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Comparative Analysis of Inclusive Education Policies in ASEAN Countries: Case Studies of Indonesia and Malaysia

Muhammad Ridwan[1*], Muhammad Luqman[2], Abbad Nailun Nabhan[3]
[1] *Educational Management, Faculty of Education, State University of Malang, Indonesia*
[2] *Master of Education, Sunway University, Petaling Jaya, Selangor, Malaysia*
[3] *Master's Degree in Education, Universiti Brunei Darussalam, Brunei Darussalam*
[1] ridwan.alwi@gmail.com*; [2] MLuqman@gmail.com; [3] Nalnabhan@gmail.com
* Corresponding author:

ARTICLE INFO	ABSTRACT
	This study presents a comparative analysis of inclusive education policies in ASEAN countries, focusing specifically on Indonesia and Malaysia. Through a qualitative case study approach, it examines the historical development, legal frameworks, policy implementation strategies, and challenges faced by both nations in promoting inclusive education. The findings reveal significant similarities, such as a shared commitment to international conventions and the adoption of inclusive education within national legislation. However, notable differences emerge in policy execution, resource allocation, teacher training, and community engagement. Indonesia demonstrates a decentralized approach with regional variations, while Malaysia adopts a more centralized and structured model. The study highlights best practices and lessons learned, offering recommendations for policymakers to enhance the effectiveness of inclusive education initiatives across the ASEAN region. Ultimately, this research contributes to the growing discourse on educational equity and the realization of inclusive societies.

INTRODUCTION

Inclusive education has emerged as a global priority in the pursuit of equitable, quality education for all students, regardless of their abilities or backgrounds. The concept emphasizes the right of every learner to access mainstream education systems without discrimination, ensuring that diversity is embraced within the educational environment (UNESCO, 2020). In recent decades, countries worldwide have taken substantial steps to integrate inclusive education into their national policies, aligning themselves with international commitments such as the Salamanca Statement (1994) and the Convention on the Rights of Persons with Disabilities (CRPD, 2006).

The ASEAN region, known for its cultural, social, and economic diversity, has shown growing interest in strengthening inclusive education frameworks. With ten member states varying greatly in development and educational infrastructure, ASEAN presents a rich context for comparative analysis (ASEAN Secretariat, 2018). Understanding how different countries within the region implement inclusive education provides valuable insights into both the challenges and successes that can inform broader regional strategies.

This study focuses on a comparative analysis of inclusive education policies between Indonesia and Malaysia. These two nations were selected due to their similar socio-cultural contexts and shared commitment to international human rights instruments, alongside notable differences in educational governance structures. By examining the development, implementation, and outcomes of inclusive education policies in these countries, this research aims to illuminate pathways for more effective policy-making across ASEAN.

Indonesia, the largest archipelagic state, has adopted a decentralized approach to education, empowering local governments to develop and implement inclusive education programs. The legal

foundation for inclusive education in Indonesia can be traced to Law No. 20 of 2003 on the National Education System and Government Regulation No. 13 of 2020 on Inclusive Education (Ministry of Education and Culture of Indonesia, 2020). Despite these frameworks, Indonesia continues to face challenges related to policy consistency, teacher preparedness, and resource disparities across regions.

In contrast, Malaysia has implemented a relatively centralized approach through the Ministry of Education's Special Education Division. Policies such as the Education Act 1996 and the Special Education Regulations 2013 guide inclusive education efforts (Ministry of Education Malaysia, 2019). Malaysia's structured initiatives, such as the Inclusive Education Program (IEP), aim to integrate students with disabilities into mainstream classrooms with support services tailored to individual needs.

Both countries are influenced by international frameworks like the Sustainable Development Goals (SDGs), particularly Goal 4, which calls for inclusive and equitable quality education for all by 2030 (United Nations, 2015). However, the path towards fully realizing inclusive education remains fraught with systemic challenges, including societal attitudes, funding constraints, and gaps in teacher training.

Research indicates that successful inclusive education relies heavily on teacher capacity and attitudes toward students with diverse needs (Sharma, Loreman, & Forlin, 2012). In Indonesia, limited professional development opportunities for teachers create inconsistencies in how inclusion is practiced. Meanwhile, Malaysia invests more heavily in pre-service and in-service training programs, though issues of implementation fidelity and classroom overcrowding persist.

