

ACCOUNTABILITY OF POLITICAL CAMPAIGNS ON SOCIAL MEDIA WITHIN ELECTORAL OVERSIGHT GOVERNANCE

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ABSTRACT

Social media has altered electoral campaigning by enabling political messages to circulate through official campaign accounts, supporters, influencers, paid advertising systems, and algorithmic distribution. This article examines the legal structure and supervision of political campaigns on social media through doctrinal and conceptual legal research. Primary legal materials are examined alongside academic literature on digital campaigning, political communication, content moderation, and platform governance. The study finds that electoral rules already establish administrative traceability through registered campaign accounts, campaign periods, content requirements, and advertising provisions, yet account-based regulation does not fully capture distributed political communication. Electoral supervision therefore requires clearer attribution standards for third-party activities, documented digital-evidence procedures, and institutional cooperation with platforms. The article further proposes a multi-actor accountability framework in which electoral participants remain responsible for controlled or attributable campaign activities, third parties are assessed according to their own conduct and coordination, and platforms carry process-oriented responsibilities within their technical control. Such an arrangement can strengthen electoral accountability while preserving proportionality, political expression, and institutional boundaries in digital communication.

Keywords: Electoral law, political campaigning, social media, election supervision, platform governance, digital advertising, accountability.

INTRODUCTION

The development of social media has altered the patterns of political communication from relatively centralized message delivery to information exchanges occurring through digital networks. Candidates, political parties, volunteers, interest groups, and citizens can produce and disseminate political messages at speeds difficult to achieve through conventional media. Bennett and Segerberg (2012) explain this shift through the concept of connective action a pattern of political engagement supported by digital communication networks that allows individuals to participate through personalized

messages. This model means campaign activities do not always depend on formal political organizational structures. Materials originating from election participants can be re-disseminated, modified, amplified, or reproduced by other users, making the boundary between campaign communicators and audiences increasingly fluid (Kim et al., 2018). This shift toward a more participatory and democratic model of information distribution via social media facilitates content sharing across expansive networks (Darmawan & Fajar, 2024). Ultimately, social media shapes a campaign environment characterized by interactivity, networking, speed, and ease of replication. In addition to delivering information more quickly and efficiently, social media also holds positive potential for democratizing information (Arifin & Rojak, 2022). These characteristics bring forth legal challenges, as election regulations generally require the clear identification of subjects, acts, timing, and campaign media so that compliance and accountability can be determined.

The shift in digital political communication must also be understood as a relationship between new media and existing media structures. Chadwick (2013) explains that political communication evolves through a hybrid media system—a reciprocal relationship between the logics of old and new media in the formation of communicative power. Clear communication patterns are essential so that every information recipient understands what is actually expected in the delivered campaign (Hariani & Mardikaningsih, 2022). Social media campaigns do not exist in isolation from television, online media, party organizations, candidate activities, and public discourse (Paatelainen et al., 2022). Posts originating from digital accounts can become news material, while news coverage can be recirculated through social networks to gain new reach through user interactions. This situation demonstrates that regulating campaigns based on separate media classifications encounters problems when a single piece of content moves across channels in a short period. The law continues to require categories to establish obligations, prohibitions, and liabilities, whereas digital communication practices operate through far more fluid interactions. This divergence between legal structures and communication architectures forms the basis for re-examining how campaign norms are applied to social media.

This transformation is also linked to campaign organization. Karpf (2012) demonstrates that advancements in digital technology influence patterns of membership, support mobilization, fundraising, and the relationship between political organizations and their supporters. The capacity to build large-scale networks can be executed with lighter organizational structures compared to conventional political organizations. In electoral campaigns, a similar dynamic enables the formation of supporter networks operating with varying levels of coordination (Barberà et al., 2021). Some may work directly under instructions from election participants, while others act on personal initiative while spreading messages aligned with a particular candidate. This distinction carries legal consequences. Campaign law requires a framework to determine when a citizen's action

constitutes individual political expression and when it crosses into a campaign activity attributable to an election participant. This question becomes even more complex when activities involve influencers, digital community managers, marketing agencies, advertisers, or accounts with identities that are not easily verified.

In an electoral legal system, certainty regarding subjects and campaign methods is necessary to maintain equal treatment among participants, information transparency, adherence to schedules, and the enforcement of campaign prohibitions. This concept reflects the level of political awareness, civic responsibility, and trust in the democratic system, which is expressed through activities such as participating in campaigns and monitoring those processes on social media (Rojak et al., 2021). Issues arise when the nature of social media enables political materials to circulate through both official accounts and other accounts lacking formal ties to election participants (Pratama et al., 2021). Messages can be produced as text, images, videos, live streams, paid content, or materials that gain wide distribution through platform recommendation mechanisms. User activity also leaves a digital footprint that can persist over time, allowing materials created during campaign periods to remain accessible or be redistributed long after those periods have ended. Under these circumstances, the concept of campaigning as a communicative act must be connected to issues of attribution, control, financing, distribution, and the ability of actors to remove or stop content dissemination. Legal problems extend beyond message content to include the structural relationships among election participants, supporters, digital service providers, and platforms.

The growth of social media as a primary outlet for public expression adds a new dimension to legal discourse on freedom of expression (Udjari et al., 2022). Supervision requirements grow increasingly complex as election monitors face a communication space lacking the geographic operational boundaries of face-to-face campaigning. A single post can be accessed simultaneously from multiple regions, forwarded by thousands of users, and resurface due to new interactions (Tobing & Kasenda, 2024). Monitoring that relies solely on identifying official accounts risks missing campaign activities carried out through supporter networks or third parties. Conversely, expanding oversight without clear boundaries raises concerns regarding citizens' freedom of opinion. The core challenge lies in establishing legal benchmarks to distinguish between citizens' political expression, election participants' campaign activities, paid communications, and coordinated actions that substantively form part of a campaign operation. Literature on digital political communication indicates that networks, organizations, and technologies collectively shape communication processes; thus, legal approaches require attention to the relationships among these actors rather than focusing strictly on a single account or post.

