

Navigating Digital Political PR Law and Ethics: A U.S.–Indonesia Comparison

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ABSTRACT

This study compares the ethical and legal frameworks governing digital political public relations (PR) in the United States and Indonesia, focusing on how cultural, political, and institutional contexts shape professional standards. Analyzing official codes: PRSA in the U.S. and PERHUMAS in Indonesia, alongside electoral laws, the research reveals contrasting values: U.S. norms emphasize free speech and transparency, while Indonesia stresses unity, social harmony, and Pancasila ideology. Despite these differences, both countries lack specific ethical guidelines for digital political PR, leaving a regulatory gap that enables disinformation and weakens public trust. Methodologically, the study applies a comparative legal-ethical approach informed by Reitz's functionalism and Eberle's interpretive method. It contributes theoretically by demonstrating how existing frameworks fail to address the complexities of digital political communication. Enforcement in both countries is fragmented—decentralized and self-regulated in the U.S., codified yet inconsistently applied in Indonesia. This article goes beyond identifying gaps by advocating the development of hybrid ethical frameworks that merge local values with democratic principles. In an era of algorithmic targeting and cross-platform propaganda, the absence of tailored regulation in digital political PR poses a serious democratic risk. A culturally grounded yet globally informed ethical standard is urgently needed.

Keywords: Digital Political PR; Ethics; Comparative Study; USA; Indonesia

ABSTRAK

Studi ini membandingkan kerangka etika dan hukum yang mengatur praktik public relations (PR) politik digital di Amerika Serikat dan Indonesia, dengan menyoroti bagaimana konteks budaya, politik, dan institusional membentuk standar profesional. Analisis terhadap kode etik resmi: PRSA di AS dan PERHUMAS di Indonesia, beserta undang-undang pemilu mengungkapkan perbedaan nilai: norma AS menekankan kebebasan berpendapat dan transparansi, sedangkan Indonesia mengedepankan persatuan, harmoni sosial, dan ideologi Pancasila. Meski berbeda, keduanya belum memiliki pedoman etika khusus untuk PR politik digital, menciptakan celah regulasi yang memungkinkan disinformasi dan menurunkan kepercayaan publik. Secara metodologis, studi ini menggunakan pendekatan etika-hukum komparatif berdasarkan fungsionalisme Reitz dan metode interpretatif Eberle. Secara teoritis, studi ini menunjukkan bahwa kerangka yang ada belum mampu menangani kompleksitas komunikasi politik digital. Penegakannya pun terfragmentasi: desentralistik dan berbasis swakelola di AS, sementara di Indonesia bersifat kodifikatif namun belum konsisten. Artikel ini tidak hanya mengidentifikasi kesenjangan, tetapi juga mendorong pengembangan kerangka etika hibrida yang memadukan nilai lokal dengan prinsip demokrasi. Di tengah kampanye algoritmik dan propaganda lintas platform, ketiadaan regulasi khusus untuk PR politik digital menjadi ancaman serius bagi demokrasi. Diperlukan standar etika yang kontekstual secara budaya namun relevan secara global.

Kata kunci: Humas Politik Digital; Etika; Studi Perbandingan; AS; Indonesia

INTRODUCTION

In 2018, the communication and political arena was shocked because of the Cambridge Analytica scandal, which exposed how the campaign strategies in the United States were using social media behavioural data to manipulate voter preferences on an unprecedented scale. Cambridge Analytica, a British political consulting firm, was unauthorizedly harvesting millions of Facebook users' data for micro-targeting political messages during the 2016 US Presidential election between Donald Trump and Hillary Clinton. The scandal highlighted a disturbing grey zone between persuasive political communication and unethical manipulation (Confessore, 2018; Cadwalladr, 2022). On the other side of the world, Indonesia faced a similar incident during its 2019 presidential election, where the widespread deployment of “buzzers” or coordinated online operatives spread misinformation and propaganda (Budiana, 2024). This called into question the ethical boundaries of political relations (PR) practices in Indonesia (Dhani et al, 2015; Lasmana et al, 2021; Saraswati et al, 2021). Even though there is an existing difference in political culture, law, and regulatory mechanisms, both cases in the US and Indonesia revealed how political campaigns operate at the intersection of influence and power, which contests their ethical standards.

