



# Analysis of Law No. 14 of 2008 on Public Information Disclosure and Ministry of Health Regulation no. 24 of 2022 on the Security and Confidentiality of Medical Records within the Eight Convergence Actions for Stunting Management in Mandailing Natal Regency for the Year 2023/2024

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Article Info	Abstract
<b>Article History</b> Received : 2025-04-01 Revised: 2025-04-16 Published: 2025-05-01  <b>Keywords:</b> <i>Stunting, information transparency, public, medical records, convergence action.</i>	Stunting is a chronic condition of poor linear growth of a child as an accumulation of impacts with the main causative factors being the lack of access to primary health services and adequate nutritional consumption, especially for families with low incomes. This study aims to determine and analyze the enforcement of the implementation of stunting management in Mandailing Natal Regency in 2023/2024 reviewed based on Law No. 14 of 2008 concerning Openness of Public Information and Minister of Health Regulation No. 24 of 2022 concerning Security and Confidentiality of Medical Records. This study uses an empirical legal research type with data sources in the form of primary and secondary data. The collection technique applies literature and field studies with qualitative data analysis. The role of the Government is very important in efforts to handle stunting in Mandailing Natal Regency in 2023/2024 with eight convergence actions. The implementation of stunting management in Mandailing Natal Regency in 2023/2024 as a national priority program must of course be conveyed to the public in accordance with Law No. 14 of 2008 concerning Openness of Public Information but must still protect the rights of stunted children in accordance with Minister of Health Regulation No. 24 of 2022 concerning Security and Confidentiality of Medical Records.

## I. INTRODUCTION

According to the World Health Organization (WHO), health is a state of complete physical, mental, and social well-being, not only free from disease or disability but also able to perform activities maximally and optimally. Health is a human right that does not discriminate on the basis of race, religion, politics, and socio-economic conditions.(Purba, Tanjung, and Oktaviona 2024)

Meanwhile, according to Law Number 17 of 2023 concerning Health, health is a healthy state of a person. Both physically, mentally, and socially and not just free from disease to enable him to live productively (chapter I, article 1, paragraph 1).

Health is a state of complete well-being that includes physical, mental, spiritual and social aspects that enable a person to live a productive life in a social and economic context. As a valuable asset, efforts to improve the quality of health continue to be fought for. The main objective of state health initiatives is to improve the quality of life which in turn will improve welfare. According to article 28 of the 1945 Constitution of the Republic of Indonesia, "every citizen has the right

to live and the right to maintain his life and livelihood", which means that everyone has the right to have an equal opportunity to maintain his life. This includes the right to receive adequate health services. Therefore, improving the quality of health services is the main focus. Government policies in the health sector must cover all levels of society because health is a human right protected by the state, as emphasized in article 28H. In an effort to improve the quality of health, the government must develop regulations that support the improvement of the capabilities of doctors and medical personnel and the development of medical technology.(Putra, Sidi, and Hasibuan, nd)

Stunting is a condition where a toddler has a length or height that is less than his age. Toddler stunting is a chronic nutritional problem caused by many factors such as socio-economic conditions, maternal nutrition during pregnancy, illness in infants and lack of nutritional intake in infants. Stunting toddlers in the future will have difficulty in achieving optimal physical and cognitive development. Stunting is a chronic

condition of poor linear growth of a child as an accumulation of the impact of various factors such as poor nutrition and health before and after the birth of the child.(Meher, Sidi, and Risdawati 2023)

The stunting rate in Indonesia in 2021 was 24.4%, in 2022 it decreased by (2.8%) to 21.6%. Although the stunting rate has decreased, this figure still does not meet the target of 3.4% per year. Meanwhile, the target in 2024, the Government is targeting the stunting rate to be at 14%. Thorough preparation to reduce the stunting rate through designed programs is the Government's main agenda. The Government believes that in realizing quality human resources by eliminating hunger and achieving food security, as well as creating sustainable advanced agriculture.(Risdawati and Zarzani 2023)

One of the main factors causing the high rate of stunting in Indonesia is the lack of access to primary health care and adequate nutritional intake, especially in low-income families. Lack of nutritional intake during pregnancy and the first 1,000 days of a child's life (from pregnancy to age two) can cause irreversible physical growth and brain development disorders. In addition, the lack of education about a balanced diet and the importance of exclusive breastfeeding, as well as parenting patterns also play an important role in worsening the problem of stunting. The impact of high rates of stunting is very detrimental to children with stunting which can ultimately hinder their potential to achieve a productive future.

