
STRENGTHENING THE GOLDEN VISA INDONESIA: BEST PRACTICES FROM SEVERAL COUNTRIES

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ABSTRACT

Golden Visa is an investment-based immigration policy scheme that grants long-term residence permits for foreign nationals. Since 2023, Indonesia has officially adopted this model through regulations aimed at attracting foreign investors, global talents, world leaders, and the diaspora. This article aims to evaluate the initial implementation of the Indonesian Golden Visa, compare it with similar practices in other countries such as Portugal, the United Arab Emirates, Singapore, and Malaysia, and formulate policy strengthening recommendations. With a qualitative approach based on literature studies and regulatory analysis, this paper finds that the success of Golden Visa is highly dependent on the selectivity of applicants, the quality of investment contributions, and cross-sectoral governance capacity. In Indonesia, although until April 2025 the investment realization value from Golden Visa has reached Rp35.4 trillion, challenges such as transparency, policy integration, and supervision of investment realization are still the main obstacles. Lessons from other countries show the importance of policy designs that are not only administratively appealing, but also impact long-term economic transformation. Therefore, Indonesia needs to formulate a Golden Visa model that is not only oriented towards the amount of investment, but also accompanied by an impact-based selection mechanism, periodic evaluation of contributions, and integration of cross-sectoral policies such as immigration, taxation, and investment. This scheme also needs to be directed at strategic sectors such as technology, renewable energy, and education, in order to create long-term added value and support the national development agenda in an inclusive and sustainable manner.

KEYWORDS *Golden Visa, foreign investment, immigration policy*



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INTRODUCTION

The Golden Visa policy is an innovation in the field of immigration that aims to attract significant investment in a country, overcome budget deficits, and strengthen international economic integration (Surak, 2021; Kochenov & Surak, 2023). This policy is carried out by offering long-term residence permits to foreign nationals. The Golden Visa is even referred to by Džankić as a form of "investment passport" that reflects the commodification of state membership (Džankić, 2019).

The schemes attached to this policy include investment in the property sector, business establishment, and financial contribution to the national fund. In real terms, this policy is not only oriented towards the physical movement of individuals between

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countries, but also reflects geopolitical dynamics and global competition in attracting financial elites and superior talents (Shachar, 2018).

Golden Visa comes in an increasingly competitive global landscape, where countries are racing to attract investors and skilled workers. Portugal, Greece, and Spain, for example, have long used these schemes to support fiscal recovery post-economic crises, particularly through property investment (Pereira dos Santos & Strohmaier, 2024). However, these programs also trigger negative impacts such as house price speculation, gentrification, and social exclusion in major cities (Gordon et al., 2025; Santos et al., 2023). In fact, Ireland stopped its program in 2023 because it was considered not to have a real economic impact and was vulnerable to abuse by individuals with problematic backgrounds (Fernandes et al., 2021).

In contrast, countries such as the United Arab Emirates and Singapore are adopting a more selective and impact-based approach. The UAE strictly sets categories of applicants, such as scientists and tech entrepreneurs, as part of the national economic diversification agenda (Khaleej Times, 2023). Singapore requires an investment contribution of at least SGD 2.5 million accompanied by a rigorous evaluation of its business plan and impact on employment (Economic Development Board, 2024). These practices show that the success of Golden Visa is not only determined by the amount of investment, but also by the quality of its contribution and good governance.

Indonesia officially adopted the Golden Visa policy through the Regulation of the Minister of Law and Human Rights No. 22 of 2023 concerning Visas and Residence Permits, which was passed on August 24, 2023. This policy grants long-term residence permits for 5 to 10 years to several subject categories, such as corporate investors, individual investors (both founders and non-founders), diaspora, global talents, world figures, the elderly (silver hair), and second home applicants. This visa product comes with a variety of conveniences, including automatic Limited Stay Permits (ITAS), the right to bring a nuclear family, and priority immigration service routes. In the context of ASEAN, the launch of this scheme marks a shift in Indonesia's immigration strategy from a restrictive approach to an economic benefit-based approach (Bahri, 2023; Directorate of Immigration Indonesia, 2023). The government targets this program as a new source of foreign exchange and a catalyst for long-term economic development (Directorate General of Immigration, 2023; Cabinet Secretariat of the Republic of Indonesia, 2023).

