

**President Elections Mechanism: Comparative Studies from Indonesia, Russia, and Türkiye**  
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**Abstract**

This study aims to determine the differences and similarities in the presidential election system in 3 (three) countries, as an example we choose Indonesia, Russia, and Türkiye. This research focuses on how the presidential election system is implemented in the countries of Indonesia, Russia, and Türkiye as well as, what are the differences in the presidential election system used, the pattern of nominations, and the requirements for presidential nominations by the countries of Indonesia, Russia, and Türkiye. This study uses a normative juridical method with a statutory approach and a comparative approach based on the constitution of each country. The results of the study show that there are similarities and differences in the presidential elections in the three countries. First, the similarity of the three countries is implementing a plural or district system with the Two Round System variant. The winner of the election must get absolute or absolute votes. Second, the differences between the three countries in presidential elections such as nomination patterns, terms of office, presidential requirements, and thresholds. However, in analyzing this difference, there are only two countries that are the same: Indonesia and Türkiye, for the same presidential term. Then the nomination pattern in Russia and Türkiye is the same. Then, the age requirements for Indonesian and Türkiye presidential candidates are the same.

Keywords: election; Indonesia; president; Russia; Türkiye

**Introduction**

Democracy<sup>1</sup> is a system of government in which political power is in the hands of the people. The democratic system gives the right to the people to choose in making decisions and express their opinions freely. This means that power in the state comes from the people and is in the hands of the people. Democracy and sovereignty always go hand in hand and cannot be separated. Democracy that wants people's sovereignty has so far been manifested in the form of general elections to elect people's representatives. The elected representatives of the people are responsible to the people and must carry out their duties by the wishes and needs of the people they represent (Qoroni and Winarwati 2021). A democratic country is a country that is organized based on Therefore, for every country that considers itself a democracy,

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<sup>1</sup> In its history, the implementation of democracy in the world began in Ancient Greece, precisely in the 5<sup>th</sup> century AD. On the other hand, various kinds of literature say that the term democracy was first coined by Plato who introduced the term democratic. Both Plato and Aristotle agreed that a democratic government system is a bad government system. They think that a government that is carried out by all or many people tends to pursue unlimited freedom. As a result, the country will decline because there are no restrictions on freedom. During the Renaissance period until the end of the 19<sup>th</sup> century ideas about democracy began to take concrete form as programs and systems were often political in nature and based themselves on the principles of individual freedom, equal rights, and voting rights for all citizens. The best tool for limiting the power of government is the Constitution, whether written or not. The constitution must guarantee citizens' rights in politics and form the basis for implementing the division of government powers. This idea is very well known as constitutionalism. The countries that adhere to it are called constitutional states or *rechtsstaat*. In line with that, democracy is understood as a procedure to achieve government by holding elections to elect people's representatives. The elected representatives of the people are expected to become representatives to achieve prosperity

elections are one of the main elements for every country that adheres to a political system that uses a democratic system. Elections are very basic or most important things to uphold the rules of the game of democratic political life. In its development, elections were initially used to elect members of parliament, until they experienced developments in the end elections were held to elect the president. The president will be chosen to have the highest authority and great responsibility in the country (Al Hidayat 2018).

A country led by the president is one of the characteristics of a presidential system of government which aims to create political stability so that the development agenda can be carried out properly without worrying about political power in parliament. With this clear system, the parliament cannot simply drop the president. However, special conditions or reasons are required for the removal of the president. In general, the presidential system of government has the advantage of the stability of the executive system based on the president's term of office (Nadir and others 2022). Regarding the presidential system, Indonesia, Turkey, and Russia are examples of countries that adhere to a presidential system where the responsibility for running the government is the president and assisted by ministers. In constitutional matters, both are in the form of a unitary state. Indonesia's legal basis adheres to the Indonesian presidential government system regulated in the Constitution of the Republic of Indonesia. Meanwhile, in the constitutional affairs of Turkey, it is regulated in the 1982 Constitution of the Republic of Türkiye. Code Number. 2709. Date of Acceptance. 7.11.1982. Regulations regarding the election of the Russian president are regulated in the Constitution of the Russian Federation (The Constitution of the Russian Federation).