Article 28 H paragraph 1 of the 1945 Constitution of the Republic of Indonesia states that everyone has the right to live in physical and spiritual prosperity, to have a place to live and to have a good and healthy living environment and has the right to obtain health services. Then in Article 34 paragraph 3 it states that the state is responsible for providing adequate health service facilities and public service facilities.(Country 2001)

The Indonesian government has been actively trying to overcome the problem of stunting by coordinating and synergizing between several ministries that have contributed to reducing stunting cases in Indonesia. The integrated cross-sectoral stunting prevention intervention activity coordination program in accordance with PMK No. 61/PMK.07/2019 follows the guidelines set by the President at the national level, Bappenas at the Regency-City level and Kemendesa PDTT at the village level. With the

proactive role of the government, it is hoped that there will be an increase in public awareness, access to quality health services, effective program implementation, and good coordination between agencies. Stunting is one of the national priority programs in the 2020-2024 National Medium-Term Development Plan (RPJPMN).

Convergence of stunting prevention is an intervention that is carried out in an integrated, coordinated and integrated manner. Convergence refers to a collaborative approach that combines efforts from various sectors and stakeholders to address the problem of stunting holistically and integratively. The eight convergence actions are situation analysis actions, preparation of work plans for activities to improve the implementation of integrated nutritional interventions, stunting discussions, stunting measurement and publication and annual performance reviews.

Like the case of children with stunting that occurred in Mandailing Natal Regency, the results of the 2023 Indonesian Health Survey (SKI) showed that Mandailing Natal Regency (Madina) experienced a decrease in the prevalence of stunting from 34.2% to 20.7%. This was conveyed by the Regional Secretary (Sekda) of Madina Alamulhaq Daulay when opening the stunting measurement and publication activity in the Ladang Sari hall, Gunung Tua Panggorengan and Panyabungan. The measurement and publication of stunting obtained through the E-PPGBM application is an effort to obtain the latest stunting prevalence data at the Puskesmas, Sub-district and Village Head service scales. Efforts to reduce stunting in Madina, said the Regional Secretary, require an increase in specific and sensitive interventions in the form of activities to increase the coverage of integrated health post and immunization services, counseling for families at risk of stunting, construction of water and sanitation facilities, parenting education and changes in clean and healthy living behavior in the community.

Indonesia passed the Law on Public Information Disclosure Number 14 of 2008 which guarantees access needs to be strengthened by participation facilitators is how to open access to various information that can stimulate and challenge communities to engage in various activities aimed at encouraging the quality of governance. Various experiences of governance advocacy show the importance of the role of data and information as one of the keys to success. However, in a transition period like today, openness and access to information are

something that must still be fought for. The obligation to disseminate public information should be carried out in a way that is easily accessible to the public and in a language that is easy to understand and determined by the Information Management Officer and related documentation.(Rahardjo 2009)

Public information is available to the public and some is not. There is public information that is mandatory to be provided and/or announced. This type of information can be accessed through the information media of the relevant public agency or requested by the applicant for public information. In addition, there is public information that is excluded, namely that which is excluded as referred to in the laws and regulations regarding the disclosure of public information. Excluded public information is strict and limited and confidential in accordance with the provisions of laws and regulations, propriety and public interest which are based on testing the consequences that arise if information is provided to the public and has been carefully considered that closing public information can protect greater interests than opening public information or vice versa.

