

Policy Overview

Making Travel Platforms Work for Indonesian Workers and Small Businesses

Caitlin Bentley
Ilya Fadjar Maharika

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Authors

Caitlin Bentley is an Independent Researcher engaged in drafting policy for including Indonesian small businesses and marginalised actors in the platform economy of the tourism sector.

Ilya Fadjat Maharika is Senior Lecturer at the Department of Architecture, Universitas Islam Indonesia.

Research coordination team

Principal Investigator: Anita Gurumurthy

Co-investigators: Deepti Bharthur, Nandini Chami

Editorial Support: Mridula Swamy, Amruta Lakhe

Design: Meenakshi Yadav, Prakriti Bakshi

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1. Introduction

Digital travel platforms such as TripAdvisor, have in many ways disrupted the travel industry. Travel destinations and businesses are captured within these one-stop shops of information and services. Digital travel platforms collect and share user-generated content, such as photos, reviews, and suggestions for all travel-related services, amenities, and attractions. These platforms are intended to facilitate travelers' experiences by collecting and distributing information so that travelers can find hotels, attractions, and businesses according to specific locations and preferences. However, by focusing on the travelers' needs and preferences, the capitalist economic dimensions of travel are emphasized at the expense of inclusion and human development concerns. For example, particular destinations, tour companies, and hotels that are reviewed positively or negatively gain popularity or infamy rapidly, owing to a snowball effect. When international corporations own critical masses of users and information on travel platforms, it may significantly elevate their position within the travel industry above that of traditional advertising and agency services.

Recently, TripAdvisor came under scrutiny for auctioning prime search result positioning and removing first-hand accounts of rape and assault experienced by tourists (Rutledge & Mollica, 2017). Moreover, in places or countries where severe social, economic inequality and informality prevails, platforms' monopoly on information and access to customers risks further exploiting poor and marginalized populations. Gendered dimensions of travel, such as cultural symbolism and traditional roles and responsibilities, may also trap individuals into perpetuating gender inequalities as a response to touristic demands of authenticity of experience, which is often reinforced by travel platforms.

Thus far, most scholarly research conducted on travel platforms has focused on the credibility and reliability of user-generated ratings (Ayeh, Au, & Law, 2013; Jeacle & Carter, 2011), how hotels can manage their reputations online (O'Connor, 2010), or deal with complaints (Vasquez, 2011). In Indonesia, only a handful of research articles have touched upon issues relating to travel platforms, such as the one on the contribution of a method to recommend restaurants (Utama et al., 2017), or that of comparing promotional strategies with Singapore and Malaysia through online discourse analysis (Diah & Haryono, 2015). There is a clear lack of research pertaining to issues of social inclusion in the travel sector of the platform economy. We propose three key avenues to explore policy implications for inclusion in travel platforms: workers' rights and local businesses, territorial and cultural implications of travel platforms, and gendered aspects of the tourism sector.

This policy overview serves as precursor to our investigation of platforms within Indonesia's travel sector. It provides a succinct snapshot of the contextual factors that are important to consider. These factors include policy and practice in the tourism sector and Indonesia's digital policy landscape. We end the policy overview by critically evaluating whether and how the current policy environment responds to the challenges introduced by travel platform policy and praxis in Indonesia.

Gendered dimensions of travel, such as cultural symbolism and traditional roles and responsibilities, may also trap individuals into perpetuating gender inequalities as a response to touristic demands of authenticity of experience, which is often reinforced by travel platforms

2. Overview of Indonesia's Tourism Sector

2.1 Indonesia's Master Plan for Tourism Development from 2010-2025

Indonesia's Master Plan for Tourism Development, titled Rencana Induk Pembangunan Kepariwisata Nasional (RIPPARNAS), outlines a strategy for national tourism development from the year 2010 until 2025. Indonesia's vision is to make the country a "world-class tourism [destination], competitive, sustainable, able to encourage regional development and people's welfare"¹ (Republic of Indonesia, 2011b). To realize this vision, the Master Plan revolves around four mission statements:

1. to develop *tourism destinations* that are safe, comfortable, easy to get to, interesting to appreciate, and that increase income for the nation, regions and communities,
2. to create *tourism marketing* strategies that are synergistic, superior, and responsible for improving travelers' experiences,
3. to support the *tourism industry* so that it is competitive, credible, increases business partnerships, whilst retaining responsibility for the natural environment and socio-cultural communities across the archipelago,
4. to involve *government organizations, local governments, private companies and community members*, in effectively regulating human resources and operational mechanisms towards greater sustainable tourism development (Republic of Indonesia, 2011b).

Indonesia's approach to tourism development therefore includes goals relating to both economic growth and sustainable tourism development. The first goal to develop tourism destinations, which seems to take precedence in the Master Plan, outlines how these destinations may be targeted, marketed, and used to increase income generation. It also outlines how large numbers of tourists will be accommodated and how the public infrastructure needs to be developed to facilitate them. A community empowerment plan is introduced later in the Master Plan. This part includes strategies focusing on community participation, gender mainstreaming, developing regulations and incentives for Small and Medium Enterprises (SME), expanding market access and capital support for products and services developed by SMEs in local communities, raising awareness, and increasing local tourism.