The differences in this study from researchers who study similar issues are, first, in research from Sultoni Fikri entitled "Comparison of Presidential Elections in Indonesia and South Korea" (Fikri and others 2022). This study examines the comparison of the presidential election system in Indonesia with South Korea. Second, research from Elva Imeldatur Rohmah with the title "Comparison of Indonesian, Iranian and French Government Systems" (Rohma 2019). This study examines the comparison of the government systems adopted by the countries of Indonesia, Iran, and France and the concept of trias politica as the basis of government. Third, research was conducted by Syafri Hariansah with the title "Mechanism of Filling Vacant Positions for President and Vice President: Comparative Studies with the United States, Brazil, and France" (Hariansah and others 2018). This research examines the mechanism of vacancy in the positions of president and vice president in Indonesia and countries such as the United States, Brazil, and France. Meanwhile, in this study, the authors examine the similarities and differences in the history, mechanisms, nomination patterns, and system regulations of the general elections of Indonesia, Russia, and Türkiye.

### **Research Method**

This study uses a normative juridical method with a statutory approach and a comparative approach. The aim is to examine the positive law in the sense of knowing, understanding, and explaining the positive legal norms and rules governing General Elections in three countries, especially in Indonesia, Russia, and Türkiye by using legal sources namely the Russian Federation Constitution, the Turkish Constitution and The 1945 Constitution of the Republic of Indonesia as well as several journals, theses, books, and other sources relevant to the study of writing (Marzuki 2016).

## **Results and Discussion**

### **Requirements for the President to be Directly Elected in a Presidential System**

Referring to the concept in general, the president is a position name used by a leader of an organization, company, or country (Fikri and others 2022). The first time this term was used for a person who chaired an event or meeting, over time the term president was used as a term for someone who has executive power, more precisely the president in leading the country. Meanwhile, according to the Black Law Dictionary president is “one placed in authority over others; a chief officer; a presidential or managing officer; a governor, ruler, or director. The chairman, moderator, or presidential officer of a legislative or deliberative body, is appointed to keep orders, manage the proceedings, and govern the administrative details of their business (Frey and Black 1934)”, in which the president as a leader has responsibility. History records that the first presidential election was held in the United States (US) in 1789, when the US was still in its early stages of formation, and at that time political parties had not yet been formed. George Washington was the world's first president and served for 2 (two) consecutive terms. The election of the first US president marked a milestone in the development of presidential systems of government around the world. Later many countries adopted this electoral system.

However, not all countries that use a presidential system require the president to be directly elected by the people. There are differences in the way presidents are elected in presidential systems in various countries around the world. Some countries hold direct presidential elections by the people, while other countries use an electoral system through a representative body or certain institutions, for example in the United States, the president is directly elected by the people through an electoral college system. In contrast, in some Latin American countries, the president is often elected by direct election. Presidential elections in some countries may involve representative bodies such as parliaments or legislative assemblies. For example, in direct elections in France, the people elect the president on the second ballot, if no candidate obtains an absolute majority on the ballot.

Direct presidential election means that the administration of government is determined by the people themselves (Triwahyuningsih 2019). The direct presidential election more or less reflects sovereignty returning to its source, where it is the people who have the right to determine who deserves to be the leader of the country. The existence of direct presidential election enactment of a presidential system in a country where the head of government is the president who is also the head of state. The presidential system of government is often referred to as the principle of separation of powers where there is a strict separation of the legislature and the executive. Because the president is directly elected by the people, the parliament cannot pressure him to step down from office, and conversely, the president as the head of government does not have the constitutional right to dissolve parliament (Penelitian and Ekonomi 2019). The president controls the government and is the chief executive appointing the ministers for the government. Ministers are assistants to the president who is responsible to him. Having elections in every country is a general mechanism for finding the best head of state.

The character of a presidential government system is that there is a clear separation of powers between legislative and executive powers, the head of government is the president,

who will appoint ministers under him as assistants or as subordinates who are responsible to him. Presidential elections in democratic countries must be held periodically at certain times following applicable laws and regulations. There are several reasons why presidential elections need to be held regularly, as follows (Tamrin 2013):

1. Opinions or aspirations of the people regarding various aspects of living together in society are dynamic and develop from time to time. Within a certain period, most people may change their opinion about state policy.
2. Conditions of living together in society can change both the dynamics within the country and external humans.
3. Changes in people's aspirations and opinions can occur because of population growth and adult people, especially new voters or first-time voters, do not necessarily have the same attitude as previous generations.
4. So there is a change in state leadership in the executive branch of power.

