorism. It is necessary to conduct an in-depth study to determine the ideal HR needs at BNPT. The increase in the number of human resources needs to be balanced with an increase in the quality of human resources.

In terms of quality, BNPT has human resources from various backgrounds, such as universities, law enforcement institutions, and intelligence. The quality of BNPT human resources needs to be continuously improved through continuous training and education. The BNPT budget comes from the State Budget (APBN) in the 2024 fiscal year. BNPT RI proposes a budget of IDR 886,239,664,700, - It is necessary to study the possibility of diversifying budget sources, such as through cooperation with the private sector or international institutions. The focus of the budget is more directed at prosecution than prevention so that the deradicalization program is not running optimally. Also, although BNPT has

removed 180,000 terrorism-related contents by 2024, extremist groups are still actively using digital space to spread radical ideology and even recruit new members.

Counterterrorism Council in the Philippines. The Anti-Terrorism Council (ATC) of the Republic of the Philippines is an inter-ministerial coordinating body tasked with formulating, implementing, and coordinating counterterrorism policies, strategies, and programs in the Philippines. The quantity of human resources in ATC can be analyzed from several aspects, the first is in terms of human resource needs. The ideal number of human resources in the ATC needs to be determined based on an in-depth study of the complexity of terrorism issues in the Philippines, the scope of duties and responsibilities of the ATC, and the available resources.

Based on the analysis, it can be seen that the quantity of human resources in ATC still has room for improvement to support more effective policy implementation in countering terrorism in the Philippines. The budget source of ATC comes from the Philippine government budget. This budget is allocated by the Philippine government to support the operational and counter-terrorism activities conducted by the ATC. Most of the ATC's budget may come from special allocations given by the Philippine government for national security and law enforcement, including anti-terrorism efforts. In addition, the Philippines may also receive assistance or financial support from international partners in their efforts against terrorism.

3.2.3 Characteristics of the Implementing Agency

The official bodies of the Indonesian and Philippine governments in implementing terrorism policies are charged with functions and duties in accordance with applicable regulations. In Indonesia, the BNPT, classified as a Non-Ministerial Government Institution (LPNK), is entrusted with the responsibility of addressing terrorism-related cases within the purview of the government. The BNPT was established in accordance with Presidential Regulation Number 12 of 2012, which pertains to Amendments to Presidential Regulation Number 46 of 2010 concerning the National Counterterrorism Agency.

The BNPT's strategic vision entails the realization of countering radicalism and terrorism through the collaborative efforts of community and government institutions, encompassing protection, prosecution, prevention, and deradicalization. This vision aims to enhance national vigilance and international cooperation to ensure national security (Zulfikar & Aminah, 2020).

The prevention program administered by BNPT is comprised of two overarching strategies. Firstly, endeavors have been made to impede the proliferation of radical ideology through the implementation of deradicalization initiatives targeting militant and core terrorist groups. These initiatives encompass a multifaceted approach encompassing prevention, reduction, rehabilitation, and resocialization activities. Second, counter-radicalization strategies aimed at sympathizers, communities, and supporters entail the implementation of prevention activities. These activities include surveillance on individuals, counter-propaganda efforts, firearms protection, vigilance activities, and protection of public and environmental facilities (Zulfikar & Aminah, 2020). The objective of the BNPT's terrorism prevention strategy is to design effective terrorism prevention strategies and policies that are as comprehensive as possible in order to prevent various acts of terrorism.

Meanwhile, the Philippines has a body called The National Counter-Terrorism Action Group (NCTAG) which was formed on November 27, 2007. This institution is an anti-

terrorist agency operating under the Philippine Anti-Terrorism Council. NCTAG is authorized to investigate various cases of terrorism attacks and process them in accordance with Republic Act (RA) 9372, also known as the Human Security Act. This act has since been amended and re-established as the Human Security Act (HAS) of 2020. Apart from the NCTAG, the Philippines is home to a prominent institution that oversees counterterrorism initiatives: the Anti-Terrorism Council.