When the Master Plan was launched, the government was targeting 44 Tourism Destinations for development, later, however, the number was brought down to 10 destinations deemed the '*10 New Balis*' (see Figure 1). TripAdvisor awarded Bali, Indonesia, with the title of the 'Top Tourist Destination in 2017' (Nurhayati, 2017). Bali is a competitive tourism destination worldwide, having attracted over 5.5 million tourists in 2017 (Bali Government Tourism Office, 2019). '*10 New Balis*' seeks to replicate Bali's tourism success across the 10 new destinations. However, in November 2017, the '*10 New Balis*' were further reduced to four destinations in the short-term: Lake Toba, Borobudur, Mandalika, and Labuan Bajo (PwC Indonesia, 2017). Currently, major developments in these areas focus on infrastructure development, such as airport, road, and hotel constructions. The government and external analyses have indicated that infrastructure deficits are the main problem to confront, and so they are prioritizing infrastructure. However, neither is there any information available concerning plans to involve SMEs in this development or how local actors will be supported to take advantage of them, nor any concrete suggestions about how technology can be used to attract tourists to these destinations in the future.

¹ Huruf a adalah terwujudnya Indonesia sebagai negara tujuan pariwisata berkelas dunia, berdaya saing, berkelanjutan, mampu mendorong pembangunan daerah dan kesejahteraan rakyat.

Figure 1 Locations of Indonesia's '10 New Balis'

Source: Straits Times Graphics (2017)

2.2 Roles and Responsibilities of Government, Businesses, and Communities in the Tourism Sector

Indonesia is a diverse country, which employs a decentralized governance structure. The country is composed of over 17,000 islands and holds more than 250 million people (The World Bank, 2017). There are 1300 ethnic groups and over 300 languages used within the country (Yuniarni, 2016). In 1999, the Government enacted a law on regional autonomy, which gave local governments the power to preside over their regions (Prasetyamartati, 2013). The central government maintained executive powers over foreign policy, national and domestic security, law, and monetary policy. However, in 2004, the central government revised the law to share devolve more power and decision-making authority to local government bodies (Prasetyamartati, 2013). Sharing power and decision-making between administrative units can be complex because Indonesia has five levels of administration: 1) central government; 2) provinces; 3) regencies and cities; 4) districts and sub-districts; and 5) villages. There may also be *adat* (traditional or customary) governments that preside over a village or a district. Although *adat* governance structures are not reflected in constitutional law, they may have more influence or power within a community.

In the tourism sector, Law Number 50, Year 2011, defines which government bodies are responsible for regulating and managing the sector and how (Republic of Indonesia, 2011a). Yet, as Table 1 indicates, responsibilities are shared between different administrative levels. However, it is not clear if there is much coordination between them. Whilst this kind of structure could facilitate greater responsiveness towards local SMEs and workers according to their needs, it may pose a challenge while suggesting inclusive platform policy. For instance, it may be difficult to build policies that apply across provinces or regencies, whilst also being difficult to gain sufficiently from platform network effects if policies respond to decentralized needs only.

Table 1 Roles and Responsibilities by Administrative Level

Central Government	Provinces	Regency/City
Compile and set master plan	Compile and set master plan for provincial tourism	Compile and set master plan for regency / city tourism
- Coordinate the development of tourism across sectors and provinces - Organize international cooperation	Coordinate the implementation of tourism within its jurisdiction	Organize and manage tourism within its jurisdiction
Establish national tourist attractions	Establish provincial tourist attractions	- Determine the attractiveness of regency / municipal tourism - Facilitate the development of new tourist attractions
Set national tourism destinations	Set provincial tourism destinations	Establish tourism destinations of districts / municipalities
Preserve national assets	Maintain provincial assets of interest	Maintain and preserve the tourist attractions in its territory
Take care of national tourism promotion	Facilitate the promotion of tourism destinations and tourism products within its jurisdiction	Facilitating and promote the destination tourism and tourism products within its jurisdiction .
Allocate the budget for tourism	Allocate the budget for tourism	Allocate budget for tourism
	Carry out registration and listing of tourism businesses	Carry out registration and listing of tourism businesses
Establish norms, standards, guidelines, procedures, and system supervision for the tourism industry		
Create a human resource development policy		
Support seamless tourism visits		
Ensures safety and security of visitors		
Improve community empowerment potential		
		Conduct training and research for tourism within the district / city
		Organize the guidance of conscious community tours

Source: Republic of Indonesia (2011b)

There are also civil society actors, such as tourism and professional associations. The Indonesian Tourism Board coordinates the contributions of these professional associations, and also focuses on raising funds to promote tourism outside of government sources.

2.3 Economic Policies in the Tourism Sector

In countries like Indonesia, there tends to be a lack of capital, which is needed to produce goods and services. It is also difficult to build up the workforce through education and training without capital development (Miyamoto, 2003). In places that lack capital, economists are interested in maximizing a country's potential to receive significant returns on capital investments (MacKinnon & Cumbers, 2019; Calvo, Leiderman, & Reinhart, 1996). One impediment may be the substantial sovereign risk involved, because national governments can abscond or change policies and regulations. Moreover, private companies have an interest in maximizing profits in any way possible. Also, foreign-owned private companies may not share the same values with Indonesia and may not wish to align with Indonesia's core objectives within the tourism sector related to infrastructure development, environmental protection, cultural preservation, and improved worker well-being. In general, UNCTAD's *World Investment Report* (UNCTAD, 2018) supports a "balanced approach" to government regulation and "crafting smart foreign investment screening mechanisms" so that countries like Indonesia get fair returns from businesses operating in the country.