The government issued the Minister of Health Regulation Number 24 of 2022 concerning Medical Records.(Muttaqin 2020)This health effort is carried out by emphasizing public services to achieve optimal health levels, without ignoring the quality of services provided to patients. Medical record services are classified as a form of non-medical service that reflects the quality of the Health Center. The medical record unit is a unit in the Health Center whose main activities are in organizing and managing medical records. Medical record services include patient registration, assembling, filling, coding and indexing, as well as analysis and reporting.(Okafo 2006)

Regarding the opening of electronic medical records, there are two things that must be used as guidelines, namely the request to open the contents of medical records must be made in writing or electronically and the opening of the contents of medical records is carried out limitedly according to needs. Basically, the opening of the contents of medical records must be in accordance with the patient's consent, without the patient's consent, the approval of the Minister of Health of the Republic of Indonesia must be obtained, which is carried out on the basis of a court order. Regulation of the Minister of Health Number 24 of 2022 provides great

authority to the Ministry of Health, especially regarding data and the contents of electronic medical records and their implementation systems. This great authority must be balanced with great responsibility. Medical confidentiality is not only personal data that must be protected, but also a foundation and philosophical basis for health workers and medical personnel in carrying out their profession. Therefore, it is necessary to strengthen regulations regarding medical confidentiality, both through harmonization and synchronization.

Regarding the handling of stunting in Mandailing Natal, it is often in the public spotlight, one of which is journalists and NGOs (Non-Governmental Organizations) who make the issue of stunting as news material. However, often the news is news that seems negative. As quoted from a social media news page, namely [www.matatelinga.com](http://www.matatelinga.com), with the title "Head of UPTD Siabu Health Center Allegedly Violates Law Number 14 of 2008 Concerning Openness of Public Information". From what the author understands in this news, the NGO suspects that the Health Center is covering up public information related to stunting, while according to the Health Center, the information requested by the NGO is part of the patient's medical records which must be kept safe and confidential. This issue went viral in Mandailing Natal Regency and the author feels the need to find out according to the Law and other regulations, what is actually the case so that all parties understand and are clear about the limitations.

For this reason, the author tries to examine the analysis of Law Number 14 of 2008 concerning Openness of Public Information with the Minister of Health Regulation Number 24 of 2022 concerning the Security and Confidentiality of Medical Records in handling stunting, especially the eight convergence actions for handling stunting.

With Formulation of the problem

1. How is stunting handled, especially the eight convergence actions implemented by Mandailing Natal Regency in reducing stunting in 2023/2024 from the perspective of Law Number 14 of 2008 concerning Public Information Disclosure?
2. How is stunting handled, especially the eight convergence actions in reducing stunting in Mandailing Natal Regency in 2023/2024, in terms of the Minister of Health Regulation Number 24 of 2022

concerning the security and confidentiality of medical records?

## II. RESEARCH METHODS

The type of research used in this study is empirical juridical by solving the problems to be studied by first conducting research on the applicable rules and continuing with research on primary data in the field. This research is descriptive because this research is expected to provide an explanation of how the law is implemented including law enforcement. This type of research can reveal problems in the implementation and enforcement of the law.(Indra Utama Tanjung 2024)

The data source in this study is secondary data. While secondary data consists of primary, secondary and tertiary legal materials. The data collection technique for this study applies literature studies and field studies. The data analysis that the researcher will use is qualitative descriptive. Qualitative analysis is a study that produces descriptive analysis data, what respondents state in writing or verbally, as well as the real actors are researched and studied as something whole.

## III. RESULTS AND DISCUSSION

### A. Stunting and the Eight Convergence Actions

Human development as stated in the 1945 Constitution is intended to advance the welfare of society through improving the cultural and intellectual foundations of the nation. Stunting is a major nutritional problem that still occurs in Indonesia. Stunting is a condition of failure to grow and develop in children due to chronic malnutrition caused by a lack of nutritional intake in toddlers, especially in the First 1000 Days of Life (HPK) from the fetus to 23 months, this causes disorders in the future, namely experiencing difficulties in achieving optimal physical and cognitive development.

