Support to the Development of the Indonesian Qualification Framework

Design of Indonesian Qualification Board

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List of abbreviations

AEC — ASEAN Economic Community
AIPDKI — Indonesian Nursing Diploma Education Institution
AIPNI — Indonesian Nursing Education Institution Association
AQF — Australian Qualifications Framework
AQRF — ASEAN Qualifications Reference Framework
ASEAN — Association of South East Asian Nations
ASEM — ASEAN – EU Education Ministers' Meeting
BAN-PT — *Badan Akreditasi Nasional Perguruan Tinggi* - National Accreditation Agency for Higher Education
Bappenas — *Badan Perencanaan Pembangunan Nasional* - National Development Planning Agency
BLK — *Balai Latihan Kerja* – Skills Training Center
BNSP — *Badan Nasional Sertifikasi Profesi* – National Professional Certification Agency
BSNP — *Badan Standar Pendidikan Nasional* – Board of National Education Standards
DGHE — Directorate General of Higher Education
DIKLAT — *Pendidikan dan Pelatihan* – Education and Training
DLSA — Directorate of Learning and Student Affairs – DGHE, and recently converted into the Directorate General of Learning and Student Affairs – DGLSA MoRTHE
HHRMA — Hotel Human Resource Manager Association
HKQF — Hong Kong Qualifications Framework
HKSAR — Hong Kong Special Administrative Region
IAI — Indonesian Association of Accountants
IAPI — Indonesian Institute of Certified Public Accountants
IQB — Indonesian Qualification Board
IQF — Indonesian Qualification Framework
KADIN — *Kamar Dagang & Industri Indonesia* - Indonesian Chamber of Commerce & Industry
KKNI — *Kerangka Kualifikasi Nasional Indonesia* – Indonesian Qualification Framework
LKP — *Lembaga Kursus dan Pelatihan* – Courses and Training Institute, accredited by MoEC
LPK — *Lembaga Pelatihan Kerja* - Skills Training Institute, accredited by MoM
LSP — *Lembaga Sertifikasi Profesi* – Professional Certification Bodies (PCB)
MoEC — Ministry of Education and Culture
MoH — Ministry of Health
MoI — Ministry of Industry
MoM — Ministry of Manpower
MoRTHE — Ministry of Research, Technology, and Higher Education
MRA — Mutual Recognition Arrangement
NZQF — New Zealand Qualifications Framework
PCB — Professional Competency / Certification Bodies – *Lembaga Sertifikasi Profesi*
PHRI — Indonesian Hotel & Restaurant Association
PKBM — *Program Kegiatan Belajar Masyarakat* – Community Learning Program
PPNI — Indonesian Nursing Association
RPL — Recognition of Prior Learning
SKPI — *Surat Keterangan Pendamping Ijasah* – Diploma Supplement
SKKNI/NCS — *Standar Kompetensi Kerja Nasional Indonesia* – National Competency Standard
SISLATKERNAS — *Sistem Pelatihan Kerja Nasional* - National Skills Training System

The Indonesian Qualification Board
Road map for its establishment

1   Rationale for Indonesian Qualification Board (IQB)

A national qualifications framework (NQF) is a set of nationally agreed standards, developed by competent authorities, which recognize learning outcomes and competences for all forms of learning [UNESCO 2012]. With the introduction of the Indonesian Qualification Framework (IQF)[1], consideration needs to be given to how to:

- communicate the frameworks (both nationally and internationally);
- coordinate and ratify further national IQF determinations;
- manage and maintain it, including ensuring progressive implementation across the various
- education and training sectors[2]; and,
- link to and support quality assurance mechanisms.

The establishment of the IQB is particularly essential for:

- providing consistent national IQF interpretations of qualifications, qualifications types, qualification type descriptors;
- harmonizing the existing qualification systems operated under different auspices, e.g. MoM, MoEC, MoRTHE, MoH[3], professional associations, other ministries;
- taking the leading role in promoting and educating the public;
- playing the key focal point for the IQF in dealing with international counter parts; and
- providing additional quality assurance of the education and training system.

2   Basic principles

Governance can be defined as: '…*the set of responsibilities and practices, policies and procedures, exercised by an agency's executive, to provide strategic direction, ensure objectives are achieved, manage risks and use resources responsibly and with accountability*[4]. In relation to qualifications frameworks, governance can refer to how an agency promotes, manages and maintains the framework, including ensuring progressive implementation across the various education and training sectors. It also refers to the legislative or regulatory basis of the agency and its roles and responsibilities.

The governance operation of the IQB should meet the following requirements:

- transparency and accountability;
- integrity, including resolution of potential and actual conflicts of interest with selflessness and objectivity in the public interest;
- due diligence;
- inclusive; and
- economy, efficiency and effectiveness.