Strömbäck and Kioussis (2019, p. 11) define political PR as “..The management process by which an actor, for political purposes, through communication and action, seeks to influence and to establish, build, and maintain beneficial relationships and reputations with key publics and stakeholders to help support its mission and achieve its goals.” From the definition given, it can be inferred that political PR is a strategic management of communication between the political actors, which can be individuals, political parties, governments, media, and constituents. The term “action” mentioned in the definition can be in the form of campaigns, media relations, digital strategies, and public opinion management. These communications and actions can be used in two ways: one that enhances democratic participation and transparency, and the other is used to manipulate public opinion, spread disinformation to polarize society, and undermine trust in democratic institutions (Avila, 2025; Daud, 2021; Pira, 2023).

These contentious issues highlight the urgent need to clearly define the ethical boundaries of political PR, a profession that often operates discreetly and beyond public scrutiny. This is particularly crucial in relation to regulatory frameworks that can guide professional conduct. The nature, strength, and effectiveness of such regulations and ethical standards vary considerably across countries, shaped by distinct historical, cultural, and political contexts. At the heart of political communication lies persuasion, the strategic attempt to influence audiences to act in ways desired by the communicator, often simplified as the effort to “win over others” (Lilleker, 2006). This goal, while central, can also be interpreted cynically as being primarily about power acquisition. This study seeks to examine the regulatory and ethical frameworks that govern political PR practices in the United States and Indonesia. These two democracies have been selected as case studies because, despite their stark differences in political development, media environments, and institutional traditions, both face persistent challenges in upholding ethical standards in political communication.

This study is guided by two primary questions: First, how do the regulatory and ethical frameworks governing digital political public relations differ between the United States and Indonesia? Second, how do different regulatory regimes shape ethical campaign communication? Addressing these questions, this paper seeks to deepen the understanding of how ethical standards in political PR are constructed and enforced across different democratic contexts in this digital era. In doing so, it underscores the risks associated with ethical ambiguities while exploring opportunities to strengthen governance and professional

accountability within political communication practices. Moreover, given that existing research on PR ethics is predominantly centered on North American contexts and samples (Jackson et al., 2022), this study aims to broaden the scope by incorporating perspectives from Indonesia, thereby contributing to a more inclusive and global discourse on political PR ethics.

COMPARATIVE LAW AND ETHICS PERSPECTIVES

Law is intrinsically linked to the political and governmental authority of the state and is enforceable through formal institutions such as courts, regulatory bodies, and law enforcement agencies (Howard et al., 2018). With the rapid advancement of communication technologies, the regulation of political communication has become an increasingly significant area of concern. Governments worldwide have responded by introducing data protection laws to safeguard user privacy, most notably, the European Union's General Data Protection Regulation (GDPR) (Letho & Kaldeio, 2023). Legal frameworks also shape the structure of political messaging, as Lilleker (2006) notes, with regulations determining how messages are framed and disseminated. In supranational contexts like the European Union, international law can also influence national regulations. At the same time, issues such as the absence of spending caps in political advertising raise questions about transparency and fairness in political communication (Letho & Kaldeio, 2023; Lilleker, 2006).

In contrast, ethics concerns the philosophical evaluation of right and wrong and represents a system of moral principles that guide behavior beyond legal obligations. Within the PR profession, ethical standards are built around core values such as honesty, transparency, loyalty, fairness, respect, and integrity (Parsons, 2016; Bowen, 2007). As political communication increasingly unfolds within digital platforms, ethical concerns have become more pronounced. These include addressing the spread of misinformation and disinformation, mitigating the effects of political polarization, and navigating the balance between freedom of expression and responsible content moderation. Current debates frequently highlight the absence of comprehensive ethical oversight in political advertising, raising further concerns about accountability and the credibility of political communication in the digital age (Letho & Kaldeio, 2023).