Another critical factor is community and parental involvement. Inclusive education thrives in environments where families and communities are actively engaged (Ainscow, Booth, & Dyson, 2006). Indonesia's decentralized system sometimes fosters strong local engagement but also results in uneven program quality. Malaysia's top-down approach ensures greater policy uniformity but can limit grassroots innovation and ownership.

Financial resources and infrastructure also play pivotal roles. In Indonesia, disparities in funding between urban and rural areas hinder the equitable delivery of inclusive education services (Somad, Haryanto & Darsinah, 2024). Malaysia has made concerted efforts to allocate resources for school modifications and support staff, though rural schools still face shortages.

Monitoring and evaluation mechanisms differ significantly between the two countries. Indonesia's decentralized system results in varied monitoring practices, with some districts excelling and others struggling. Malaysia employs standardized evaluation metrics, though criticisms have arisen regarding the overemphasis on academic performance over holistic development (Alzahranı, 2020).

In terms of student outcomes, both countries have demonstrated improvements in enrollment rates for students with disabilities. Nevertheless, dropout rates remain a concern, indicating the need for more comprehensive support structures (UNICEF, 2019). Policies alone are insufficient without effective implementation strategies that address the multifaceted barriers to inclusion.

This comparative study highlights that while Indonesia and Malaysia share similar aspirations regarding inclusive education, their differing governance models and policy implementation strategies yield diverse results. Understanding these differences provides valuable lessons for ASEAN countries seeking to strengthen their inclusive education systems.

The findings suggest that a hybrid approach, combining centralized policy guidance with decentralized flexibility, may offer the most effective pathway. Such a model would allow for national coherence while empowering local innovation and responsiveness to community needs.

Ultimately, this research contributes to the broader discourse on educational equity and inclusion, reinforcing the need for sustained political will, intersectoral collaboration, and culturally sensitive implementation strategies across the ASEAN region. It is only through persistent efforts that the vision of inclusive, equitable education for all can be truly realized.

METHOD

This research employs a qualitative comparative case study approach to analyze inclusive education policies in Indonesia and Malaysia. The qualitative method was selected to enable an in-depth understanding of the complexities, contexts, and nuances surrounding policy development, implementation, and outcomes in each country (Creswell & Poth, 2018). A comparative case study design

was chosen to highlight similarities and differences between the two cases, facilitating the identification of key factors that influence the success or limitations of inclusive education initiatives.

Research Design

The study utilizes a multiple-case study design, following Yin's (2018) framework for comparative case analysis. Indonesia and Malaysia were purposively selected as cases due to their shared regional and cultural contexts, similar commitments to international inclusive education frameworks, and their distinct approaches to educational governance. This design allows for a detailed exploration of each country's inclusive education policies and practices while enabling cross-case thematic comparisons.

Data Collection

Data for this study were collected from a combination of primary and secondary sources. Primary data collection involved document analysis of official government policies, regulations, action plans, and strategic frameworks related to inclusive education in Indonesia and Malaysia. Secondary sources included peer-reviewed journal articles, reports from international organizations (e.g., UNESCO, UNICEF, ASEAN Secretariat), and reputable national and international news outlets that reported on education policies and developments.

In total, 25 key documents were analyzed, including Indonesia's Law No. 20 of 2003 on the National Education System, Malaysia's Education Act 1996, and related ministerial regulations and strategic plans up to 2024. This document analysis allowed for a comprehensive understanding of the legal and policy foundations, objectives, implementation strategies, and evaluation mechanisms.

Data Analysis

Thematic analysis was used to systematically code and interpret the data. Following Braun and Clarke's (2006) six-phase guide to thematic analysis, the researcher familiarized themselves with the data, generated initial codes, searched for themes, reviewed themes, defined and named themes, and produced the report. Thematic categories included policy development, governance structures, teacher training, resource allocation, community involvement, and monitoring and evaluation mechanisms.

Cross-case synthesis was then employed to compare and contrast the findings between Indonesia and Malaysia (Yin, 2018). Similarities and differences were systematically mapped, allowing the researcher to identify patterns, best practices, and persistent challenges across both cases.