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[1]   Presidential Decree 8/2012 on the Indonesian Qualification Frameworks (Kerangka Kualifikasi Nasional Indonesia)
[2]   Inclusive of all pathways and all education and training sectors including skills sector
[3]   MoH = Ministry of Health
[4]   Australia Government 2007, p. 1.

> **Recommendation 1:**
> *The IQB should be able to operate based on the principles of: transparency; accountability; integrity, including resolution of potential and actual conflicts of interest with selflessness and objectivity in the public interest; due diligence; and economy, efficiency and effectiveness.*

3   International experiences

The majority of countries that have implemented a NQF have created new qualifications authorities to design and/or implement and manage their qualifications framework. However, these authorities vary substantially, especially in their terms of reference, operations, size and capacity (Allais 2010). In essence the variance is due to:

- nature, scope and purpose of the NQF;
- characteristics of the qualifications system, including the quality assurance arrangements;
- degree and scope of desired stakeholder engagement; and
- social and political characteristics of the country.

Generally, the variances are as a result of whether the authority has a quality assurance role or not within the qualifications system. Regardless, each country has established only *one single agency* to manage the NQF and coordinate its implementation across all education and training sectors.

Generally speaking, most countries reviewed have tracked systems, whereby vocational education and training sector and higher education are separate and distinct. Australia is clearly a tracked system with vocational education and training (VET) sector being distinct and unrelated to higher education; although there is some blurring of provision with some providers and qualification types and a very strong emphasis at all levels on access and provision of vertical and horizontal pathways.

Within any qualifications system the quality assurance arrangements include:

- approval (and monitoring) of the achievement standards (such as study programs, curriculum, occupational standards, educational or competency standards);
- approval of education and training providers, including approval to be established and approval to deliver specific programs);
- monitoring and auditing of provider processes and outcomes, including student learning and employment outcomes and student and user satisfaction levels;
- control, supervision or monitoring of assessment, certification and graduation procedures and outcomes;
- Provider or system-wide evaluations of quality, including evaluations by external agencies; and,
- provision of public information on the performance of providers.[5]

Countries typically divide these functions across different types of agencies, such as:

- accreditation agencies;
- provider registration and monitoring agencies;
- qualifications agencies and awarding bodies;
- licensing agencies and professional bodies;
- self-accrediting and/or awarding providers; and
- external quality agencies such as those responsible for the ISO standards[6]

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[5] Bateman, Keating, Gillis, Dyson, Burke & Coles 2012, p. 8.
[6] Bateman, Keating, Gillis, Dyson, Burke & Coles 2012, p. 9.

	Australia (past)	Australia (current)	Hong Kong	Ireland	New Zealand	Scotland	South Africa
Name of agency responsible for the NQF	AQF Council or Board	Unit within DET	Education Bureau	QQI	NZQA	SCQF Partnership	SAQA
Legal basis of agency	Committee of ministerial council	Unit within DET	Under the Education Bureau	State agency	Legislated as a Crown entity	SCQFP as a company limited by guarantee	Legislated as an entity given a legal personality
Legislation control of system	Tight for vocational, and flexible for higher education	In between	In between	In between	Tight	Flexible	In between
Qualifications systems	Tracked	Tracked	Tracked	Tracked	Tracked	Tracked	Tracked
Quality assurance agencies	state and territory agencies	Two agencies – one for VET and one for Higher Education	Independent QAA for non university sector	Merge of 4 agencies into QQI (2012)	NZQA for non university sector and Universities NZ for university sector	Quality Assurance Agency for higher education Scottish Qualifications Authority	3 Councils responsible for higher education, trades and occupations, and general and further education
Source of funding of agency responsible for NQF	Government	Government	Government	Government funding, fees, other grants	Government funding and fees	Government	Government

The number and type of agencies and the balance of their responsibilities, as well as the processes that are used to undertake their functions are varied.

For effective implementation of an NQF across sectors it is accepted that success depends on the level of trust between the sectors.[7] Building communities of trust between the sectors relies on accurate and transparent information in relation to the quality assurance arrangements deployed. The role of the responsible agency for managing the NQF could be instrumental in communicating the quality assurance arrangements, providing for linkages between sectors and encouraging flexible pathways.

Of the six countries reviewed, the mechanism for the establishment of the responsible agency is intrinsically linked to the legal basis of the country's NQF. Ireland and South Africa, for example, have a legal document establishing their NQFs. On the other hand, Australia for example, did not establish its NQF through specific legislation but focused on agreements between government agencies. In all but Australia and Hong Kong, the current responsible agency has a legal basis and a level of independence from that of the government. This legal independence has two advantages – it provides for a political mandate for its role in the maintenance, implementation and promotion of the NQF and also provides for a level of autonomy from the direct influence and competing demands of government ministries and potential for changes in policies.