There are several factors that cause stunting including infectious diseases, food intake, genetics, environmental sanitation, economic status and parenting patterns. Parenting patterns are all forms and processes of interaction that occur between parents and children that can influence the development of the child's personality. Stunting as a problem of chronic malnutrition caused by insufficient nutritional intake for a long time due to the provision of food

that does not meet nutritional needs.(Yusdani 2020)

From a human rights perspective, the state has several obligations and responsibilities related to stunting in children in Indonesia as stated in Article 52 paragraph (1) of Law Number 39 of 1999 concerning Human Rights, all children from when they are still in the womb have the right to live and improve their standard of living. The following are elements of the state's obligations and responsibilities for children who have not or have experienced stunting in Indonesia, namely:

1. Fulfillment, the State must act actively in fulfilling the rights of children who have not and have experienced stunting through legislative steps in the form of laws and administrative regulations, as well as legal steps if there are violations of the rights of children who experience stunting;
2. Respect, the state must respect and not interfere in hindering the fulfillment of the rights of its citizens in terms of handling children suffering from stunting;
3. Protecting, the state has an obligation to provide protection against obstacles that occur when fulfilling the human rights of children suffering from stunting.

Because stunting is a state obligation to resolve it, the law must also be present in protecting the rights of stunted children. Law enforcement is not just a rule but also understanding the background and purpose of the rule. Legal protection for children includes guarantees of security, tranquility, welfare and peace for the present and the future. This protection does not only depend on legal instruments, but also involves the role of society, the environment and culture and efforts to improve a better future.(Daulay, Zarzani, and Aspan 2022)

Referring to Law No. 17 of 2023 concerning Amendments to Law No. 36 of 2009 concerning Health and Law No. 18 of 2012 concerning Food. On that basis, the Government has made several policies, namely determining [Presidential Decree No. 72 of 2021](#) Regarding Amendments to Presidential Decree Number 42 of 2013 which regulates the Implementation of the National Movement for Accelerating Nutrition Improvement. The Roadmap for Accelerating Nutrition Improvement consists of four main



components which include advocacy, cross-sector strengthening, development of specific and sensitive programs, and development of databases. Nutrition interventions, both direct (specific) and indirect (sensitive), need to be carried out jointly by ministries/institutions and other stakeholders. In addition, there are several legal regulations that can be used as guidelines in handling the reduction of stunting rates, including:

1. Presidential Regulation of the Republic of Indonesia No. 15 of 2023 concerning Technical Instructions for the 2023 Physical Special Allocation Fund.
2. Presidential Regulation No. 72 of 2021 concerning Acceleration of Stunting Reduction.
3. Presidential Regulation No. 18 of 2020 concerning the National Medium-Term Development Plan for 2020-2024.
4. Presidential Regulation No. 83 of 2017 concerning Strategic Food and Nutrition Policy.
5. Regulation of the Minister of Home Affairs No. 84 of 2022 concerning Guidelines for the Preparation of the Regional Revenue and Expenditure Budget for the 2023 Fiscal Year.

Eight convergence actions also called integration actions, are instruments in the form of activities used to improve the implementation of integrated nutrition interventions in preventing and reducing stunting. The implementation of integrated stunting reduction nutrition interventions requires changes in the approach to implementing programs and cross-sectoral behavior so that nutrition intervention programs and activities can be used by target families of 1000 HPK households.



Mandailing Natal Regency in implementing eight convergence actions in reducing stunting in 2023 has implemented action 1, namely situation analysis which was carried out on February 28, 2023. The second action was the preparation of a health program on March 7, 2023. Action 3, namely stunting discussions, was carried out at the village, sub-district and district levels on May 26 at the Ladang Sari Panyabungan Hall which was attended by the Deputy Regent of Mandailing Natal, the regional secretary, heads of the Regency TPPS OPD, sub-district heads, heads of health centers and village heads.