Golden Visa comes in an increasingly competitive global landscape, where countries are competing with each other to attract investors and skilled workers. Countries such as Portugal, Greece, and Spain have long used these schemes to support fiscal recovery after economic crises, especially through property investment (Pereira dos Santos & Strohmaier, 2024). However, these programs trigger negative impacts such as house price speculation, gentrification, and social exclusion in major cities such as Lisbon and Madrid (Gordon et al., 2025; Santos et al., 2023). Ireland even stopped its program in 2023 because it was considered not to have a significant real economic impact, and had the potential to be used by individuals with problematic backgrounds (Fernandes et al., 2021). This suggests that while the Golden Visa promises fiscal benefits, the policy can lead to social and economic distortions if not carefully designed.

Instead, countries such as the United Arab Emirates and Singapore choose a approach based on rigorous selection and productive impact. The UAE, through its General Directorate of Residency and Foreigners Affairs (2022), establishes very specific categories of applicants, such as scientists, technology entrepreneurs, and health professionals. The UAE Golden Visa became an integral part of their Vision 2030, which

focuses on diversifying the economy and reducing dependence on oil (Khaleej Times, 2023). Singapore, through its Global Investor Programme (GIP), requires an investment contribution of at least SGD 2.5 million as well as a rigorous evaluation of its business plan, impact on employment, and integration into national strategic sectors (Economic Development Board, 2024). This strategy reflects that the success of Golden Visa does not lie in the nominal value of the investment alone, but in the quality of its contribution and sectoral direction (Surak & Tsuzuki, 2021).

In Indonesia, this scheme is also expected to strengthen economic diplomacy and national competitiveness. Through the Golden Visa, the government wants to position Indonesia as a strategic destination for global investors, especially in the technology sector, renewable energy, and the development of new regions such as the Capital City of the Archipelago (IKN). This policy is in line with the national strategy to increase Foreign Direct Investment (FDI) and improve Indonesia's ease of doing business ranking in the eyes of the world (United Nations Conference on Trade and Development (UNCTAD), 2024). In the official report of the Directorate General of Immigration (2025), there are more than 572 Golden Visa holders with a realized investment commitment value of IDR 35.4 trillion, most of them from the second home category and individual investors. Although this figure is relatively positive, there is no reporting mechanism that shows the impact of investment on the real sector or local job creation.

However, the adoption of the Golden Visa is not without structural and governance challenges. One of the main problems is the absence of a system to monitor the actual contribution of visa holders, both in terms of real investment, tax compliance, and integration into the national economic ecosystem (Sumption & Hooper, 2014). The experience of countries such as Canada and the United Kingdom shows that without adequate oversight, these schemes can become a means of legalizing illicit funds or speculative migration (Kunz, 2021; Gordon et al., 2025). In addition, the disparity in access to visa services for domestic communities compared to the convenience provided to foreign investors has the potential to cause socio-political tensions, especially in areas with high housing pressures and inequality (Santos et al., 2023).

Another challenge is the lack of policy synergy between the immigration, taxation, investment, and security sectors. Regulations that are too sectoral and have not been digitally integrated make it difficult to evaluate cross-agency the background, origin of funds, and the realization of investment commitments of visa applicants (Schacherer, 2023; Kochenov & Surak, 2023). Therefore, Indonesia needs to immediately build an integrated data system and cross-sectoral legal framework that supports transparency and accountability in the implementation of the Golden Visa. The involvement of institutions such as the Financial Services Authority (OJK), the Financial Transaction Reporting and Analysis Center (PPATK), and the Investment Coordinating Board of the Republic of Indonesia (BKPM) in initial verification is very necessary so that the visas granted are truly impact-based and free from reputational risks. Strong due diligence practices in Singapore and an investment progress evaluation system in the United Arab Emirates can be a reference in strengthening this policy control.

On the other hand, Golden Visa also opens up new opportunities for Indonesia to reorganize its global talent integration strategy. With the increasing trend of mobility of digital professionals, tech expatriates, and global retirees, Indonesia has the potential to utilize the Golden Visa to expand its base of qualified human resources (EY, 2025). However, to realize this, it is necessary to develop an ecosystem that supports the comfort of living, legal certainty, and global connectivity such as premium health services, an

international education system, and competitive tax policies (Organisation for Economic Co-operation and Development (OECD), 2024). If it is not balanced with the reform of the supporting sector, this scheme will only become an administrative instrument without a transformative impact on the national economic structure.