The Republic of the Philippines has an Anti-Terrorism Council that oversees the Secretariat (NICA) and the Program Management Center. The Program Management Center has a direct structure to various institutions, including the National Terrorism Prevention Office (NTPO), the Capability Building Office (CBO), the Legal & International Affairs Office (LIAO), the Readiness Assessment & Monitoring Office (ORACMO), and the Office for Special Concerns (OSC) (Sorusit, 2017). In accordance with Republic Act No. 11479, 2020, the council is entrusted with responsibilities that are to be executed with due consideration for the rights of the people, as stipulated by the Constitution and associated legal statutes.

3.2.4 Inter-organizational Communication and Implementation Activities

The implementation of a policy is determined by the communication between policy makers, policy implementers, and policy objectives. Communication between related institutions and implementation activities in both Indonesia and the Philippines has been carried out quite well which can be seen from several aspects in both Indonesia and the Philippines.

Table 6 Comparative of Inter-Organizational Communication and Implementation Activities

Aspects	Indonesia	Philippines
Availability of Legal Standards	Law No. 5 Year 2018 as a clear basis for counterterrorism	Anti-Terrorism Act of 2020 (RA 11479) as the main legal foundation
Institutional Involvement	Coordinated by BNPT, with the involvement of TNI, Polri, BIN, and the Attorney General's Office.	Coordinated by the Anti-Terrorism Council, with support from NCTAG and NICA
Cross-Agency Cooperation	Established synergy between domestic institutions (Police, TNI, BIN, BNPT), as well as foreign cooperation through ASEAN and the UN.	Communication between institutions is carried out systematically through the coordination of ATC and other supporting institutions.
International Information Exchange	Actively cooperate with other countries' intelligence in regional and global scope (e.g. UN and ASEAN)	Also cooperate with countries and international institutions for terrorism detection and response.

3.2.5 Attitude of Implementers

The attitude of the implementers is one of the crucial aspects that affect the effectiveness of policy implementation, including in counterterrorism in Indonesia and the Philippines. This attitude reflects the extent to which the implementers understand, accept, or even reject the formulated policy and how intense they are in carrying out the task. Both Indonesia and the Philippines show different characteristics in this regard, which are influenced by historical factors, institutional structure, and socio-political dynamics of each country.

Table 6 Comparative of Implementers' Attitudes

Aspects	Indonesia	Philippines
Approach	A combination of hard approach (Densus 88) and soft approach (deradicalization program by BNPT).	More dominant use of hard approach through military action and strict laws
Lead Implementing Agency	Densus 88 (prosecution) and BNPT (prevention & deradicalization)	ATC, NCTAG, and military personnel
Deradicalization Policy	Actively run by BNPT with community, education, and rehabilitation approaches.	Started developing soft measures such as the PAMANA program
Human Rights Issues	Starting to balance security and human rights protection	Much criticism related to human rights violations and the definition of terrorism which is considered too broad

3.2.6 Economic, Social and Political Environment

The external environment, which includes the economic, social, and political environment, plays a major role in success. When the environment is favorable, the implementation of terrorism policies in Indonesia and the Philippines can be successful and vice versa..

Both Indonesia and the Philippines have support through the economic sector in the form of substantial funding. This is evidenced in the amount of the Indonesian Government budget in 2022 worth IDR 1.9 trillion (Fadilla, 2022). Then the budget ceiling in 2023 amounted to IDR 431.16 billion for countering terrorism in the fields of international cooperation, prevention, prosecution, and management support (Fauzi, 2022). While the Philippine Government through the grow with equity in Mindanao program allocated funds of \$98,900,000 with 760 infrastructure projects built and ease of access to health and education services (Musyafa et al., 2023)

