

Selective Human Rights Diplomacy: Indonesia's Foreign Policy toward LGBTQ Rights amid Domestic Moral Politics

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ABSTRAK

Artikel ini menjelaskan bagaimana Indonesia menegosiasikan komitmen internasional terhadap hak asasi manusia dan politik moral domestik dalam kebijakan luar negeri terkait hak-hak LGBTQ. Dengan menggabungkan analisis kebijakan luar negeri kualitatif, analisis wacana kritis, dan perbandingan temporal siklus ketiga dan keempat Universal Periodic Review (UPR), studi ini menelaah laporan nasional, rekomendasi dan respons pemerintah, instrumen PBB dan ASEAN, pernyataan diplomatik, serta wacana politik domestik pada periode 2017–2023. Temuan menunjukkan enam strategi yang saling terkait: generalisasi, keterlibatan prosedural, penerimaan selektif, pemingkanaan moral, perlindungan kedaulatan, dan keheningan strategis. Strategi tersebut memisahkan perlindungan dari pengakuan eksplisit, sehingga Indonesia dapat mempertahankan kredibilitas internasional sambil tetap menyesuaikan diri dengan batasan politik domestik. Artikel ini mengembangkan konsep diplomasi HAM selektif dan menunjukkan bahwa ambiguitas diplomatik merupakan instrumen terstruktur untuk mengelola legitimasi ganda. Karena itu, tingkat penerimaan UPR agregat tidak dapat menggantikan analisis pada tingkat rekomendasi.

Kata kunci: Indonesia; Diplomasi Hak Asasi Manusia; Hak LGBTQ; Lokalisasi Norma; Universal Periodic Review

ABSTRACT

This article explains how Indonesia negotiates international human rights commitments and domestic moral politics in its foreign policy toward LGBTQ rights. Combining qualitative foreign policy analysis, critical discourse analysis, and a temporal comparison of Indonesia's third and fourth Universal Periodic Review (UPR) cycles, it examines national reports, recommendations and government responses, UN and ASEAN instruments, diplomatic statements, and domestic political discourse from 2017 to 2023. The findings identify six interrelated strategies: generalization, procedural engagement, selective acceptance, moral reframing, sovereignty shielding, and strategic silence. These strategies separate protection from explicit recognition, allowing Indonesia to preserve international credibility while operating within a domestically constrained political win-set. The article develops the concept of selective human rights diplomacy and argues that diplomatic ambiguity is a structured instrument of dual-legitimacy management. Aggregate UPR acceptance rates therefore cannot substitute for recommendation-level analysis of wording, justification, and implementation.

Keywords: Indonesia; Human Rights Diplomacy; LGBTQ Rights; Norm Localization; Universal Periodic Review



INTRODUCTION

Indonesia occupies a consequential position in human rights diplomacy as a large Muslim-majority democracy, a founding member of ASEAN, and an active participant in United Nations institutions. Post-authoritarian governments have linked the country's international identity to democracy, peace, sovereign equality, and multilateral cooperation, while maintaining strategic autonomy and the principle of non-interference. Rights associated with sexual orientation, gender identity, gender expression, and sex characteristics (SOGIESC) expose this tension because they connect international equality claims to domestic disputes over religion, family, morality, culture, and national belonging (Karim, 2020; Lakatos, 2020; Langlois, 2025).

Indonesia's engagement with the Universal Periodic Review (UPR) demonstrates that the tension is not a simple opposition between an internationalist state and a conservative society. In the third cycle, Indonesia received 225 recommendations and supported 167; in the fourth, it received 269 and supported 205, with five recommendations split. The support rate rose from 74.2% to 76.2% (Office of the United Nations High Commissioner for Human Rights [OHCHR], 2023; United Nations Human Rights Council [UNHRC], 2017, 2023). These aggregates indicate sustained procedural participation, but they do not show whether the government accepted recommendations that explicitly named sexual orientation or gender identity, how it justified partial support, or whether implementation produced enforceable protections.

SOGIESC claims have entered international human rights law incrementally. No core global treaty expressly lists SOGIESC as a protected category. Yet, treaty bodies and the Human Rights Council increasingly interpret existing guarantees of equality, privacy, dignity, and freedom from violence to include sexual and gender minorities (Simm, 2020; Winkler & Bantekas, 2024). Recent research identifies expanding but uneven inclusion across UN institutions, together with persistent gaps in recognition, data, enforcement, and institutional coordination (Daly et al., 2022; Seppey et al., 2026; Weistroffer et al., 2025). The diplomatic question is therefore not only whether a state accepts universal human rights, but how it translates an evolving category into domestic law and policy.

Indonesia gives this problem a distinctive political form. Historical scholarship has shown the diversity of gender and sexuality across the archipelago and the ways modern national institutions produced new sexual identities and boundaries (Boellstorff, 2005; Davies, 2010). More recent studies document moral panics, criminalization debates, and the mobilization of religion, family, and social order in anti-LGBT politics (Rodríguez & Murtagh,

2022). These positions are neither uniform nor culturally predetermined. They are produced through competition among ministries, parties, legislators, religious organizations, media actors, national human rights institutions, health professionals, and civil-society networks.