Thus, strengthening the Golden Visa Indonesia requires a cross-disciplinary approach involving legal, economic, social, and public governance dimensions. Comparative studies of the practices of other countries show that flexibility must be accompanied by selectivity, and incentives must be accompanied by accountability (Surak, 2021; Kochenov & Surak, 2023). This study aims to evaluate the initial implementation of the Golden Visa scheme in Indonesia and identify its main challenges, by examining similar practices in several countries such as Portugal, the United Arab Emirates, Singapore, and Malaysia. Through a juridical approach and public policy analysis, this study seeks to formulate strategic recommendations to strengthen the sustainability and effectiveness of the Golden Visa Indonesia program based on lessons learned from international experience.

RESEARCH METHOD

This research uses a qualitative-descriptive approach with the main methods in the form of literature studies and document analysis. This approach allows for an in-depth understanding of the structure and implementation of Indonesia's Golden Visa policy in the context of comparison with other countries (Shachar, 2018; Surak, 2021). This study reviews formal regulations such as the Regulation of the Minister of Law and Human Rights No. 22 of 2023 and supporting documents from the Directorate General of Immigration, including official statistics of Golden Visa holders until April 2025 (Directorate General of Immigration, 2025).

Secondary sources used include international academic journals such as the Journal of Ethnic and Migration Studies, International Comparative Jurisprudence, and reports from global institutions such as the Organisation for Economic Co-operation and Development (2024), the United Nations Conference on Trade and Development (2024), and EY Global (2025) that analyze economic migration trends and investor visa policies. To enrich the comparative perspective, this study also examines policy practices in countries such as Portugal, UAE, Greece, Malaysia, and Singapore based on data from Golden Visa Greece (2024), MM2H.com (n.d.), and Economic Development Board (2024).

The analysis was carried out with a comparative policy analysis framework to identify differences in design, selection mechanisms, and the impact of the implementation of Golden Visa. This study also considers the factors of governance, transparency, and economic contribution which are important parameters in evaluating the success of investment-based immigration policies (Pereira dos Santos & Strohmaier, 2024). Thus, this study aims not only to describe Indonesia's Golden Visa policy descriptively, but also to compile recommendations based on international best practices.

RESULTS AND DISCUSSION

Golden Visa's Strategic Position in Indonesia's Immigration Architecture

Golden Visa occupies an important position in Indonesia's immigration policy transformation strategy, which is increasingly geared towards supporting the national development agenda and increasing global competitiveness. In recent decades,

Indonesia's immigration paradigm has shifted from an administrative approach and strict supervision of foreign nationals to a more open, selective, and contribution-based model. The Golden Visa policy is one of the concrete manifestations of these changes, where residence permits are no longer only granted on the basis of employment or family relationships, but also on the basis of economic value and strategic potential possessed by visa applicants. Thus, the Golden Visa is not only an instrument of immigration law, but also a tool of economic policy and investment diplomacy.

The issuance of the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 22 of 2023 concerning Visas and Residence Permits marks the beginning of the official legal framework for the implementation of the Golden Visa. In this regulation, the visa and residence permit scheme is formulated with an approach that accommodates the needs of the business world and global investors. The types of Golden Visas introduced are very diverse, reflecting the government's efforts to reach various profiles of foreigners who can contribute to national development. This shows that immigration policy is no longer stand-alone, but has become an integral part of investment, employment, and digital economy policies.

In the macro context, Golden Visa is designed to support national strategic agendas, such as accelerating investment, improving the quality of global human resources, and encouraging post-pandemic economic recovery. The Indonesian government targets investment inflows that are not only speculative, but also create a double effect on the real sector, such as the technology, health, education, and tourism industries. In addition, this visa is also positioned to support the already implemented Second Home program, which aims to attract foreign retirees, freelance professionals, or qualified expatriates to stay longer in Indonesia, especially in developing regions such as Bali, Batam, or the Capital City of the archipelago (IKN). This approach shows that immigration policy has begun to be directed as a motor for regional development and economic diversification.

Golden Visa also strengthens the dimension of Indonesia's economic diplomacy. In the midst of global competition in attracting talent and investors, Indonesia needs to build an ecosystem that is not only competitive in terms of financial incentives, but also attractive in terms of legal certainty and ease of administration. By granting long-term residence permits of up to 10 years, as well as the ease of bringing family and efficient access to immigration facilities, Indonesia hopes to become the destination of choice for foreign nationals who want to make the country a hub of business activities or a second home. This is in line with the global trend where human mobility, especially the rich and highly educated, is becoming increasingly dynamic and selective towards residential destinations (Surak, 2021; Džankić, 2019).