Direct presidential election is seen as a democratic process because it better reflects the will of the people and increases public involvement and exercise of political rights. Advantages of the implementation of direct presidential elections: The elected president will have a strong mandate and legitimacy because it is supported by the votes of the people who vote directly in support of him (Roffi 2018). The implementation of the presidential election also sees that the people's representatives who have been elected to have legitimacy, are legitimate to be able to exercise their power and authority to act on behalf of the people, those representatives. In a direct democracy, the people must decide for themselves through individual voters.

#### **President Elections Mechanism: Comparative Studies from Indonesia, Russia, and Türkiye**

The presidential election system has an important role in maintaining the political stability of a country, especially countries that adhere to a presidential system. Electoral systems in various countries certainly vary, depending on the cultural, political, and historical conditions of each country. In Indonesia, the presidential election system is carried out and directly elected by the people. Meanwhile in Russia, the president is directly elected by the people, as well as in Türkiye.

The following is a comparative analysis of presidential elections in Indonesia, Russia, and Türkiye. Election These three countries both implement a presidential system, and the president is directly elected through elections.

#### **Mechanism of Presidential Elections in Indonesia**

As a sovereign country, the president has a vital role in achieving the country's goals and aspirations. In the history of the constitutional administration of the Republic of Indonesia, the presidential election process has experienced dynamics along with the political situation in each regime. The history of post-independence Indonesia recognizes several periods during the journey of the Republic of Indonesia. During this period, the process of electing the president as head of state was also influenced by the political situation. Viewed from the point of view of the development of democracy, the history of the shift in office of the Indonesian president can be divided into four concepts of democracy. First, the period of parliamentary democracy which emphasized the role of parliament and parties, and because of that it can be called Parliamentary Democracy (1945-1959). On November 11, 1945, a change occurred when the workers' body proposed to the president the existence of a ministerial accountability system to parliament, namely the central national committee. As a result of this major change, on 14 November 1945 the presidential cabinet under President Soekarno resigned and was replaced by a new cabinet with Sutan Sjahrir as prime minister. Since then,

the presidential system has shifted to a parliamentary system of government and the General Elections in Indonesia during the Old Order period of 1955 were the first general elections in Indonesian political history. The aim of these elections is not to get a new president, but rather to elect a prime minister. Where the President is the Head of State and the Prime Minister is the Head of Government. The 1955 elections did not result in significant changes to the provisional Constitution. During the parliamentary period, there was also no strong cabinet. From 1950-1959 there was a change of prime minister because there was no majority power in parliament.

*Second*, the period of guided democracy which in many aspects had deviated from constitutional democracy, which was formally its basis, and showed several aspects of people's democracy (1959-1966). The failure of the constituents to draw up a new constitution resulted in the conditions and situation of the homeland at that time being unfavorable for the development of the state administration of the State of Indonesia. Thus, on July 5, 1959, the president issued his decree, one of the contents of which was the re-enactment of the 1945 Constitution of the Republic of Indonesia (hereinafter referred to as the 1945 Constitution of the Republic of Indonesia). The legal basis for this decree is the state in state snoodrect.

*Third*, the period of Pancasila democracy which was a constitutional democracy that emphasized the presidential system (1966-1998). Pancasila democracy is a constitutional democracy that emphasizes the presidential system. The formal basis for this period was Pancasila, the 1945 Constitution of the Republic of Indonesia, and the Decree of the MPRS/MPR to rectify the deviations from the 1945 Constitution of the Republic of Indonesia that occurred during the Guided Democracy period. In its development, the role of the president has become increasingly dominant over other state institutions. Looking at democratic practices at this time, the name Pancasila was only used as political legitimacy for the rulers at that time, because in reality what is being implemented is not following the values of Pancasila. Thus, in 1973, a general election process was held to elect a president and vice president after forming the Majelis Permusyawaratan Rakyat (MPR) institution.

*Fourth*, the period of direct democracy, namely reforms that want democracy to be established in Indonesia as a correction to the political practices that occurred during the direct democracy period (1998-present). The direct election of the president is more democratic compared to the election through the MPR. According to Jimly Asshiddiqie, the direct election of the president by the people which has been adopted into the formulation of the 1945 Constitution of the Republic of Indonesia has provided a strong constitutional foundation, under the principles of a presidential system of government, presidential candidates and vice presidential candidates are selected in one package, because these two positions are seen as a unified presidential institution, the purpose of direct presidential elections is to elect leaders who have strong support from the people to achieve national goals as mandated by the 1945 Constitution of the Republic of Indonesia (Andryan 2020).