Indonesia's approach to increasing capital development has changed over the years. In general, it has drawn on loans and foreign investment. For instance, Indonesia is receiving a loan from the World Bank, and other bilateral sources to complete the '10 New Balis' development project (Hawley, 2017). Indonesia also encourages investments in some sectors, whilst tightly controlling other sectors, and has significantly changed the rules over the decades. The *Negative Investment List*² outlines the rules and regulations set out by the Government of Indonesia for foreign investment and ownership in Indonesia, and has recently increased opportunities for foreign investment in the power and transportation sectors, and tightened controls in the oil and gas and mining industries (Gordon & Jenie, n.d.). In the tourism sector, hotels and restaurants are both listed on the *Negative Investment List*.

Restaurants are now completely unrestricted according to the new list, whilst hotels must abide by a graded scheme that protects local ownership for SMEs and enables complete foreign ownership of 3-star hotels and above (BKPM, 2017). The Government also announced a plan to give companies investing heavily in the country, a *Tax Holiday*, whereby "an investment of Rp 500 billion (\$36.34 million) to Rp 1 trillion will make a company eligible for five years holiday for corporate tax" (Asmarini, 2018). It is not clear whether international hotel chains may qualify for such a tax holiday, but the policy demonstrates how the current government is currently trying to attract more foreign investment. This aligns with the Master Plan strategy to focus on big infrastructure development to build up the '10 New Balis' quickly.

A major problem with foreign investors in the tourism sector is that, in the past, companies have found ways to cheat governments out of revenues (Buades, 2010). Buades' (2010) analysis of transnational corporate hotels has argued that transnational corporations develop alliances, investment strategies, and accounting tactics in order to avoid demonstrating profits, which in turn reduces their tax payments. In reality, much of their revenues end up in tax havens (Buades, 2010). How benefits afforded to massive foreign conglomerates may or may not translate into benefits for Indonesian workers, and how these benefits may likewise advantage these companies significantly in relation to travel platforms is of utmost concern here.

² Daftar Negatif Investasi

In contrast to national loans and foreign investments, the contributions of SMEs must not be taken for granted in the tourism sector. The International Finance Corporation (IFC) found that in 2016, Indonesian SMEs accounted for 22 per cent of GDP (IFC, 2016)

2.4 Labor and Welfare

Indonesia's labor law outlines strong and rigorous rules and procedures that businesses must follow, which are quite detailed and complex (Republic of Indonesia, 2003). For example, when businesses hire permanent employees, a severance package is required, and this can become a high-cost issue from a company's perspective. Labor unions have long histories within the country (Ingleson, 2001), and are well-versed with labor laws, being vocal advocates for their rights. Permanent employees in Indonesia can take businesses to court over labor rights violations and the process can be very long (Tjandra, 2010). All this means that businesses are offering permanent contracts less and less and favoring short-term renewable contracts in order to avoid the difficulty of dealing with labor law compliance.

Each province sets a minimum wage requirement that must be followed, which is referred to as the standard wage (see WageIndicator.org, 2018, for these). The Labor Law (Republic of Indonesia, 2003) also stipulates that workers must not work more than 40 hours in a week, either seven hour shifts over six days or eight hours per day over five days. Laborers who work longer than this must give consent to do overtime and be justly compensated for the same. They cannot work more than three hours overtime in a day, or 14 hours in a week. Workers are also entitled to annual leave, amounting to 12 days total, but this only applies if they work for 12 months consecutively. Special provisions in the labor law were made to protect women workers (presumably from violence and for health concerns) by implementing restrictions on working night-shifts only. Women who are under 18, pregnant, or ill cannot work night-shifts. Those who can must be provided with transportation home. There are no provisions for maternity or paternity leave. Only Article 153 (Republic of Indonesia, 2003, p. 39) stipulates that women cannot be fired for being absent from work for being pregnant, giving birth, breastfeeding, or having a miscarriage.

Platforms could indeed be a critical source of information to facilitate real-time snapshots of tourism flows throughout the country in order to carry out such a program

However, in the tourism sector, many of these conditions may not apply in practice. Employers are often faced with unpredictable circumstances related to seasonal or day-to-day changes in demand. To deal with the situation, they may hire seasonal, or low-skilled workers who are readily available and easily replaced (Ioannides & Zampoukos, 2017). Companies may use the circumstances as a means to coerce workers into longer hours during peak periods. Hotel workers might be encouraged to live or sleep onsite, such that their rest and freedom is compromised should a guest turn up. It may also be common for families to own SMEs, such that they employ their children unlawfully. Lastly, the above issues do not apply to roughly 80% of the population who are not in formal sector employment.

Indonesia recently implemented universal health care and a national social security program that benefits all workers, in both the formal and informal economies (Maftuchan & Fanggihda, 2015). The social security scheme includes four aspects: pension scheme, old age benefits, workplace injury benefits, and death benefits. The program was enacted into a law and began in 2014. It has been implemented in waves throughout the country and targets enrollment of all Indonesians by 2019. However, there are still some aspects of the program that are unresolved, particularly when it comes to informal workers. For instance, informal workers are not included in the

pension scheme and are responsible for contributing 100% to their benefits. This means that if they enroll in the program, they pay 1% of their monthly salary for accident benefits, at least 2% for old-age benefits and 0.3% for death benefits (Maftuchan & Fanggidae, 2015). In contrast, employers are required to contribute towards their employees' benefits, including the pension scheme. Furthermore, it is perhaps straightforward to regulate how businesses and formal workers enroll in the program. Yet, it remains a challenge to convince informal workers to invest their own money into the system. In a study conducted by the International Labour Organization (ILO, personal communication, November 29, 2017) amongst Indonesian coffee farmers, only 40% were interested in registering for the program if it was not too complicated, and the others were skeptical, or thought that it was not for them. It is not clear how Indonesia plans to ensure that the remaining 60% will enroll in the program.