Furthermore, Golden Visa has the potential to be a catalyst for accelerating the digitalization of services in the immigration sector. This program requires data integration between institutions, improving the public service system, and simplifying the administrative flow of residence permits. This can encourage digital transformation in immigration services and increase the transparency and accountability of related institutions. If managed properly, the Golden Visa can be an entry point for immigration bureaucracy reform and a model of good practice in value-added public service sector reform. Within this framework, this scheme not only has an impact on increasing state revenue, but also creates a broader institutional reform effect.

Nevertheless, Golden Visa's strategic position is inseparable from the challenges and risks that come with it. If not accompanied by strong oversight policies and a

transparent evaluation system, the program risks becoming a legal loophole for asset laundering, speculative migration, or even the abuse of residence permits for purposes contrary to national law. Therefore, the placement of the Golden Visa in Indonesia's immigration policy architecture must always be positioned in a balance between openness and control, between the attractiveness of investment and the rule of law. In this context, strengthening synergy between institutions including the Directorate General of Immigration, the Investment Coordinating Board, the Directorate General of Taxes, and the State Intelligence Agency is crucial so that the goals of this program can be achieved optimally without causing long-term risks.

Comparison of Golden Visa Policy Designs in Different Countries

The design of the Golden Visa policy in various countries shows quite significant differences, both in terms of policy objectives, applicant criteria, form of investment, and the duration of the residence permit granted. These differences reflect the characteristics of the legal system, economic structure, and national development orientation of each country. Indonesia as a newcomer country in the implementation of this scheme needs to learn from the variety of approaches in order to design a model that suits domestic needs and global trends. In addition, this comparison is also important to understand the advantages and disadvantages of each model so that Indonesia does not repeat the mistakes of other countries that lead to the withdrawal or termination of the program.

Portugal has become one of the most prominent examples in the global Golden Visa discourse due to its success in attracting thousands of foreign investors since the program was introduced in 2012. By offering long-term residence permits to non-EU citizens investing in the property sector, Portugal managed to bring in investments worth more than €6 billion through 2022 (Global Citizen Solutions, 2024). Nevertheless, the negative impact of this program on the housing market, such as the drastic rise in property prices and gentrification in urban areas, prompted the Portuguese government to discontinue most visa categories in 2023 (Santos et al., 2023). This is an important lesson that policy design that is too loose and uncontrolled can produce a counterproductive social impact on the welfare of local communities.

Meanwhile, the United Arab Emirates is implementing a more selective and strategic approach. The Golden Visa scheme in the UAE is for investors, technology professionals, scientists, doctors, and excellent students, and grants a residence permit of up to ten years. The UAE government also integrates this visa policy with an innovation and high-tech economic development strategy. According to data from Khaleej Times (2023), more than 150,000 Golden Visa permits have been issued, reflecting the program's success in attracting global talent and supporting long-term development plans. The UAE's policy design shows that the key to success lies not only in the minimum investment value, but also in the accuracy of target segmentation and the quality of administrative services that support the comfort of stay.

Malaysia through the Malaysia My Second Home (MM2H) program also provides important experience in designing investment-based immigration policies. MM2H does not require the purchase of property, but requires the applicant to show proof of financial assets and fixed income. This approach is more inclusive of retirees and expats who want to enjoy a tropical lifestyle with a lower cost of living. However, the program also faces criticism for not contributing directly to productive investment and relying more on lifestyle appeal. The Malaysian government has also made several adjustments to the

terms and mechanisms of this program to increase its credibility and economic impact (MM2H.com, n.d.).

Greece and Spain are two other European countries that are widely referenced in the Golden Visa study because of their success in attracting investors, especially from China and Russia. Both countries offer residence visas on the condition that they purchase property of a certain value, but in recent years have begun to shift policy focus towards more productive investments. Greece, for example, recently raised the property value threshold from €250,000 to €500,000 in metropolitan areas to prevent unbridled speculation (Golden Visa Greece, 2024). These measures demonstrate the importance of continuous adjustments in policy design to accommodate market dynamics and maintain a balance between openness and protection of the public interest.

In the context of Southeast Asia, Singapore implements a very strict policy for investment-based residency schemes through the Global Investor Programme (GIP). This program not only requires a high investment value, but also an evaluation of the business track record and future business plans. Singapore is positioning this policy as part of a strategy to screen strategic investors that are able to have a direct impact on innovation, job creation, and the development of national priority industries. The strict selection and strong integration of these policies make Singapore one of the most selective and effective countries in utilizing the mobility of the world's rich for its national interests.