Existing scholarship offers several partial explanations. Human rights foreign-policy studies show that declarations, practice, national identity, interests, and reputation often diverge (Baehr et al., 2002; Milani, 2015). Research on UN diplomacy emphasizes how governments contest the implications and monitoring consequences of norms while affirming their abstract validity (Chen & Hsu, 2021; Kinzelbach, 2012). Regional studies show that ASEAN combines universal rights language with contextual limitations involving sovereignty, public morality, culture, and national law, allowing institutional participation without agreement on the moral authority or enforceability of particular rights (Arifin, 2022; Davies, 2021).

However, these literatures rarely converge in a focused account of Indonesia's diplomatic treatment of LGBTQ rights. Research on Indonesian sexuality concentrates mainly on domestic law, activism, media, public health, and religious discourse. In contrast, research on Indonesian foreign policy generally treats human rights at a high level of aggregation. Global LGBTQ-rights scholarship explains internationalization and backlash but less often examines how a government can support universal language, accept most UPR recommendations, and still avoid explicitly recognizing a specific rights-bearing constituency (Kollman & Waites, 2009; Swiebel, 2009).

A countervailing strand of scholarship cautions against reading resistance to issue-specific human-rights language as simple rejection of universality. Studies of ASEAN ritualism, state contestation, and strategic responses to external pressure show that governments may regard contextualization, domestic sequencing, and jurisdictional control as legitimate components of human-rights governance rather than as evidence of norm failure (Davies, 2021; Gruffydd-Jones, 2019; Wiener, 2014). This perspective matters for the Indonesian case because it highlights the political and institutional reasons officials give for limiting explicit recognition, while still allowing those justifications to be evaluated against the practical consequences for affected groups.

This article asks how Indonesia negotiates international human rights commitments and domestic moral politics in its foreign policy toward LGBTQ rights. It aims to identify the diplomatic practices through which officials affirm universal commitments, name or reframe SOGIESC claims, respond to domestic constraints, and preserve international credibility. The article argues that Indonesia practices selective human rights diplomacy: a patterned strategy

that combines endorsement of universal principles, sustained participation in international institutions, differentiated acceptance of rights claims, and calibrated use of sovereignty, morality, religion, family, legal process, and silence to limit the localization of contested norms.

The study makes three contributions. First, it moves analysis of Indonesian LGBTQ politics into foreign policy and international institutions. Second, it treats silence and ambiguity as observable diplomatic instruments rather than residual evidence of inconsistency. Third, it distinguishes procedural engagement from substantive localization. A state may accept most recommendations while maintaining a narrow domestic win-set for explicit SOGIESC recognition; recommendation-level wording, justification, and implementation are therefore analytically more important than aggregate acceptance rates.

ANALYSIS FRAMEWORK

The analysis combines two-level games, norm localization, and norm contestation to explain why specific wording becomes a central object of diplomacy. Together, these approaches connect international expectations, domestic political costs, and the state's management of contested normative categories.

Two-Level Games and the Domestic Win-Set

Putnam's two-level games framework treats international negotiation and domestic bargaining as simultaneous processes (Putnam, 1988). At Level I, representatives negotiate with other states and international institutions; at Level II, domestic actors authorize, reinterpret, resist, or impose costs on the resulting commitment. Although UPR recommendations are not treaties, supporting them may imply legal reform, bureaucratic coordination, reporting obligations, reputational exposure, and electoral consequences. Ministries assess legal compatibility and capacity, while parties, religious organizations, legislators, media actors, and local authorities influence what officials consider politically sustainable.

Indonesia therefore confronts two forms of legitimacy. Internationally, it benefits from appearing democratic, cooperative, and committed to multilateral review. Domestically, explicit LGBTQ recognition can be framed as a challenge to religion, family policy, morality, or sovereignty. The international win-set for broad terms such as dignity and nondiscrimination is wider than the domestic win-set for SOGIESC-specific legal recognition. Ambiguity enlarges the overlap: clear acceptance may trigger backlash, whereas categorical rejection may

damage Indonesia's international standing. General wording, partial support, procedural deferral, and silence create intermediate positions.