There do not seem to be many, if any at all, labor or welfare policies targeted at workers within the tourism sector, despite the importance of the sector to Indonesia's economy and development. Many Indonesians may turn to farming in the low season, but as the population grows, or as workers migrate to urban centers, this may not be possible for all tourism workers to do. Innovative policies may be in order here, such as tracking the number of tourists visiting a particular destination and determining how many guides or hospitality workers are needed. A program could then guarantee annual employment for these workers, and if they are not working, provide them with other meaningful work to enhance community or environmental aspects, the city or region. Platforms could indeed be a critical source of information to facilitate real-time snapshots of tourism flows throughout the country in order to carry out such a program.

2.5 Other Influential Discourses in the Tourism Sector

The over-arching alternative discourse in the tourism sector is that of sustainable tourism development. According to Indonesia's Strategic Plan for Sustainable Tourism and Green Jobs, sustainable tourism development draws on five components, which are influential discourses in and of themselves (ILO Jakarta Office, 2012). These are: poverty reduction, rural development, cultural preservation, gender equity, and environmental protection.

Poverty Reduction and Rural Development

Spenceley and Meyer (2012) have outlined how tourism has, in many ways, the potential to reduce poverty, by enabling inclusive economic growth and contributing to the well-being of local populations. Additionally, over the past two decades, tourism trends have shifted away from large group tours or resorts towards individualistic formulas (Patiño, Medina, & Arilla, 2016). Tourists today seek more flexibility, and authentic experiences involving immersion in local cultures, adventure, and nature (Jones & Ohsawa, 2016; Mackenzie, 2015; Richards, 2014). Indonesia's Strategic Plan for Sustainable Tourism Development Plan focuses primarily on the potential for tourism to create *green jobs*, which the plan suggests "protect the environment and open employment and skills trainings for vulnerable persons, including women and youth who might not otherwise be able to access these opportunities" (ILO Jakarta Office, 2012). However, not all tourism benefits poor and marginalized workers, or the local economy for that matter. For instance, tourists may rely on *middle-actors* to organize tours through rural areas, or to suggest routes and accommodation to use. Platforms could help marginalized workers and SMEs in rural areas connect directly with tourists, thus cutting out the need for middle-actors. However, relatively little is known about the effects of tourism on poverty reduction or rural development in Indonesia.

Gender Equity

Women and young people comprise the majority of the workforce in Indonesia's tourism sector (ILO Jakarta Office, 2012). The sector offers many opportunities for women, enabling them to take on new leadership and professional roles, which has been shown to contribute positively to women's empowerment (Moswete & Lacey, 2014;

Scheyvens, 2000). However, Indonesian women still face considerable constraints such as “low payments, low quality jobs, lack of access to education, violence at work, stress, sexual harassment and abuse” (ILO Jakarta Office, 2012). They also earn “10-15% less than their male counterparts and tend to perform jobs such as cooking, cleaning and hospitality” (ILO Jakarta Office, 2012). In accordance with Tucker and Boonabanna (2012), understanding the nuanced ways in which women are implicated and empowered in the tourism sector requires careful consideration of the intersectional ways in which women and men are positioned within the sector. Any analysis of how and why platforms impact women and men must then take into account how women and men’s power and position is situated in its context.

Cultural Preservation and Environmental Protection

Indonesia has suffered grave environmental degradation due to both regulated and unregulated land-clearing and farming activities. Main drivers have been the oil and gas, coal and palm oil industries, which make up a majority of Indonesia’s economy (Ministry of Tourism, 2016). Moreover, under Dutch rule till the 1940s, and later under President Suharto, large numbers of Indonesia’s forest-dwelling populations were moved out of the forests and into government resettlements. Most of these populations held animist beliefs and had strong connections with the forests, as forests formed the basis of their ways of being and knowing. Some of these populations are now returning to their roots, viewing tourism as a means to justify and finance environmental and cultural protections. For example, Indoneo travel agency has been arranging tours with Dayak tribes in Kalimantan, as a way for tourists to understand their belief system, their superior ways of natural resource management, and their traditional dances (Indoneo, 2017). However, there is very little evidence that actors in the tourism sector, including the Government, are implementing strategies to monitor and understand land use, carrying capacity, or the effects of tourism on cultures and environments. Once again, platforms could be used to shed light on some of these aspects, but almost no research has been conducted on this topic.

2.6 Travel Platforms in Policy and Praxis

We adopt Gawer and Cusumano’s (2002, p.2) definition of digital platforms as “an evolving system of inter-dependent pieces that can each be innovated upon.” Initially this definition was based on the observation that companies were losing centralized power to dictate terms for complementary manufacturers to follow in an industry. However, in 2013, they incorporated the notion of *network effects* into their definition acknowledging that “the more users who adopt the platform, the more valuable the platform becomes to the owner and to the users because of growing access to the network of users and often to a growing set of complementary innovations” (Gawer & Cusumano, 2013, p.417). Although, it initially seemed like digital platforms were causing power to decentralize, eventually it became clear that certain platforms were instead creating new power centers that operate differently. As such, scholars of the platform economy likewise observed that “diverse platforms, residing in the cloud, however we categorize them, are provoking a profound economic reorganization of markets, work arrangements, and, fundamentally, of value creation in the contemporary economy” (Kenney & Zysman, 2015, p.2) and that “the platform has emerged as a new business model, capable of extracting and controlling immense amounts of data and with this shift we have seen the rise of large monopolistic firms” (Srnicsek, 2017, p.6).

