Report on the External Review of the

National Accreditation Agency for Higher Education of Indonesia
(Badan Akreditasi Nasional Perguruan Tinggi)
BAN-PT

January 2018

CONTENTS

Abbreviations

BAN-PT	Badan Akreditasi Nasional Perguruan Tinggi (National Accreditation Agency for Higher Education)
AQAF	ASEAN Quality Assurance Framework
ASEAN	
EQA	External Quality Assurance
EQAA	External Quality Assurance Agency
HEI	Higher Education Institution
KKNI	National Qualifications Framework of Indonesia
LAM	Lembaga Akreditasi Mandiri (discipline based accreditation agency)
MoRTHE	Ministry of Research Technology and Higher Education
SAN	National Accreditation System
SAPTO	
SAR	Self-Assessment Report
SHARE	
SN-DIKTI	National Standard for Higher Education

1. EXECUTIVE SUMMARY

This report analyses the state of alignment of the Indonesian *National Accreditation Agency for Higher Education (Badan Akreditasi Nasional Perguruan Tinggi), BAN-PT,* with the *ASEAN Quality Assurance Framework (AQAF), quadrants 1 and 2*. It is based on an external review conducted in 2017.

The review forms part of the activities under the SHARE project. (http://www.share-asean.eu/) SHARE offers selected External Quality Assurance Agencies (EQAAs) the opportunity to undergo a review exercise, led by a panel composed of ASEAN as well as European Quality Assurance experts. The review exercise is development-oriented and shall

- evaluate the alignment of the agency with the AQAF;
- help to further develop national systems, standards and processes according to the AQAF and in view of international practice;
- enable EQAAs in countries with consolidated External Quality Assurance (EQA) structures to benchmark their national systems with regional standards and in view of international good practice.

The external review of BAN-PT was conducted in line with the process described in the *Guidelines For The Review of External Quality Assurance Agencies Under The EU-SHARE Project* and consisted of a self-assessment and the submission of a self-assessment report (SAR) on 11 August 2017, a Site Visit on 20/21 November 2017 at the BAN-PT premises in Jakarta and the submission of the assessment report to the SHARE consortium on 23rd January 2018.

After thorough analysis of the SAR and the various interviews during the Site Visit the panel concluded that BAN-PT is a well-established agency that reaches a high level of alignment with quadrants 1 and 2 of the AQAF.

The panel wants to highlight in particular the design of the accreditation procedures in line with international good practice and the transparent guidance for all parties involved in the accreditation procedures which supports a professional and consistent conduct of the procedures. Related to this BAN-PT is to be commended for the intended shift from an input-oriented approach towards a more output and outcome-oriented approach to accreditation, which will support the enhancement dimension of quality assurance.

The panel also makes some recommendations, which are to be understood as supporting BAN-PT to strengthen its future developments in particular as regards the implementation of the new accreditation approach, which is going to be a challenge for all parties involved, the higher education institutions, the assessors and also the staff of BAN-PT. Further recommendations address BAN-PT's collaboration with external stakeholders namely employers and students which should be intensified and formalized on a regular basis and its internal quality management system which also should be developed and implemented on a regular basis.

2.   INTRODUCTION

This report analyses the state of alignment of the Indonesian *National Accreditation Agency for Higher Education (Badan Akreditasi Nasional Perguruan Tinggi), BAN-PT,* with the *ASEAN Quality Assurance Framework (AQAF), quadrants 1 and 2.* It is based on an external review conducted in 2017.

BACKGROUND OF THE REVIEW

The review forms part of the activities under the SHARE project. (http://www.share-asean.eu/) SHARE offers selected External Quality Assurance Agencies (EQAAs) in Indonesia, Malaysia, the Philippines, and Thailand the opportunity to undergo a review exercise, led by a panel composed of ASEAN as well as European Quality Assurance experts. The review exercise is development-oriented and shall

- evaluate the alignment of the agency with the AQAF;
- help to further develop national systems, standards and processes according to the AQAF and in view of international practice;
- enable EQAAs in countries with consolidated EQA structures to benchmark their national systems with regional standards and in view of international good practice.

REVIEW PROCESS

The external review of BAN-PT was conducted in line with the process described in the *Guidelines For The Review of External Quality Assurance Agencies Under The EU-SHARE Project.* The panel for the external review of BAN-PT was appointed by ENQA on behalf of the SHARE consortium and composed of the following members:

- Achim Hopbach, Managing Director, Austrian Quality Assurance and Accreditation Agency, Austria (chair)
- Steffen Westergaard Andersen, Director of Operations, The Danish Accreditation Institution, Denmark
- Maria Celeste T. Gonzalez, Ateneo de Manila University, Manila, The Philippines; Chair of the Graduate Commission, Philippine Accrediting Agency of Schools, Colleges and Universities, Manila, The Philippines
- Ahmad Mohammad, Director, University Quality Centre, University Sains Malaysia, Penang, Malaysia

The panel was supported by Siti Elija Binti Jamaluddin, AQAN Secretariat.