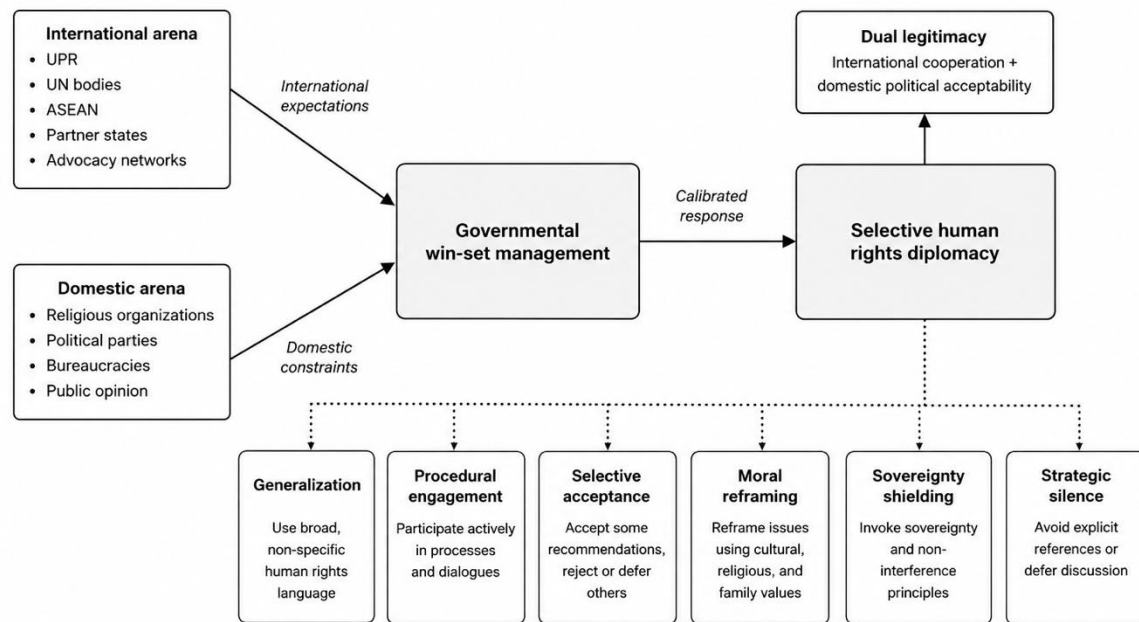
Norm Localization and Contestation

Norm diffusion research explains how international standards spread through advocacy, persuasion, socialization, and institutionalization. Localization shifts attention to local actors who select and reconstruct external norms through existing beliefs and institutions rather than adopting them intact (Acharya, 2004; Merry, 2006). In Indonesia, SOGIESC claims may be translated into protection from violence, privacy, public health, service access, or general nondiscrimination. Such translation can produce real protection while withholding explicit recognition of LGBTQ people as a legal or political constituency.

Norm contestation adds that actors may dispute a norm's validity, meaning, application, or the authority of the forum interpreting it (Wiener, 2014). Indonesia need not reject universal human rights directly; it can contest whether SOGIESC necessarily follows from them, whether international bodies may specify domestic implementation, or whether national context should determine scope and timing. General categories may include sexual and gender minorities in principle while leaving their distinct vulnerabilities unmeasured and politically invisible (Kirichenko, 2023; Petričušić, 2024).

Selective Human Rights Diplomacy

Selective human rights diplomacy refers to a patterned state practice with six elements: generalization, procedural engagement, selective acceptance, moral reframing, sovereignty shielding, and strategic silence. Generalization substitutes "all persons," "citizens," or "vulnerable groups" for an explicit identity category. Procedural engagement demonstrates cooperation through reporting and dialogue. Selective acceptance supports low-cost elements while noting, splitting, or qualifying others. Moral reframing places claims within narratives of family, religion, child protection, responsibility, or social harmony. Sovereignty shielding presents interpretation and implementation as domestic authority. Strategic silence omits terms that would force a politically costly position.

Figure 1 - Two-Level Mechanism of Selective Human Rights Diplomacy

Source: Authors' conceptualization, 2026.

These practices separate protection from recognition. Officials can condemn violence, arbitrary detention, or denial of services in universal terms without recognizing LGBTQ people as a distinct rights-bearing group or accepting reforms in family, education, and morality-based regulation. The concept therefore goes beyond labels such as hypocrisy, noncompliance, or cultural relativism. It asks which claims the state generalizes, specifies, translates, postpones, or leaves unnamed, and how these choices distribute political risk across audiences.

The central proposition is that the narrower the domestic win-set for explicit LGBTQ recognition, the more likely officials are to rely on generalized language, procedural cooperation, partial acceptance, moral or sovereign justification, and silence. ASEAN's coexistence of universal language and contextual limitation provides a regional vocabulary for this strategy (Association of Southeast Asian Nations [ASEAN], 2012; Davies, 2021). Figure 1 summarizes how international expectations and domestic constraints translate into calibrated responses and dual legitimacy.