A scholarly gap emerges when electoral regulations create obligations using categories of participants, executors, official accounts, materials, and campaign periods, while digital political communication unfolds through more dispersed structures. Political

communication literature provides strong explanations regarding digital networks and changing political organizations, but translating these concepts into a legal supervisory design still requires synthesis. This issue is not merely a matter of absent regulations. The more fundamental challenge lies in the relationship between available rules and the dynamics of content distribution, which are also determined by private actors, recommendation systems, ad services, and user actions. If norms target only election participants, parts of the dissemination process may fall outside supervisory reach. If obligations are extended too broadly to users and platforms, restrictions risk becoming disproportionate. The academic need is to construct a framework of understanding that clarifies objects of regulation, the division of authority, supervisory mechanisms, and forms of liability suitable to the nature of platform-based campaigning.

This study formulates the following research questions: First, how is the legal construction of political campaigning through social media framed within the electoral system, particularly regarding subjects, accounts, materials, timing, and forms of communication within the regulatory scope? Second, how can the design of supervisory authority over social media political campaigns connect the functions of election monitors with the technical power of digital platforms without blurring their respective boundaries of authority? Third, how can models of legal liability and supervisory governance be structured to respond to distributed, algorithm-driven digital campaigns that involve actors beyond official participant accounts? These three questions are designed to be addressed through a legal literature study combining primary legal materials and academic literature explaining transformations in digital political communication.

METHODS

This study employs a legal literature review with a doctrinal and conceptual orientation. The doctrinal approach is used to identify, interpret, and systematize norms governing election campaigning, social media, supervisory authority, and liability in electronic communication. Hutchinson and Duncan (2012) explain that doctrinal research operates through the examination of legal sources, the identification of principles, and the construction of coherent relationships among relevant rules. Primary materials for this research include electoral laws, General Elections Commission (KPU) regulations, Election Supervisory Body (Bawaslu) regulations, and electronic information legal provisions related to digital communication. Secondary materials consist of journal articles and academic books on digital campaigning, political communication, election supervision, content moderation, and platform governance. The literature search was conducted using a combination of terms related to electoral law, digital campaigning, social media, platform governance, content moderation, and election supervision. Sources were selected based on their relevance to the three research questions, publisher authority, bibliographic clarity, and the ability of the sources to explain the relationship between legal norms and the characteristics of digital campaigns.

Material processing was carried out through normative reading, conceptual categorization, argument comparison, and synthesis. McConville and Chui (2007) frame legal research as a field capable of employing legalistic, theoretical, comparative, and interdisciplinary approaches depending on the questions to be answered. Van Hoecke (2011) emphasizes that the choice of method in legal research relates to the nature of the questions and the underlying concept of law adopted. On this basis, this study does not treat regulations as a standalone list of provisions. Norms are mapped according to subjects, objects, timing, obligations, prohibitions, supervisory authority, and liability mechanisms, and are then compared with literature on the characteristics of digital platforms. The synthesis stage was utilized to identify both the alignments and gaps between normative structures and platform-based communication practices. The resulting interpretation is limited to traceable materials and is not aimed at measuring the empirical success rate of supervisory bodies. This approach was chosen because the three research questions focus on legal structures, relationships among concepts, and governance designs that can be explained through legal materials and academic literature.

RESULTS AND DISCUSSION

Legal Construction of Political Campaigning Norms via Social Media

The legal framework for political campaigning via social media rests on election law as a special regime regulating participants, campaign organizers, methods, timing, materials, and campaign procedures. Law Number 7 of 2017 concerning General Elections serves as the primary foundation for holding elections and has been amended by Law Number 7 of 2023. This amendment indicates that reading campaign law requires utilizing the body of regulations in force post-amendment, rather than treating the original text in isolation. At the technical level, General Elections Commission (KPU) Regulation Number 15 of 2023 regulates General Election Campaigns, and its status on the KPU Legal Documentation and Information Network (JDIH) is recorded as active, having been amended by KPU Regulation Number 20 of 2023. This structure places social media campaigning within the official election campaign regime, meaning that digital activities satisfying the elements of a campaign cannot be understood merely as private communications devoid of electoral consequences (Ngazis & Ngazis, 2025).

KPU Regulation Number 15 of 2023 defines an Election Campaign as the activity of election participants or other parties designated by participants to convince voters through the presentation of the participants' vision, mission, programs, and/or self-image. The same regulation defines social media as an internet-based two-way platform enabling interaction, participation, discussion, collaboration, sharing, and community-based content creation (Nisangi & Solihah, 2024). This formulation reveals two interconnected legal elements. The first element focuses on the actors and the purpose of the activity, while the second acknowledges the participatory nature of social media. The

convergence of these two elements implies that identifying a campaign cannot rely solely on the type of technology used. An assessment must consider the actor's relationship to the election participant, the content of the communication, and the persuasive intent derived from the activity. Furthermore, this definition demonstrates that the law formally recognizes social media as an official venue for conducting campaigns.

The recognition of social media as a campaign method is accompanied by the establishment of administrative mechanisms intended to ensure traceability. Article 37 of KPU Regulation Number 15 of 2023 permits election participants to conduct campaigns via social media. A maximum of twenty social media accounts may be created for each type of application, while campaign designs and materials must contain at least the vision, mission, programs, and/or self-image of the election participant. This provision indicates that rule-makers use the account as the primary administrative unit to connect the identity of the participant with digital activities (Sapardiyono & Soesilo, 2024). This model holds regulatory value because monitors gain an identifiable object and participants have a clear boundary regarding official accounts. At the same time, the account-based model assumes that relevant campaign activities can be mapped through a list of accounts under the participant's control an assumption that must be tested when campaign materials circulate across much broader supporter account networks.