Table 7 Comparative of Economic, Social, and Political Environment

Aspects	Indonesia	Philippines
Economic Environment	2022: IDR 1.9 trillion budget 2023: IDR 431.16 billion for prevention & prosecution	Grow with Equity in Mindanao program: USD 98.9 million 760 infrastructure projects & services in health, education
Economic Focus	Prevention, international cooperation, enforcement, support management	Empowerment of affected communities through infrastructure & public service development
Social Environment	BNPT & Synergy Team: 679 physical/non-physical development actions (2022) 298 follow-up actions with 46 K/L (2023)	GCERF: 21 local educational, religious, and community institutions Participatory & community-responsive approach
Social Focus	Government & community synergy in national joint action	Collaboration of local & international organizations, with open community engagement
Political Environment	Law No. 5 of 2018 Cooperation with UNCTED, CTITF, TPB-UNODC, implementation of the 4 pillars of the UN Global Counter-Terrorism Strategy. Clear & systematic regulatory focus	Republic Act No. 11479 (Anti-Terrorism Act 2020) Expansion of government authority draws controversy
Political Focus	Strong legislations & international diplomacy	Problematic and controversial national legislation

The participation of the social environment can be seen in the presence of BNPT and the Synergy Team through an action plan with 679 physical and non-physical development actions. The community worked together on the agenda which took place in 2022 in several regions including West Nusa Tenggara, Central Sulawesi, East Java, West Java and Central Java then continued in 2023 with 298 action plans together with 46 Ministries / Institutions (BNPT, 2023). Whereas in the Philippines, community participation is through a social-community approach through the Global Community Engagement and Resilience Fund (GCERF) with cooperation with 21 organizations / institutions in the Philippines ranging from education to religious organizations and participatory

openness of the community in providing complaints (Umam et al., 2023).

In Indonesia, policies on terrorism are present as an implication of the ongoing political process. There is a legal product born from the political environment, namely Law Number 5/2018 on the Amendment to Law Number 15/2003 on the Stipulation of Government Regulation in Lieu of Law No.1/2002 on the Eradication of the Criminal Acts of Terrorism into Law. In addition, political diplomacy is also carried out by Indonesia through active cooperation with the United Nations Counter-Terrorism Executive Directorate (UNCTED), Counter-Terrorism Implementation Task Force (CTITF), and United Nations Counter Terrorism Implementation Terrorism Prevention Branch-United Nation Office for Drugs and Crime (TPB-UNODC) as well as efforts to apply the 4 pillars of the United Nations Global Counter-Terrorism Strategy (UNGCTS) (Rimapradesi et al., 2024).

Meanwhile, the Philippine Government, with the issuance of Republic Act No. 11479 or the Anti-Terrorism Act of 2020 (ATA) by expanding the powers of executive departments and law enforcement officers in addressing the growing security challenges in the Philippines (Philippine Center for Investigative Journalism & Free Legal Assistance Group, 2021). It can be said that in terms of the political environment, both Indonesia and the Philippines both produce a policy product as a political outcome itself. However, there are differences in both where in Indonesia the substance is clear while in the Philippines the ATA policy in fact provides criticism from various parties because of several provisions that are unconstitutional, unclear, and dangerous.

CONCLUSION

Berdasarkan penelitian ini kebijakan penanggulangan Based on this research, counter-terrorism policies in Indonesia and the Philippines have a strong legal basis, but still face challenges in maintaining the balance between security and human rights. Therefore, more fair and preventive regulations are needed to increase the effectiveness of the law without violating human rights.

In terms of resources, both countries have established implementing organizations and involved the community in counterterrorism efforts. However, strengthening coordination and optimizing resource utilization are still needed to make policies more efficient and responsive to the dynamic threat of terrorism.

The institutional structure shows different approaches, where Indonesia applies a combination of militaristic and rehabilitative approaches through Densus 88 and BNPT, while the Philippines emphasizes more on repressive approaches. Strengthening the deradicalization strategy in the Philippines could be a solution in addressing the root causes of radicalism. Communication between organizations in both countries is quite good, but increased synergy and integration in sharing data and handling strategies can be further optimized. In addition, policies need to be more adaptive to socio-political dynamics in order to gain wider support.

Lastly, although economic and political support for terrorism policy has been good, there is still social resistance in the Philippines that highlights the legality and effectiveness of the policy. Therefore, increasing transparency and public involvement in policy formulation are important steps to improve the legitimacy and sustainability of counterterrorism programs.

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