RESEARCH METHODS

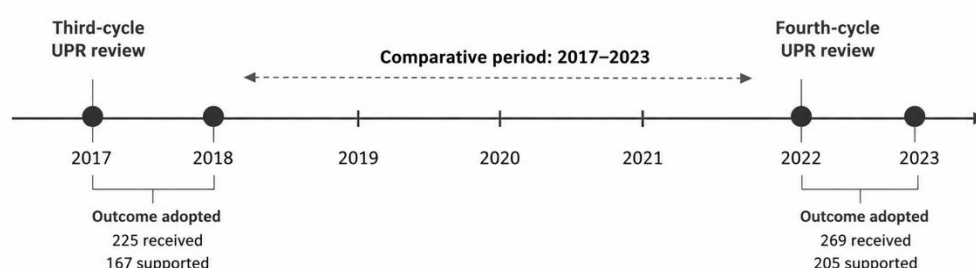
Research Design and Scope

The study uses qualitative foreign policy analysis in a single-country case study with temporal comparison. Indonesia is the case, while the third and fourth UPR cycles provide two institutional observation periods. The principal period runs from 2017 to 2023, beginning with

the third-cycle review and ending with the adoption of the fourth-cycle outcome. Holding the review mechanism broadly constant makes it possible to compare changes in participation, wording, justification, and response across cycles.

The unit of analysis is an official statement, recommendation, response, decision, or diplomatic practice concerning rights associated with sexual orientation and gender identity. The study does not treat “LGBTQ Indonesia” as a single social condition. It examines how state representatives and relevant domestic actors define claimants, allocate institutional responsibility, and select language when international and domestic expectations diverge.

Figure 2 - Temporal Design for Comparison of Indonesia's Third and Fourth UPR Cycles



Source: Authors' conceptualization based on UNHRC (2017, 2023) and OHCHR (2023).

Documentary Corpus

The corpus integrates six documentary groups: Indonesia's national UPR reports; UN compilations and stakeholder summaries; Working Group reports, government addenda, response matrices, and outcome documents; Indonesian statements in UN human rights forums; the ASEAN Human Rights Declaration and related regional materials; and public statements from ministries, parliamentarians, parties, religious organizations, national human rights institutions, and civil society where they clarify domestic constraints. Reporting is treated as governance rather than a neutral container of facts because it shapes bureaucratic priorities, state identity, and the interpretation of obligations (McGuinness, 2021). Comparing government self-representation with external submissions and outcomes reduces dependence on a single institutional narrative (Lacatus & Carraro, 2023).

Table 1 - Documentary Corpus and Coding Function

Document Group	Examples	Analytical Role	Primary Codes
National UPR reports	Third and fourth cycles	State self-representation and priorities	Universality; equality; vulnerable groups; omission

Document Group	Examples	Analytical Role	Primary Codes
UN and stakeholder inputs	UN compilation; stakeholder summary	External problem definition	SOGIESC; discrimination; violence; legal reform
UPR outcomes and responses	Reports; addenda; matrices	Formal position and degree of acceptance	Support; partial support; noted; deferral
Diplomatic statements	Human Rights Council and related forums	Audience management and issue framing	Nondiscrimination; sovereignty; public morality
ASEAN instruments	AHRD; materials AICHR	Regional vocabulary of universality and limitation	Context; non-interference; public order; morality
Domestic political discourse	Ministries; parliament; parties; religious bodies; NHRIs	Domestic constraints and coalition mapping	Religion; family; electoral risk; social consensus

Source: Authors' research design, 2026.

Coding and Analytical Procedure

The analysis applies hybrid coding. Deductive codes derive from the framework: universality, equality, non-discrimination, sovereignty, public morality, religion, family, cultural context, legal process, procedural engagement, selective acceptance, strategic silence, and reputation management. Inductive coding captures additional actors, terms, and justificatory patterns. The first stage records whether documents explicitly name LGBTQ people, sexual orientation, gender identity, gender expression, sex characteristics, SOGI, SOGIESC, or broader categories such as “vulnerable groups.” The second classifies the state’s position as support, partial support, noted, rejection, omission, deferral, or procedural acknowledgment. The third records justification and audience.

Silence is coded relationally rather than as simple absence. It is treated as meaningful only when a document addresses non-discrimination or vulnerable groups, another actor has raised a SOGIESC-related claim in the same institutional process, and the official response substitutes a general category, omits the specific term, or redirects the issue into another frame. Critical discourse analysis then examines how officials construct legitimate claimants and acceptable limitations; comparative position analysis traces change across cycles and forums; and limited process tracing links diplomatic language to domestic controversy and interagency bargaining.

Reliability and Ethics

Descriptive statistics summarize recommendations received and supported, but interpret them only as measures of procedural engagement. A recommendation-level matrix records document source, date, wording, state response, justification, and implementation

domain. Triangulation across UN records, Indonesian statements, ASEAN texts, and domestic discourse supports construct validity. At the same time, negative-case analysis identifies explicit protections or uses of SOGIESC terminology that challenge the expected pattern. The study analyzes public institutional materials and collects no personal data. It distinguishes official claims from the authors' terminology and avoids treating conservative discourse as a uniform national culture.