The traceability mechanism is reinforced through mandatory registration. Article 38 requires campaign organizers to register official social media accounts with the KPU at the corresponding electoral level no later than three days before the campaign period begins. Copies of the registration are also submitted to the Election Supervisory Body (Bawaslu), the Indonesian National Police, and the ministry handling communication and informatics affairs (Siagian, 2024). This provision establishes an inter-agency coordination node starting from the administrative stage. Campaign organizers are also required to close official social media accounts on the final day of the campaign period. From a normative design perspective, registration functions as an attribution mechanism, whereas account closure pertains to temporal limitations. These two obligations illustrate the law's attempt to translate time-bound campaigning principles into the digital sphere. Difficulties arise when content has been re-disseminated or stored on other accounts outside the control of campaign organizers.

Digital regulations also cover campaign advertising. Article 39 of KPU Regulation Number 15 of 2023 includes social media as a platform for displaying campaign ads and sets daily limits on ad placements per social media platform. The regulation grants media providers space to schedule broadcasts, while subsequent provisions mandate equal opportunities for participants and govern media behavior regarding campaign ad broadcasts. This structure transfers principles of equality and transparency from conventional campaigning to the digital realm. The issue lies in digital advertising having different distribution mechanisms than broadcast advertising. Ad reach can be influenced by user targeting, behavioral data, auction pricing, and platform distribution systems. Equal ad

duration or purchasing opportunities do not automatically yield equal voter exposure. This discrepancy highlights the gap between formal ad placement metrics and the technical dynamics of digital content distribution.

The official account registration model creates administrative certainty, yet the digital campaign space extends beyond registered accounts. Participant content can be shared by volunteers, sympathizers, influencers, supporting organizations, or ordinary users. The varying legal relationships among these actors determine whether their activities can be attributed to the participant. The phrase "other parties designated" within the campaign definition provides a basis for reaching actors outside formal structures when a designation relationship exists. The remaining question concerns activities that factually support a participant but lack proof of designation. If all support is treated as a participant's campaign, citizens' freedom of political expression could be diminished. Conversely, if all undesignated support is placed outside the campaign regime, participants might gain leeway to utilize informal intermediaries. Therefore, elements of coordination, funding, instruction, material control, and organizational ties are appropriate legal attribution indicators.

Temporal boundaries present similar challenges. Campaign law establishes a clear period to ensure competition proceeds on an equal schedule, whereas social media possesses persistence. Closing official accounts can cease account management activities, but previously copied or forwarded content cannot always be withdrawn from the entire network. Even without new posts from participants, user interactions can make older materials visible once again (Kim et al., 2018). From a normative perspective, a distinction must be drawn between active participant conduct to distribute content and the passive persistence of content copies outside their control. Liability should align with the capacity to control and with actions that can be attributed. This approach ensures that silent period obligations do not morph into an absolute requirement to erase all digital footprints—a task that may technically exceed a participant's capability.

Campaign material boundaries also require careful reading. Requirements regarding vision, mission, programs, and self-image help identify official material, but digital political communication is frequently crafted in more implicit formats. Memes, short videos, entertainment content, endorsements, comments, and personal narratives can serve a persuasive function without adhering to conventional campaign formats. Consequently, oversight relying strictly on specific words or symbols can easily miss communicative meaning arising from combinations of messages, account identities, publication times, distribution patterns, and participant relationships (Borucki & Kettemann, 2024). Legal assessments must move from identifying form to identifying communicative function while maintaining testable evidentiary standards. Utilizing functional interpretation must not devolve into purely subjective assessments; factual indicators such as payments, instructions, access to official materials, or coordination patterns must serve as the foundation.

Persily (2017) demonstrates that the digital environment has altered the challenges facing electoral democracy, primarily through shifts in information distribution and the ability of social media to influence the political public sphere. Platform algorithms designed to maximize user engagement inadvertently prioritize sensational content (Sinambela, 2022). This research offers the lesson that election law cannot treat platforms merely as neutral channels. In digital campaigns, distribution system design determines who sees a message, how often it appears, and how users interact with it. For the law, this finding does not imply that every algorithmic mechanism must be controlled by election administrators. Rather, the implication is that objects of regulation should incorporate transparency regarding how paid or coordinated political communication is distributed—a focus far more measurable than attempting to regulate all public political discourse.

Chester and Montgomery (2017) explain that digital political operations utilize marketing technology, data collection, targeting, and communication techniques allowing messages to be tailored to specific user groups. This characteristic poses challenges to campaign transparency principles because messages received by one voter group may differ from those received by another. In conventional media, monitors can relatively easily observe publicly broadcast ads. Segmented ads, however, may have lower public visibility despite achieving significant reach within target groups. The legal consequence is that digital campaign transparency must encompass information regarding sponsors, payers, broadcast periods, general targets, and ad material archives. Such transparency differs from content restriction; its goal is to provide supervisory bodies and the public with the ability to audit paid political communications.

The available construction of norms demonstrates that the law has established a foundation for integrating social media into official campaigns through definitions, account limitations, registration, material regulation, scheduling, and account closure obligations. The strength of this model lies in participant traceability and the creation of monitorable administrative objects. Its limitation lies in its reliance on the concept of official accounts when digital political communication moves through far broader networks. Regulation development should not abandon the official account model, but rather complement it with attribution measures for third parties, transparency for paid communications, and a distinction between active distribution and passive content persistence. The legal construction of digital campaigns must be read as an interplay among subjects, materials, timing, financing, control, and distribution mechanisms—a framework serving as the basis for assessing how supervisory authority should be executed.