Ethical theories serve as vital tools in analyzing political communication, particularly as contemporary politics becomes increasingly shaped by strategic messaging and digital media. Utilitarianism, a consequentialist approach, judges political actions based on the greatest benefit for the most people, making it relevant in justifying campaign strategies that aim for widespread social good, even if they involve trade-offs (Roberts & Black, 2021). Deontological ethics, grounded in rule-based moral reasoning, requires communicators to adhere to principles like truthfulness and respect for autonomy, regardless of outcomes (Plaisance, 2013). Virtue ethics, in contrast, centers on the character of the communicator, encouraging political actors to embody moral virtues such as honesty, courage, and integrity in their public discourse (Ward, 2018). In the context of polarized publics and digital disinformation, these theories remain crucial for promoting ethical responsibility and democratic integrity in political messaging.

Law and ethics serve different but complementary functions. Law is externally imposed and carries the weight of legal sanction, while ethics is driven internally, rooted in personal conscience, organizational culture, or professional codes of conduct (Parsons, 2016). Ideally, law and ethics should reinforce each other: ethical norms act as a form of internal control, promoting responsible behavior voluntarily, while laws provide an external framework that

mandates minimum standards of conduct and protects public interest. Together, they offer a dual mechanism for ensuring accountability in political PR.

However, the relationship between law and ethics becomes complex in the context of political PR, especially given the rapid technological evolution and emergence of new political tactics (Parsons, 2016; Moor, 2005). Legal systems often lag behind in responding to novel ethical challenges brought about by developments such as algorithmic targeting, the use of bots, and breaches of data privacy in political campaigns. These innovations raise urgent ethical concerns that current election laws were not designed to address (Moor, 2005; Howard et al., 2018; Armiwulan et al., 2024).

Furthermore, both law and ethics exhibit elements of universality and cultural specificity. Certain foundational ethical principles, such as honesty, respect, and dignity, are widely upheld across cultures, echoing the universalist spirit of the Universal Declaration of Human Rights (United Nations, 1948). Likewise, basic legal norms prohibiting violence, theft, or fraud are found across most societies (Kizza, 2017). Nonetheless, the interpretation and enforcement of both ethics and law are deeply influenced by cultural and political contexts. For example, the concept of “transparency” is highly valued in Western democracies like the United States, where First Amendment traditions emphasize openness and the public’s right to know (Ruijter, 2017; Fitzpatrick & Bronstein, 2006). In contrast, Indonesia’s cultural emphasis on social harmony and aversion to confrontation leads to a different set of expectations around transparency in political communication (Mangundjaya & Putri, 2018). Similarly, laws governing political speech, campaign finance, and access to public information vary widely across countries, reflecting unique historical, institutional, and cultural influences.

Recognizing the interplay between universal ethical norms and culturally specific applications is essential for evaluating political PR practices across national boundaries. This understanding underscores the limitations of importing ethical codes or regulatory frameworks from one country to another. Esser and Pfetsch (2020) observe that the academic field of comparative political communication, where ethical and legal considerations are central, emerged prominently in the early 1990s. While political communication itself is as old as politics, and comparative studies had long been a staple of political science, communication scholars only recently began adopting a systematic international perspective. This comparative approach emphasizes the impact of political structures, cultural norms, and institutional values on the communication behavior of political actors. Laws and ethical codes governing digital communication are part of these broader contextual factors (Letho & Kaldeio, 2023).

For example, ethical codes of conduct for political campaigning are often effective only to the extent that they are tailored to the specific political and cultural context in which they operate. The International Institute for Democracy and Electoral Assistance (2024) emphasizes the importance of adapting ethical standards to local electoral systems, campaign practices, and societal values, thereby reinforcing the need for a comparative perspective. In the European Union, for instance, the European Regulators Group for Audiovisual Media Services (ERGA) (2022) has identified significant fragmentation in the regulation of political advertising. A 2020 ERGA report revealed that EU member states follow highly diverse approaches to regulating audiovisual political advertising, with some prohibiting specific forms outright. A 2021 follow-up report further documented inconsistencies in how political and issue-based advertisements are defined and treated across member states.