Actions 4 and 5 were carried out to socialize the Mandailing Natal Regent Regulation Number 31 of 2023 concerning the Convergence of Stunting Prevention and Overcoming in Villages. As well as the Development of Human Development Cadres. Action 6, namely Data Management, was carried out in the Baperida Hall on October 23, 2023, which discussed the condition of intervention coverage data. Action 7, namely Measurement and Publication of measurement results. Measurement and publication of stunting are efforts by the district government to obtain the latest stunting prevalence data at the health center, sub-district and village service scales. This action was carried out on November 28, 2023, which took place in the Bagas Godang hall, which was attended by 23 sub-district heads, 26 health center heads, 30 KB extension workers and 50 priority locus village heads.

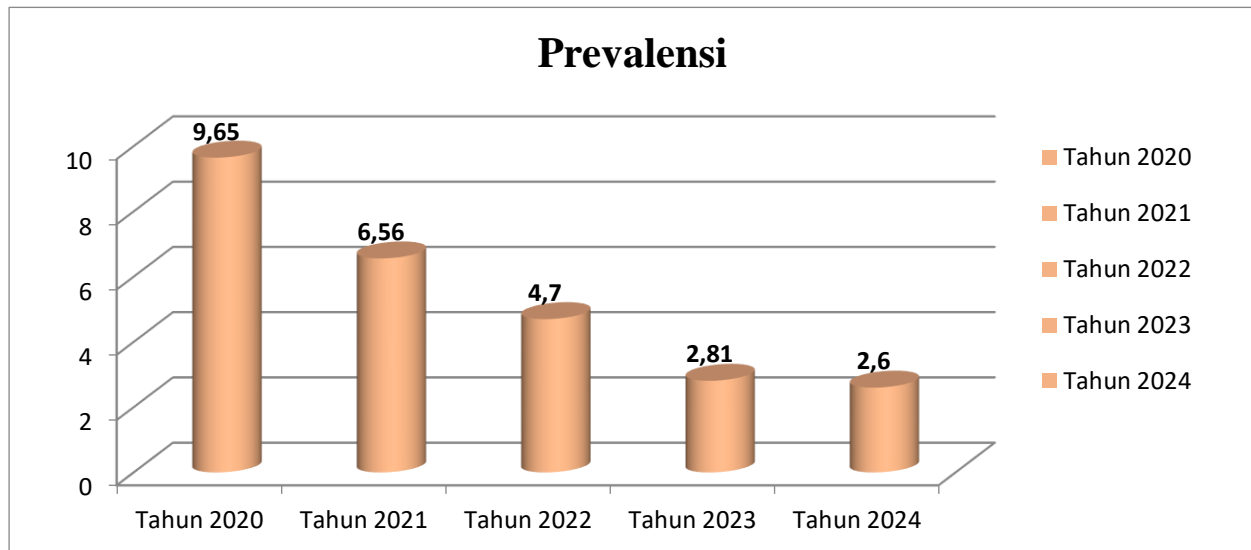
In action 7, a stunting case audit was also carried out where this activity aims to find the cause of the stunting case as an effort to prevent similar cases from occurring. The implementation of the stunting case audit is carried out twice a year consisting of the dissemination of AKS 1 and the dissemination of AKS 2 which is based on the Decree of the Stunting Case Audit Team signed by the Deputy Regent as the head of the TPPS of Mandailing Natal Regency.

The last action, namely action 8, is to carry out a review of performance results. In this case, the results of the stunting prevalence in Mandailing Natal Regency decreased by 13.5% from 34.2% in 2022 to 20.7% in 2023. This was conveyed by the Head of BAPERIDA Mandailing Natal Regency in his presentation at the Mandailing Natal Regency Performance Assessment Presentation event which was attended by the assessment team from the Provincial Health Office and the Ministry of Health.

The government's efforts to combat stunting include a comprehensive set of strategies and programs designed to address the problem from multiple angles. These initiatives do not only focus on direct interventions against stunting, but

### Picture 1 Prevalence of Stunting in Mandailing Natal Regency

From the graph, it can be seen that the prevalence of stunting since 2020-2024 has decreased drastically. Starting in 2020 at 9.65%,



also target the underlying factors, such as poverty and limited access to adequate nutrition. The government is also strengthening the health care system, especially in rural and remote areas. These efforts are supported by cross-sectoral collaboration between the government, non-governmental organizations and communities. Nutrition and health education programs are introduced in schools and through the mass media to increase understanding of the importance of nutrition, especially during the first 1000 days of a child's life.