Upon receipt of the self-assessment report (SAR) on 11 August 2017, panel members, as a first step analysed individually the documents. On 18/19 September 2017 the members of the panel were trained by the EU-SHARE consortium at the *Preparatory Seminar for Assessors for the SHARE Pilot Review Exercises of EQAAs* which was held in Kuala Lumpur, Malaysia. The panel took the opportunity of the seminar to hold a meeting in order to agree on organisational aspects such as time-lines and responsibilities. It was agreed that each panel member would have prime responsibility for selected principles without compromising the joint responsibility for the whole assessment. Following on this the panel analysed the SAR and compiled preliminary assessments, comments and open questions regarding the AQAF principles. On 2 October 2017, the panel requested further material, mainly existing exhibits and three additional documents, to be submitted before the Site-Visit; also, the draft programme of the Site-Visit, which was developed, based on the analysis of the SAR and using a template provided by the SHARE consortium was sent to BAN-PT. With minor changes, the programme was agreed between the panel and BAN-PT. On 19 November 29017 the panel met for a preparatory meeting and prepared the various interviews to be conducted during

the Site Visit by agreeing on the relevant topics to be addressed and main questions to be asked. The Site Visit was conducted on 20/21 November 2017 at the BAN-PT premises in Jakarta. Between the interviews and at the end of the first day the panel took stock of the information gathered and agreed on further topics to be pursued. After the de-briefing meeting with the chairmen of the Accreditation Council and Executive Board, the panel convened and agreed on the main findings. After the Site Visit, the panel members drafted paragraphs regarding those standards they had the prime responsibility for. The report was finalized after two rounds of comments and modification and sent to BAN-PT for correcting factual errors on 9th January 2018. BAN-PT submitted comments on 22nd January 2018. The final report was submitted to the SHARE consortium on 23rd January 2018.

SELF-ASSESSMENT REPORT

BAN-PT set up a "task force" to conduct the self-assessment and to draft the SAR which consisted of Agus Setiabudi (member and secretary of the Executive Board), Sugiyono (member of the Executive Board) Bambang Suryoatmono (member of the Accreditation Council, Imam Buchori (member of the Accreditation Council) and Domo Pranoto (Secretariat). The task force collected existing information coming from meetings with assessors and stakeholders and also analysed internal data on the conduct of the accreditation procedures. Drafts of the SAR were discussed at joint meetings of the Accreditation Council and the Executive Board. During the process, a meeting with assessors was used to inform about the process and also feedback was sought from the Ministry of Research Technology and Higher Education (MoRTHE); no comments were received though.

The SAR contains an introduction to the higher education system of Indonesia and to BAN-PT followed by descriptive paragraphs and paragraphs about strengths and areas for improvement under each relevant principle. The SAR was supplemented by two annexes, a comprehensive description of the Indonesian accreditation system and the BAN-PT strategy 2017-2021. In addition, the SAR referred to 30 further documents of evidence (exhibits) which were provided to the panel upon request. Although the SAR is written in a clear and informative style with helpful analytical parts, the 30 exhibits are necessary to complete the picture and to verify the descriptive parts. The panel was challenged since the exhibits were mainly in local language.

SITE-VISIT

The site visit was conducted at BAN-PT premises on 20-21 November 2017 with a preparatory meeting of the panel held the day before. The panel conducted 13 interview sessions and had the opportunity to discuss with the representatives of the management, the Accreditation Council, staff, MoRTHE, assessors, and stakeholders such as students, representatives from universities and employers' organisations. The panel appreciated the openness and very constructive atmosphere of the interviews, which helped the panel to discuss all relevant topics. The panel wants to highlight in particular the open and self-critical approach of BAN-PT representatives during the interviews, which gave evidence of the intention to use the review as opportunity for improving the operations of the agency.

3. FINDINGS: ALIGNMENT OF BAN-PT WITH THE ASEAN QUALITY ASSURANCE FRAMEWORK (AQAF)

3.1 AQAF PRINCIPLE 1: THE EXTERNAL QUALITY ASSURANCE AGENCY

Principle 1.1

The EQAA in the ASEAN countries have mission and common goals/statements

Guidance notes/Interpretation:

- The mission and goals of this body provides a clear mandate regarding its roles and responsibilities
- EQA's mission and goals are developed with, and approved by key stakeholders

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BAN-PT defined its mission in accordance with the agency's tasks stipulated in Regulation No. 32/2016 of the MoRTHE:

"a. to develop accreditation system for study programs and HEI in accordance with the policy for the development of Indonesian higher education;
b. to prepare and establish instruments of higher education accreditation based on SN-DIKTI;
c. to accredit higher education institutions;
d. to issue, change, and revoke the decision on accreditation status and rank for HEI;
e. to assess, verify, and decide on appeal filed by HEI on the decision related to accreditation status and rank issued by BAN-PT;
f. to develop and to strengthen institutional networking with stakeholders at national and international levels;
g. to assess the feasibility of LAM's establishment, as the basis for recommending the establishment of LAM to the Minister;
h. to periodically evaluate the performance of LAM and to report the results to the Minister;
i. to develop instruments for evaluating the establishment of HEI based on SNDikti;
j. to recommend the fulfillment of minimum accreditation requirements in the establishment of HEI in collaboration with the Directorate General of Institutional Development for Science and Technology, and Higher Education, of MoRTHE; and
k. to regularly report to the Minister on the results of accreditation along with recommendations for improvement." (see the following chapter on principle 1.2)

The mission comprises items such as

- "building a quality culture in higher education;
- developing an accreditation system as an enactment of external quality assurance;
- performing accreditation efficiently, reliably, and accurately; and
- developing a quality independent accreditation institution"

in addition, can be considered a condensed version of the quite comprehensive legal mandate.

It is worth noting that as regards "developing an accreditation system as an enactment of external quality assurance" the mission encompasses an aspect, which is not explicitly mentioned: BAN-PT is not the only accreditation agency in Indonesia. The law foresees a division of responsibilities between BAN-PT responsible for accreditation of higher education institutions and discipline based accreditation agencies, LAM (Lembaga Akreditasi Mandiri), responsible for accreditation of study programmes. BAN-PT however plays a crucial role in organizing the whole accreditation system by giving recommendations to the ministry for recognizing LAMS and supervising their operations by acting as their appeals body. To date only one LAM has been set up, notably in the field of health care; another LAM in the field of accounting is in the process of establishment. MoRTHE wishes more LAMs to be established in the near future, notably in the disciplines of engineering, economic and business, mathematics and

science. As long as no LAMs exist, BAN-PT has to conduct accreditation of study programmes in the respective disciplines in addition to its original task of institutional accreditation.

