

INTISARI

Undang-Undang Perlindungan Data Pribadi (UU PDP) diundangkan pada 17 Oktober 2022 sebagai tonggak penting dalam upaya negara melindungi data pribadi warga. Namun, pasca pengesahannya, regulasi ini menuai beragam kritik dari akademisi, pakar, maupun organisasi masyarakat sipil. Kritik terutama diarahkan pada kelemahan substansi pasal, ketidakjelasan mekanisme penegakan hukum, serta keterbatasan legitimasi proses pembentukan kebijakan. Kondisi tersebut menunjukkan bahwa persoalan pada tahap implementasi berakar pada ketidaksempurnaan formulasi, di mana solusi kebijakan yang dihasilkan belum sepenuhnya menjawab kebutuhan masyarakat. Penelitian ini menganalisis proses formulasi UU PDP dengan menggunakan kerangka *Multiple Streams Framework* (MSF) yang dikembangkan oleh John Kingdon (1984). Melalui metode analisis konten terhadap 207 dokumen, artikel berita dari dua media utama Indonesia, serta laman resmi Kementerian Komunikasi dan Digital periode 2018–2024, penelitian ini menemukan bahwa formulasi UU PDP berlangsung dalam dinamika politik dan regulatif yang kompleks. Hasil analisis menunjukkan bahwa regulasi ini belum sepenuhnya merepresentasikan kepentingan publik, melainkan lebih menekankan pendekatan regulatif yang belum operasional. Dengan demikian, kritik yang muncul pasca disahkannya UU PDP dapat ditelusuri hingga pada tahap formulasi kebijakan yang tidak sepenuhnya responsif terhadap masalah dan kebutuhan masyarakat.

Kata Kunci: UU PDP, Formulasi kebijakan, Kritik publik, *Multiple Streams Framework* (MSF), Perlindungan Data Pribadi

ABSTRACT

The Personal Data Protection Act (PDP Law) was promulgated on October 17, 2022, as a milestone in safeguarding citizens' personal data in Indonesia. However, following its enactment, the law has drawn significant criticism from academics, experts, and civil society organizations. The critiques primarily target the immaturity of certain provisions, the lack of clarity in law enforcement mechanisms, and the limited legitimacy of the policy-making process. These issues indicate that challenges in the implementation stage are rooted in shortcomings during policy formulation, where government-designed solutions failed to adequately address societal needs. This study analyzes the formulation process of the PDP Law using the Multiple Streams Framework (MSF) developed by John Kingdon (1984). Employing a content analysis method, the research examines 207 documents, news articles from two major Indonesian media outlets, and official publications of the Ministry of Communication and Digital Affairs between 2018 and 2024. The findings reveal that the formulation of the PDP Law was shaped by complex political and regulatory dynamics. The analysis demonstrates that the regulation has yet to fully represent public interests, leaning instead toward a regulatory approach that remains largely non-operational. Consequently, the criticisms emerging after the enactment of the PDP Law can be traced back to flaws in the policy formulation stage, which inadequately responded to the problems and needs of society.

Keywords: PDP Law, Policy Formulation, Public Criticism, Multiple Streams Framework (MSF), Personal Data Protection