Supervisory Authority Governance in Digital Campaigns

Campaign supervision forms part of the election administration structure that positions Bawaslu as the supervisory institution. Bawaslu Regulation Number 11 of 2023 specifically governs Election Campaign Supervision, replacing the campaign oversight framework used in the 2019 Election. The establishment of this dedicated regulation

demonstrates that campaign oversight requires operational procedures matching the forms of campaign activities regulated by the KPU, including social media usage. The scope of supervision encompasses prevention, compliance monitoring, identification of alleged violations, and follow-up actions based on the type of violation. In the digital domain, these functions must operate against fast-moving objects that can change before examination processes conclude (Nasution et al., 2023). The Electronic Information and Transactions Law (UU ITE) provides a legal framework regulating electronic transactions, positioning statutory compliance and clear communication as key to preventing violations and conflicts (Negara & Darmawan, 2023). Consequently, supervisory design must prioritize documentation capabilities, account identity verification, timestamping, and electronic evidence preservation from the outset.

Campaign supervision regulations establish a relationship between monitors and administrative information submitted by participants. Official account registration provides Bawaslu with an initial list to serve as a monitoring baseline. In normative practice, this list helps distinguish accounts officially acknowledged by participants from other accounts circulating on platforms (Ilmar et al., 2024). This model yields supervisory efficiency because institutional resources can be directed toward verifiable objects. However, the account list cannot serve as the sole boundary for supervision. Alleged violations can surface through unregistered accounts, particularly when indications of ties to election participants or campaign organizers exist. Supervisors must maintain procedures to test these ties using payment information, shared managers, coordination patterns, materials, or other legally obtained communications evidence. Data protection principles require that personal information obtained be used in accordance with its collection purpose and not misused in ways that threaten individual privacy (Issalillah & Hardyansah, 2024). Proving relationships becomes far more decisive than mere formal account status.

Digital supervision possesses a strong preventive dimension. Prevention can be achieved by conveying regulatory information to participants, establishing consultation channels, issuing notices regarding account obligations, and communicating with platform providers prior to the campaign period. Preventive efforts hold value because the dissemination of digital content can proceed far faster than case handling. Once content achieves widespread reach, restoring the status quo ante becomes difficult even if a violation is eventually declared. Prevention must not turn into prior restraint or censorship without legal basis. A more balanced model involves providing clear guidelines, administrative obligation checklists, rapid contact systems, and reporting procedures allowing participants to rectify administrative violations when the law provides room for correction. Preventive supervision in this sense reinforces legal certainty without turning monitors into political communication editors.

The greatest challenge in supervision lies in scale. Supervisors face vast quantities of accounts, posts, videos, comments, and interactions. Manual monitoring of all political

communication is unrealistic and could lead to inconsistent case selection. Utilizing digital tools can assist in tracking keywords, accounts, timestamps, and distribution patterns, but legal decisions must not be delegated to automated systems (Dommett, 2020). Systems can generate initial indicators, whereas assessing whether material constitutes campaigning, whether participant ties exist, and whether specific prohibitions are met still requires legal examination. Separating detection functions from adjudication functions is a vital principle: technology expands information-finding capabilities, while decisions remain rooted in norms, evidence, and procedures.

Kreiss and McGregor (2018) demonstrate that technology companies play an active role in electoral political communication through services, infrastructure, consulting, and campaign relations. These findings correct the image of platforms as entirely passive intermediaries. In election supervision, the fact that platforms possess knowledge regarding accounts, ads, and distribution means supervisory bodies maintain a degree of dependence on company-controlled information. This dependence must be regulated through transparent procedures so that information access does not rely on informal relationships. Official contact mechanisms, data request formats, response deadlines, disclosable data categories, and user rights protections can form a more accountable partnership.

Gillespie (2018) explains that social media platforms execute content moderation through policies and decisions bearing major consequences for public discourse. This private authority becomes relevant to elections because reducing distribution, removing content, suspending accounts, and flagging materials can affect user access to political communication. Supervisory bodies should not surrender legality determinations to private company policies. Election law violations and platform community guideline violations are two overlapping yet distinct categories. Content might violate platform policy without breaking election law, or vice-versa. Maintaining this distinction ensures company decisions are not treated as legal rulings.

Klonick (2018) portrays major platforms as administrators of systems of rules, processes, and decisions that functionally govern online expression. Such power raises accountability questions because private processes do not always carry the same guarantees as public legal processes. For election supervision, these findings point to the need for bounded cooperation. Platforms can execute technical actions that Bawaslu cannot perform directly, whereas the legal basis and violation classifications remain with institutions empowered by law. A healthy relationship requires a division of functions: supervisors determine electoral relevance through legal procedures, while platforms follow up on requests based on authority, terms of service policies, and applicable law.

This cooperation requires digital evidence procedures. Social media content is easily edited or deleted, meaning documentation must record account identities, content URLs, access times, material formats, and information indicating ties to alleged violations. Screenshots are useful, but their value increases when accompanied by metadata, source

logs, and procedures preserving evidence integrity. Requests to platforms must distinguish between data preservation requests, information requests, and content action requests, each carrying different legal consequences. Establishing standard procedures reduces the likelihood of decisions being made via ad hoc communications between officials and companies. These standards also help participants or users understand the basis for actions taken against their accounts.

Supervision requires a triage mechanism because not all political content carries the same urgency. Priority can be assigned to non-transparent paid communication, accounts suspected of being controlled by participants but left unregistered, active silent period violations, and materials containing alleged legal violations with high dissemination risks (Marcellino et al., 2020). Priority settings must be articulated in publicly accessible guidelines—a principle reducing selective supervision risks and allowing resources to be directed at acts most critical to electoral integrity. Statistical reporting on finding types, handling processes, and final outcomes can strengthen accountability without exposing protected personal data.