Because a single researcher conducted the coding, the study addressed reliability through a structured intra-coder procedure rather than intercoder agreement. The codebook defined each category and its inclusion and exclusion rules before full coding; the researcher recorded ambiguous cases in analytic memos; and the recommendation-level matrix preserved the original wording, response status, justification, and source so each coding decision could be checked against the primary document. After the first full coding pass, the researcher re-coded a purposive subset containing explicit SOGIESC references, generalized equality language, split responses, and candidate cases of strategic silence. The researcher resolved discrepancies by returning to the operational definitions and source context, and retained negative cases rather than forcing them into the expected pattern. This audit trail maintained consistency across cycles and documentary groups.

RESULTS AND DISCUSSION

The comparison identifies a stable diplomatic repertoire rather than a movement from straightforward rejection to acceptance. Indonesia performs universal commitment through participation and majority support. Still, it narrows contested claims as they move from broad principle to named claimant, from named claimant to legal obligation, and from obligation to implementation. The findings are presented through four empirical patterns, followed by their theoretical and policy implications.

Performing Universal Human Rights

Indonesia's position begins with a broad commitment to the human rights architecture. It participates in reviews, submits reports, answers questions, and supports most recommendations. The number received increased from 225 in the third cycle to 269 in the fourth, while the number supported rose from 167 to 205. The absolute increase in supported recommendations was 38, or 22.8%, and the support rate rose by two percentage points. This

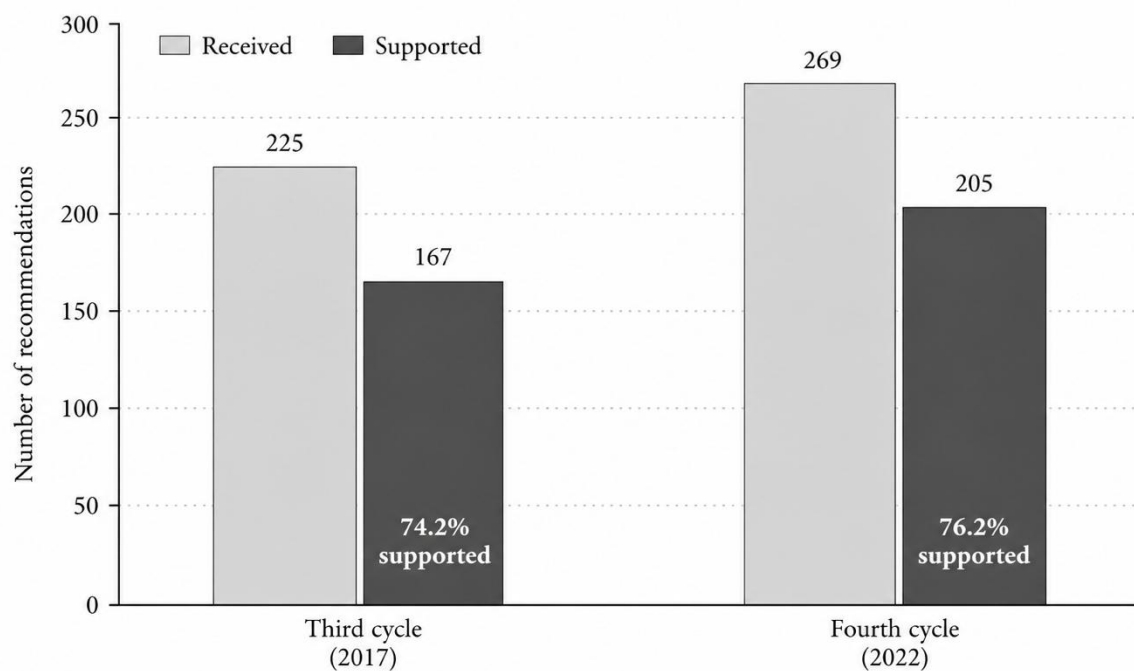
record sustains Indonesia's image as a democratic and cooperative multilateral actor, but it measures participation across all issues rather than acceptance of SOGIESC-specific claims.

Table 2 - Indonesia's Third- and Fourth-Cycle UPR Outcomes

Cycle	Received	Supported	Support Rate	Change in Supported Recommendations
Third cycle (2017)	225	167	74.2%	Baseline
Fourth cycle (2022)	269	205	76.2%	+38 (+22.8%)

Source: OHCHR (2023).

Figure 3 - Recommendations Received and Supported in Indonesia's Third and Fourth UPR Cycles



Source: OHCHR (2023).

Broad universalist language performs two functions. It aligns Indonesia with international expectations while lowering the immediate domestic cost of commitment. Terms such as dignity, equality, nondiscrimination, citizenship, and vulnerable groups can accommodate multiple claimants without naming each one. International actors may read general nondiscrimination as including sexual orientation and gender identity, while domestic officials can maintain that implementation must follow existing law, social values, and constitutional arrangements.