When compared to the policy designs above, the Golden Visa Indonesia scheme appears to be looser in selection, but still limited in scale and scope of investment. Some visa categories such as Second Home and Silver Hair do reach a wider profile, but they are not accompanied by policies that ensure the contribution of investment to productive sectors. In addition, there is no strong system in terms of impact evaluation or verification mechanisms on the realization of investment commitments. Compared to Singapore and the UAE which emphasize the quality and impact of investments, Indonesia is still in the early stages of building a solid foundation of selection and governance.

By understanding these various policy designs, Indonesia can formulate a Golden Visa model that balances openness to investment and protection of national interests. Strengthening the aspects of target segmentation, impact-based selection, and post-visa monitoring mechanisms are the main keys so that this program can survive in the long term and make a real contribution to national development. The experience of other countries teaches that flexibility must be accompanied by firmness, and investment attractiveness must be accompanied by legal certainty and the integrity of public policy.

Economic and Social Impact of Golden Visa

Golden Visa schemes in various countries are generally designed to make a significant contribution to national economic growth, both through direct investment inflows, increased consumption, expanding the tax base, and job creation. In many cases, the Golden Visa is used as an instrument to overcome economic crises or accelerate fiscal recovery, as Portugal did after the 2008 European financial crisis. In Indonesia, expectations for this scheme are also quite large. The government stated that the Golden Visa is not only aimed at increasing foreign direct investment, but also to attract global talent who can contribute to innovation and development of strategic sectors, such as digitalization, health, and education (Directorate General of Immigration, 2024).

Data from the Directorate General of Immigration as of April 2025 shows that the total number of Golden Visa holders reaches 572 people, with the largest category coming from Second Home schemes and corporate investors. The total value of investment

commitments recorded has exceeded Rp35.4 trillion, a promising achievement in the early stages of policy implementation. However, an important question that must be answered is whether the investment really has a sustainable impact on the Indonesian economy. Most of the investment was recorded in the form of company incorporation and property acquisitions, but there was no clear data on real contributions to job creation, technology transfer, or increased national industrial competitiveness.

Table 1. Comparison Table of Golden Visa Programs in Different Countries

Aspects	Indonesia Golden Visa	Portugal	Greece	Malaysia (MM2H)	UAE	Singapore (GIP)
Year Launched	2022 (second home)2023 (golden visa)	2012	2013	2002 (major revision 2021)	2019	2004
Legal Basis	Regulation of the Minister of Law and Human Rights of the Republic of Indonesia No. 22 of 2023	Act 29/2012 & Law 23/2007	Law 4251/2014	Immigration Act 1959/63	Cabinet Decision No. 56 of 2018	Economic Development Board Act
Key Investment Requirements	IDR 2 billion (USD 130,000) to USD 50,000,000 (varies depending on subject)	Real Estate: €500,000; Capital Transfer: €1.5 million; Creation of 10 jobs; R&D: €500,000	Real Estate: €250,000-500,000; Bank deposit: €400,000; Obligation: €400,000	Deposit: RM 1 million (USD 240,000); Monthly income: RM 40,000; Liquid assets: RM 1.5 million	Real Estate: AED 2 million (USD 545,000); Business investment: AED 2 million	Option A: SGD 10 million in new/existing business; Option B: SGD 25 million in investment funds
Visa Duration	5-10 years, extendable	2 years, can be extended 3 years, then the next extension	5 years, renewable	5 years, renewable	5-10 years, renewable	Permanent Residence (PR)
Residency Requirements	No minimum requirements	7 days of the first year, 14 days every 2 subsequent years	No minimum requirements	No minimum requirements	No minimum requirements	Minimum 183 days/year to maintain homework
Pathway to Citizenship	There is no direct route, you still have to have an ITAP first	Yes, after 5 years of residency	Yes, after 7 years of residency	No direct line	None, except in special cases	Yes, after 2 years of PR
Investment Options	Miscellaneous (deposits, capital market investment instruments, direct investments, property)	Miscellaneous (real estate, capital transfer, job creation, R&D, culture, venture capital)	Limited (real estate, bank deposits, bonds)	Limited (fixed deposit)	Diverse (real estate, business, bank deposit, talent)	Very specific (business or investment fund)
Key Benefits	Long-term visa; Right to work/businesses; Ease of business licensing	Schengen Access; Minimum residency requirements;	There are no residency requirements; Lowest entry point in Europe;	Low cost of living; Quality health and education infrastructure	There is no personal income tax; 100% foreign ownership	Stable business and regulatory environment; World-class