The boundary between supervision and moderation must also be affirmed to protect freedom of opinion. Election monitors are tasked with ensuring compliance with election law, not establishing general standards on which political opinions citizens may or may not express. Candidate criticism, personal support, satire, and political debate do not automatically constitute campaigns attributable to participants. Enforcement should be grounded in provable legal elements. When monitors request platform action, the normative basis, target object, duration, and rationale for the action must be recorded. This structure allows supervision to be firmly executed while keeping restrictions proportional.

An adequate supervisory model ultimately relies on a three-tiered relationship. The first tier is participant compliance through account registration, material management, and campaign duty execution. The second tier is public supervision by Bawaslu through prevention, monitoring, examination, and follow-up. The third tier is technical platform support through providing information and authorized technical actions. These three tiers must not substitute for one another (Afnira, 2023). Participants remain responsible for activities within their control, monitors remain responsible for electoral decisions, and platforms remain responsible for their services and technical actions. This division aligns better with digital communication structures than a model placing the entire burden on a single institution.

Supervisory authority design needs to be constructed as an institutional relationship structure, rather than a singular expansion of Bawaslu's authority over all platform activities. Bawaslu requires the capacity to detect, document, request information on, and process alleged violations, while platforms are needed to provide technical support regarding their controlled data and services. Procedural clarity, separation of legal functions from private moderation, digital evidence standards, and action request

transparency serve as core components. This structure paves the way for the next question regarding how legal liability should be divided when violations simultaneously involve participants, third parties, and platforms.

Multi-Actor Liability and Strengthening Oversight Governance

The character of digital campaigns shows that accountability cannot be built solely through a linear relationship between election participants and a single official account. Activities can involve candidates, parties, campaign teams, agencies, influencers, account administrators, ad buyers, and platforms. Each actor has a different level of knowledge, control, and advantage. The basic principle of accountability needs to follow the relationship between legal obligations and the ability to control actions. Participants can be held accountable for activities carried out by themselves or legally attributable to them (Heinmaa et al., 2023). Third parties bear responsibility for their actions when normative elements are met. Platforms are not automatically responsible for all user content, but their obligations can arise in areas within their technical power, such as ad information, official request management, or the enforcement of terms of service.

Gorwa (2019) explains platform governance as a network of rules and relationships involving companies, states, users, and societal actors. This concept is useful for understanding that social media regulation cannot be reduced to a relationship between the state and users. Platforms have internal rules and infrastructure, the state has legal authority, and users shape communication behavior through interaction. In election campaigns, adequate governance needs to connect these three elements while maintaining their respective lines of accountability. The state establishes electoral obligations, election organizers enforce these obligations according to their mandate, platforms provide traceability for the functions they control, and participants are responsible for campaigns attributable to them.

Helberger, Pierson, and Poell (2018) offer the concept of cooperative responsibility, which is the fulfillment of public value through the distribution of responsibilities among actors with different capacities. This perspective is well-suited for digital campaign monitoring because no single institution controls the entire communication chain. Bawaslu holds a public mandate, participants know their campaign structures, platforms control distribution infrastructure, and users possess freedom and responsibility over their communication. The cooperative responsibility model does not imply a vague division of responsibility. Rather, each obligation must be mapped according to the actors' capabilities. Platforms can be required to provide certain transparency, but decisions regarding election violations still require a legal basis. Participants can be required to disclose parties managing paid communications, but it is unrealistic to impose responsibility for all spontaneous citizen support.

Electronic information law functions as a complementary layer to electoral law. Law Number 1 of 2024 is the second amendment to Law Number 11 of 2008 on Electronic

Information and Transactions. Its existence demonstrates that digital communication also falls under the general regime of electronic information. By recognizing electronic information as an object of regulation and providing a basis for taking action against misleading content, the ITE legal framework serves as an essential instrument to ensure that the expansion of commercial freedom into the digital realm does not ignore consumer protection principles (Sahidu et al., 2023). The relationship between the two regimes must be read systematically. When issues relate directly to procedures, timing, accounts, or campaign obligations, electoral law serves as the primary reference. When actions involve electronic acts governed generally, electronic information provisions can become relevant according to their respective elements. This separation prevents the use of general law to cover up evidentiary gaps in electoral law and prevents the neglect of electronic rules when an act indeed fulfills the elements stipulated by the statute.

Participant accountability should rest on a testable concept of attribution. Attribution relationships can be demonstrated through formal appointments, payments, contracts, instructions, account access, provision of materials, schedule coordination, or control over the content of communication. The stronger the relationship, the stronger the basis for linking a third party's actions to the participant (Canfil, 2022). Conversely, a mere similarity in political preferences is insufficient. This approach protects citizens who independently express support, while preventing participants from using unofficial parties to evade campaign obligations. In disputes, the burden of proof must follow the mechanisms established by election procedural law, while attribution indicators serve to assist in fact assessment.

Influencers and content creators occupy a category that requires special attention if they receive payment or benefits to produce political communication. The core issue is not their social status as influencers, but rather the economic and coordination relationships underlying the communication. Paid content designed to persuade voters has a different character from spontaneous support. Therefore, the obligation to disclose sponsorship relationships can provide a more appropriate solution than a general ban on influencer involvement. Disclosure helps voters know that communication is part of a compensated activity and helps monitors trace relationships with participants or payers. Such obligations can be placed alongside campaign fund reporting mechanisms if the financing can be attributed to the participant.

Political ad transparency is the next element. Digital service users often lack a clear picture of what types of data are collected, with whom the data is shared, and for what purposes the data is processed (Fared & Darmawan, 2021). Ideally, every digital ad should contain information enabling the identification of the payer and the relationship with the participant. Platforms can provide political ad repositories containing materials, sponsors, airing periods, expenditure amounts within a certain range, and general information about the target audience. Such a mechanism gives monitors the ability to assess compliance without having to obtain the personal data of every user. Repositories

also help the public, academics, and civil society conduct independent reviews. Regulations need to distinguish public transparency from law enforcement data access. Public information must be limited to what is necessary for accountability, while more detailed data can only be requested through a valid legal basis and procedure.