The first bullet point of the mission, "building a quality culture in higher education", shows that BAN-PT aspirations go beyond the legal mandate, which focuses on legal and technical aspects of the national quality assurance system and BAN-PT's role. By referring to the concept of quality culture BAN-PT emphasizes that external quality assurance is only one pillar of quality assurance in higher education with internal quality assurance as the other. Consequently, BAN-PT's mission goes beyond organizing the accreditation system and conducting accreditation procedures but comprises also a goal which might need additional activities in order to be reached or which, at least gives a certain direction for the design of the accreditation procedures, notably to support HEIs in establishing internal structures and procedures that foster establishing a culture of quality.

In addition to its mission, BAN-PT also adopted a vision, as defined in its *Strategic Plan for 2017-2021*, which is "to be a credible, independent, accountable and globally recognized accreditation agency." Taking mission and legal mandate together the role of BAN-PT in the Indonesian higher education system is well described.

Neither the SAR nor the various interviews during the site-visit revealed any relevant involvement of stakeholders in the process of developing the mission or the vision apart from the fact that, obviously the ministry played a major role in defining the agency's tasks in legal terms.

The panel concluded that the mission and goals are defined in a clear and transparent way and thus provide orientation as regards roles and responsibilities of BAN-PT, which is at the core of principle 1.1. The panel noted though that the second important feature of the principle, involvement of stakeholders, is missing.

However, regarding a further aspect of principle 1.1 "approval by stakeholders" the panel learned during the interviews with representatives from the ministry and other stakeholders that BAN-PT's role in the system is well respected and appreciated.

RECOMMENDATION

The panel recommends BAN-PT to involve stakeholders in future processes of evaluating and revising its mission and vision.

Principle 1.2

The EQAA has an established legal basis and is formally recognised and trusted by competent public authorities in its home country.

Guidance notes/Interpretation:

- Legal basis for the formation of EQAA provides the authority to set up and conduct external quality assurance activities. It may be a statutory body or unit of a ministry through an Act of Parliament, Cabinet decree, Presidential decree or its equivalent.
- Competent public authorities (ministries, agencies, recognition bodies, employers), work with, rely on and recognize the decisions made by the EQAA.

The Indonesian accreditation system and consequently BAN-PT are legally regulated in various laws and ministerial regulations of which the most relevant are

- *Law No 12/2012 on Higher Education*,

which stipulates that the responsible minister has to establish a quality assurance system (section 51), comprising internal and external quality assurance (section 53) and which defines accreditation and the role of the national accreditation agency and other accreditation agencies (section 55);

- and *Regulation No. 32/2016 of the MoRTHE* which derives the tasks of BAN-PT from the law as mentioned in the previous chapter.

According to these legal documents, BAN-PT is a non-structural government institution, which is independent and responsible to the Minister that manages government affairs with regard to higher education.

The legal mandate of BAN-PT considered broad and comprises the tasks to develop accreditation procedures; to conduct accreditation of higher education institutions and to monitor accredited institutions. The law foresees also other accreditation agencies that conduct accreditation of programmes, founded on a private basis, recognized by the ministry and supervised by BAN-PT. As long as no LAMS exist, BAN-PT has to cover programme accreditation also.

It is worth noting that the legal mandate also covers the task "to develop and to strengthen institutional networking with stakeholders at national and international levels" which puts BAN-PR into the position of a facilitator in questions regarding quality of higher education.

The legal consequences of accreditation are defined in so far as only accredited higher education institutions are allowed to award degrees in accredited programmes.

In legal terms, BAN-PT has been granted legal authority in terms of the above-mentioned tasks, notably to develop the accreditation procedures, to conduct accreditation, and to take accreditation decisions.

The legal basis also defines the structure of BAN-PT. It is comprised of the Accreditation Council as a policy-making organ and the Executive Board as a policy-executing organ. The composition and responsibilities of both bodies are regulated by law.

In performing its duties and function, BAN-PT is supported by BAN-PT Secretariat that serves to provide technical and administrative support. Hence, the agency is not a separate legal entity since the secretariat is legally and administratively part of MoRTHE. It is the intention of BAN-PT though to establish the agency as separate legal entity in order to gain more flexibility in administrative terms.

BAN-PT, in performing its legal tasks is recognized not only by the relevant public authorities but also by stakeholders, notably employers. During the site visit, the panel learned, especially from the interviews with representatives from the ministry and from stakeholders that the accreditation status of universities and their programmes is, to various degrees relevant for recruiting staff in the public and the private sectors. This creates a problem as regards the fact that at the time of the review of BAN-PT, only approx. 1.100 out of 4.500 universities, 19.000 out of 24.000 programmes are accredited, and the deadline for universities and programmes to be accredited expires in May 2018. The sheer number shows that BAN-PT with its resources will not be able to conduct all the remaining procedures, and the deadline presumably will have to be extended by the ministry.

The panel concluded that BAN-PT has a strong and reliable legal basis that facilitates a professional and independent fulfilment of its tasks, which is at the core of principle 1.2. In addition, the panel established that stakeholders, in particular public and private employers and also students rely on the results of BAN-PT's activities. This is just one but important aspect of the overall high appreciation of BAN-PT's role in the Indonesian higher education system.