However, even though digital platforms may have evolved to promote dominant forms of *platform capitalism*, platforms can be used to pursue other social and political objectives. This is why we adopt Gawer and Cusumano’s (2013) definition of platforms as evolving inter-dependent pieces that can each be acted upon to create network effects. We argue that it is up to implicated actors to both construct and regulate platforms to ensure they contribute towards a desired objective. For instance, platforms have been used to enable individual and community empowerment by increasing public participation opportunities (de Moor, 2010; Restakis, Araya, Calderon, & Murray, 2015). Similarly, Heinrichs (2013, p.229) argued that platforms can be used to “enable shared access to

goods, services, data and talent. These systems take a variety of forms but they all leverage information technology to empower individuals, corporations, non-profits, and government with information that enables distribution, sharing and reuse of excess capacity in goods and services.” These perspectives imply that with the right policies and practices, platforms can be used in beneficial, socially inclusive ways.

For the tourism sector, our emphasis is on actors and objectives that may be marginalized in travel platform policy and praxis, and whether or not there are inclusive alternatives. The objectives we explore relate to those outlined above that focus on sustainable tourism development, primarily gender equality, community empowerment, and cultural and territorial impact. The actors we concentrate on are women, community members working in the tourism-sector, and micro-enterprise and SME owners. The remainder of this policy overview maps out current policy and praxis necessary to consider in our investigation.

2.7 Qualities and Characteristics of Travel Platforms

There have been many attempts to categorize and understand digital platforms according to various qualities and characteristics. We provide this overview of the popular platforms that may be currently used in the tourism sector for comparative purposes. This list is not exhaustive, as it focuses only on platforms available in English and Bahasa.

We considered Gawer and Cusumano’s (2013) concept of dominant designs, for organizing this overview. Concerning a dominant design, “when it emerges, sets the standard for what form and features users expect a particular product to take in the future.” A dominant design “makes a distinction between ‘core’ and ‘peripheral’ subsystems and components, where the stabilization of one level of the hierarchy allows for more innovation at peripheral levels.” We were also interested in whether we could find platforms that espoused alternative objectives or other governance structures than the dominant designs. Our cursive analysis presented in Table 2 demonstrates that most of the travel platforms we considered harness user-generated content to promote products and services, whilst the dominant designs then direct users to peripheral subsystems where users can purchase products and services. We found very few alternative platforms that did not have commercial objectives or corporate governance structures.

Table 2 Qualities and characteristics of travel platforms

Type of travel platform	Examples	Core Objective(s)	Features and Characteristics	Ownership/ governance structure
Dominant designs	TripAdvisor	To provide all information tourists may need, as well as direct users to relevant travel booking services.	<ul style="list-style-type: none"> - User reviews, forums and content (photos) - Listings - algorithm and filter based - Price comparisons - Non-restrictive access for businesses, workers and customers 	Corporate ownership and governance
	Lonely Planet website Jetsetter		<ul style="list-style-type: none"> - Destination information (videos, suggested itineraries, reviews) - Listings with aggregated descriptions from various online sources 	

Table 2 Qualities and characteristics of travel platforms (Contd.)

Type of travel platform	Examples	Core Objective(s)	Features and Characteristics	Ownership/ governance structure
			<ul style="list-style-type: none"> - Tailored reviews, and embedded user-generated reviews from other sources. - Travel bookings 	
Peripheral Subsystems	Skiplagged Priceline Expedia Kayak Traveloka Tikt Travelocity Momondo Zuji	To sell packages of tourism products and services (e.g. flights, hotels, car rentals).	<ul style="list-style-type: none"> - Booking platforms for tourism products and services (plane tickets, hotels, car rentals, etc.) - User reviews - Product/service information 	Corporate ownership and governance
	Viator Hotels Booking Agoda	To sell specific tourism products or services (e.g. hotels only)		
	Skyscanner Kiwi			
Complementary platforms	Airbnb HomeAway	To offer accommodation services through privately-held rental. These services can be used by tourists but are also used for other purposes (e.g. long-term rental)	<ul style="list-style-type: none"> - Listing and booking personal properties and rooms (Airbnb can be used by businesses as well) - Ratings of community members and hosts 	Corporate ownership and governance
	Grab Saytaxi Bluebird Uber	To provide transportation services. These services can be used by tourists but are also used for other purposes (e.g. urban transport)		
Alternative platforms	Co-operative travel Fairbnb	To sell tourism products and services that align with a specified code of practice/ ethics.	<ul style="list-style-type: none"> - Listing and booking of products and services 	Collective ownership, private governance

Table 2 Qualities and characteristics of travel platforms (Contd.)

Type of travel platform	Examples	Core Objective(s)	Features and Characteristics	Ownership/ governance structure
	Wikitravel	To provide a comprehensive travel guide for free	- Crowdsourced information about travel destinations, including	Private ownership, collective governance

The dominant design concept seems to work within the tourism sector primarily within capitalist platform models. There is an apparent relationship between major platforms that offer all sorts of services under one roof (such as, TripAdvisor and Lonely Planet). These harness, and have influence over, a range of complementary platforms to derive value. For instance, dominant platforms may be generating much of the traffic towards complementary platforms (such as, Booking.com or Expedia.com). However, the dominant design concept does not capture the influence of complementary platforms and alternative platforms on the tourism sector (see Table 3). Complementary platforms may have little to no association with dominant designs, but may serve tourists and tourism actors nonetheless, and may need consideration. Similarly, alternative platforms that operate on a set of principles or code of ethics may not be popular enough to compete with dominant designs. However, alternative platforms may serve small and local businesses significantly in a different way, and may likewise require consideration.