The government's program policy related to handling stunting as a manifestation of protecting children's rights is a constitutional mandate that protecting children is part of human rights. Therefore, the recovery of children from stunting is the responsibility of the State so that children can live healthily and get a decent life. Every child has the right to good health services, the right to food (nutritional intake) and the right to welfare. This is as happened in Mandailing Natal Regency, the Government plays an important role in making various efforts to handle stunting. In the distribution of stunting prevalence and the preparation of activity programs that prioritize villages with the highest stunting prevalence through meetings resulted in the Determination of Priority Locus Villages for Handling Stunting in Mandailing Natal Regency in 2024 as many as 50 villages based on the Decree of the Regent of Mandailing Natal No. 800/0911/K/2023.

then in 2021 it was found at 6.56%, in 2022 at 4.7% and in 2023 at 2.81%, and in 2024 at 2.6%. This means that the Mandailing Natal Regency Government has succeeded in making efforts to handle stunting with various selected programs along with applicable regulations.

Based on the results of interviews with the Mandailing Natal District Health Office, efforts were made to provide direct socialization, collaborate with health centers, village midwives and conduct nutritional education campaigns through integrated health posts.

There are also several programs and activities implemented by the Mandailing Natal District Health Service, including:

1. Fulfillment of Individual Health Efforts and Community Health Efforts
  - a. Management of Community Nutrition Health Services
  - b. Management of Health Services for Mothers and Newborns
  - c. Flying Doctor Service Management
  - d. Management of Toddler Health Services
  - e. Environmental Health Services Management
  - f. management of public health insurance
2. Health Human Resources Capacity Improvement Program, in the form of quality development and human resource improvement for Health Workers.
3. Community Empowerment Program in the Health Sector, namely increasing

health promotion efforts through the Community Healthy Living Movement (Germas).

Furthermore, the Health Center also revealed counseling activities and distributed brochures to the community about the importance of child nutrition and steps to prevent stunting. This involves village health cadres to support the delivery of this information. The role of the government in handling stunting is counseling on child care patterns at the integrated health post to prevent an increase in stunting and to reduce stunting rates, providing milk for pregnant women. improving community nutrition through additional food provision programs (PTM) at integrated health posts, for example biscuits and food offerings such as rice, side dishes, vegetables, pudding and fruits to improve children's nutritional status. Newborns must also be given exclusive breastfeeding for up to 6 months, may be continued until the age of 2 years and may be given formula milk.

The results of the study show the active role of the government in supporting community health centers in efforts to handle stunting at the primary service level. Government support is seen through the provision of assistance in the form of nutritional counseling and monitoring of child growth and development at integrated health posts as an important effort in education and direct monitoring in the community. The provision of additional supplements for children at risk of stunting shows the government's commitment to addressing nutritional factors that contribute to stunting. The government also focuses on increasing the capacity of health workers through training, enabling them to detect and handle stunting cases earlier and more effectively.

#### **B. Implementation of Stunting Handling in Mandailing Natal Regency in 2023/2024 Reviewed Based on Law No. 14 of 2008 Concerning Openness of Public Information and Minister of Health Regulation No. 24 of 2022 Concerning Security and Confidentiality of Medical Records**

According to Presidential Regulation of the Republic of Indonesia Number 72 of 2021 concerning the Acceleration of Stunting Reduction, it is explained that stunting is a disorder of growth and development of children due to chronic malnutrition and repeated infections, which is characterized by their length

or height being below the standards set by the minister who organizes government affairs in the health sector. However, in the long term, stunting can reduce the quality of life of children as adults due to lack of opportunities for education, employment and increased income. In addition, there is a possibility of experiencing obsession in adulthood which increases the risk of diseases such as diabetes, hypertension and others. (Siyen, Hadi, and Asriwati 2020)

Law Number 14 of 2008 concerning Openness of Public Information is a legal basis that guarantees the right of every individual to access public information. The main objective of this law is to increase transparency and accountability in the implementation of government and encourage public participation in public decision making.