The membership of each the agencies responsible for the NQF of the six countries were reviewed. Membership numbers generally range from 8 to 16 members; however, in the case of South Africa the IQB in its initial stage (and directly after the apartheid period) had up to 25 members. Some interesting features are, 2 student representatives on the governing body (QQI Ireland), an international observer (previous arrangements in Australia), a government representative as an observer (SCQF), nomination from specific sectors or peak bodies (e.g. teachers, principals), community representation (e.g. Scotland).

An analysis of the six countries reviewed for this Road Map indicates that various processes are utilized, namely nominations sought from relevant bodies, appointments by the relevant Minister, additional members from particular agencies (e.g. SCQF Board), a Chair selected from within the members or have an independent Chair and consideration of skills and expertise, e.g. AQF Council (Australia), QQI (Ireland), SCQF Committee (Scotland), South Africa.

A review of the six countries also revealed variations in reporting structures. The majority of the agencies is considered quasi autonomous non-government organizations, and is responsible in some way to the government. In the main, most responsible agencies report to their government via an annual report and also have their financial accounts audited annually. Reports are generally submitted to parliament and are required to be made public on their website (e.g. New Zealand). In addition, some agencies are required to submit strategic plans; in the case of Ireland it is every three years, as was the case in Australia where it was on an annual basis. Of interest is that New Zealand Qualifications Authority reports to two Ministers acknowledging the cross sect oral nature of NQFs and in Australia the previous structures of a Council or Board reported to a ministerial council of commonwealth and state and territory ministers – again acknowledging the cross sectoral nature and emphasis of the NQF.

4   National current context

Indonesia appears to have a strong segmentation, especially between the skills and training sector and the higher education sector, though vocational programs are offered in both the education sectors under two ministries. The responsibility for these two main sectors lies with the MoM, MoEC, MoRTHE, as well as other line ministries (who provide education and training), plus a range of quality

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[7] Tuck 2007.

assurance players across various sectors with very little current documentation to explain how the strategies interconnect or indeed overlap.

The main quality assurance agency included in the higher education sector is BAN-PT, which is currently responsible for program and institutional accreditation, whilst BSNP is responsible for the development of quality standards for education providers. In the skills training sector, MoM has the responsibility for facilitating the development of competency standards and qualifications in conjunction with line ministries. Under MoM, the LA-LPK[8] is responsible for the approval of training providers and training programs. In addition, BNSP provides assessment services and certification to completing students, as well as existing workers, through the registration/licensing of assessment providers (i.e. professional certification bodies).

The Indonesia qualifications system, being heavily tracked and with the limited coordination across ministries, does not facilitate student mobility between the academic sector and the vocational skills sector, either horizontal or vertical pathways.

In the case of Indonesia, the IQF outlines existing structures and provides additional information to facilitate qualifications transparency. The IQF is promulgated in Presidential Decree 8/2012. The Presidential Decree stipulates a hierarchy of 9 levels of learning outcomes aligned to 9 levels of qualifications to enable equivalencing of qualifications and learning outcomes across formal education, non-formal, informal, or work experiences. The Presidential Decree 8/2012 on the IQF does not describe qualifications types (either descriptors or volume measures). The Presidential Decree currently is supported by a range of Ministerial regulations from the MoM, MoEC, and MoRTHE that appear to cover the scope of what 'makes up' a qualifications framework. It is less clear if ministerial regulations from the MoM cover the same scope and depth of information. As such the IQF is currently not a cohesive and transparent national qualifications framework; this will be the biggest challenge for the IQB to develop the Presidential Decree (Perpres) or Government Regulation (PP) into a fully integrated and cohesive NQF.

5   Recommended scope, role and responsibilities

Castejon, Chakroun, Coles, Deij and McBride's (2011) research into European Union countries note that the remit of new qualifications agencies can be generalised into various functions, including

- provide policy advice as to the implementation of NQFs and the qualifications system
- ensure links with other national and international qualifications frameworks
- cooperate with similar bodies in other countries
- carry dissemination, such as conferences, research, consultancy and publication activities
- arrange for recognition of skills and qualifications for student and manpower mobility.

Research across the six countries in terms of roles and responsibilities indicate quality assurance responsibilities (applied by the agencies of Ireland, South Africa and New Zealand) and the common communicative and coordination roles included:

- monitoring the NQF in terms of applicability, currency and implementation;
- dissemination and promotion of the NQF, including the role of information center;
- dissemination and promotion of quality assurance, through liaison and/or an overarching quality assurance role, and providing assistance as well as training; and
- liaison with international bodies and promotion of each country's NQF and qualifications, including alignment activities.

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[8] Lembaga Akreditasi – Lembaga Pelatihan Kerja

5.1   Scope of the responsibilities

Strong governance arrangements, including a political mandate for the IQF Board, are critical to the successful implementation of the IQF. In all known instances of international examples, the responsible agency's scope or focus is on the country's qualifications system and the relationship with the qualifications framework. There is only one single agency; not to do so would provide for multiple agencies and multiple focal points, which is potentially confusing to local and international stakeholders.