These findings align with broader scholarly concerns about the variability of legal and ethical frameworks across Europe. Comparing national codes of conduct, such as those in the

Netherlands, with emerging EU-level regulations reveals the potential for national “soft law” mechanisms to complement regional directives, ultimately fostering greater transparency and ethical conduct in digital political campaigns. In this context, Crook’s *Comparative Media Law and Ethics* (2009) offers valuable insights. It examines why media law and ethics have evolved differently in the United Kingdom and the United States, while also referencing other jurisdictions such as France, Japan, India, China, and Saudi Arabia. By categorizing media legal systems into four jurisdictional types, Crook (2009) provides a framework for comparative analysis that can be extended to political communication. Understanding these legal and ethical differences is crucial to making sense of how political communication is regulated and practiced across different national contexts.

CONTEXT OF POLITICAL PR IN THE US AND INDONESIA

Messina (2007) identified foundational practitioners in PR history, highlighting Arthur Page and Edward Bernays, who emphasized that PR should serve the public interest and advocated for prioritizing the public good in PR practices. Yet, political PR in the U.S. has often carried a negative connotation due to its associations with persuasion and propaganda. Nevertheless, the country has developed a long-standing tradition of professionalized PR that evolved alongside democratic values, placing ethical persuasion at the center of political communication (Messina, 2007; Harbour, 2024).

In contrast, political PR in Indonesia has roots in a history deeply intertwined with propaganda and state control. Dhani et al. (2015) trace their origins back to traditional and colonial-era propaganda techniques, with President Sukarno using propaganda to foster national unity after independence. Under the Suharto regime, political communication was dominated by strict media censorship and pervasive state-sponsored propaganda aimed at maintaining political stability and suppressing dissent. It was only following the Reformasi era beginning in 1998, characterized by democratic reforms and press liberalization, that Indonesia’s political PR began shifting toward transparency, public engagement, and competitive electoral practices.

While both countries now recognize the critical role of political PR in shaping electoral politics, the U.S. experience reflects a longer trajectory of professionalization and ethical reflection, whereas Indonesia’s political PR is still evolving within a context of democratic consolidation and regulatory development.

METHODOLOGY

This study employs a comparative legal methodology grounded in the frameworks developed by Reitz (1998) and Eberle (2011). Reitz’s functionalist approach guides the analysis of how different legal systems respond to similar regulatory challenges, particularly in the context of political public relations. Eberle’s interpretive methodology complements this by facilitating a contextual understanding of legal norms within each country’s unique socio-political and institutional environment. Together, these frameworks enable a nuanced, multidimensional examination of legal and ethical structures in two democratic settings: the United States and Indonesia.

The analysis proceeds in six structured steps. The first step involves the selection of core documents, both legal and ethical, that are central to the regulation of political public relations. In the United States, the Federal Election Campaign Act (FECA) serves as a primary legal text. For Indonesia, Law No. 7 of 2017 on General Elections and General Elections

Commission (KPU) Regulation No. 15 of 2023 on campaign activities are examined. To broaden the scope beyond statutory mandates, the study also analyzes the Code of Ethics of the Public Relations Society of America (PRSA) and the Code of Ethics of the Public Relations Association of Indonesia (PERHUMAS). These documents were selected based on their relevance to political communication, their official or institutional status, and their recency. These criteria ensure that the analysis is built on authoritative, thematically pertinent, and up-to-date sources.

In the second step, all documents were collected from verified and credible sources, including official government portals, legal databases, and the websites of relevant professional associations. This approach safeguards the authenticity, reliability, and legal validity of the materials analyzed. The third step involves contextual mapping, in which each document is situated within its national context. Factors such as political systems, regulatory institutions, legal cultures, and historical trajectories are considered to better understand how legal and ethical norms are shaped, interpreted, and enforced in the respective countries.

The fourth step focuses on thematic coding and qualitative content analysis. Using both inductive and deductive approaches, the documents were analyzed across five analytical categories: legal tradition, focus areas, enforcement mechanisms, ethical norms, and cultural values. These categories were drawn from both the content of the documents and the existing literature on political communication ethics and legal regulation (Reitz, 1998; Eberle, 2011; Crooks, 2009). This dual approach allows for the emergence of context-specific themes while maintaining theoretical coherence.