Everyone has the right to apply for public information except information that is excluded according to certain regulations such as medical records and job secrets. Public bodies are required to provide accurate and non-misleading information, and to build an efficient information system to facilitate access. Violations of the KIP provisions are subject to criminal sanctions, this shows the importance of compliance with this law. (Siyen, Hadi, and Asriwati 2020)

Based on the results of interviews with the Mandailing Natal District Health Office which indicate the application of the principles of public information disclosure and medical data protection policies in the implementation of stunting management. In the context of information disclosure, there is the availability of general data related to the prevalence of stunting in various regions through the official website of the local government and socialization programs at the sub-district level. This step aims to increase public understanding of the impacts and prevention of stunting in line with Law No. 14 of 2008 concerning Public Information Disclosure.

The implementation of the policy of openness of public information is an effort to uphold human rights because every individual has the right to access public information. With public access to information, the public can monitor public services and participate in the decision-making process. In order to realize the rights of the community in general in relation to all government actions, the sharing of public information is also very important. This is closely related to the ideals of democracy upheld by the government and freedom of expression, both of which are human rights.

Good health services are a community need and are often a measure of development success. The increasing knowledge of the community today also encourages increased demands from the community to obtain their rights in various fields of health services. In Indonesia, there are health facilities whose management is capital-intensive, labor-intensive and technology-intensive, namely hospitals. However, in fact there are still people who complain about the poor service of hospitals in medical record services related to the security and confidentiality of patient medical record files which often have errors in their management.

This is certainly related to the security and confidentiality of medical record data, which when referring to the interview results, the Health Office implements a strict policy in accordance with Permenkes No. 24 of 2022 by providing access to children's medical records only to certain authorized health workers. Every patient's personal data is kept confidential and may not be disseminated outside of medical purposes. The use of a data encryption system in the medical record application adds protection, ensuring that only authorized officers can access data on children affected by stunting. This approach reflects the office's efforts to balance transparency of public information with protection of medical data privacy, so that it can fulfill public information obligations while still protecting the confidentiality of patient personal data. (Sagita, nd)

Minister of Health Regulation Number 24 of 2022 concerning Security and Confidentiality of Medical Records regulates the security and confidentiality of medical records which are very relevant in the context of handling stunting in Indonesia in general and in Mandailing Natal Regency in particular. This Minister of Health Regulation aims to protect patient data and ensure that health information is managed properly. In terms of data security, ensuring that medical records are protected from unauthorized access and disclosure of personal information. In terms of information confidentiality, emphasizing the importance of maintaining the confidentiality of patient data, especially in the context of public health programs such as stunting. (Rahmadsyah and Sidi 2023)

This Ministerial Regulation must be in line with the KIP Law, in the sense that relevant information must remain accessible to the public, as long as it does not violate individual confidentiality. With the KIP Law, the public has

the right to know information related to the stunting management program, including statistical data and policies implemented. Then, Ministerial Regulation Number 24 of 2022 is here to ensure that the health data of children involved in the stunting management program is protected so that parents feel safe to participate.

For example, when carrying out action 7, namely the audit of stunting cases, where pediatricians discuss the causes of stunting in children, the child's identity is not mentioned in public. Doctors use initials where the child's address and personal data are protected. This is in line with Law Number 27 of 2022 concerning Personal Data Protection which has been ratified and comes into effect on October 17, 2024.

Medical record data is considered as part of personal data information that must be protected by the government or the party controlling the personal data. The principle of maintaining the confidentiality of personal data, which also includes medical record data, is a very important mandate to always be implemented, this principle is not merely a legal obligation but the foundation of a trust relationship between patients and health care providers. Confidentiality of medical record data involves protecting the patient's personal information, such as medical history, examination results, and treatment plans.