After the New Order period, elections were held in October 1999, the history of implementing the first elections during Indonesia's reform period. As we enter this reform period, Indonesia is determined to create a democratic government system based on the constitution. The election for president and vice president for the 1999-2001 was based on MPR Decree No. VI/MPR/1999 (reform period) concerning procedures for the nomination and

election of the president and vice president. This was regulated in the 1945 Constitution of the Republic of Indonesia before the fourth amendment to Article 6 paragraph (2) states "The President and Vice President are elected by the People's Consultative Assembly with the most votes." The presidential election procedure is carried out by the MPR by selecting the president first (not in an election package) and after the president is elected then the vice president is elected. In this period the presidential election process was carried out before the vice-presidential election.

Then after the amendments to the 1945 Constitution of the Republic of Indonesia held the first presidential election on July 5, 2004, the people participated directly in the presidential election, this year is the second election since the introduction of competitive multi-party elections took place in 1999 and made this an important historic event in the process of developing democracy in Indonesia. In the transition journey towards democracy, the country still faces many serious challenges and difficulties that have arisen since 1999. Indonesia still has problems of security, economic stability, and cases of corruption which are of great concern to the public as voters voted in the 2004 election with the implementation of the presidential election. which is divided into 2 rounds. 2004 was the year that was said to be a true democracy in Indonesian politics. Amending the 1945 Constitution which was carried out in stages up to four times, has brought changes to the mechanism for electing the president and vice president, which is no longer through elections in the MPR, but through direct elections by the people. The direct presidential election system is still used in Indonesia today.

Electing the president as an executive officer is more specifically regulated in Article 6A of the 1945 Constitution of the Republic of Indonesia, while Indonesia regulates election issues in Article 22E of the 1945 Constitution of the Republic of Indonesia. The involvement of parties in politics as an organization that reflects the diversity, philosophy, and public interest has a significant impact on the election of presidential candidates. In today's democratic country, political parties are used as a tool to facilitate effective work, because the rapidly growing number of citizens is not possible if every citizen is directly involved in making public decisions in Indonesia. Based on Article 6A paragraph (1) of the Third Amendment of the 1945 Constitution, it is explained that the President and Vice President are directly elected as a pair by the people. Then in Article 6A paragraph (2) of the Third Amendment of the 1945 Constitution, it is explained that the candidate pairs for President and Vice President are proposed by a political party or a coalition of political parties participating in the General Election before the Election. Presidential election together with political parties, party systems, interest groups, the press, as well as government and people's representative institutions is a means to achieve democracy.

Implementing democratic elections has clear standards and can be applied universally in any country as long as the country claims to have adhered to a democratic political system. All parameter assessments are based on applying the principle of justice, which in essence elections must be held in a free, open, and transparent manner for all parties participating in the election, both political party organizations and individuals. The Constitutional Court Decision Number 14/PUU-XI/2013 concerning the Review of Law Number 42 of 2008 concerning the General Election of the President and Vice President carries the idea of simultaneous elections. In its decision, the Constitutional Court stated that the holding of legislative elections and presidential and vice-presidential elections were held simultaneously, which applies to elections starting in 2019 and onwards. Thus, starting in 2019, the Indonesian

presidential election system will be carried out directly by the people and will be carried out simultaneously with parliamentary elections (Faiz and Redhani 2018).

In the presidential election system, it is also known that a minimum number of seats is required to nominate a presidential candidate. This is then referred to as the vote acquisition threshold better known as the threshold. Parliamentary elections in the concept of Indonesian democracy recognize thresholds in every form of the general election system, starting from the electoral threshold as a requirement for political parties to participate in elections, the parliamentary threshold as a form of party threshold to be able to occupy seats in the central parliament, to the presidential threshold as a threshold. Party votes to nominate candidates for president and vice president in the general election. This means that the presidential threshold is a requirement for someone to be able to run for president or Vice President in elections. The presidential threshold is regulated in Article 5 paragraph (4) of Law Number 23 of 2003 concerning the General Election of the President and Vice President (hereinafter referred to as Law No. 23/2003), Article 9 of Law Number 42 of 2008 concerning the General Election of the President and Deputy President (hereinafter referred to as Law No. 42/2008) and then regulated again in Law Number 7 of 2017 concerning General Elections (hereinafter referred to as Law No. 7/2017).