The fifth step applies Reitz's (1998) functionalist lens in a comparative analysis of how both countries address analogous regulatory issues. This comparison highlights similarities and differences in legal frameworks, institutional structures, and practical implementation. Through this lens, the study explores how each system responds to ethical concerns in political public relations, revealing the underlying logic and function of their respective regulatory approaches.

Finally, the sixth step synthesizes and interprets the findings. By integrating insights from both statutory regulations and professional codes of ethics, the study offers a comprehensive understanding of how ethical behavior in political PR is promoted, regulated, and internalized. This synthesis contributes to a deeper appreciation of the interplay between law, ethics, and political communication across divergent democratic environments.

However, the methodology is not without limitations. While the selected documents provide a robust basis for legal and ethical analysis, they may not fully capture the complexities of actual practice. Informal norms, political pressures, and the discretionary power of regulatory bodies can significantly influence how these documents are applied in real-world scenarios. Moreover, the absence of case law or enforcement data limits the study's ability to assess how these frameworks function in practice. As such, the findings should be interpreted as reflective of formal regulatory structures and ethical aspirations, rather than as definitive accounts of professional behavior in the field.

RESULTS AND DISCUSSIONS

This comparison reveals that Indonesia integrates ethical norms directly into its legal frameworks, emphasizing cultural and ideological values (like Pancasila), while the US emphasizes institutional oversight and financial transparency. Both systems, when viewed

through the lens of public relations ethics (PRSA and PERHUMAS), highlight a shared commitment to truthfulness, integrity, and public interest, although operationalized differently. These differences are summarized in Table 1 and inform the following analysis of how their regulatory and ethical frameworks shape digital political public relations and campaign ethics in both countries.

Legal Tradition

Indonesia's legal system is rooted in civil law traditions and is characterized by comprehensive codification, as exemplified by statutes such as Undang-Undang (UU) No. 7 Tahun 2017 on Elections. This codified legal framework provides a clear and structured foundation for regulating electoral processes and establishing communication ethics within political campaigns. The PERHUMAS Code of Ethics, Indonesia's professional code for PR practitioners, explicitly aligns with this legal system by anchoring its professional standards both in national law and in Pancasila, the country's foundational philosophical and moral ideology. Pancasila imbues the ethical framework with distinctly Indonesian values such as social justice, unity, and deliberative consensus (Siregar, 2024; Suganda & Suganda, 2024, Prasetyo, 2022), which guide PR professionals to balance legal compliance with broader societal responsibilities. This integration of law and national philosophy fosters a uniquely contextualized approach to political public relations, where digital campaign practices must not only meet formal legal standards but also adhere to collective moral expectations reflective of Indonesia's diverse society.

By contrast, the United States operates under a common law system characterized by precedent-based jurisprudence and a decentralized legal framework. Regulatory oversight of elections is primarily exercised through the Federal Election Commission (FEC), which enforces compliance with election laws including campaign finance and advertising disclosures (Hasen, 2020). The Public Relations Society of America (PRSA) Code of Ethics reflects this environment by emphasizing principles such as honesty, fairness, and independent judgment within the context of democratic norms and individual rights (PRSA, 2015).

The American ethical framework thus promotes transparency and accountability, reinforcing legal compliance as a minimum baseline while encouraging practitioners to uphold higher standards of integrity in the public sphere (Parsons, 2016). This approach shapes digital political PR by prioritizing the protection of free speech and information flow, even as it seeks to prevent misinformation and unethical influence through voluntary ethical commitments and regulatory mechanisms (Kreiss, 2016).

These divergent regulatory and ethical frameworks profoundly influence how digital political PR and campaign ethics are practiced in each country. In Indonesia, the codified and philosophically infused standards encourage PR professionals to navigate digital campaign communication with a dual commitment to legal rules and cultural values, often leading to stricter controls on content that might disrupt social harmony or violate Pancasila's principles (Daffana, 2024). Meanwhile, in the U.S., the common law and democratic tradition enable a more pluralistic and adversarial digital political environment, where regulatory enforcement is complemented by ethical self-regulation, fostering a marketplace of ideas but also posing challenges in combating digital misinformation and polarization (Chadwick & Dennis, 2017). Understanding these contextual differences is crucial for comparative analyses of digital political communication ethics, highlighting how national legal and moral traditions shape professional practice and the limits of regulation.