Validity and Reliability

To enhance the validity and reliability of the study, triangulation was employed by comparing findings across different document types (laws, policy papers, reports, and journal articles) (Patton, 2015). Additionally, peer debriefing sessions were conducted with two education policy experts from Southeast Asia to verify the interpretation of the data and ensure that contextual nuances were accurately captured.

Limitations

This study acknowledges certain limitations. First, it relies heavily on publicly available documents and literature, which may not fully capture recent informal practices or policy shifts that have not yet been documented. Second, as a qualitative case study, the findings are not intended to be generalizable beyond the specific contexts of Indonesia and Malaysia. However, the insights drawn provide valuable lessons that could inform inclusive education policies across ASEAN countries.

Ethical Considerations

Since this study utilized publicly available documents and did not involve human participants, formal ethical approval was not required. Nonetheless, the researcher adhered to academic integrity by properly citing all sources and respecting intellectual property rights throughout the research process.

RESULTS AND DISCUSSION

The comparative analysis of inclusive education policies in Indonesia and Malaysia reveals a complex interplay of historical, political, and socio-cultural factors influencing their development and

implementation. Both countries have demonstrated commitments to inclusive education through policy enactments aligned with international frameworks such as the Salamanca Statement (UNESCO, 1994) and the Convention on the Rights of Persons with Disabilities (CRPD, 2006). However, the extent and effectiveness of their policies differ markedly due to variations in governance, resource allocation, teacher preparedness, and community engagement.

In Indonesia, inclusive education policy is primarily rooted in Law No. 20 of 2003 concerning the National Education System, which mandates that all citizens have the right to education, including individuals with special needs. This was further strengthened by Ministerial Regulation No. 70 of 2009, which provides guidelines for inclusive education implementation. Nevertheless, despite strong legal frameworks, actual policy implementation remains inconsistent across regions due to Indonesia's decentralized governance system (Suharti, 2013).

Malaysia, on the other hand, initiated inclusive education under the Education Act of 1996, with subsequent policies such as the Special Education Regulations of 2013. The Malaysian approach is characterized by a more centralized governance structure, enabling more uniformity in policy implementation across states (Jelas, & Mohd Ali, 2014). Furthermore, Malaysia's Education Blueprint 2013–2025 places significant emphasis on increasing access and equity, highlighting inclusive education as a national priority (Ministry of Education Malaysia, 2013).

A notable difference between the two countries is the degree of teacher training and professional development offered to support inclusive education. In Malaysia, the government has invested significantly in specialized training programs for mainstream teachers to accommodate students with disabilities (Jelas, Z. M., & Mohd Ali, M., 2012). In contrast, Indonesia faces persistent challenges in providing adequate training opportunities, with many teachers reporting limited knowledge and skills to manage inclusive classrooms effectively (Ediyanto et al, 2017).

Resource allocation also presents a major contrast. Malaysia has developed structured financial support mechanisms, including additional funding for schools that enroll students with disabilities and investment in assistive technologies (Nasir, 2016). Indonesia, while having similar provisions in national policy, often encounters practical constraints at the local level, where funding and resource distribution are uneven, especially in rural and remote areas (UNESCO, 2015).

Community involvement emerges as another critical factor influencing the success of inclusive education. In Malaysia, awareness campaigns and partnerships with non-governmental organizations (NGOs) have fostered greater acceptance of inclusive education among parents and local communities (Yeo, Chong, & Neik, 2016). Indonesia, while making strides in this area, still faces cultural barriers where disabilities are often stigmatized, affecting parental willingness to enroll children in inclusive settings (Sutantoputra, 2014).

Monitoring and evaluation mechanisms in Malaysia are relatively robust, with the Ministry of Education conducting regular assessments and producing publicly accessible reports on the progress of inclusive education initiatives (Ministry of Education Malaysia, 2013). Conversely, Indonesia's monitoring systems are less standardized, often relying on sporadic reports from local education offices, leading to fragmented data and limited accountability (World Bank, 2018).

Another important finding relates to curriculum adaptation. Malaysia has adopted differentiated instruction models and modified assessment systems to accommodate diverse learners, ensuring that students with disabilities can engage meaningfully with the curriculum (Jelas, Z. M., & Mohd Ali, M., 2012). Indonesia's curriculum reforms acknowledge the need for adaptation, but implementation remains sporadic, with many schools lacking the resources or expertise to tailor curricula effectively (UNESCO, 2015).