Algorithm-based distribution adds another dimension. The law does not need to prescribe how every recommendation algorithm should work, as technical designs change rapidly and touch upon platform activities far broader than elections (Samuelson, 2023). A more stable regulatory focus is process obligations. Platforms can be asked to generally explain political ad distribution parameters, provide information regarding reach purchases, and record major changes to distribution policies during the campaign period. A process-oriented approach reduces legal dependency on specific technologies. It also allows monitors to understand whether increased reach stems from ad purchases, organic interactions, or other promotional features carrying financial consequences.

Complaint mechanisms and content moderation actions require procedural safeguards. Participants or users whose content is acted upon should obtain information regarding the basis of the request, the category of violation, and avenues of objection when the law provides such space. For material that must be addressed immediately due to a short election period, procedures can utilize shorter deadlines without eliminating decision documentation. Technical actions must also be proportional. In certain circumstances, stopping paid ads may suffice without deleting an entire account. In other situations, account restrictions may be necessary if the account itself becomes a vehicle for repeated violations. The principle of proportionality helps reconcile electoral integrity with the protection of expression.

Data access is an increasingly valuable prerequisite for monitoring. Bawaslu does not need all user data, but requires data relevant to specific examinations. The data request framework needs to specify the purpose, type of information, period, legal basis, and limits of use (Sultan et al., 2023). Platforms need to have official channels as well as records of requests received and actions taken. Aggregated transparency reports can show the number of requests without disclosing protected case information. This mechanism also reduces dependence on personal relationships between institutions and corporate staff. Once cooperation is formalized, changes in officials or company policies do not immediately cut off law enforcement channels.

Sanction design must follow the character of the violation and the actor. Administrative violations, such as failing to meet registration obligations, should not automatically be treated the same as acts containing criminal elements (Marique & Marique, 2020). Similarly, technical errors that are promptly corrected have a different character from planned actions to conceal funding sources or use coordinated networks to evade rules. Such differentiation keeps sanctions proportional. For platform actors, the most logical obligations are directed at executing procedural tasks within their control, such as transparency, responsiveness to legitimate requests, and the storage of specific

information. Responsibility for content must still follow applicable legal frameworks and should not be shaped by the assumption that platforms know all user communications.

The synthesis of the platform governance approach and cooperative responsibility produces a multi-layered monitoring model. The first layer is the traceability of official activities through account registration and financial reporting. The second layer is attribution rules for third parties based on evidence of a relationship with participants. The third layer is paid communication transparency and ad repositories. The fourth layer is data request mechanisms and documented technical actions. The fifth layer is objection procedures and public reporting. This model does not concentrate all power in a single institution. The strength of the model lies precisely in the distribution of obligations based on the legal and technical capacity of each actor.

Digital campaign accountability needs to adopt a multi-actor structure with principles of attribution, transparency, proportionality, and distribution of obligations (Borz & Francesco, 2024). Participants are responsible for communications within their control or attributable to them. Third parties are responsible for actions fulfilling legal elements, especially when there are financing or coordination relationships. Platforms are responsible for technical functions and processes within their power according to established legal obligations. Bawaslu maintains its electoral assessment function and does not surrender it to private corporate policies. This structure can bridge the character of electoral law, which requires certainty, with the dispersed and fast-moving character of digital communication.

CONCLUSION

This study yields three main conclusions. First, campaign law has recognized social media as an official method and established mechanisms including account limits, registration, content regulation, scheduling, and account closures. This structure provides administrative certainty, but does not yet fully capture content distribution through supporter networks and third parties. The normative construction needs to be complemented by attribution metrics that consider coordination, financing, instructions, and control. Second, digital campaign monitoring needs to be built on a division of functions among participants, Bawaslu, and platforms. Bawaslu remains the holder of the electoral oversight function, while platforms provide technical support and information within their control. Third, accountability requires a multi-actor model that distinguishes the responsibilities of participants, third parties, and platforms. Ad transparency, financing traceability, digital evidence procedures, documented data requests, and procedural protections constitute key elements. Overall, the findings demonstrate that social media monitoring needs to shift from an account-based approach toward governance based on relationships, attribution, and traceability.

Subsequent digital campaign rulemaking should clarify attribution metrics for third-party

activities to election participants through indicators of formal relationships, financing, instructions, content control, and coordination. Regulations should also develop transparency obligations for paid political communications, including sponsor identities and inspectable ad archives. Bawaslu, together with the KPU, needs to establish standard protocols with platform providers governing evidence preservation, information requests, technical actions, response timeframes, and decision logging. The development of automated monitoring tools should be limited to detection functions and not used as a substitute for legal assessment.