From the explanation above, it can be understood the relationship between the implementation of Law No. 14 of 2008 concerning Openness of Public Information and Regulation of the Minister of Health No. 24 of 2022 concerning Security and Confidentiality of Medical Records in a series of stunting handling activities in Mandailing Natal Regency in 2023/2024. This means that there are two legal aspects in the form of the public's right to obtain transparent information related to the stunting program in accordance with Law No. 14 of 2008 concerning Openness of Public Information and the government's obligation to maintain the security and confidentiality of medical records of children affected by stunting in accordance with Regulation of the Minister of Health No. 24 of 2022 concerning Security and Confidentiality of Medical Records. So researchers can find a balance between openness of information that helps the public understand and support efforts to handle stunting, and ensuring the confidentiality of personal data remains protected, given the sensitivity of medical information in the context of public health services.



In accordance with the background of the problem of the existing Law, there is indeed nothing that clearly states that the disclosure of stunted children's data in public forums of the stunting handling team is allowed. And in the Minister of Health Regulation on the confidentiality of medical records, it also does not clearly state what the sanctions are for those who violate the disclosure of medical records in public. For sanctions, perhaps we can refer to the Personal Data Protection Law. (Meher, Sidi, and Risdawati 2023)

In the author's opinion, there needs to be additional regulations from regional heads regarding matters that may be disclosed to the public in order to resolve stunting cases. So that there is no misunderstanding between government institutions and the community in terms of conveying public information when it comes into contact with medical records.

#### **IV. CONCLUSIONS AND RECOMMENDATIONS**

Law enforcement of human rights for children with stunting according to Indonesian law has been regulated in various regulations including Law No. 17 of 2023 concerning Health, Presidential Regulation of the Republic of Indonesia No. 15 of 2023 concerning Technical Instructions for the 2023 Physical Special Allocation Fund, Presidential Regulation No. 72 of 2021 concerning Acceleration of Stunting Reduction, Presidential Regulation No. 18 of 2020 concerning the National Medium-Term Development Plan for 2020-2024, Presidential Regulation No. 83 of 2017 concerning Strategic Food and Nutrition Policy, and Regulation of the Minister of Home Affairs No. 84 of 2022 concerning Guidelines for the Preparation of the Regional Revenue and Expenditure Budget for the 2023 Fiscal Year.

The role of the Government is very important in efforts to handle stunting in Mandailing Natal Regency in 2023/2024 by involving various steps in the form of direct socialization, collaborating with health centers, village midwives and conducting nutrition education campaigns through integrated health posts. There are also several programs and activities that are implemented, namely the fulfillment of individual health efforts and community health efforts, programs to increase the capacity of health human resources, in the form of developing quality and improving human resources for health workers, and community

empowerment programs in the health sector, namely increasing health promotion efforts through the Community Healthy Living Movement (Germas).

The implementation of stunting management in Mandailing Natal Regency in 2023/2024 is carried out in accordance with Law No. 14 of 2008 concerning Openness of Public Information and Minister of Health Regulation No. 24 of 2022 concerning Security and Confidentiality of Medical Records. This means that there are two legal aspects in the form of the public's right to obtain transparent information related to the stunting program in accordance with Law No. 14 of 2008 concerning Openness of Public Information and the government's obligation to maintain the security and confidentiality of medical records of children affected by stunting in accordance with Minister of Health Regulation No. 24 of 2022 concerning Security and Confidentiality of Medical Records.

The final conclusion, the combination of Law Number 14 of 2008 and Permenkes Number 24 of 2022 creates a strong framework to support transparency and security in the management of public information and health data. This is very important in the context of handling the stunting issue in Mandailing Natal Regency, where community involvement and personal data protection are the keys to the success of the program.

#### **Recommendation**

Researchers recommend that the Mandailing Natal Regency Government issue a kind of SK (Decree) or Perbup (Regent Regulation) regarding the scope and limitations of matters related to patient medical records in handling national priority programs, which are for public consumption and which are not. So that there are no violations by officers or officials assigned in handling because the things carried out in terms of stunting, namely eight convergence actions, are vulnerable to the opening of patient medical records.

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