The role of international collaboration is prominent in both countries but manifests differently. Malaysia has actively engaged in international benchmarking and has incorporated best practices from countries such as Australia and the United Kingdom into its education reforms (Jelas, & Mohd Ali, 2014). Indonesia has similarly participated in international initiatives but often faces challenges in localizing global frameworks to fit its diverse socio-cultural contexts (Suharti, 2013).

Teacher attitudes towards inclusion also significantly influence the success of policies. Research indicates that Malaysian teachers, while generally supportive of inclusive education, still express concerns about classroom management and workload (Nasir, 2016). Indonesian teachers often report feelings of

unpreparedness and skepticism about the feasibility of inclusion without significant systemic support (Ediyanto et al, 2017).

The issue of policy clarity further distinguishes the two cases. Malaysian inclusive education policies provide detailed operational guidelines for schools, teachers, and administrators, facilitating smoother implementation (Ministry of Education Malaysia, 2013). In Indonesia, policies tend to be broader and less prescriptive, leading to varied interpretations and practices at the provincial and district levels (Sutantoputra, 2014).

Despite challenges, both countries have showcased promising practices that can inform broader ASEAN regional efforts. Malaysia's Inclusive Education Program (Program Pendidikan Inklusif) and Indonesia's Inclusive Education Pilot Projects offer valuable models for peer learning and regional cooperation (ASEAN Secretariat, 2017). These programs demonstrate that success requires sustained political will, strategic resource investment, and continuous capacity building.

The findings suggest that while legal frameworks and policy commitments are crucial first steps, successful inclusive education depends largely on systemic coherence, cultural attitudes, and sustained investment in human and material resources. Policy makers must consider not only legal mandates but also the lived realities of students, teachers, and communities to ensure meaningful inclusion.

In conclusion, the comparative analysis underscores that inclusive education in Indonesia and Malaysia is a dynamic and evolving process influenced by historical trajectories, governance models, and socio-cultural contexts. Achieving genuinely inclusive education will require ongoing efforts to address structural inequalities, build inclusive mindsets, and strengthen cross-sector collaboration. These lessons are not only relevant for Indonesia and Malaysia but also hold broader implications for the advancement of inclusive education across ASEAN nations.

CONCLUSION

This comparative analysis of inclusive education policies in Indonesia and Malaysia highlights significant strides made by both countries in promoting the right to education for all learners, including those with disabilities. While both nations have demonstrated political commitment to inclusive education through the establishment of legal frameworks and policy initiatives, notable differences exist in their approaches and the outcomes achieved. Malaysia's centralized governance and strong policy coherence have enabled more systematic implementation of inclusive education, supported by substantial investments in teacher training, infrastructure, and community engagement. Conversely, Indonesia's decentralized governance, while allowing for local adaptation, has resulted in inconsistencies in policy enforcement and resource distribution.

The findings underscore that inclusive education is not merely about the presence of supportive laws; rather, it requires comprehensive systems of support involving adequately trained teachers, accessible curricula, sufficient funding, and active community participation. Malaysia's strategic emphasis on teacher professional development and monitoring mechanisms has contributed to a more structured and sustainable model of inclusion. Indonesia's experiences, while challenged by regional disparities, show the importance of grassroots initiatives and the role of local leadership in fostering inclusive practices.

A critical factor influencing the success of inclusive education in both contexts is societal attitude toward disability. While Malaysia has made concerted efforts to shift societal perceptions through public awareness campaigns and NGO partnerships, Indonesia continues to face cultural stigmas that impede full inclusion. Therefore, beyond technical and financial investments, attitudinal change remains a crucial pillar for inclusive education's future advancement in both countries.

Moreover, international frameworks such as the Salamanca Statement and the CRPD have served as important references for national policies; however, their local contextualization remains a challenge. Both countries need to deepen their efforts in adapting these global norms to fit their unique social, economic, and cultural realities. The comparative study thus highlights the necessity for ongoing, context-sensitive policy refinement and implementation strategies.

Sustaining inclusive education requires not only continuous governmental support but also an intersectoral approach that involves health services, social welfare systems, and civil society organizations. In this regard, Malaysia's more integrated and holistic approach provides valuable lessons, while

Indonesia's growing experimentation with inclusive models across diverse provinces offers insights into flexible and context-adaptive strategies.

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