REFERENCES

- Afnira, E. (2023). Optimalisasi Media Sosial sebagai Sarana Publikasi Pengawasan Pemilu 2024: Kasus Bawaslu Kota Tanjungpinang. *Jurnal Mahasiswa Komunikasi Cantrik*, 3(1). <https://doi.org/10.20885/cantrik.vol3.iss1.art4>
- Arifin, S., & Rojak, J. A. (2022). Social Media and Public Opinion Formation: Information Dissemination and Polarization. *Journal of Social Science Studies*, 2(1), 139-142. <https://jos3journals.id/index.php/jos3/article/view/90>
- Badan Pengawas Pemilihan Umum Republik Indonesia. (2023). Peraturan Badan Pengawas Pemilihan Umum Nomor 11 Tahun 2023 tentang Pengawasan Kampanye Pemilihan Umum.
- Barberà, O., Sandri, G., Correa, P., & Rodríguez-Teruel, J. (2021). Political Parties Transition into the Digital Era. In *Digital Parties: The Challenges of Online Organisation and Participation*, 1–22. https://doi.org/10.1007/978-3-030-78668-7_1
- Bennett, W. L., & Segerberg, A. (2012). The Logic of Connective Action: Digital Media and the Personalization of Contentious Politics. *Information, Communication & Society*, 15(5), 739–768. doi:10.1080/1369118X.2012.670661.
- Borucki, I., & Kettemann, M. C. (2024). Better Safe than Sorry? Digital Campaigning Governance in Germany. *Policy Studies*, 45(5), 750-772. <https://doi.org/10.1080/01442872.2024.2311167>
- Borz, G., & Francesco, F. D. (2024). Digital Political Campaigning: Contemporary Challenges and Regulation. *Policy Studies*, 45(5), 677–691. <https://doi.org/10.1080/01442872.2024.2384145>
- Canfil, J. K. (2022). The Illogic of Plausible Deniability: Why Proxy Conflict in Cyberspace May No Longer Pay. *Journal of Cybersecurity*, 8(1). <https://doi.org/10.1093/cybsec/tyac007>
- Chadwick, A. (2013). *The Hybrid Media System: Politics and Power*. Oxford University Press.
- Chester, J., & Montgomery, K. C. (2017). The Role of Digital Marketing in Political Campaigns. *Internet Policy Review*, 6(4), 1–20. doi:10.14763/2017.4.773.
- Darmawan, D., & Fajar, A. S. M. (2024). The Role of Social Media in the Distribution and Dissemination of Education Publications in the Digital Age. *Studi Ilmu Sosial Indonesia*, 4(2), 41-58. <https://sisijournals.id/index.php/sisi/article/view/53>
- Dommett, K. (2020). Introduction: Regulation and Oversight of Digital Campaigning—Problems and Solutions. *The Political Quarterly*, 91(4), 705–712. <https://doi.org/10.1111/1467->

923X.12888

- Fared, M. A., & Darmawan, D. (2021). Use of Consumer Behaviour Data for Personalised Advertising in Digital Marketing. *Studi Ilmu Sosial Indonesia*, 1(2), 93-108. <https://sisijournals.id/index.php/sisi/article/view/75>
- Gillespie, T. (2018). *Custodians of the Internet: Platforms, Content Moderation, and the Hidden Decisions That Shape Social Media*. Yale University Press.
- Gorwa, R. (2019). What is Platform Governance? *Information, Communication & Society*, 22(6), 854–871. doi:10.1080/1369118X.2019.1573914.
- Hariani, M., & Mardikaningsih, R. (2022). The Performance of Authenticity and the Commodification of Parasocial Bonds: Twin Pillars of Influencer Culture on Social Media. *Studi Ilmu Sosial Indonesia*, 2(2), 385-412. <https://sisijournals.id/index.php/sisi/article/view/117>
- Heinmaa, T., Wolf, P., Dalke, L.-M., & Neven, M. (2023). Winning Elections the Right Way: Online Political Advertising Rules in Europe and Selected Countries Globally. *International Institute for Democracy and Electoral Assistance (International IDEA)*. <https://doi.org/10.31752/idea.2023.77>
- Helberger, N., Pierson, J., & Poell, T. (2018). Governing Online Platforms: From Contested to Cooperative Responsibility. *The Information Society*, 34(1), 1–14. doi:10.1080/01972243.2017.1391913.
- Hutchinson, T., & Duncan, N. (2012). Defining and Describing What We Do: Doctrinal Legal Research. *Deakin Law Review*, 17(1), 83–119.
- Ilmar, A., Bahirah, H. I., Rahmawati, R., & Yuliandri, P. (2024). Effort of The Election Supervisory Agency (Bawaslu RI) in Preventing Vlack Campaign in the 2019 Election. *Ekspresi dan Persepsi: Jurnal Ilmu Komunikasi*, 7(1), 21–37. <https://doi.org/10.33822/jep.v7i1.7231>
- Issalillah, F., & Hardyansah, R. (2024). Relevance of Privacy within the Sphere of Human Rights: A Critical Analysis of Personal Data Protection. *Bulletin of Science, Technology and Society*, 3(1), 31–39. <https://inti.ejournalmeta.com/index.php/inti/article/view/39>
- Karpf, D. (2012). *The MoveOn Effect: The Unexpected Transformation of American Political Advocacy*. Oxford University Press.
- Kim, Y. M., Heinrich, R. J., Kim, S. Y., & Baragwanath, R. (2018). Campaigns Go Social: Are Facebook, Snapchat, and Twitter Changing Elections?. *In New Directions in Media and Politics*, 122–142. <https://doi.org/10.4324/9780203713020-7>
- Klonick, K. (2018). The New Governors: The People, Rules, and Processes Governing Online Speech. *Harvard Law Review*, 131(6), 1598–1670.
- Komisi Pemilihan Umum Republik Indonesia. (2023a). Peraturan Komisi Pemilihan Umum Nomor 15 Tahun 2023 tentang Kampanye Pemilihan Umum.
- Komisi Pemilihan Umum Republik Indonesia. (2023b). Peraturan Komisi Pemilihan Umum Nomor 20 Tahun 2023 tentang Perubahan atas Peraturan Komisi Pemilihan Umum Nomor 15 Tahun 2023 tentang Kampanye Pemilihan Umum.
- Kreiss, D., & McGregor, S. C. (2018). Technology Firms Shape Political Communication: The Work of Microsoft, Facebook, Twitter, and Google with Campaigns During the 2016 U.S. Presidential Cycle. *Political Communication*, 35(2), 155–177. doi:10.1080/10584609.2017.1364814.