RECOMMENDATION

The panel recommends that BAN-PT proactively initiates or supports the establishment of LAMs in order to be able to focus on its core mandate.

Principle 1.3

The EQAA has autonomous responsibility for its operations and its decision making processes and judgement are free from undue influence.

Guidance notes/Interpretation:

It is important for the EQAA to show its independence and autonomy to develop its systems, procedures and methods. Its decision making process is free from outside influence and is entirely the responsibility of the EQAA. In the ASEAN context, however, it is often difficult to be operationally and financially independent. It is imperative, however, that the accreditation/ evaluation decisions are made by the EQAA themselves.

Based on the legal mandate as stipulated in stipulated in *Regulation No. 32/2016 of the MoRTHE* BAN-PT is granted to take various decisions:

 "...
b. to prepare and establish instruments of higher education accreditation based on SN-DIKTI;
c. to accredit higher education institutions;
d. to issue, change, and revoke the decision on accreditation status and rank for HEI;
e. to assess, verify, and decide on appeal filed by HEI on the decision related to accreditation status and rank issued by BAN-PT;
...
i. to develop instruments for evaluating the establishment of HEI based on SNDikti;
j. to recommend the fulfillment of minimum accreditation requirements in the establishment of HEI in collaboration with the Directorate General of Institutional Development for Science and Technology, and Higher Education, of MoRTHE.*"*

The regulations foresee no involvement of other authorities in the decision-making procedures of BAN-PT. In this regards the agency's role was even strengthened recently. Whereas up until 2016 the regulations for the accreditation procedures had to be approved by the MoRTHE this is not the case anymore today, hence the Accreditation Council of BAN-PT develops and decides upon its accreditation procedures autonomously. The accreditation decisions taken by BAN-PT are final, although subject to appeal, which means that they are taken autonomously without need for any kind of approval by the ministry.

There is only one cornerstone of the Indonesian accreditation system, which is not autonomously decided upon by BAN-PT, namely the adoption of the national higher education standards that is done by MoRTHE. On the one hand, it is not an Indonesian specificity that national standards in higher education are defined by a ministry or even the parliament; and this does not constitute any compromise of the autonomy of an agency as long as it is autonomous in conducting the procedures and in taking decisions. On the other hand, BAN-PT plays an important role in the development of the standards, which is done in a joint working group led by BAN-PT.

For conducting the accreditation procedures BAN-PT introduced internal regulations that cover all steps from receiving applications for accreditation, nominating external reviewers till the decision making process.

The secretariat is, in legal terms part of the MoRTHE, although not situated within the ministry building but in a separate premises. Hence, administratively BAN-PT has to follow the

usual regulations for ministerial staff. However, recruitment of staff is within the responsibility of BAN-PT. BAN-PT reports that one priority for the near future is to establish the secretariat as an entity under the MoRTHE. This secretariat should be administratively independent in order to gain flexibility in administrative terms.

In financial terms, BAN-PT is in so far not independent as it is totally funded by the MoRTHE.

BAN-PT considers its independence as strength. The panel could verify through analysis of the legal documents and also through various interviews with representatives of the ministry and stakeholders that clearly revealed that Ban-PT is considered to be an independent body as regards its operations and accreditation decisions. It is noteworthy that also the administrative and financial links with the ministry do not compromise the independence in operational and decision-making terms. Regarding the latter one could even conclude that public funding is to be considered a strength in terms of independence since no financial links with the institutions to be accredited exist.

The panel concluded that the legal regulations provide a suitable framework for BAN-PT to develop its procedures, conduct accreditation and take accreditation decisions independently which is, as stipulated in principle 1.3 a precondition for being a credible accreditation agency.

Principle 1.4

The EQAA has a standard and transparent system for appointing or electing members of the

Board.

Guidance notes/Interpretation:

- There are selection or election criteria that guide the EQAA in the appointment or election of its Board members. The appointment or election of Board members is announced to the public.
- There should be a good and appropriate balance of stakeholders' representation in the Board.

The organizational structure of BAN-PT comprises two decision-making bodies:

- The Accreditation Council is the policymaking body of BAN-PT, which develops and decides upon the accreditation procedures and oversees the implementation.
- The Executive Board is the executive body, which is responsible for conducting the accreditation procedures and taking the accreditation decisions.

The selection and appointment of members of both bodies is regulated in Regulation No. 32/2016 of the MoRTHE, which stipulates the following criteria:

- Indonesian citizenship
- Doctoral degree
- Registered lecturer with minimum rank of senior lecturer
- In addition, applicants have to submit a statement about what they want to achieve in case of appointment.

The criteria for membership are predefined and published. It is noteworthy that they clearly focus on experts from the academic world, and no specific provision for membership of stakeholders is made.

The selection and appointment processes are organized as follows: The minister publishes an open call for applications and forms a selection committee, which consists of former repre-

sentatives of HEIs and of representatives from the ministry. The selection committee assesses the applications makes a selection of applicants and conducts interviews with them. Based on the interviews, the selection committee compiles a shortlist which comprises approximately 1.5 as much as available positions and which is submitted to the minister. The minister chooses from the shortlist and appoints the members.

During the various interviews with members of the two bodies and representatives from the MoRTHE, the panel learned more about the practicalities of the selection process as exemplified by the selection of Board members in 2016. The selection committee was comprised of high-level executives and shortlisted 137 out of 639 applicants. Based on the following interviews a list of 15 applications was submitted to the minister. After the ministerial decision, the appointments were published on the website of the ministry.