In Indonesia, the presidential threshold was first formulated in Law no. 23/2003 Article 5 paragraph (4) of the Law which explains that "a pair of presidential and vice-presidential candidates can only be proposed by a political party or coalition of political parties that obtains at least 15% of the seats in the DPR or 20% of the national valid votes. in parliamentary elections". This threshold provision was the first to be applied in Indonesia in the 2004 election, which coincided with the first time Indonesia had held direct presidential elections and the presidential and legislative elections were still separate. Changes in the amount of the presidential threshold occurred in the 2009 presidential election. This was followed by changes in Law No. 42/2008 concerning the General Election of the President and Vice President. At that time, the threshold increased by 5% from the 2004 presidential election which was 15% to 20%. The existence of a threshold in terms of the presidential threshold is to strengthen a presidential government system or form an effective presidential government system (Sumodiningrat 2021).

Furthermore, in 2019, the presidential threshold will not change. However, the legal basis has changed in Article 222 of Law no. 7/2017 explains that "candidate pairs are proposed by political parties or coalitions of political parties participating in the election that meet the requirements for obtaining seats of at least 20 percent of the total seats in the Dewan Perwakilan Rakyat (DPR) or obtaining 25 percent of valid votes nationally in the previous election for members of the DPR". In 2004, 2009, and 2014 presidential elections, the number of seats in the DPR and national valid votes were used for the results of the legislative elections held before the presidential election but in the same year. In the three presidential elections, the legislative elections were held several months before the presidential election. Meanwhile, in the 2019 presidential election, the threshold used is the acquisition of the number of DPR seats and valid national votes in the previous election for members of the DPR, namely the 2014 legislative election. This is because the presidential and legislative elections were held simultaneously in April 2019.

The 2024 elections will be held soon, so political parties have the right to nominate candidates for president and deputy if they obtain 20 percent of the seats in the DPR based on the results of the 2019 elections or by obtaining 25 percent of the national valid votes. The application of the presidential threshold, when interpreted as a condition for the support of political parties sitting in parliament, is to form a presidential government in a multiparty system so that it runs effectively and stably. The president and Vice President have strong support from the people so they can carry out the functions of government power. In addition to receiving strong support from the people, the President and Vice President need to get support from the DPR to realize government effectiveness and efficiency and strengthen the presidential system but not with a presidential threshold (Adjie Hari Setiawan 2023).

### **Mechanism of Presidential Elections in Russia**

Russia is a country with a complex and varied political history. Since the dissolution of the Soviet Union in 1991, Russia has experienced political dynamics in determining the system of government. At the beginning of the emergence of Russia, they implemented a semi-presidential system, until finally, they adopted a strong presidential system with a president elected through direct elections by the people (Azhar 2018). Russia uses the general election system to achieve democratic leadership. Elections may be the best time to gain and maintain power with strong legitimacy so that existing parties will compete fiercely with other parties. At the same time, elections are the right time for the Russian people themselves to choose leaders who can represent their aspirations, because Russia was indeed formed because of the disintegration of the Soviet Union (USSR) on December 7, 1991 (Malang 2022).

The beginning of democratization in Russia was inseparable from the collapse of the Soviet Union and the election of Yeltsin as the first president to announce that Russia was no longer part of the Soviet Union. Yeltsin carried out extraordinary reforms both in the economic and political spheres. In the political field, it provides for the people's political rights in the Duma and elections for the Duma and president, protection of civil rights, and freedom of the media. During Soviet rule, Russia had held general elections following Gorbachev's glasnost and perestroika programs but these elections were still on the plains of the absence of formal claims of democracy from the Russian government (Emerson 2020). The first election after the claim of democracy took place in 1993, and Boris Nikolayevich Yeltsin was elected in a referendum, thus being crowned the first President of Russia. That same year, Yeltsin dissolved parliament which adopted a constitution. The draft constitution shows the active role of society in holding elections and selecting the president and his deputy in the legislative process (OSCE/ODIHR 2019). However, after the end of Boris Yeltsin's government in 1999, it was recorded that only two people could become president of this country, these two people were Vladimir 'Vladimirovic' Putin and Dymitri Medvedev, even the first name had been president of Russia for 8 years of presidential tenure, and also means the maximum term a citizen can serve as president in Russia (Review 2011).