Aspects	Indonesia Golden Visa	Portugal	Greece	Malaysia (MM2H)	UAE	Singapore (GIP)
		Pathway to EU citizenship	Access to Schengen		of the business; Global connectivity	education system; Asian financial hub
Number of Recipients	> 500 to 2025 (Directorate General of Immigration, 2025)	>11,000 major investors, >6.8 billion euros of investment (Global Citizen Solutions, 2024)	>9,500 investors, >3 billion euros of investment (Golden Visa Greece, 2024)	>57,000 participants (2002-2021), a drastic decrease after the 2021 revision (MM2H.com, n.d.)	>150,000 recipients (Khaleej Times, 2023)	>1,800 applications since 2004, 50% approval rate (Economic Development Board, 2024)
Significant Reforms	No major reforms yet	2022: Removing real estate options in major urban areas	2023: Raising the threshold in popular regions to €500,000	2021: Drastically increased financial requirements	2022: Expanding categories for talent	Periodic evaluation and adjustment of requirements
Economic Focus	Direct investment	Post-crisis real estate sector recovery; Regional diversification	Real estate recovery and post-crisis economy	Domestic consumption and real estate	Knowledge-based economy and diversification of oil	High-value, knowledge-based business sectors

Source: Processed from the Directorate General of Immigration (2023, 2025), Global Citizen Solutions (2024), Golden Visa Greece (2024), MM2H.com (n.d.), General Directorate of Residency and Foreigners Affairs - Dubai (2022), Economic Development Board (2024), Khaleej Times (2023), Bahri (2023), Portugal Pathways (n.d.)

The table above presents an in-depth comparison of the Golden Visa policy designs of six countries, including Indonesia. It can be seen that Indonesia has a relatively moderate minimum investment value when compared to Singapore or the UAE, but the scope of the visa recipient category is much wider. This has the advantage in terms of initial appeal, but on the other hand poses the challenge of ensuring a real economic contribution from visa holders. Countries such as Singapore and the UAE emphasize impact-based selection and strategic sectors, while Portugal and Greece highlight property investments that have ultimately been criticized for causing price inflation and social pressures.

One of the main challenges of the Golden Visa scheme is how to measure the real contribution of visa holders to the economy, not just in terms of the nominal value of the investment. The experience of European countries shows that investment inflows through Golden Visas are often passive, such as the purchase of properties that are then rented out or left unproductive. In Portugal, for example, the program has driven a significant increase in property prices in major cities, but it has not been followed by an increase in real sector investment or employment growth (Pereira dos Santos & Strohmaier, 2024). This has led to social unrest, especially among local communities who are marginalized due to property speculation and the rising cost of living.

On the social side, the Golden Visa program also has the potential to create a new class of segregation between wealthy foreigners who get legal easements and facilities, and locals who face limited access to basic resources such as housing and public services. Some critics of the Golden Visa program say that this policy is a form of "neoliberal

privilege," where legal status is sold to a global elite group by ignoring the principles of justice and inclusivity (Shachar, 2018; Surak, 2021). In Indonesia, the potential for similar tensions could arise if there is no social security and balancing policy that ensures that the benefits of these policies are also enjoyed by the wider community, not just by the elite of foreign investors.

Another social impact that needs to be watched out for is the emergence of forms of migration that are not in accordance with the spirit of the policy. In some countries, Golden Visas are used as a loophole to "whitewash" funds from the proceeds of economic crimes or as a means of tax evasion (Sumption & Hooper, 2014). Therefore, it is important for Indonesia to establish a robust verification and audit system on the origin of funds, the identity of the applicant, and the implementation of investments once the permit is granted. Without an adequate supervisory system, policies that were originally designed to strengthen the economy can turn into legal loopholes that actually damage Indonesia's national order system and legal reputation in the eyes of the world.

However, the Golden Visa scheme also has the potential to have a positive social impact if designed and implemented with an inclusive strategy. For example, Golden Visa holders can be directed to invest in social sectors such as health, education, and green energy, which directly impact people's lives. In some countries, visa holders are required to form local partnerships, contribute to CSR programs, or absorb local labor as part of their investment commitments. If Indonesia is able to direct the Golden Visa to this model, then this policy will not only be a tool for economic growth, but also a means of sustainable and inclusive social development.