The roles and responsibilities of the IQB should be clearly defined and distinct from the role of the various ministries and agencies in IQF implementation. The roles and responsibilities of the IQB should include:

a) coordination and monitoring of IQF implementation across the sectors;
b) policy direction of the IQF;
c) being the single voice advocating and promoting the benefits and role of the IQF at a national level and international level;
d) liaison with relevant international agencies;
e) provision of cross sectoral objective advice on the effectiveness of Indonesia's qualifications
f) system; and
g) Coordination and maintenance of agency quality standards, meta-evaluation of the quality assurance agencies. A key role of the IQB is to hold all ministries and agencies accountable for their performance. The IQB will maintain a register of recognized quality assurance agencies.

The IQF addresses all three main sectors of education and training: schools, vocational skills training, and higher education, and as such that the IQB should represent all sectors, including non-formal and informal learning outside established formalized education and training institutions. The IQB needs to be supported by a strong Secretariat to undertake the operations and functions of the IQB.

> **Recommendation 2:**
> *It is strongly recommended that there is one single agency to maintain and monitor the IQF, and its scope of responsibilities is to be across all education and training sectors.*

5.2   Maintenance and monitoring of IQF

The Presidential Decree 8/2012 does not refer to the establishment of the IQB to manage or monitor the implementation of the IQF. Reference is only made to implementation of the IQF through ministries and other agencies. The international research has shown that there should be one single agency appointed the remit of managing and monitoring a national qualifications framework. Without this role being undertaken by one entity in Indonesia, the successful and coordinated implementation and the purported benefits of a qualifications framework is at risk.

> **Recommendation 3:**
> *It is recommended that an appropriate decree be promulgated to provide a political mandate to monitor and manage the IQF*

5.3   Policy direction

Currently the only high level policy on the IQF is the Presidential Decree 8/2012, all other regulations are at individual ministry level and relate to the specific ministry's implementation of the IQF. Without a single point of policy development for the IQF, the interpretation of outcomes and qualifications across various ministries and agencies will vary. In all known international instances

there is only one policy 'maker' for the national qualifications framework although decisions and policy development are undertaken in consultation with key stakeholders.

A national qualifications framework is generally made up of key features, such as level descriptors; qualifications types, e.g. bachelor degree; qualification type descriptors; and credit or volume measures. Frameworks also include supporting policies related to implementation of the framework, e.g. agreed definitions; certification; rules for design and construction of qualifications; (including the use of a NQF logo[9]); pathways opportunities (such as recognition of prior learning); and international referencing processes.

Within Indonesia, definitions related to Indonesian qualification systems, if evident, are in specific regulations related to relevant ministries and do not necessarily have national scope or national commitment to a common understanding. The only high level policy document at national level is that of the Presidential Decree 8/2012. This Decree established the IQF and includes a limited number of definitions including those related to:

- national qualifications framework;
- learning outcomes;
- equalization;
- qualification;
- work experience;
- work competency certification;
- work competency certificate; and
- Profession.

It is imperative to come to an agreement (or a common understanding) on terminology across the education and training sectors for further discussion and implementation of the qualifications framework in Indonesia. It is proposed that the IQB could take a prominent role in consulting with relevant ministries and providing public documentation of agreed terms.

In Indonesia, the Presidential Decree 8/2012 outlines the level descriptors but does not provide any other advice in relation to qualifications. A review of regulations from the MoEC indicates that in the other component parts of a framework are mostly included for higher education. Whether similar documents are developed by the ministry responsible for manpower is less clear. To promote transparency of the IQF and to avoid a mix of qualification types and descriptors, definitions and application of certification, the IQB should be responsible for developing overarching national policy directly related to the IQF, including national policy on:

- qualifications including component parts e.g., qualification types, qualification types descriptors including the volume;
- recognition of prior learning;
- certification, including naming conventions and use of the IQF logo;[10]
- international referencing activities; and
- Education and training definitions.

The relevant regulations documented by MoEC could be 'co-opted' as IQB level documents on agreement from MoM and other ministries, and it needs to be published as one document. Relevant line ministries could still develop additional specific requirements as long as they are not conflicting with the national policy.

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[9] An IQF logo could be utilised if and when qualifications and quality assurance arrangements meet the requirements of the IQB's policies.

[10] Limiting application to quality assured programs and providers (recognised by an accrediting agency); only used on certifiates/awards, excluding diploma supplements, statements of results, and marketing materials etc.