There is something unique about the government system in Russia because the government system in Russia is divided into two, namely under the control of the President and Prime Minister. In Russia, the governmental power is exercised by the prime minister only within the boundaries of national power. The prime minister is appointed by the president with the approval of Parliament, while ministers are appointed at the suggestion of the prime minister, except for the minister of state security whose appointment must be approved by the State Duma (legislative) (Clark and Clark 2015). Even though there is a prime minister, power



remains in the hands of the president as head of state and head of government. Then the Prime Minister in Russia has almost the same position as the assistant to the president or just the vice president in the internal government, it's just that the post-1993 amendments to the Russian constitution abolished the position of vice president. In this presidential system of government, the president is the executive with strong powers. In the Constitution of the Russian Federation, the Russian federal government system does not have the position of vice president. There is no vice president position in the Russian government system to maintain power centered on the president and a government mechanism that focuses on one individual as the highest leader, namely the president who has broad executive powers and is responsible for running the government. The Russian Federation is a federal presidential republic. The Constitution defines it as "a democratic federal law-bound state with a republican form of government". The president serves as head of state enjoys various powers and responsibilities and is directly elected (Schmidt 2015). As head of state, the president of the Russian Federation represents Russia in domestic and international relations.

The term of office of the Russian president is six years over two terms. Based on the mandate of the Constitution of the Russian Federation (The Constitution of the Russian Federation) 1993, Article 81 (1) that the term of office of the President of Russia is 6 years and is elected by citizens of the Russian Federation directly with a secret ballot election system. The President of the Russian Federation can be re-elected for no more than 2 (two) running terms. The term of office of the Russian president has also undergone changes since the 2008 constitution regarding the presidential term, which was only four years, but was finally changed at the president's suggestion to six years and served for a maximum of two terms. This change occurred during the time of President Dmitry Medvedev who replaced Vladimir Putin.

The requirements to become president of the Russian Federation are affirmed in the 1993 Constitution of the Russian Federation, article article 81 (2) that every citizen of the Russian Federation can be elected as President of the Russian Federation who is not less than 35 years old and has a residence not less than 10 years in the Russian Federation. Then the nomination pattern, there are three ways to nominate a presidential candidate. First, presidential candidates can be promoted through individual or independent channels. In this mechanism, candidates must obtain a minimum of 300,000 voters in the form of signatures. Signatures must be collected between 80 and 45 days before election day. Second, the presidential candidate is nominated by a non-parliamentary political party. In this mechanism, presidential candidates are required to collect 100,000 signatures from voters 80 to 45 days before the election is held. Third, the presidential candidate is nominated by a political party in parliament. In this mechanism, there are no special provisions that must be met, so that political parties have the privilege to nominate presidential candidates alone or in a coalition. Following the submission of registration documents, including collecting supporting signatures, Russia's Central Election Commission (CEC) is the agency responsible for administering elections at the national level and is tasked with overseeing the electoral process.

## Mechanism of Presidential Elections in Türkiye

Before becoming a republic, Türkiye was known as the Ottoman Empire. During the Ottoman dynasty, the government system was a monarchy, namely power based on blood relations or descent, which is better known as the royal system. In this system, the process of electing state leaders does not use democratic principles involving the people in the political process, because in a monarchy system, the highest supremacy is a king. The monarchy system adopted by the Ottoman Empire means that all policies and regulations apply in society come from one highest source, namely the King or sultan. The king has the right to determine the political attitude of the kingdom in the economic, political, legal, and military fields. However, the Ottoman Empire finally collapsed in the early 19th century. There is a demand to change from an absolute monarchy system to a democratic state. The wave of democratization in Türkiye was inseparable from political turmoil both internally and externally, so on September 9, 1923, the Republic of Türkiye was officially established. In line with the inauguration of the Republic of Türkiye, the democratization transition from a monarchy to a republic was followed by the appointing of Mustafa Kemal Atatürk as the first President of Türkiye.