In general, the Golden Visa scheme is at the crossroads between economic interests and social values. On the one hand, it offers great opportunities to bring in capital and increase national capacity in the face of global competition. But on the other hand, without a strong regulatory and governance framework, it can cause profound social distortions and inequality. Indonesia needs to ensure that this policy is approached not only from the point of view of investment value, but also from the point of view of social benefits and the sustainability of national development. An impact-based policy approach should be the main orientation in evaluating the success of Golden Visa in the future.

Evaluation of the Implementation and Challenges of Golden Visa in Indonesia

Since its inauguration through the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 22 of 2023, the implementation of the Golden Visa scheme in Indonesia has begun to show interesting dynamics. The Directorate General of Immigration, as the main implementing agency, has established the technical procedures for issuing visas, including administrative requirements and a mechanism for initial evaluation of the value of the investment claimed by the applicant. Based on data as of April 11, 2025, the total number of Golden Visa holders reached 572 people with a consolidated investment value of IDR 35.4 trillion. This figure should certainly be appreciated as the initial achievement of a policy that has only been running for less than two years. However, an in-depth evaluation of its effectiveness and direction of implementation needs to be carried out to measure long-term success and develop measures for improvement.

One of the main challenges in the implementation of Golden Visa in Indonesia is the lack of a clear and comprehensive periodic monitoring and evaluation system. There are no explicit provisions in the regulations regarding how the government will assess a visa holder's actual contribution to the economy, whether in the form of annual investment

reports, independent audits, or involvement in productive business activities. Without this kind of oversight mechanism, it is difficult to ensure that the visa holder actually meets the investment commitments submitted at the time of application. In this context, Indonesia can learn from countries like Singapore that implement a strict evaluation system of investment progress and economic impact, before extending residence permits.

In addition, inter-agency coordination in the implementation of the Golden Visa policy still needs to be strengthened. Although the Directorate General of Immigration is at the forefront as a policy organizer, the implementation of this program actually involves many other parties such as the Investment Coordinating Board (BKPM), the Directorate General of Taxes, the Ministry of Investment, and even Bank Indonesia. However, there is no unified system across agencies that actively integrates data and their respective functions in monitoring visa holders. As a result, the assessment process for applicants is still administrative and static, not evaluative and impact-based. In fact, cross-sector collaboration is crucial so that the Golden Visa policy is not only a domain of immigration, but also an integrated national development instrument.

Another challenge that is quite prominent is the weak transparency of public information related to this policy. The official website of government agencies does not present many periodic reports or digital dashboards that present data and developments in the implementation of Golden Visa in real-time. This lack of openness has the potential to generate negative perceptions, both from the local community and potential investors, due to the lack of accountability in the management of policies related to special facilities for foreign nationals. As a policy that is special and full of incentives, Golden Visa must be carried out with the principles of transparency and public accountability so as not to become a source of social jealousy or conflicts of interest.

Furthermore, the aspects of legal protection and regulatory certainty for Golden Visa holders also need to be clarified. In some cases in other countries, visa holders face difficulties due to sudden policy changes, such as in Portugal and Ireland that terminated the program at short notice. In Indonesia, this risk can be anticipated by building a legal system that is not only flexible, but also provides legal guarantees to investors who have invested their capital legally. Otherwise, the scheme could lose its appeal in the eyes of global investors who are highly sensitive to regulatory risks and political uncertainty.

In the initial implementation stage, Indonesia also faces the dilemma between reaching as many applicants as possible to demonstrate quantitative success, and maintaining the exclusivity and quality of visa holders for long-term success. Some subjects such as Second Home with an investment value of at least Rp. 2 billion and Silver Hair with an investment value of USD 50,000 deposits have managed to attract significant amounts in a short period of time, but these categories do not make a real contribution to the economy. When compared to other subjects such as individual investors not setting up a company, it has a minimum investment value of USD 350,000 for a stay of 5 years. Therefore, it is necessary to apply a performance-based approach, where the amount and extent of the contribution of each subject is proportional to the facilities that will be obtained by the foreigner.

In general, the implementation of Golden Visa in Indonesia is still in an experimental phase that requires consolidation and refinement. Without strong governance, a transparent legal framework, and an impact-based evaluation system, these schemes risk becoming purely symbolic policies that have no long-term strategic value. The government must place this policy as part of the big agenda of immigration policy reform that is closely linked to the national economic strategy. In that way, the Golden

Visa is not only a tool to attract investment, but also a means of strengthening Indonesia's economic structure in the midst of global competition.