> **Recommendation 4:**
> *It is recommended that the IQB takes responsibility for all national policy documentation related to the IQF, including Qualifications and its component parts (e.g. level descriptors, qualification types, qualification type descriptors, volume measures); Recognition of prior learning; Certification including naming conventions and use of the IQF logo; international referencing activities; and National education and training definitions.*

5.4 Coordination

The Presidential Decree 8/2012 indicates that line ministries and relevant agencies can implement the IQF as they see fit. The minister in charge of education affairs and minister handling labor issues are assigned to develop any 'further stipulations'. However, the Decree does not:

- make it clear if any stipulations are to be joint or individual, or whether both ministries can issue varying stipulations on the same issue; and
- Indicate if other line ministries or agencies need to follow these stipulations.

There is no overarching body that monitors and provides objective information to the President of how the IQF is being implemented across all education, skills, and training sectors and whether the aims of the IQF will or are being met. There are similar international models of peak agencies being a coordinating body, e.g. South Africa where the South African Qualifications Authority is required to develop a system of collaboration to guide the mutual relations of the Authority and the three Quality Councils.

Therefore the IQB could take a coordination role by:

- developing a system of collaboration across all education and training sectors and quality agencies ministries and agencies;
- facilitating meetings and building relationships between the three key ministries and with other ministries and agencies;
- facilitating development of high level IQF documents that are implemented by all ministries and agencies;
- informing ministries and agencies of implementation targets; and progress; and
- Requiring data to be sent from each of the relevant ministries and agencies to analyze and gain a better picture of implementation of the IQF in all education and training sectors.

> **Recommendation 5:**
> *It is recommended that decree be promulgated identifies a key role of the IQB as being coordination of the implementation of the IQF.*

5.5 Advocating and promoting

Research across the six countries indicates that one of the key roles and responsibilities of the agency is to disseminate and promote the NQF. For an NQF to be successful in meeting its country's goals and ambitions, a NQF needs to be well understood by all stakeholders including:

- employer and employer groups;
- parents, potential students, students and graduates;
- international agencies involved in cross border education provision and student mobility;
- international agencies responsible for manpower mobility; and
- Professional associations and licensing bodies.

The IQB could provide general and high level information regarding the IQF and link with ministries in promoting the IQF in their circle of remit. As the focal point, the IQB should be able to provide the necessary information regarding the IQF and its link with the international standards. This function could be facilitated by a website that:

- includes IQF level information and policies;
- links to recognised peak quality assurance agencies; and
- Links to ministry websites dedicated to their implementation of the IQF.

The IQB also has a key role in linking other non-qualification recognition strategies (e.g. licensing, professional association membership) to enhance the linkages between the IQF and the system (but separate in terms of certification) to these other outcomes. Without a centralised single agency, the information and promotion of the IQF could result in conflicting information.

> **Recommendation 6:**
> *It is recommended that decree be promulgated that identifies a key role of the IQB as being the single voice advocating and promoting the benefits and role of the IQF at the national level and internationally.*

5.6   Liaison and focal point

Promoting and being a focal point for international relationships is acknowledged as a key function of the single NQF agency. Indonesia, as one of the foundation ASEAN member states, is involved with a number of international activities that are of particular relevance to the IQB:

- The UNESCO Regional Convention on the Recognition of Studies, Diplomas and Degrees in Higher Education in Asia and the Pacific was established in 1983, to which Indonesia was a signatory. The new convention, the Asia-Pacific Regional Convention on the Recognition of Qualifications in Higher Education [2011], aims to 'ensure that studies, diplomas, and degrees in higher education are recognized as widely as possible, considering the great diversity of educational systems in the Asia-Pacific region and the richness of its cultural, social, political, religious, and economic backgrounds' [UNESCO 2012].The Convention focuses on establishing basic principles for the provision of information and the implementation of the convention. Article IX.3.1 indicates that 'a network of national information centers on academic mobility and recognition shall be established and shall uphold and assist the practical implementation of this Convention by the competent recognition authorities' [UNESCO 2012:10].
- The basis for the ASEAN Qualifications Reference Framework (AQRF) is derived from the ASEAN Charter signed by the ten ASEAN leaders in Singapore on 20 November 2007, where aspirations to become a single entity – an ASEAN Community – were reinforced. The AQRF has been approved and will support other multilateral and bilateral arrangements within the community including mutual recognition agreements [AQRF 2014:1]. The proposed governance arrangements of the AQRF indicate that there will be a regional committee which will liaise with one focal point in each ASEAN country. The national focal point is expected to represent all education and training sectors and promote the AQRF and NQF linkages. In addition, there is to be one key focal point to coordinate the in country activities, including the referencing activity (which includes establishing a national referencing panel).

Providing support in negotiating mutual recognition agreements, participating in other international strategies, and being a focal point for international collaboration and alignment activities should be a key responsibility of the IQB. One single focal point promotes coordination of these strategies at the highest level, and is an expectation at least by the AQRF.