In the era of Atatürk's leadership, he attempted to exercise control over politics in Turkey by adopting a one-party system (Heper and Cinar 1996). By adhering to one party, Atatürk succeeded in hegemony over all existing powers. Even Atatürk forced his ideology so that it could be carried out through his political party, namely the Cumhuriyet Halk Partisi (CHP) better known as the Republican People's Party. This party is the main engine for spreading, implementing, and legitimizing the ideology of secularism in Türkiye. Since then, Türkiye has shifted from being a state based on Islam to becoming a secular state.

After the era of Atatürk's leadership, the political structure in Türkiye changed. A dual structure emerged in the executive power, where the executive power is not only held by the president but also carried out by the Council of Ministers led by the prime minister (Tosun 2016). In the executive structure in Türkiye, it is known that there are two separate government structures, namely Merkezden Yönetim (Central Government) and Yerinden Yönetim Kuruluşları (Decentralized Government Institutions). Within the structure of the central government, there are two parts, namely, Başkent Teşkilatı (Capital Institution) and Taşra Teşkilatı (Regional Institution). The capital institution is an institution located in Ankara which is the capital city of Türkiye. Within the structure of the Capital Institution there are, namely, Cumhurbaşkanı (President), Bakanlar Kurulu (Council of Ministers), Başbakan (Prime Minister), Bakanlıklar (Ministries), and supporting institutions such as Millî Güvenlik Kurumu (National Security Council), Danıştay (Council of National Security) State), and Sayıştay (Audit Agency).

With the existence of two executive institutions run by the president and the council of ministers, Türkiye is more familiar with the parliamentary system. Why? Because the role and duties of the president are very limited, the president even acts more as a symbol of the state. This limitation of the president's role has finally led to discourse for an immediate amendment to the Turkish Constitution so that the president's role is deemed necessary to increase government. In the end, the political dynamics that occurred in Türkiye changed the government system which was originally a parliamentary system to a presidential system (Organization for Security and Co-operation in Europe/Parliamentary Assembly 2018). A referendum in 2007 overturned the previous system whereby the legislature elected the

president, the Grand National Assembly of Türkiye. Türkiye's first direct presidential election was in 2014.

The President of the Republic of Türkiye now has much greater power and authority due to the implementation of the Turkish presidential system with a president, namely Erdogan. In a parliamentary system, the position of a president is only symbolic because the one who runs the government is the prime minister. However, it can be seen that after the implementation of the presidential system, the position of the president is no longer symbolic because the president will be much more actively involved in running the government. Since a significant constitutional amendment occurred in 2017, with this amendment, Türkiye's political system changed to a presidential system from previously parliamentary. The elected president has more powers, holding the positions of head of state and head of government. The president will be elected for a five-year term and can be a re-election candidate for another term. In the 2018 elections, presidential and parliamentary elections were announced at the same time to avoid political instability. Türkiye switched from a parliamentary system to a presidential system. In this system, the president in Türkiye has broad executive powers and is elected through direct elections by the people (KE 2016).

In the Turkish presidential elections, this is regulated in the Constitution of the Republic of Türkiye of 1982, Code Number 2709, acceptance Date 7.11.1982. The requirements to run for election to the President of the Republic of Türkiye are regulated in the Constitution of the Republic of Türkiye, specifically Article 101 which explains; "The President of the Republic is a Turkish citizen who is over forty years of age, has a higher education, and fulfills the requirements, directly elected by the people from among his citizens. The president's term of office is five years. This means that presidential candidates must be Turkish citizens with bachelor's degrees. A political party nominates a candidate running for president and was a member of that party at the time of the previous general election or carried out by a party that obtained at least 5% (five percent) of the votes acquired during the previous general election or has 20 seats in parliament. In addition, presidential candidates can nominate themselves through individual or independent channels with the provision that they must collect 100,000 (one hundred thousand) votes or can also collect 100,000 (one hundred thousand) votes during the previous election. This is governed by Article 101 of the Turkish Constitution on presidential elections.

The president of Türkiye is directly elected in a two-round system. Candidates must receive a simple majority (more than 50%) of the vote to win to be elected. The winner of the second round between the two candidates who received the most votes in the first round will be declared elected if neither candidate wins an overall majority. Due to the term of office, the President of Türkiye can only hold office for a maximum of two terms with five years for each term. A third term will be permitted if the election is held quickly before the end of the second term. In Türkiye 's Grand National Assembly, snap elections can take place with the approval of 60% of the members of parliament present or by executive order. The only way to allow the president to run for re-election is with the approval of the Grand National Assembly of Turkey during a second term (Fajrian and Kurniawan 2021). Overall, the presidential election system in Türkiye has changed since the first presidential elections until the constitutional amendments in 2017. Currently, the presidential election system is held directly through

general elections, with presidential candidates put forward by political parties or independent individuals who meet the requirements set by the general election set. This mechanism ensures the active participation of the people in electing the leaders of their countries.