Currently all members of both the Accreditation Council and the Executive Board come from academia hence not all stakeholders are represented. One can say that the eligibility criteria obviously create a hurdle for those who are not registered as senior lecturers, which means for representatives from the non-academic world, they will not be eligible.

The panel concluded that the criteria for the selection of members of the Council and the Board are predefined and transparently communicated. The selection procedure is sound and involves stakeholders. However, there is no stakeholder involvement in the two decision-making bodies of BAN-PT, which is also an important element of standard 1.4.

RECOMMENDATION

The panel recommends BAN-PT to initiate discussions with the ministry about modifying Regulation No. 32/2016 of the MoRTHE in order to facilitate stakeholder representation in the Executive Board and particularly in the Accreditation Council.

Principle 1.5

The EQAA's policies and management practices are based on good governance, transparency and accountability.

Guidance notes/Interpretation:

- The EQAA has management structures, e.g. the Board, Executive Committees, and appropriately qualified staff for all positions.
- There are operational manuals/guidelines, QA processes and procedures which are made available to the public. These indicate transparency.
- Accountability to authorities and stakeholders should be indicated. Its financial system and performance should be transparent.

The overall structure of the BAN-PT comprising Accreditation Council, Executive Board and the secretariat, and the internal division of responsibilities between the various bodies are regulated by BAN-PT Regulation No. 1/2017. Details of BAN-PT's organization and governance, and its internal management system are explained in this regulation:

The Executive Board is tasked with making day-to-day decisions including all accreditation decisions, whereas the Accreditation Council is responsible for the more strategic decisions, which concerns policies and regulations. Further, the Accreditation Council is also acting as appeal instance in those cases, where a higher education institution may file a grievance against an accreditation decision.

The BAN-PT secretariat is predominantly made up of clerical staff who provide support to the Accreditation Council and the Executive Board. The secretariat also provides mainly administrative support to the assessors.

As mentioned in section 1.2, the daily management of the secretariat in administrative, financial and human resource aspects are under the responsibility of the Secretariat Manager, who is a government official employed in the MoRTHE. The panel was though explained that as of September 2016, the staff is now supervised by the management, and to a much lesser extent by the ministry. Still, however, staff is formally appointed by the ministry and then assigned to the BAN-PT, which does create some rigidity in the system, but once assigned the staff works 100 solely for the BAN-PT.

The panel noted that the Executive Board is tasked with taking all decisions related to accreditation, such as nominating the assessors and taking the final accreditation decisions concerning programmes and institutions, and this amounts to a very high number of decisions. According to the Strategic Plan 2017-2021 the BAN-PT was projected to take decisions about approximately 3000 programmes and 1000 institutions in 2017 and this is supposed to increase to 4000 programmes and 1500 Institutions in 2018. The panel was asking how the five members of the Executive Board were able to handle such a high number of cases every year. The BAN-PT explained that the decisions were very much guided by the conclusions of the assessors, who for their part relied heavily on the accreditation instruments that provide a fixed system of scored points that directly translates into accreditation decisions. The Executive Board is therefore principally concerned with discussing those cases, that based on the score can be considered borderline cases. In cases of doubt, the Executive Board may decide to appoint a new assessor to validate the outcome by looking into the documents provided by the assessors, and/or the Executive Board may look into the national database to verify input data such as for instance number of faculty or resources available.

The above-mentioned regulation also covers the role of the secretariat staff, and it was explained that a large part of the work of the secretariat is administrative and technical and concerned with making sure that the pre-defined process steps in the accreditation takes place. Much time is therefore going into making arrangements for meetings, booking transportation and hotels, making documents available et cetera. This mirrors the profile of the staff, where two are quality assurance officers, 46 support staff and 10 janitors and drivers.

The panel therefore concluded that the bulk of the performance of tasks closely related to the actual accreditation assessments are centred on the assessors and the Executive Board under the supervision of the Accreditation Council. Today there are thus just two quality officers tasked with activities that directly underpin the decisional and policy work of the BAN-PT.

The panel considers that the policies and management practices are not only clearly defined and described but they are also sound in the current system, where accreditation decisions are highly quantified and based on predetermined categories and overall scores. The panel is, however, encouraging the BAN-PT to consider whether the number and the current composition of the staff of the BAN-PT adequately reflects a future situation, where accreditation decisions will be less reliant on predetermined input factors and shifting its focus to assessments being based more on judgement of outputs and outcome.

The new accreditation instruments expected in 2018, as mentioned in section 1.6, may possibly challenge current practices. If a new system with a higher focus on outcome and output, would leave more room for the assessors to exercise their wisdom and expertise, and hence tend to make the process of accreditation less mechanistic, it may call on the BAN-PT to take a greater role in ensuring consistency across the judgements made by assessors than today. It would seem likely that the task of verification currently undertaken by appointing additional assessors would be significantly more complex, and require the BAN-PT to have internal structures to cater and facilitate in such processes.

The panel further notes that, with the positive benefits of introducing an IT-based system to facilitate the accreditation process also changes in the organization of the accreditation activi-

ties will follow. For instance, so far assessors have been meeting in large settings, where some typically 200-220 panels have been invited to a 2-3 days meeting to do the desk assessment of 2-3 programmes for each panel. If this first step in the accreditation process has played a broader role, for instance providing a contact point and a forum where assessors would also be discussing their individual approaches to accreditation with a broader range of assessors and by means of such a dialogue with peers possibly align their views, then a change in this area may equally increase the need to have a stronger internal base of staff to ensure alignment and consistency in accreditation decisions.

In more general terms, the panel finds that the impact of the planned changes in accreditation instruments, with a stronger focus on output and outcome, may turn out to be greater than what is currently appreciated, and would therefore recommend that the BAN-PT gives further thought to any need to introduce organizational changes to better support the new demands that are likely to emanate from the changes of the accreditation instruments.