> **Recommendation 7:**
> *It is recommended that the decree identifies a key role of the IQB as being the single liaison and focal point for international relationships.*

5.7 Evaluation

In any qualifications system there are competing demands and allegiances. Ministries implementing quality assurance arrangements and promoting their sector system are sometimes reluctant to identify and report inefficiencies, duplication and issues of implementation. Some countries have established an agency to advise senior ministers on national issues or concerns regarding the country's education and training system, i.e. across all sectors. In Indonesia the education and training system is disjointed, there are limited pathways (vertically and especially horizontally), recognition of prior learning is limited, and there are a large number of quality assurance agencies.

If the IQB is to take on this role, it will need to be able request data, reports and information from relevant ministries, peak quality assurance agencies and bodies to be able to piece together and provide cross-sectoral, objective advice as to future directions and strategies to improve the education and training system of Indonesia.

It is proposed that the IQB could provide this advice to ensure that issues are raised at the highest level regarding the qualifications system and the NQF and whether they are meeting Indonesia's aspirations and needs.

5.8 Quality assurance – accountability versus regulation

Of the six countries reviewed, three agencies also had quality assurance roles, especially of qualifications and of institutions. Given the varied number of quality assurance agencies across all education and training sector in Indonesia, it is not recommended for the IQB to take on a quality assurance role of achievement standards and of institutional provision. However, confidence in the certification process is a critical aspect of building confidence in IQF qualifications. In this respect the IQB could take a role in assuring quality by holding the quality assurance agencies accountable for their own performance and that of any of their subsidiary quality assurance agencies' or bodies ' performance.

A regulatory approach for the IQB would mean that it could:

- approve and monitor quality assurance ministries and agencies, which would mean auditing the agencies to ensure they meet documented criteria or standards;
- have the power to refuse membership and/or sanction quality assurance agencies;
- maintain a register of quality assurance ministries and agencies, that includes any that have been sanctioned, that could be publicly viewed; and
- create another layer of regulation that makes an already complex system more complex.

However, a regulatory approach is only one way for instilling confidence in IQF qualifications. The IQB could take an accountability approach by monitoring and ensuring that the peak quality assurance ministries and agencies meet agreed quality standards and comply with key performance targets and reporting requirements. Quality assurance agencies meeting quality standards is a model used internationally in country and across countries. In this quality assurance approach the IQB would:

- develop quality standards for quality assurance agencies;[11]
- require annual reporting (or additional reporting if requested) for the purpose of monitoring and meta-evaluation or review;
- maintain a register of quality assured agencies; and

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[11] The quality standards would specify the requirement for peak quality assurance agencies to be subject to external international quality assessment at least every five years. The quality standards would also include a requirement for the peak agencies to quality assure any agencies/bodies it delegates or licences the responsibility of quality assurance of qualifications, providers and/or provision of education, training and assessment services.

- report to the Office of the President (or as defined in the decree) on agency compliance to the requirements.

It is recommended that the accountability approach is adopted in preference to a regulatory approach, which will address:

- governance arrangements and accountability requirements;
- continuous improvement approach to quality requirements;
- periodic external audit requirement against the quality standards; and
- eligibility for membership to international agencies, e.g. INQAAHE[12].

Any quality standards should reflect the benchmarking quality standards referenced in the ASEAN Qualifications Reference Framework, given that any referencing process of the IQF to the AQRF requires a benchmarking exercise of a country's quality assurance processes of its qualifications system. Currently there are three quality assurance frameworks cited in the AQRF to which member states are to benchmark the quality assurance of their qualifications system in the referencing process.

Unsatisfactory performance of peak quality assurance agencies could be addressed through the IQB's reporting requirements. Regardless of whether a regulatory or accountability approach is applied, the scope of the IQB's quality assurance activities could be:

- limited to peak quality assurance ministries and agencies;[13] or
- applied to all quality assurance ministries and agencies.

The IQB could take:

- A blended approach requiring all agencies to comply with general reporting requirements and also be subject to quality audits; or

Another alternative is a staged approach, which is moving from a regulatory approach for all quality assurance ministries or agencies to overtime progress to an accountability approach limited to peak ministries or agencies.

> **Recommendation 8:**
> *It is recommended that the decree identifies a key role of the IQB as being holding all ministries and agencies accountable for their performance as quality assurance agencies.*

6   Recommended membership

Membership of the IQB is critical to demonstrating at the highest level the importance of a cohesive qualifications system to meet the needs and aspirations of Indonesia. How the various players within a qualifications system have 'a voice' in the management and maintenance of the NQF is important in ensuring that all sectors have a sense of ownership of the framework. As previously mentioned, across countries, membership of governing entities is generally either:

- representative of the education and training sectors and stakeholders of the qualifications system, or
- expert membership with expertise in the area of qualifications frameworks or quality assurance.

These two approaches do not exclude examples that include a notion of both options.