Based on the analysis above, it can be seen that there are several comparisons of systems and mechanisms for presidential elections between Indonesia, Russia, and Türkiye. Of the three countries, there are similarities, namely, *first*, the three countries have direct presidential elections, although in each country there are political dynamics towards filling the presidential position. *Second*, the three countries use a plural or district system with the Two Round System variant. This means that the election of a candidate as president must get absolute or absolute votes (50%+1). *Third*, in Indonesia and Türkiye, the requirement to become president is at least 40 years old (see **table 1**). *Fourth*, the term of office of the presidents of the three countries is equally limited to two periods, but there are differences, if in Indonesia and Türkiye, the term of office is 5 years, while in Russia it is 6 years (see **table 1**). Those are some similarities between the three countries, where Indonesia and Türkiye have many similarities.

**Table 1.** Differences in Presidential Elections

	Indonesia	Russia	Türkiye
Nomination patterns	The condition will nomination mandatory Indonesian president proposed by the party political or combined from several party politics.	Presidential Candidate Federation Russia can nominate itself/independent or stand on Name party politics. Parties in parliament can carry out nomination on Name party nor party that doesn't is in parliament.	Presidential Candidates the Republic of Türkiye can be through individual or proposed by the party politics.
Term of Office	The election president is chosen in a manner direct with a term of 5 (five) years or a maximum of two terms of office.	The election president is chosen in a manner direct with a term of 6 (six) years or a maximum of two terms of office.	The election president is chosen in a manner direct with a term of 5 (five) years or a maximum of two terms during the term of office.
Condition candidate president	Condition For becoming candidate president and vice president is Indonesian citizens age at least 40 years old.	Condition For become President Russia is Federation citizens Russia aged No not enough of 35 years and housed stay No not	Condition For becoming the president of Türkiye a Turkish citizen, aged over 40 years, has an education high (graduate).

enough of 10 years in  
 the Federation Russia.

Threshold	<i>presidential threshold</i> of 20% seats or 25% of the vote.	No there is a threshold.	<i>electoral threshold</i> , the Candidate for President of The Republic of Türkiye is nominated through receiving party at least 5 percent voice in election parliament previously or has 20 seats in parliament.
President served	President accompanied by the vice president during his tenure	No accompanied by the vice president.	President accompanied by the vice president during his tenure

Then based on the table above it can be seen that there are differences between the three countries studied in this writing. *First*, the nomination pattern, the nomination requirements in Indonesia are only proposed by political parties or coalitions of political parties. Meanwhile, in Russia and Türkiye, nomination patterns can be done through individuals or independently (see **table 1**). *Second*, is the threshold. In Indonesia, the requirement to nominate a presidential candidate must meet the Presidential Threshold of 20%. Meanwhile in Türkiye, the requirement to nominate presidential candidates uses an electoral threshold for candidates proposed by political parties. The threshold for the presidential nomination does not apply to the Russian presidential election, so all citizens or political parties have the right to nominate presidential candidates (see **table 1**).

### Conclusion

After understanding and analyzing the presidential election mechanism in 3 (three) countries, namely Indonesia, Russia, and Türkiye, there are similarities and differences that have been described in the comparison table so that a conclusion can be drawn, that is, all presidential elections use a plural or district system with the Two Round System variant, so that the candidate is declared the winner who gets absolute or absolute votes. Then among the three countries, only Indonesia must be carried out by political parties, while Russia and Türkiye can nominate themselves through individual channels. Indonesia should also implement a similar thing, so that to become president you don't need to go through a political party. Because the people directly elect them, anyone with potential should be able to run for

president. Then, there are threshold rules, in Indonesia applying Presidential Threshold provisions and Türkiye implementing an electoral threshold if promoted by a party. While in Russia there is no threshold. There are pros and cons to the threshold for presidential elections in Indonesia, according to the author, the threshold provision should not be necessary, so that everyone has the right to run for president.

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