2.8 Indonesia’s Digital Policy Landscape

In order to provide insight into the main challenges that need to be confronted to make travel platforms more inclusive to SMEs and Indonesian workers, we need to understand the state of access/connectivity for these actors, and the policies, if any, that have been put in place surrounding digital platforms, data protection and governance, or digital inclusion. We turn now to the contextual factors that may affect policy and praxis surrounding travel platforms in Indonesia.

Access and Connectivity

Statistics regarding access and connectivity represent Indonesia as a well-connected country with high rates of internet and mobile penetration. For instance, PUSKAKOM (2015), a research center at the University of Indonesia, found that internet penetration was at 34.9% in 2014. Almost 85% of internet users are online via their mobile phones (PUSKAKOM, 2015). However, Purbo’s (2016) research demonstrates that these figures can be misleading as there may be a high concentration of internet and mobile users in urban areas, and rural areas may tend to be neglected.

The World Wide Web Foundation’s Web Index ranked Indonesia 52 out of 86 countries, giving the country a score of 39.27. The Web Index evaluates countries based on; universal access to the internet, freedom and openness that citizens enjoy online, relevant content in their own language, and the extent to which citizens are empowered to use the internet. Indonesia scored relatively low on the empowerment dimension, indicating that the majority of the country’s population requires greater support to fully take advantage of the internet. Similarly, the World Economic Forum’s Network Readiness Index ranked Indonesia 73 out of 139 countries. Indonesia outperformed a majority of countries on affordability of internet, but is lagging behind with regard to individual and business usage,

as well as social and economic impacts of the internet. This data suggest that there remains considerable scope to improve the utility of the internet amongst Indonesians.

Two key policies underpin Indonesia's plan to develop telecommunications infrastructures. First, Law 36/1999 stipulates that only licensed operators may construct and operate telecommunications infrastructure. Second, the government collects 1.25% of all operators' revenue to fund the Universal Service Obligation (USO). The USO finances infrastructure development in underserved areas. Purbo (2016) has argued, however, that such top down approaches to increase access and connectivity fail to take into account the dynamics involved in not only providing infrastructure, but also in empowering communities to take advantage of such infrastructure. He suggests that a community-centered approach has been more effective.

Furthermore, the national connectivity figures do not capture differences across the country in how people access and use the internet. Differences in quality, quantity, and affordability of information and communication resources, rather than only access to internet, have created enormous disparities in terms of who is connected and how they are connected (Hilbert, 2016). SMEs, for instance, may potentially be able to gain more from using platform dashboards on laptops, but the costs associated with purchasing a laptop and broadband internet connection may be incredibly high when compared to the cost of using platforms via mobile apps and mobile internet connections. Furthermore, women and men may have different access and use constraints that may be important to consider. These aspects of the connectivity context indicate that it is necessary to explore why and how workers and small businesses are connecting to the internet, and whether and how their experience affects the ways in which they interact with travel platforms.

The Importance of Indonesia's Technology Sector

The momentum in Indonesia surrounding the technology sector suggests great hope and potential for the country's government and citizens. Much of it has been generated within the transport and e-commerce sectors, but there are some tech startups emerging from Indonesia serving the tourism sector as well.

In 2015, the Indonesian government began accelerating its support to Indonesia's technology sector (Chopra, 2017). The Minister of Communications and Information Technology aimed to convince local investors to put their money into Indonesian tech companies instead of foreign technology companies (Chopra, 2017). The Ministry planned to raise \$1 billion Rupiah for Indonesia's IT startups. The next year, President Joko Widodo announced a new initiative called the *1000 Startups Movement* (Sundaryani & Ribka, 2016), with the goal to facilitate the launch of a thousand new startups by 2020. The initiative began in Jakarta, Yogyakarta, and Surabaya in September 2016 (Chopra, 2017). It included activities to support startups such as workshops, incubation programs, boot camps and hackathons. It is expected to spread across the country to Medan, Pontianak, Denpasar and Makassar. For instance, in June 2017, the first boot camp on tourism happened in Bali (Techstars, 2017). However, we could not find any information regarding the results of this event.

Two notable Indonesian startups within the tourism sector are Traveloka (<https://www.traveloka.com>) and Tiket (<https://www.tiket.com>). As outlined in the previous section, we suggested that these platforms respond to dominant design trends. As such, they may not be contributing significantly to increasing inclusion for SMEs and workers, but this remains to be seen. For example, at the moment, they seem to prioritize economic gains regardless of who ultimately receives them or how these are distributed. But in the future, it may be possible for the Indonesian Government and citizens to have greater influence on these companies.