- Marcellino, W., Johnson, C., Posard, M. N., & Helmus, T. C. (2020). Foreign Interference in the 2020 Election: Tools for Detecting Online Election Interference. <https://doi.org/10.7249/RRA704-2>
- Marique, E., & Marique, Y. (2020). Sanctions on digital platforms: Balancing proportionality in a modern public square. *Computer Law & Security Review*, 36, 105372. <https://doi.org/10.1016/J.CLSR.2019.105372>
- McConville, M., & Chui, W. H. (Eds.). (2007). *Research Methods for Law*. Edinburgh University Press.
- Nasution, A. I., Azaria, D. P., Alfarissa, T., Abidin, F. R. M., & Fauzan, M. (2023). Peningkatan Peran Bawaslu Republik Indonesia dalam Mengawasi Kampanye Hitam di Media Sosial Pada Pemilu Serentak 2024. *Jurnal Civic Hukum*, 8(2). <https://doi.org/10.22219/jch.v8i2.27700>
- Negara, D. S., & Darmawan, D. (2023). Digital Empowerment: Ensuring Legal Protections for Online Arisan Engagements. *Bulletin of Science, Technology and Society*, 2(2), 13–19. Retrieved from <https://inti.ejournalmeta.com/index.php/inti/article/view/34>
- Ngazis, M., & Ngazis, M. (2025). Legal Challenges Regarding Social Media Campaign Regulation in the 2024 Election. *KnE Social Sciences*, 10(28), 373–384. <https://doi.org/10.18502/kss.v10i28.20130>
- Nisangi, S., & Solihah, R. (2024). Peran Media Sosial sebagai Salah Satu Kekuatan Kampanye Politik pada Pemilihan Presiden 2024. *Jurnal Ilmiah Muqoddimah: Jurnal Ilmu Sosial, Politik, Dan Humaniora*, 8(1), 181–181. <https://doi.org/10.31604/jim.v8i1.2024.181-189>
- Paatelainen, L., Kannasto, E., & Isotalus, P. (2022). Functions of Hybrid Media: How Parties and Their Leaders Use Traditional Media in Their Social Media Campaign Communication. *Frontiers in Communication*, 6. <https://doi.org/10.3389/fcomm.2021.817285>
- Persily, N. (2017). The 2016 U.S. Election: Can Democracy Survive the Internet? *Journal of Democracy*, 28(2), 63–76.
- Pratama, A. S. S. F., Danan, E. Y. M. S., Angeline, G., Abdillah, I., Prayoga, J. P. J., & Jabari, N. A. M. (2021). A Roadmap for the Successful Use Oo Social Media in Electoral Campaigns. *Bulletin of Social Informatics Theory and Application*, 5(1), 28–37. <https://doi.org/10.31763/businta.v5i1.430>
- Republik Indonesia. (2017). Undang-Undang Nomor 7 Tahun 2017 tentang Pemilihan Umum.
- Republik Indonesia. (2023). Undang-Undang Nomor 7 Tahun 2023 tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 1 Tahun 2022 tentang Perubahan atas Undang-Undang Nomor 7 Tahun 2017 tentang Pemilihan Umum Menjadi Undang-Undang.
- Republik Indonesia. (2024). Undang-Undang Nomor 1 Tahun 2024 tentang Perubahan Kedua atas Undang-Undang Nomor 11 Tahun 2008 tentang Informasi dan Transaksi Elektronik.
- Rojak, J. A., Khayru, R. K., & Darmawan, D. (2021). Citizens' Political Participation in Electoral Democracy and the Dynamics of Civil Society Movements. *Studi Ilmu Sosial Indonesia*, 1(1), 161-176. <https://sisijournals.id/index.php/sisi/article/view/70>
- Sahidu, S., Putra, A. R., & Darmawan, D. (2023). Medical Advertising Regulations and Patient Protection as Consumers of Healthcare Services. *Journal of Social Science Studies*, 3(1), 331-342. <https://jos3journals.id/index.php/jos3/article/view/282>
- Samuelson, P. (2023). A Legal Challenge to Algorithmic Recommendations. *Communications of the*

- ACM, 66(3), 32–34. <https://doi.org/10.1145/3581763>
- Sapardiyono, S., & Soesilo, G. B. (2024). Pengaturan Kampanye di Media Sosial: Telaah Kritis Peraturan KPU No 15 Tahun 2023 Tentang Kampanye Pemilihan Umum. *Jurnal Interpretasi Hukum*, 5(2), 1131–1140. <https://doi.org/10.22225/juinhum.5.2.10468.1131-1140>
- Siagian, R. M. (2024). Election Campaign Oversight Strategy for 2024: Addressing Bawaslu's Complexity and Challenges. *Deleted Journal*, 3(2), 99–110. <https://doi.org/10.46507/jclp.v3i2.666>
- Sinambela, E. A. (2022). The Digital Public Sphere Under Threat of Disinformation a Literature Study on Hoax Dissemination Dynamic and Vulnerability Factors. *Studi Ilmu Sosial Indonesia*, 2(2), 289-306. <https://sisijournals.id/index.php/sisi/article/view/113>
- Sultan, Z., Muhammad, & Alqarni, W. (2023). Peran Lembaga Pengawas Pemilu: Data Pemilih Berkualitas menuju Pemilu 2024. *Jurnal Pemerintahan dan Politik*, 8(4), 260-268. <https://doi.org/10.36982/jpg.v8i4.3336>
- Tobing, R. D., & Kasenda, D. G. (2024). Legal Review of the Supervision of the 2024 General Election Campaign Through Social Media. *Awang Long Law Review*, 7(1), 59–69. <https://doi.org/10.56301/awl.v7i1.1260>
- Udjari, H., Suwito, Pakpahan, N. H., Hardyansah, R., & Wibowo, A. S. (2022). Reframing Freedom of Speech and Hate Speech Prohibition in a Democratic Indonesian Legal System. *Journal of Social Science Studies*, 2(1), 179-182. <https://jos3journals.id/index.php/jos3/article/view/139>
- Van Hoecke, M. (Ed.). (2011). *Methodologies of Legal Research: Which Kind of Method for What Kind of Discipline?* Hart Publishing.