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[12]   INQAAHE = International Network on Quality Assurance Agency in Higher Education
[13]   Peak agencies are those at the top tier i.e. those that either take full responsibility for quality assurance (e.g. BAN-PT) or delegate or license others to act on their behalf (e.g. BNSP which licenses Professional Certification Bodies).

Young [2005] notes that extending the membership of a NQF agency 'can considerably extend the range of stakeholders involved' and he states 'the benefits of this extension are the scope it provides for democratizing decision making about qualifications' (2005:24). However, Young emphasizes the need to balance 'experts in different occupational fields to stakeholders such as users, community organizations and trade unions' [2005:25]. He notes that an imbalance could result in 'a danger that special interests will dominate, and conflicts…are introduced' [2005:25].An interesting point made by Castejon, Chakroun, Coles, Deij & McBride [2011] is that creating a new law can change the balance of 'influence and responsibility of the various bodies that work in the qualifications system'[2011:41]. A new law can also 'influence the governance of qualifications systems through the process of involving stakeholders in the consultation process' [2011:42].

The following membership of the Board is recommended.

Stakeholder	Member	Reasoning
MoM	1, ex-officio echelon-1 officer	Article 9, Decree 8/2012, MoM
MoEC	1, ex-officio echelon-1 officer	Article 9, Decree 8/2012
MoRTHE	1, ex-officio echelon-1 officer	Article 9, Decree 8/2012
Coordinating ministries	2, ex-officio echelon-1 officer	Decree 8/2012 refers to other ministries that are involved in implementation in their sector. However not all other relevant line ministries can be represented due to manageability of the Board's number.
Quality assurance agencies, e.g. BAN-PT	1	Selected to represent the broad range of quality assurance agencies in the training, assessment and certification process.
Industry	1	Peak body representing industry. There are at least 2 (i.e. KADIN, APINDO) and one is to be nominated.
Professional associations	1	To be selected from a peak body of professional associations.
Education and Training Provider association	1	Peak body representing a cohort of education and training provider associations.
Manpower union	1	Peak body representing a key union, e.g. teachers' union, but it is up to the peak manpower union to decide who is the most appropriate union.
Civil society or community	1	Membership sought from disadvantaged groups/agencies and community groups/agencies
Additional	2	With expertise in the area of quality assurance or qualifications frameworks, nationally or internationally
Chair	1	Independent with expertise in the area, nominated outside the membership

Table-13: Details of IQB membership

Therefore careful consideration needs to be given to the membership of the IQB to ensure that the balance of power is not unduly influenced and that there is sufficient representation of key stakeholder groups. The Presidential Decree 8/2012, Article 9 provides some guidance as to who are the key stakeholders in the implementation of the IQF; which is the 'minister handling labor issues and minster in charge of education affairs' [2012:5-6].

The total proposed membership is 13 plus an independent Chair. The size of the IQB is dependent on the level of representation and expertise needed. To further promote a balanced membership, consideration needs to be given to not only the balance of representatives on the Board but also of the relative positions of those nominees on the Board.

> **Recommendation 9:**
> *It is recommended to include membership of the IQB and that the membership is as proposed above, to include 13 members and 1 independent Chair. The process for seeking membership should include a call for nominations and selection by the Office of the President.*

7   Secretariat: a supporting organization

It is essential that the IQB to be supported by a strong Secretariat, though not necessarily staffed by a large number of personnel. The staff quality and competencies are more important than quantity. In addition to the necessary administrative work to support the Board, the Secretariat should be sufficiently equipped to maintain a database of all information concerning quality assurance agencies operating in Indonesia.

Depending on the quality assurance approach and the scope of the remit of the agency the Secretariat will need to be supported by additional staff. The table below outlines the two approaches to quality assurance and the impact on staffing requirements.

Approach	Scope Peak agencies or all agents	Staffing Needs
Accountability	Periodic reporting Meta evaluations External international evaluation every 5 yearsyears	To carry out eta-evaluations the IQB could draw from experts from the revelant parties (e.g. employers, proffesionalassociations, industries, education providers, skills and training providers, civil society) and independent international experts. To maintain independence, staff for five year international evaluations could be international experts commissioned by the IQB, including those drawn from within international quality agencies or with extensive quality assurance experience.
Regulatory	As above plus annual monitoring audit approach	In addition to the above, for an monitoring audit approach, the IQB could draw assessors from the relevant parties, i.e.professional associations, industries, education providers, skills and training providers, civil society) and independent experts. Since these assessors would be hired on assignment basis, a database of a pool of qualified assessors needs to be properly maintained by the Secretariat.