As far as transparency in dealings with the public, the panel notes that the BAN-PT website includes information concerning accreditation procedures, accreditation instruments and a directory of all accreditation decisions taken, at programme as well as institutional level. There was a general appreciation among the stakeholder interviewed of the homepage as a useful source of information about the BAN-PT and its activities.

Overall, the panel finds that the BAN-PT has policies and management practices that are based on good governance, transparency and accountability.

COMMENDATION

The panel commends BAN-PT for shifting its accreditation procedures from an input towards an output and outcomes oriented approach.

RECOMMENDATION

The panel recommends that BAN-PT conducts a thorough analysis whether organizational changes are necessary to better support the new demands that are likely to emanate from the changes of the accreditation instruments from input to output and outcome approaches.

Principle 1.6

The EQAA keeps abreast with new developments and innovations in quality assurance as part of its internal continuous improvement system.

Guidance notes/Interpretation:

- The EQAA provides relevant and effective policies and practices to keep up with the changes in higher education, teaching and learning, online and technology and new demands for improved services.
- Research is being done and feedbacks solicited. Presentations are made in various conferences. A continuous quality improvement process is embedded in its management system.

BAN-PT has since its establishment in 1994 been developing and changing its external quality assurance activities in keeping with the changes that have taken place in the educational environment surrounding the agency.

Thus, BAN-PT has expanded its activities to cover accreditation of programmes at diploma, master's degree and PhD levels as well as accreditation at institutional level. When the national qualifications framework of Indonesia, KKNI, was introduced in 2012, this lead BAN-PT to

introduce changes to the accreditation instruments. The law on Higher Education, law no. 12, 2012, further lead BAN-PT to make substantial initiatives to modify the accreditation system to fit into the general national architecture of quality assurance which was defined, and which has further been institutionalized with the National Accreditation System (SAN).

Currently a new approach is being developed which will focus more on outputs and outcomes than on inputs. This major shift not only reflects international trends but also needs which were aired by national stakeholders. The MoRTRHE had as part of the process to determine a new approach, held three consecutive meetings with assessors, representatives of both public and private higher education institutions, where also BAN-PT participated. Here ideas concerning new standards were discussed. This was followed by a public hearing, where HEIs could write in their comments. Internally, BAN-PT has established an ad hoc committee, which includes senior assessors to define the development of the new instruments and the relevant training.

The panel learned that the development of the accreditation instruments to introduce the new standards has proven to be a challenging task. BAN-PT established earlier in 2017 an ad hoc committee, which also includes senior assessors to look into these issues. However, progress has been slower than anticipated. It is taking time to define well-functioning indicators and proxies for some of the outputs and outcomes. For instance, the tracking of the alumni to determine their labour market career is difficult because of limitations in working of the tax system. BAN-PT is however preparing an initial trial to test some of the instruments, so that they can come into force later this year.

According to BAN-PT, the new accreditation system will significantly change the task of the assessors. The new accreditations will be much less mechanistic, and more evaluative and qualitative. This is expected to lead to more substantial reports, than the current reports that have attained scores as their pivotal point. The future reports are to provide analysis and qualitative assessments, and they are expected to be better to inspire development and promote improvement of the quality of education.

Because of the key role of assessors in this change, BAN-PT is planning to make cascading training of assessors. Similar training or information activities directed to the higher education institutions are foreseen. BAN-PT is relying on the 14 regional coordinators, responsible of private institutions in different regions, which they consider their partners, to help organize these events, including making contact and sending out invitations to assessors or institutions. BAN-PT will take charge of the contents of the events, be they training of trainers aimed at assessors or information meetings for the HEIs.

Thus training activities can commence in winter 2017/2018, even if some issues are still to be resolved concerning the indicators, related inter alia to reliability and indicators not being prone to manipulation by institutions.

When asked about the role of the Accreditation Council in these activities, the Council explained that they have been developing a new policy on outcome focus, which amongst other emphasizes learning outcome and programme evaluation.

Higher education institutions confirmed that they had been invited to meetings, where also BAN-PT participated, and where new standards were discussed. Overall, the consultations had however not been very extensive.

The panel came to the conclusion that BAN-PT is playing an active role in developing the new instruments to make the new accreditation system come into being, and that the agency had been promoting a new focus on output and outcome. There has been a certain consultation of stakeholders, being HEIs and the assessors. There seem on the other hand to have been little if any consultation of employers, industry or representatives of students.

Principle 1.6 also talks of conducting research and soliciting feedback. The panel believes that the BAN-PT could benefit from having some more capacity in-house to look into new developments and innovations in quality assurance, because such activities could give BAN-PT a

stronger basis for playing a proactive role in discussions about future developments in quality assurance.

More generally, the panel notes that ~~the~~ BAN-PT, over the years have been changing its activities and developing the agency according to the perceived needs. BAN-PT has in this way remained a relevant and important actor in external quality assurance of higher education in Indonesia.

COMMENDATION

The panel commends BAN-PT for shifting its accreditation procedures from an input towards an output and outcomes oriented approach.

Principle 1.7

The EQAA has sufficient and adequate resources.

Guidance notes/Interpretation:

The resources must be sufficient to enable the EQAA to perform its functions, meet its goals in a timely manner and serve its stakeholders. The resources include appropriately qualified and sufficient manpower and their development, financial capacity to sustain its activities and future plans, including physical and IT infrastructure.