Global Learning and Its Relevance for Indonesia

In designing and implementing the Golden Visa policy, Indonesia has a great opportunity to learn from the experiences of other countries that have implemented similar schemes before. Each country brings its own success and failure stories, which, if critically examined, can be a source of reflection and a source of inspiration for more mature policies. Countries such as Portugal, Spain, and Greece, for example, show how the Golden Visa is able to attract large amounts of investment, especially in the property sector. However, they also show significant risks when such policies are not accompanied by strong controls on social and economic impacts. The surge in house prices, the marginalization of local residents, and the controversy over the legality of investment are important notes that finally encourage several countries to evaluate, even close the program (Surak & Tsuzuki, 2021; Santos et al., 2023).

In contrast, the experience of countries such as Singapore and the United Arab Emirates shows a more measurable and tangible contribution-based Golden Visa model. In Singapore, the Global Investor Programme scheme emphasizes investment quality, business track record and long-term business plans. Visas are not granted automatically just because there are funds ready to be invested, but must be accompanied by a business proposal that can add value to the national economy. This creates a natural selection of the type of investors who enter not just those who seek safe residence, but active economic actors who have a vision and commitment to the development of strategic sectors. In the UAE, the success of the Golden Visa program is determined not only by the relaxation of the duration of stay, but also by cross-policy integration, from taxation, ease of business licensing, to access to high-quality public services.

From the case of Malaysia, Indonesia can learn that the attractiveness of a tropical lifestyle and relatively low cost of living can be an effective starting capital to attract Golden Visa applicants, especially from retirees or foreign citizens with middle-to-upper incomes. However, an important lesson that can also be learned is that without selective rules and a strict evaluation system, this program can become just an "expensive residence permit" that has no real impact on the country's economy. Therefore, Indonesia needs to avoid price wars or competition based on convenience alone, and start building policy differentiation based on strategic advantages such as the potential of the digital sector, sustainable tourism, or the blue and green economy.

One of the important aspects that can also be learned from global practice is the importance of building an inclusive and visionary public narrative regarding the Golden Visa policy. Shachar (2018) emphasizes that investment-based immigration programs often generate controversy because they are considered to prioritize wealth over the integrity of citizens. Therefore, successful countries generally include big visions in their policies, for example, as part of efforts to build innovation centers, encourage regional development, or strengthen economic diplomacy. Indonesia can take a similar approach by aligning the Golden Visa as part of a long-term development strategy such as industrial downstreaming or national digital transformation.

In addition, international practice also demonstrates the importance of community and local stakeholder involvement in the policy design and evaluation process. Information transparency, public consultation, and regular reporting on the impact of Golden Visa are important elements to maintain the legitimacy and accountability of the

program. Indonesia still has room to improve this policy communication, both in the form of digital platforms, performance reports, and statistical data disclosure. When local communities feel that the Golden Visa policy has a direct impact on their well-being, for example, through new jobs, better infrastructure, or knowledge transfer, social resistance to these policies will be much lower.

Overall, lessons learned from global practice show that the success of Golden Visa is determined not only by the amount of investment that comes in, but also by the quality of the policy design, the governance of its implementation, and the extent to which its impact can be felt in a real and equitable manner. Indonesia has the opportunity to not only follow global trends, but to become a leader in formulating an inclusive, productive, and sustainable Golden Visa model. By absorbing lessons from other countries and adapting them to the national social, economic, and legal contexts, Indonesia can strengthen its position as a strategic destination country for global investors and professionals, without sacrificing the values of social justice and national sovereignty.

CONCLUSION

The study concludes that Indonesia's Golden Visa policy has the potential to become a strategic instrument for attracting high-quality foreign investment and global talent. However, its current implementation still lacks structural integration, sectoral focus, and mechanisms for measurable impact. Comparative insights from global benchmarks highlight that the effectiveness of Golden Visa schemes depends on rigorous eligibility criteria, alignment with national development priorities, and robust governance frameworks. Therefore, to enhance the effectiveness of the Golden Visa, Indonesia must adopt a holistic and selective approach, prioritizing investments in strategic sectors such as technology, green economy, healthcare, and education, while ensuring cross-agency coordination and transparent oversight.

Future studies should investigate the long-term socioeconomic impact of Golden Visa holders on local communities, employment quality, and innovation ecosystems. In addition, empirical research is needed to assess the effectiveness of impact-based evaluation models for residency schemes, as well as public perception and social acceptance of such policies. These areas will provide critical evidence to refine the policy framework and ensure that the Golden Visa scheme contributes not only to economic growth but also to inclusive and sustainable national development.

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