Data Policies

At the end of 2016, the Minister of Communication and Information Technology released a new regulation on Personal Data Protection in Electronic Systems (Innis, 2017). This policy is targeted at systems operators in Indonesia, and ensures protections surrounding personal data. The policy thus protects an individual's right to access personal data stored about them, correct or delete the information, give or withdraw consent to have their data processed or used for marketing, and, complain to relevant authorities upon breaches of these protections (Iskandar & Harmahesa, 2017). However, the policy is currently undergoing a two-year testing phase, so it is not clear exactly how it will be implemented. Likewise, there are some stipulations outlawing storage of personal data overseas, but no regulations concerning sending personal data abroad (Iskandar & Harmahesa, 2017). Big data analytics are not regulated under this policy or any other as well. Lastly, there is no requirement under Indonesian law for companies to report data breaches to authorities (Iskandar & Harmahesa, 2017). Hence, only those who suffer a data breach and make a complaint will be afforded access to justice.

Within the tourism sector, there is a need to address data privacy in a contextualized manner. For example, it is difficult to envision if and how current data policies adequately tackle the complexity of the international tourism trade. For this assessment, it would be beneficial to have a deeper understanding of how platforms collect, maintain and process customer information, as well as any other digital record keeping issues that may crop up.

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2.9 Promises and Perils of Platform Policies in Indonesia

Indonesia has had much success and strife with digital platforms, yet critical events have largely transpired in sectors other than tourism. In terms of promising platform policy schemes, many significant successes have been implemented by platform corporations themselves. For instance, Grab is a taxi and ride-sharing platform that is owned and operated by a corporation in Singapore. Grab offers its drivers social security benefits such as contributions to medical insurance, free personal accident insurance, and microloans (Grab, 2016; n.d.; Russell, 2018). However, offering contributions to medical insurance did not work effectively in Indonesia. There, Grab decided to simply cover its drivers' healthcare. So long as the driver did not have any accidents, the company would pay his/her hospital bills (ILO Officer, personal communication, November 29, 2018). However, it seems that Indonesian workers did not wish to identify as Grab 'workers,' and preferred that the scheme did not regulate the program in such a way (ILO Officer, personal communication, November 29, 2018). Schemes that provide some benefits and incentives for workers, but do not need informal workers to identify themselves with the concerned platform, may be important in Indonesia.

Other successes have been recorded at e-commerce platforms such as Lazada and Tokopedia. Lazada reaches out to rural areas, meets with local vendors directly and offers training and support to micro-enterprises on using the platform effectively to sell their products (Millward, 2016). Alternatively, Tokopedia has set up an extensive network of third-party facilitators to ensure that SMEs have adequate support available (Samanta, 2017). However, no research has been conducted to understand what the value of these policies have been for SMEs or marginalized workers. Perhaps the platform reaps the most rewards for potentially increasing total sales, but as competition grows, SMEs may still lose out if demand for their products does not increase to meet the new supply conditions.

In contrast, platforms have also caused considerable tensions in Indonesia. Ride-hailing platforms Uber and GrabCar met with drastically different responses across the nation. For example, protests by bus, taxi and three-wheeled motorbike taxi drivers erupted in Jakarta in March 2016 (Figure 2). Protesters argued that these ride-hailing platforms are not adequately regulated and that their companies are losing out as a result (Hines, 2016). At multiple levels, the Bali government has flatly refused to allow these platforms to operate in the region, but then one regency changed its mind. On the national scale, conflicting statements from different Government Ministries were made, such that the Minister of Communication supported the platforms, arguing there were no laws prohibiting them, whereas, the Jakarta Governor and the Ministry of Transportation supported the taxi drivers (Hines, 2016). After the protests, the Ministry of Transportation deemed Uber and GrabCar to be illegal until they followed regulated procedures, such as getting special licenses, auto-insurance, and following regulated fares. The repercussions of the new policy, however, are still unclear.

Figure 2 Protest against Uber and GrabCar in Jakarta



Source: (BBC, 2016)

3. Main Policy Challenges to Confront: Building Inclusive Policy for Travel Platforms in Indonesia

Identifying the main policy challenges to confront to make travel platforms more inclusive toward Indonesian workers and SMEs is crucial. Understanding the perspectives of a range of actors, as well as gaining insights from travel platform practices will be central to addressing identified challenges. Our research with local communities and businesses will therefore underpin the creation of new policy guidelines that can help actors from the village/municipal level up to the national level to support greater inclusion of marginalized workers and businesses in relation to travel platforms.

The Government, at all levels, needs to grasp the importance of platforms within the tourism sector and understand how and why marginalized workers and SMEs may be disadvantaged. The current Master Plan, and related action plans prioritizing big infrastructure developments and foreign investment, demonstrates stronger commitment to private sector interests than to the objectives focused on community empowerment and sustainable tourism development. Our inclusion policy seeks to overcome this bias by establishing principles for travel platforms that take into account multiple objectives simultaneously, whilst prioritizing the perspectives of marginalized workers and SMEs. These principles will only be successful and relevant if regulators understand the

main policy challenges. Instead of coming up with principles on our own, through interviews and case study research, we will gather rich insights across a range of perspectives.

Based on this policy overview, some of the key challenges we will focus on include: building a critical awareness around the importance of platforms in the travel sector, developing the skills and knowledge needed to engage with travel platforms, and formal accountabilities or responsibilities pertaining to the management and implementation of inclusive travel platforms.

3.1 Building critical awareness

Travel platforms have largely flown under the radar in Indonesia and have not yet been factored into policy-making in the tourism sector. Some startups have been successful, and new startups are encouraged. Travel platforms have been perceived quite positively within the country, yet, the lack of regulation concerning how products and services are offered and promoted may be negatively affecting local workers and businesses. Furthermore, most actors responsible for regulating and coordinating the tourism sector have duties unrelated to travel platforms. These other duties may be more urgent in the short-term, but they reduce the time that these actors have to address the less urgent or long-term activities that may be more effective for generating sustainable and equitable tourism outcomes. Hence, we need to build clear and strong arguments for why these actors need to pay look at long term outcomes. Our research focuses on three themes to build critical awareness in this area: workers' rights, gender responsiveness, and cultural and territorial impact of travel platforms.