General language is not necessarily empty. It can support protection against violence, administrative remedies, access to health services, and equal public services. Yet its reach depends on whether agencies collect disaggregated data, issue implementing rules, and identify

affected groups. The absence of SOGIESC-specific data can preserve formal universality while sustaining practical invisibility (Daly et al., 2022). The ASEAN Human Rights Declaration reinforces this dual position by affirming universal rights while allowing limitations connected to national context, public order, morality, and general welfare (ASEAN, 2012). Selectivity becomes most visible when officials move from universal principle to explicit category and enforceable obligation.

Deferring Explicit LGBTQ Recognition

The second pattern is deferral through substitution, partial translation, and proceduralism. International institutions increasingly use SOGIESC terminology to specify how established rights apply to sexual and gender minorities (Seppey et al., 2026). Indonesian officials nevertheless have more room to accept an underlying protection than the identity category through which it is articulated. A recommendation against violence, arbitrary detention, or denial of health services can fit constitutional commitments to dignity and equality. A recommendation requiring explicit protected grounds, repealing morality-based restrictions, recognizing families, or reforming curricula carries higher political costs.

Selective acceptance formalizes this distinction. Officials may support a recommendation's general objective while noting a specific clause or clarifying that only some components are accepted. The five split responses in the fourth-cycle record demonstrate why a binary accepted-rejected classification can misrepresent the state's position. Generalization produces a similar effect lexically: after an external recommendation introduces SOGIESC, the government may answer with "all citizens," "every person," "minorities," or "vulnerable groups." The response acknowledges the normative field while retaining control over its domestic meaning.

The fourth-cycle record makes this selectivity visible in the wording of individual recommendations. Sweden recommended that Indonesia "Guarantee legal protection against discrimination for LGBTIQ persons" (recommendation 140.251), while Mexico called for a comprehensive anti-discrimination law and reform of laws discriminatory toward LGBTIQ+ persons (140.252). Both were among the recommendations noted rather than supported. By contrast, Indonesia supported recommendation 140.254, which combined repeal of discriminatory laws with comprehensive anti-discrimination protection, and 140.255, which focused on discriminatory treatment in access to health care on grounds of sexual orientation or gender identity (A/HRC/52/8; A/HRC/52/8/Add.1). The pattern therefore cannot be reduced

to a binary refusal of LGBTQ-related language; it is recommendation-specific and turns on formulation, legal scope, and perceived domestic compatibility.

The government's own addendum also states that it considered recommendations concerning LGBTIQ rights on a "case-by-case basis" and emphasized that no national regulation specifically refers to LGBTIQ people (A/HRC/52/8/Add.1). This language directly illustrates sovereignty shielding and generalization: equality is affirmed through the constitutional category of "everyone," while the identity-specific category is withheld from domestic legal recognition.

Procedural engagement creates temporal deferral. Indonesia can receive recommendations, join interactive dialogue, submit an addendum, and report follow-up without accepting the recommending state's framing. Contested reform may be presented as requiring consultation, harmonization, socialization, institutional capacity, or gradual development. Such language converts disagreement over principle into a question of timing and sequencing. Dialogue-oriented diplomacy can preserve cooperation, but it also gives governments discretion to postpone specification (Petrasek, 2013).

A comparable logic appears in the third-cycle addendum. Indonesia explained that some pending recommendations required "further consultation with broader and relevant national stakeholders," while others were difficult to translate into policy, were not national priorities, or did not reflect the factual context on the ground (A/HRC/36/7/Add.1). It subsequently noted recommendations that sought legal frameworks lacking universal support or international consensus, or actions outside the national human-rights agenda. These formulations show how substantive disagreement can become procedural, contextual, and temporal grounds for deferral.

Strategic silence completes the process. Silence is observable when national reports discuss nondiscrimination and vulnerable groups without naming sexual minorities after external actors have raised the issue, or when officials answer a specific question with a general category. It preserves several interpretations simultaneously: the government may claim that broad protection includes everyone; domestic opponents see no explicit concession; and international partners treat the issue as unfinished rather than categorically rejected. The material risk is that protection remains unenforceable across distinct grounds, sectors, exemptions, and territories (Weistroffer et al., 2025).

Domestic Moral Politics as a Foreign-Policy Constraint

Diplomatic selectivity is rooted in domestic coalition politics rather than a fixed national culture. Religion, family, public morality, and social order acquire influence through organizations, parties, bureaucracies, legislative debate, media campaigns, and elections. Indonesia's domestic arena is heterogeneous: some actors support pluralism, protection from violence, and inclusive services, while others frame LGBTQ recognition as a threat to religious doctrine, family, children, or national identity. Foreign-policy officials anticipate which coalitions can transform a technical phrase in a UN response into a visible domestic controversy.

Comparative evidence illustrates how moral vocabularies become institutional resources. In Philippine legislative hearings, LGBT people were represented both as rights-bearing citizens and as a foreign ideology or social problem (Gamalinda & Ofreneo, 2024). The Indonesian mechanism is not identical, but the comparison shows how competing representations shape the cost of recognition. Electoral incentives intensify the effect because politicians can gain visibility as guardians of religion, family, or public order. Public opinion can support rights-oriented foreign policy in some settings. Still, officials respond to the expected distribution and intensity of opinion on the specific issue rather than to an abstract national preference (Allendoerfer, 2017). The perceived win-set may therefore narrow before any formal legislative vote occurs.