Table 1. Summary Table Regulatory and Ethical Framework Comparison Between the U.S. and Indonesia

Country	Indonesia		US	
Law & Ethical Code	Law No 7/2017 and Regulation No. 15/2023	PERHUMAS	Federal Election Campaign Act (FECA)	PRSA
Legal tradition	Civil law	Uphold national law, Pancasila, professionalism	Common law	Advocates, honest, fair communication
Focus areas	Candidate conduct, campaign messaging, institutional roles (KPU, Bawaslu, DKPP)	National identity, cultural sensitivity, accountability	Campaign finance, foreign interference, transparency	Truth, independence, transparency
Enforcement	DKPP (ethics), Bawaslu (violations), police (criminal acts)	Disciplinary actions, mediation mechanisms	FEC (finance rules), courts	Accountability, grievance procedures
Ethical content	Respectful language, religious/cultural adherence, unity-in-diversity (Pancasila)	Honest communication, reject misleading messaging	Legal compliance, free speech, broadcaster responsibility	Avoid deception, promote public interest
Cultural values	Pancasila, religious belief, national unity	Ethics grounded in national and moral values	Individual freedom, federalism, open expression	Professionalism rooted in democracy

Source: Compiled from KPU (2023); MKRI (2017); Federal Election Commission (2021); PRSA (2015) and PERHUMAS (2017)

Focus Area

In Indonesia, political communication regulation is centered on managing candidate behavior, campaign messaging, and the roles of institutional actors such as the KPU, Election Supervisory Agency (Bawaslu), and Election Organizer Ethics Council (DKPP). These institutions are mandated to ensure orderly electoral conduct that aligns with national unity and respects Indonesia's vast cultural and religious diversity (Noor & Marlina, 2023; Hutabarat, 2023). The PERHUMAS Code of Ethics encourages practitioners in the digital public relations sphere to craft political messages that are not only legally compliant but also harmonized with societal values and pluralistic norms, reducing the risk of inflammatory content and cultural offense during online campaigns. Consequently, digital political PR in Indonesia tends to be cautious and consensus-oriented, balancing persuasive strategies with the imperative to preserve social cohesion (Mary, 2019; Youngs, 2015).

By contrast, the U.S. system emphasizes campaign finance regulation, transparency, and protection against foreign interference, with the FEC playing a pivotal enforcement role (Hasen, 2020). The PRSA Code of Ethics complements this framework by advocating for truthfulness, independence, and transparency, which are consistent with the liberal-democratic values underlying the U.S. electoral and communication system (PRSA, 2015; Parsons, 2016). These ethical principles inform the strategic priorities of digital political PR by placing a premium on clear attribution of sponsorship, fact-based messaging, and autonomy from partisan or foreign influence. In the U.S. context, digital campaigns are encouraged to maintain transparency through tools like disclaimers and real-time disclosures, particularly on social media platforms where microtargeting and third-party data use are prevalent (Kreiss & McGregor, 2019). Ethical concerns thus often revolve around data privacy, algorithmic manipulation, and political advertising transparency, rather than cultural or ideological harmony.

These regulatory and ethical distinctions significantly shape how political actors and PR professionals engage with digital platforms during campaigns. In Indonesia, communication strategies are filtered through a socio-legal lens that prioritizes stability, mutual respect, and collective values, often resulting in more centralized oversight of campaign content (Nasution, et al., 2020). In the U.S., the emphasis on individual rights and political pluralism allows for more adversarial and competitive communication tactics, with ethical boundaries maintained through professional norms rather than strong legal prohibitions (Chadwick & Dennis, 2017). Understanding these contextual frameworks is essential to evaluating the ethical performance of digital campaign practices in each country.