Approach	Scope Peak agencies or all agents	Staffing Needs
		To instill trust in the process and outcomes, it is desirable that assessors are independent and that there is no conflict of interests. How independence is achieved if assessors are drawn from the organisations noted above would need to be explored.[14]

Table-14: Quality assurance approach

> **Recommendation 10:**
> *It is recommended that the IQB is supported by a strong Secretariat staffed with competent and qualified staff.*

8   Possible legal status

There are a range of options as to where the Board will be based, however not all are suitable for the long term sustainability of the IQF and the Board. In addition, it is critical that the legislative basis has precedence over regulations related to ministries.

Given that Presidential Decree 8/2012 specifically refers to the ministries responsible for education affairs and for labor issues, one of these ministries could be responsible for the Board. However, the IQB should not be sectorally based[15] as research has shown that in order to be successful, qualification- system reforms require that all stakeholders are mobilized and involved, and that they are aware of the objectives and they take ownership of the necessary changes [UNESCO 2015]. If the IQB is sectorally based within a ministry or exclusive to a ministry, then other education and training sub sectors will not be fully engaged nor mobilized.

	Ministry	Legal entity	Office of the President / State Secretariat
Benefit	Relevant to the needs of providers and employers / users	Independent and not easily affected by any government intervention	Ensure policy coordination and synchronization across sectors
	Funding is assured by government budget	Funding could be acquired from government, though could still generate revenue through *"fee for services"*	Funding is assured by government budget

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[14] Note that it is common for agencies to utilise contract assessors with experience in the sector but not currently practicing within the sector, e.g. ASQA in Australia.

[15] Within a ministry dedicated to a sub sector of the education and training system.

	Ministry	Legal entity	Office of the President / State Secretariat
Risk	Tend to be segmented	Could be difficult to harmonize its policy with government policy	Over centralization of tasks currently carried out by different agencies
	Easily affected by Ministerial sectoral policies	Services could become unaffordable due to high tariff charged	Unnecessary government intervention could affect independence
	Government intervention could reduce independence		

Table-15: Possible legal status of IQB

The international experiences indicate that the majority of responsible agencies are quasi-autonomous non-government organizations; responsible to the government. Such a structure may provide the IQB with a level of long term stability. As a separate entity, the IQB can then meet some of its proposed roles, e.g. cross-sectoral and objective advice, without being subject to the vagaries of political changes and policy within ministries.

Considering that a relevant ministry is not the best option for placement of the IQB; another option is that the IQB reports directly to the Office of the President or the State Secretariat. This would provide the IQB with a level of independence from any one ministry.

Recommendation 11:
It is recommended that the IQB be established according to the following criteria, not affiliated to any one ministry; has a level of autonomy that enables it to act independently and be seen as independent; has a legal basis at least equal with the regulations related to ministries responsible for education and manpower; and has a level of long term stability to enable it to implement the IQF over extended period of time.

9 Timelines for implementation

A timeline for the establishment of the IQB and the implementation of the IQF go hand in hand. *However, the implementation of the IQF at the IQB is distinct from and needs to be separated in policy and legislation from the implementation of the IQF at ministry level.* At this stage it appears that implementation of the IQF within the MoEC and MoRTHE is further advanced than that within the MoM. The implementation of the IQF at national level and across all sectors should be overseen by the IQB to ensure that there is alignment in interpretation and application.

The following recommended timeline indicates the time necessary for the establishment of the IQF Board and the implementation of the IQF (beyond that achieved at ministry level).

Short term	
December 2015	Confirm terms of reference for the establishment of the IQB and promulgate in legislation. Related recommendation 1, 2, 3, 4, 7, 8, 10, 11
March 2016	IQB is established by a Presidential decree Related recommendation 2, 3, 6. 7, 11

Short term	
May 2016	Relevant authority is to seek IQB membership nominations, and appointments made. Establishment of the IQB Secretariat to undertake its operations and functions. Related recommendation 9, 10
August 2016	Finalize meeting protocols for coordination of ministry implementation. Related recommendation 7
September 2016	Confirm all IQF documentation at national level to be implemented at ministerial and or international level. Related recommendation 5, 6
September 2016	Endorse agency standards and protocols for recognition as a quality assurance agency for the purpose of IQF qualification certification. Related recommendation 8
September 2016	Establish a publicly accessible website to promote the IQF, the IQB, national policy documents in relation to the IQF, agency standards and protocols and links to relevant ministries and quality assurance agencies. Related recommendation 5, 6
Medium term	
December 2016	Complete short analysis of implementation at ministry level (e.g. education, manpower). Propose similar project to current project to be established in the MoM. Related recommendation 4
January 2017	All quality assurance agencies that have applied to be recognized have been initially evaluated according to the agreed criteria and protocols. Register of recognized QA agencies is publicly available through the IQF website. Related recommendation 8
Long term	
June 2020	Undertake system wide analysis of implementation of the IQF. Related recommendation 11
January 2023	All initially recognized quality assurance agencies have been externally evaluated according to the agreed criteria and protocols. This is an ongoing process. Related recommendation 8

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