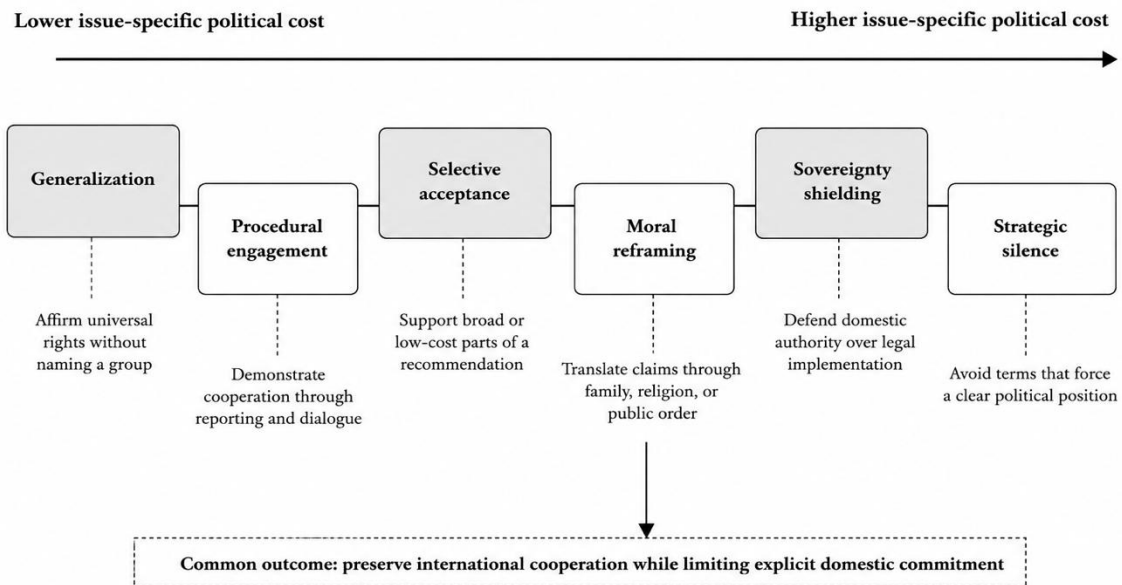
Bureaucratic bargaining reproduces the same constraint. UPR reports and responses require coordination among agencies responsible for foreign affairs, law, religion, health, education, social affairs, security, and women and children. The foreign ministry may prioritize international credibility and precise engagement with UN terminology, while other agencies prioritize existing law, administrative feasibility, family policy, or social stability. General rights language becomes a practical compromise because it survives interagency negotiation more easily than an explicit SOGIESC category. Human rights diplomacy often depends as much on bureaucratic alignment as on external pressure (Myrick & Weinstein, 2022).

Family and sovereignty discourse bridge domestic and international arenas. Family discourse recasts sexuality as a matter of child protection, marriage, responsibility, and social continuity; sovereignty discourse converts substantive disagreement into a jurisdictional claim about who may define and implement rights. Indonesia's history of external scrutiny and its commitment to non-interference give this framing diplomatic resonance (Karim, 2020). Public pressure may even shrink space for explicit recognition when opponents depict SOGIESC as

foreign ideological imposition or when officials fear organized backlash (Gruffydd-Jones, 2019; Jenichen & Deka, 2025). The result is a gradient of political cost: protection against violence is easier to universalize than explicit antidiscrimination categories, family recognition, education reform, or repeal of morality-based rules.

Strategic Ambiguity and Dual-Legitimacy Management

Figure 4 - Strategy Repertoire under Rising Issue-Specific Political Cost



Source: Authors' conceptualization, 2026.

The six practices form a coherent repertoire. Generalization creates interpretive openness; procedural engagement gives that openness institutional credibility; selective acceptance formalizes differentiated commitment; moral and sovereignty frames justify its boundaries; and strategic silence prevents further specification. Figure 4 orders the strategies by rising issue-specific political cost. The ordering is conceptual rather than statistical, and several strategies may appear in a single document or response.

The UPR comparison reveals the difference between engagement and localization. Indonesia's overall support rate increased, and the number of supported recommendations rose substantially. These changes demonstrate expanded cooperative participation; they do not establish a parallel expansion in explicit LGBTQ recognition. An aggregate trajectory can improve while a contested category remains deferred. This divergence is the empirical signature of selective human rights diplomacy.