Enforcement Mechanisms

In Indonesia, political communication and campaign ethics are enforced through a multi-tiered system involving state institutions and professional bodies. The DKPP oversees ethical conduct among election officials, while Bawaslu monitors campaign violations. Criminal cases such as defamation or vote buying fall under law enforcement jurisdiction (Putra, 2022; Isnawan, 2024). The PERHUMAS Code of Ethics complements this by providing professional guidelines and disciplinary mechanisms, reinforcing cultural sensitivity, moral responsibility, and alignment with *Pancasila* values (Prasetyo, 2022). In digital political PR, this system encourages risk-averse messaging, as violations can quickly lead to institutional sanctions and reputational harm. Civil society groups are increasingly active in monitoring online political communication, though their influence remains limited due to resource and

legal constraints. Initiatives such as Kawal Pemilu, Jagasuaramu.id, and Jagapemilu.com exemplify grassroots efforts to enhance transparency and combat misinformation in the digital sphere. These platforms enable citizens to report election irregularities and verify vote counts, thereby fostering public trust in the electoral process (Purnamasari, 2024).

In contrast, the U.S. enforces campaign ethics through centralized legal institutions. The FEC regulates campaign finance and advertising, while courts handle constitutional disputes (Hasen, 2020). The PRSA Code of Ethics, though not legally binding, promotes self-regulation and peer accountability through ethical guidelines and reporting mechanisms (PRSA, 2015; Parsons, 2016). This framework supports innovation and open political expression but places ethical responsibility primarily on individuals and organizations, often resulting in inconsistent practices, especially in digital areas like microtargeting and data use (Kreiss & McGregor, 2019).

To address these gaps, U.S. civil society organizations such as the Campaign Legal Center and EFF advocate for stronger oversight and transparency. While Indonesia relies on structured enforcement and national values to guide ethical behavior (Eryanto et al, 2022), the U.S. model emphasizes professional autonomy and legal adjudication, relying on watchdog efforts to mitigate lapses (Fitzpatrick & Bronstein, 2006). These contrasting systems shape digital political PR differently: Indonesia fosters cautious, collectivist communication, while the U.S. promotes competitive messaging, with ethics often enforced reactively through public scrutiny (Chadwick & Dennis, 2017).

Ethical Content

Ethical communication in Indonesia is deeply embedded in the nation's sociocultural and philosophical roots, drawing heavily on communal values and the principle of *Bhinneka Tunggal Ika* (unity in diversity). Within this framework, public relations ethics emphasize respectful language, adherence to religious and cultural norms, and the maintenance of social harmony (Heryanto, 2018). This orientation reflects a strong deontological foundation, where communicators are morally bound to uphold collective values and societal responsibilities, regardless of strategic gains. Practitioners are expected to act as cultural stewards, reinforcing norms that prioritize cohesion over controversy (Afrianti & Andreastuti, 2024). In the digital age, this ethical structure evolves into a form of preventive ethics, where digital political PR professionals are encouraged to self-regulate and avoid content that may provoke ethnic, religious, or ideological tensions. Given the virality of platforms like Instagram and Twitter/X, the stakes of ethical missteps are high, potentially resulting in public backlash or legal consequences (Nabilah et al., 2022). This approach also echoes a utilitarian rationale: content moderation serves the greater good by minimizing social disruption and maintaining national unity.

In contrast, the U.S. tradition of ethical communication is shaped by liberal democratic values, particularly freedom of speech, individual autonomy, and press independence. Ethical norms in political PR are informed less by collective cultural expectations and more by professional standards emphasizing transparency, truthfulness, and credibility (Parsons, 2016). This reflects a blend of deontological and virtue ethics: practitioners are expected to honor principles such as honesty and autonomy while also embodying personal integrity and ethical character in navigating political discourse (Ward, 2018). At the same time, a consequentialist (utilitarian) dimension often appears in the strategic deployment of persuasive messaging aimed at mobilizing large voter segments or promoting broad social goals, even when tactics such as microtargeting or emotional appeals are used (Roberts & Black, 2021). However, the

minimal legal constraints on political expression in digital spaces also open the door to risks such as disinformation, polarization, and manipulation, particularly in the high-pressure environment of electoral campaigns (Kreiss & McGregor, 2019).

Indonesia and the United States approach ethical political communication from fundamentally different philosophical and regulatory perspectives. Indonesia's model centers on moral duty and communal virtue, seeking to preserve social cohesion through culturally sensitive and restrained messaging. In contrast, the U.S. model emphasizes individual responsibility and professional integrity within a broader framework of free expression and democratic contestation. Both systems, however, engage with utilitarian, deontological, and virtue ethics in distinct ways as they confront the ethical challenges of digital political communication. While Indonesia prioritizes stability and unity, the U.S. emphasizes pluralism and transparency: each reflecting their broader political cultures and ethical traditions.