Firstly, concerning workers' rights, Indonesia has made great strides in recent years to develop a social security system that takes into account the needs of marginalized workers, including those who work in the informal sector. Although new laws and regulations aiming to enroll all citizens into the system by 2019 are in place, it is not clear whether and how tourism and hospitality businesses are following the new rules, nor whether independent or informal workers in the tourism sector are choosing to enroll. Additionally, tourism workers face challenges of low payments, long working hours, and limited benefits. They may also have long periods without work and with limited alternatives. Whilst it may not be realistic for travel platforms to solve some of these problems, it is unjust for businesses to benefit from platforms without transferring some of these benefits to its workers.

Secondly, the Master Plan does not inform how Indonesia plans to address gender equality in the tourism sector. Amidst such ambiguity, it remains a challenge to measure how exactly travel platforms may contribute. We will apply an intersectionality perspective drawn from gender studies to explore intersections between gender, class, religion, tourism, and travel platforms in two ways. First, we will explore gender differences regarding the roles that women and men adopt within the tourism sector, driven by Indonesian cultural norms and opportunities. Second, we will explore the situated agency of women in the context of both passive and active participation or representation on travel platforms. We draw on a Women, Culture and Development (WCD) perspective for this aspect, which builds on intersectionality theory and situates women's empowerment within a situated and contextualized power analysis (Bhavnani, Foran, Kurian and Munshi, 2016). This perspective does not apply universal gender equality standards and does not cast them as victims. Instead, it includes women as active participants in the power analysis and "suggests a new lens through which to [explore]... the ways women resist and celebrate the circumstances of their lives" (Bhavnani et al., 2016, p.2).

Travel platforms have largely flown under the radar in Indonesia and have not yet been factored into policy-making in the tourism sector

Thirdly, whilst the Government may be clear on the '10 New Balis' it wishes to make popular, there is no consideration that tourists may have other desires in mind. Due to the way in which user-generated reviews and photos potentially circulate rapidly on travel platforms, some destinations may become popular without much planning. In these cases, policies may need to respond by redirecting these activities to protect certain areas or to preserve cultural preferences. Our research will build a critical awareness surrounding the ways in which community members both participate in, and avoid the use of, platforms for such reasons.

3.2 Skills, Knowledge, and Resources Needed to Engage with Travel Platforms

There may be both positive and negative consequences of travel platforms, depending on many different factors. Some of the factors we highlighted hinge on the core objective of the platform, ownership and governance structures of platforms, and its features and functions. We also suggested that the tourism sector has established dominant designs that have stabilized practices within it towards corporate gains. Competition is likely to be a growing issue for SMEs. It is still not clear if encouraging SMEs to use travel platforms will benefit them significantly.

Actors will need to build knowledge around the issues to make a judgement regarding how and why to engage with platforms. Platforms demonstrate issues for small businesses, as algorithmic ranking is an issue. Small hotels with few guests cannot realistically obtain the same number of reviews as large hotels with hundreds of guests per month. TripAdvisor also accepts cash payments for boosting a company's ranking on its listings (Rutledge & Mollica, 2017).

Consumer preferences and competition are also difficult issues to address in the tourism sector, which platforms can both ease and exacerbate. Bali has managed to gain success for a wide range of businesses, perhaps because they attract not only luxury tourists, but also backpackers and other different types of travelers. Smaller businesses may be able to benefit from platforms in this case due to a wider range of services being in demand. Regarding competition, in places where there are numerous competing businesses, it will be very difficult for SMEs to compete with larger actors. In places where there is little competition, they may have an easier time. Economies of scale advantage bigger businesses to use platforms effectively as well. The more a business can afford to build its reputation, the more it can pay attention to what is happening both in the market and on platforms. In tourism, people likewise have expectations of how they want their holiday to go. Brands give expectations that people can trust and rely on, which platforms may not be able to overcome. All of these issues will need to be considered when SMEs consider whether or not to engage with platforms.

Once actors have sorted through all of the important issues, they will still need the skills and resources to use platforms effectively. As discussed in the digital policy landscape section, there is a higher probability that workers and SMEs use the internet on their mobile phones. This has implications for how travel platform policy could be managed and implemented. It also implies that basic platform skills should be factored into the kinds of support entrepreneurship programs give, and into educational programs for business owners and workers. Yet, it is not clear if such support is already being given or is needed.

3.2 Towards formal accountabilities and responsibilities for building inclusive travel platforms

The last policy-making challenge to confront is the lack of formal accountabilities or responsibilities to address platform policy-making and issues. The Master Plan outlines how the Government is heavily involved in managing and implementing tourism development in Indonesia. Yet, coordination between administrative levels is lacking.

Local governments may be in the best position to support SMEs and workers in their area, but the national ministries will also need to be involved in making supportive policies.

This policy overview indicates that a few platform companies have begun to consider social welfare aspects of platform workers. Yet, no travel platforms have engaged in such practice, and there are often no formal accountabilities or responsibilities towards tourism service providers from travel platforms. It is also not clear whether and how, platform companies in the tourism sector may be influenced to be more actively involved. Indonesia and its citizens, thus far, have little say over how travel platforms are structured, or how data collected on them is used.

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