BAN-PT has a staff of 59 members and 5 board members. They work closely together with the members of the Accreditation Council who are, however, not employed by BAN-PT. The staff is employed by the MoRTHE, but assigned to BAN-PT. BAN-PT is negotiating the agency's budget on an annual basis, based on an assumption of the number of programmes and institutions that the agency will be able to accredit in the following year. The agency emphasizes that although the annual budget of the BAN-PT is part of the ministerial budget, the agency has independence in carrying out its tasks and functions.

According to the SAR, there are more than 24.000 programmes and approximately 4.500 higher education institutions that are within the scope of accreditation. Given that accreditation is granted for five years, this would imply that ~~the~~ BAN-PT on average should accredit 4.800 programmes and 900 institutions annually equal to a total number of 5700 accreditations annually. Given that there is a LAM dealing with accreditation of the some 3000 programmes in the health sector, the overall number is somewhat lower, implying that on average the total number of accreditations should be in the area of 5100 annually.

However, the annual operational budget which MoRTHE is providing to ~~the~~ BAN-PT is based on the assumption that a total of 4000 accreditations are conducted – irrespective of whether programme or institutional accreditation. This falls short of covering the total average number mentioned above. BAN-PT explains that this is due to the limited internal capacity of BAN-PT, where not only finances but also the scarcity of assessors is raised as an issue. The vast majority of the assessors are university professors, who still have their proper work at their university. The recruitment of more assessors is challenging. BAN-PT makes open announcements for recruitment, and in terms of budget the agency will get funding for an additional 100-200 assessors per year.

There is also an issue related to their training as further discussed in section 2.7. BAN-PT assumes that the new IT system to support in the accreditation process, named SAPTO, will lead to efficiency gains. SAPTO will reduce the workload and make the process cycle shorter. Many of the manual processes will presumably be less, and some activities will not have to be undertaken anymore, such as manually computing data from one data sheet to another. The

panel also learnt that until now documents have been sent by post, and this is now in many cases replaced by the swift sending of documents by mail or by use of other internet interfaces. The panel learned that so far about in total some 700 programmes have been using SAPTO from its introduction in April 2017 until November 2017. 185 programmes have already been fully processed and finalised.

In addition, the higher education institutions found the ICT system SAPTO useful. The processing time in accreditation has become shorter, and with the IT system, the institutions have a much better idea about the process steps and the time line, because they can follow the development of the process on-line in SAPTO.

Assessors found that SAPTO makes it easy to validate, and for instance write to a fellow assessor to comment on the items of the assessment, or for instance the clarity of the text. Assessors in general felt SAPTO worked well, and it gives more time and flexibility to the assessors, because they can now sit at home, and have the freedom to decide when to use their time to undertake the assessments.

BAN-PT also foresees that there will be a mix of quantitative data and some qualitative assessments in the new accreditation system with more focus on output and outcome. And it is assumed that the ICT system will strongly help in the calculation of the quantitative data, and hence leave more time for assessors to look into the qualitative assessments, which will be more prominent in the new accreditation instrument, in order to reflect the intentions of the new accreditation system.

BAN-PT saw a need to develop the skills of staff in terms of competences and capacity, for instance in relation to the new SAPTO system, where only a limited number are ready to work and make data entries in the new ICT system. BAN-PT has identified areas of skills to be developed. Some training has commenced, including training for staff to work with the new on-line system. Following feedback from HEIs, the agency has also identified development of inter-personal and relational skills as a focus area. In addition, a better understanding of accreditation among the staff is a priority area, so that they can better understand the steps in the accreditation process, and principles of conflict of interest among assessors, and hence become better to perform in their positions.

Further, the panel notes, that the plans to introduce area specific LAMs to take care of programme accreditations in their relevant subject areas may in the longer term reduce the number of accreditations to be undertaken by BAN-PT, but the panel also notes, that so far the progress in establishing LAMs has been limited with currently one LAM in function, and possibly one or two new LAMs to come into functioning in the coming years. The target for BAN-PT is that there will be 15 LAMs established by 2021, with three new LAMs established every year. In meetings with BAN-PT and in meetings with the MoRTHE the panel has not been able to obtain more detailed information that would suggest which assumptions lie behind these targets or which steps that are envisaged to create the development of these new LAMs.

The panel would therefore recommend that it is clarified which strategy and approach to adopt to create a climate in which third parties would find it attractive to develop LAMs, and further to determine the respective roles and responsibilities of the Ministry and the BAN-PT in bringing these changes about. The successful establishment of LAMs would have a significant impact on the resources necessary for BAN-PT to fulfil its tasks.

The panel notes that while the new ICT system may result in efficiency gains, it is difficult to assess whether the likely cost of running the new more qualitative and outcome based accreditations instruments will or will not more than outweigh these gains, and thus result in an overall more expensive accreditation process. Panel finds that it may be worthwhile to make an analysis of the impact of the IT based system on the activities of the BAN-PT staff. This could form the basis for developing further training activities to ensure that staff, according to their role in BAN-PT, would have the relevant qualifications to make full use of the opportunities that the ICT system will provide.

Further, the panel finds that BAN-PT may wish to assess the related ramifications of the new it-facilitated accreditation process, and discuss which internal organizational changes may be helpful to ensure that BAN-PT will benefits fully from these changes.

The panel acknowledges that the limitation in funds and internal capacity of the BAN-PT may have implied that fewer accreditations have been undertaken in the recent years, than what would be necessary if all institutions and programmes are to be accredited every five years as foreseen by the law. In this situation, the panel would recommend that BAN-PT and the MoRTHE considers the possibility of aligning aims and facts more closely, for instance by determining what would be the realistic number of accreditations in the coming years and adjusting the accreditation period accordingly.