The strategy protects dual legitimacy. Internationally, officials point to participation, democratic institutions, and nondiscrimination commitments. Domestically, they emphasize

legal process, sovereignty, family, religion, and the absence of externally imposed recognition. Ambiguity allows these narratives to coexist because neither audience receives a fully specified commitment. It can create incremental openings when broad equality provisions later support administrative protection or advocacy. Still, it can also stabilize exclusion when high acceptance rates substitute for measurable remedies and named accountability (Smith & Goodhart, 2024).

Theoretical and Policy Implications

The findings refine research on institutional participation and substantive commitment. Earlier human rights foreign-policy research emphasized the gap between official positions and practice (Baehr et al., 2002). The Indonesian case adds an intermediate layer: scholars must compare universal principles with issue-specific recognition before assessing implementation. Recommendation-level analysis should distinguish wording, claimant, split response, justification, responsible institution, timetable, and measurable outcome. Aggregate acceptance is useful for procedural comparison but cannot establish the status of a contested group.

The case also extends two-level games beyond treaty ratification. Soft-law recommendations, speeches, reporting, and nonbinding review outcomes still generate domestic authorization costs. A single term can produce interagency conflict or electoral backlash even without immediate legal force. Domestic institutions and societal coalitions therefore shape the language of human rights diplomacy and its eventual implementation (Alves, 2025; Milani, 2015).

For norm localization, the key distinction is between protection and recognition. Local actors may translate a prohibition on violence or service denial into established legal vocabularies while resisting the SOGIESC category that identifies the claimant and broader structure of discrimination. This outcome is neither full adoption nor rejection. It produces an uneven rights architecture in which certain harms become governable while some subjects remain unnamed. Strategic silence should consequently be analyzed as risk allocation, not merely as missing data.

Policy engagement should use this gradient without treating low-cost protection as sufficient. Recommending states can prioritize violence prevention, detention safeguards, health access, and public-sector nondiscrimination while maintaining longer-term attention to explicit legal equality, data, education, and accountability. Indonesian institutions can improve transparency by publishing recommendation-level explanations for supported, split, and noted

positions; involving national human rights institutions, public-health experts, and affected communities in follow-up; and separating indicators for violence, service access, legal discrimination, public-sector conduct, and data collection. External actors should avoid framing the dispute as universal rights against Indonesian culture, because that language can strengthen nationalist resistance. Long-term institutionalization and domestic coalition building are more likely to widen the win-set than inflexible public pressure (Tan, 2021).

LIMITATIONS

This study has four limitations. First, it is a single-country case study centered on Indonesia's third and fourth UPR cycles; the six-strategy repertoire is therefore proposed as an analytically transferable mechanism, not as a statistically generalizable model of human-rights diplomacy across states. Comparative research is needed to test whether similar combinations of generalization, procedural engagement, selective acceptance, moral reframing, sovereignty shielding, and strategic silence appear under different institutional and domestic political conditions.

Second, the analysis relies on public documentary materials. These sources reveal official wording, response status, and public justification but cannot directly reconstruct confidential interagency bargaining or diplomats' private intentions. Third, strategic silence is necessarily interpretive. The study reduces this risk by coding silence only relationally, when an issue was explicitly raised in the same institutional process, and the official response generalized, omitted, or redirected it. Fourth, a single researcher conducted the coding. The codebook, recommendation-level audit trail, re-coding of a purposive subset, memoing of ambiguous cases, triangulation, and negative-case analysis strengthen internal consistency. Still, they do not substitute for independent intercoder reliability. Future work should combine replicated coding with elite interviews and cross-national process tracing.

CONCLUSION

This article examines how Indonesia negotiates international human rights commitments with domestic moral politics in its foreign policy on LGBTQ rights, arguing that Indonesia practices selective human rights diplomacy—officials endorse universal principles, participate extensively in international review, and support most recommendations, while limiting the localization of contested claims through generalization, procedural engagement, selective acceptance, moral reframing, sovereignty shielding, and strategic silence. The comparison between the third and fourth Universal Periodic Review (UPR) cycles illustrates

this pattern: Indonesia supported 167 of 225 recommendations in the third cycle and 205 of 269 in the fourth, indicating sustained procedural cooperation, though these figures do not by themselves establish substantive SOGIESC recognition, since such an assessment requires recommendation-level analysis of wording, split responses, justification, responsible institutions, implementation, and the presence or absence of named claimants. The two-level games framework explains why diplomats seek formulations acceptable in both international and domestic arenas, while localization explains how dignity and nondiscrimination can be narrowed into protections embedded within existing legal and moral vocabularies. Contestation explains disputes over category, authority, timing, and implementation. Ambiguity may open gradual routes to protection, but it can equally support claims of compliance while affected groups remain invisible. Future research should test this mechanism through interviews and process tracing, and compare selective diplomacy across countries and contested issue areas.

DATA AVAILABILITY STATEMENT

The aggregate UPR counts used in this article are publicly available in the third- and fourth-cycle documentation of the UN Human Rights Council and OHCHR country materials for Indonesia. A replication package should include the document inventory, codebook, and recommendation-level coding matrix, subject to institutional requirements.

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