Cultural Values

Indonesia's public relations ethics are strongly influenced by its cultural, religious, and ideological foundations. These values foster a collective orientation in public communication, prioritizing harmony, national unity, and respect for diversity over individual expression. In the digital era, such values are increasingly relevant amid algorithmic amplification, information overload, and the viral spread of divisive content (Lim, 2017). Consequently, digital political public relations in Indonesia is not merely strategic but is viewed as a civic duty, anchored in ethical restraint and aligned with nation-building objectives.

Nonetheless, Indonesia continues to face significant implementation challenges. Ensuring the neutrality of electoral bodies such as the KPU and Bawaslu, as well as law enforcement, is difficult in a context where political loyalties may shape institutional behavior (Setiawan, et al., 2024). Furthermore, inconsistencies in regional enforcement and varying interpretations of ethical standards exacerbate the problem.

In contrast, the United States operates within a liberal framework grounded in individual freedom, federalism, and open expression. Political PR has a truth-telling function in the free marketplace of ideas (PRSA, 2015). Practitioners are expected to serve the public interest, avoid conflicts of interest, and resist deception, duties that are especially critical in a digital environment rife with misinformation and polarization (Fitzpatrick & Bronstein, 2006). Yet, in the U.S., ethical enforcement is hampered by campaign finance loopholes, weak sanctions, and limited formal complaint mechanisms, which contribute to issues such as dark money, micro targeted disinformation, and declining public trust (Tambini, 2023).

The United States and Indonesia differ notably in media systems and cultural dimensions, as shown by Hallin and Mancini (2004) and Hofstede et al.'s (2010) frameworks. The U.S. aligns with the Liberal Model, marked by commercial media, high journalistic professionalism, and minimal state control, supported by a culture of individualism and low power distance. Indonesia, resembling the Polarized Pluralist Model, features politicized media, lower journalistic autonomy, and state influence, shaped by high power distance and collectivism. Despite these differences, both countries rely on professional codes of ethics to manage digital political PR. Indonesia's approach reflects national ideology and communitarian values, while the U.S. emphasizes personal responsibility and transparency. Enforcement challenges persist in both: institutional inconsistencies in Indonesia and regulatory gaps in the U.S. Yet, bodies like PERHUMAS and PRSA play a critical role in upholding ethical standards to support democratic discourse in the digital era.

CONCLUSION

This comparative analysis of digital political public relations in the United States and Indonesia highlights the complex interaction between regulatory frameworks, ethical standards, cultural contexts, and the dynamics of digital communication. Although both countries have established comprehensive campaign laws and general PR ethical codes, significant gaps persist in addressing the unique challenges posed by digital political PR, especially in terms of enforcement mechanisms. Fragmented regulations, limited disclosure requirements for digital PR activities, and the absence of tailored ethical guidelines create vulnerabilities that threaten democratic processes and erode public trust.

The disconnect between law and ethics allows digital political PR practitioners to operate with minimal oversight, frequently advancing powerful interests at the expense of the public good. Strengthening ethical standards in digital political PR demands not only clearer regulations and stricter laws but also effective enforcement mechanisms and protections for whistleblowers. Crafting hybrid approaches that honor cultural differences while fostering transparency and accountability in digital spaces is essential to preserving democratic integrity in both nations. Ultimately, building a digital political communication environment where power, ethics, and law are harmonized is critical for sustaining a healthy and participatory democracy. To achieve this, governments should strengthen regulatory frameworks that ensure transparency and accountability in digital political PR, including clear guidelines on content sponsorship, misinformation, and data use. Public relations associations must enforce ethical codes through regular training, certification, and sanctions for violations. Media literacy programs should be expanded to empower citizens to critically evaluate political content online. Lastly, fostering collaboration between tech platforms, civil society, and regulatory bodies can help create shared standards that balance free expression with democratic integrity in the digital sphere.

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