In discussions with the panel, BAN-PT also raised the issue of having more than the current two quality assurance officers. They found that the agency is in need of more people who are able to design and discuss about accreditation and take part in the development of the accreditation instruments. It was also noted that the Executive Board members are only serving five years, and therefore there is a need to have some core staff members who sustain knowledge and ensure continuity in the work of the agency.

As already touched upon, the panel would suggest that BAN-PT also makes a thorough analysis of the impact of introducing new accreditation instruments which according to the SAR will define a new approach to accreditation with more emphasis on qualitative data, and providing more room for the assessors to use their expertise to make more comprehensive discussions of strengths and areas for improvement in programmes and institutions. The panel believes that such a new approach will not only significantly change the expectations to the capability of the assessors, but may also create new pressures on BAN-PT to ensure consistency in assessments and to ascertain that active means are employed to ensure equal treatment of equal circumstances when programmes or institutions are assessed. In the current system, it can be argued that the high reliance on quantitative data inputs that are turned into points based on a fixed scale, creates a transparent and simple system, where institutions can check whether they have the right assessment based on the points given, and reflecting input factors. In the new system as described, the assessors will have more scope for making assessments and judgments that cannot always as easily be referring back to objective facts: A greater focus on qualitative input and less tangible factors such as outcome will therefore imply assessments, which will be more open to interpretation.

It is the panel's view, that BAN-PT in the new context would benefit from reflecting on the possible needs to have a stronger internal quality assurance assessment capacity to take care of these new demands, including for instance checking consistency among the assessments made in accreditations, developing the training of assessors, and increase the internal capacity to make general QA assessments and developing accreditation instruments. This would likely imply the recruitment of a number of new staff members, of which some would have formal qualifications in evaluation and others in quality assurance, to support the work currently undertaken by the Executive Board, and assisting in developing new capacity in the agency, to deal with the new challenges that the new approach vested in the new accreditation instruments may create.

RECOMMENDATION

The panel recommends that BAN-PT reflects on the possible needs for more capacity in the agency to deal with the new challenges that the new approach vested in the new accreditation instruments may create. This might imply a new staff structure.

BAN-PT is well connected with other quality assurance agencies and has been developing its activities, drawing on inspiration and expertise found in collaboration with its international partners and international networks of quality assurance agencies.

Strategic alliances with accreditation agencies in other countries such as the New Zealand Qualifications Authority and the Malaysian Qualifications Agency have been nurtured as a means of developing quality of higher education and mutual recognition of qualifications.

Further BAN-PT has been enhancing its credibility and professionalism through bilateral, regional and international partnerships such as AQAN and APQN, and BAN-PT is signatory to various international agreements with the aim of gaining better international recognition.

The panel notes that BAN-PT has taken an active interest in developing international cooperation, and contributed to increasing the international recognition of the Indonesian quality assurance system, while also gaining new insights and ensuring practical outcomes, such as for instance cooperation in the training of assessors.

At the national level, BAN-PT considers ministries such as the MoRTHE, the Ministry of Religious Affairs, the Ministry of Defence, and also industry, as their main stakeholders.

In its collaboration with national partners, BAN-PT meets with the HEIs – public and private. An annual meeting is organized by the ministry, where approximately public 120 HEIs, ministries, BAN-PT and assessors meet. Separate meetings are held by the 14 regional coordinators, responsible of private institutions in different regions. BAN-PT explained that this meeting structure reflects the fact that the public HEIs are closer regulated by the ministry and therefore more informed. Private institutions on the other hand have less close contact, and contact follows the lines of general state governance, i.e. through the 14 regional state offices. Higher education institutions explained that no regular meeting is organized between BAN-PT and the HEIs, but that BAN-PT takes part in the annual meeting organized by the ministry.

BAN-PT does however organize an annual meeting with the assessors. The HEIs explained that a key issue discussed with BAN-PT in the last annual meeting with the ministry had been the SAPTO. The higher education institutions expressed an interest in having an opportunity to discuss the new accreditation system standards.

The panel noted that there are no regular meetings with employer's organizations, and no meetings or contact with students, except as part of the accreditation process where students are interviewed.

Asked about key discussions with stakeholders during the last 2-3 years, the agency pointed to the discussions about the possibilities of developing new LAMs, where some encouraging developments were noted in the areas of architecture or agriculture.

As far as national collaboration with stakeholders in concerned, the panel concludes that there is a great potential for developing a closer relationship with employer organizations, industry, students and professional bodies in order to gain further insight into their perception of the

needs of quality in education, and to develop mutual understanding and an acceptance of the importance of external quality assurance in higher education.

The panel notes that BAN-PT has been collaborating with a long list of international partners with a recognized strong capability in external quality assurance, and the panel finds that BAN-PT has developed valuable regional alliances and international ties to the benefit of the Indonesian quality assurance of higher education.

COMMENDATION

The panel commends BAN-PT for collaborating actively with international partners.

RECOMMENDATION

The panel strongly recommends that BAN-PT strengthens its general collaboration with national stakeholders including employers and students on a regular basis.

Principle 1.9

The EQAA has a reliable system for controlling, auditing and assessing all processes of its operation.

Guidance notes/Interpretation:

- A good internal management system addresses annual strategic planning, systemic checks, performance assessment, including outputs and outcomes.
- PDCA practices
- EQAA are generally being audited financially by higher authorities through yearly performance reviews.
- Audits done by external QA bodies for separate certification and compliance with specific requirements.

BAN-PT has developed a strategic plan, which among other specifies annual key performance indicators for the years 2017 to 2021. According to these indicators, BAN-PT was to undertake a total of 4000 accreditations in 2017, and this is set to increase in 2018 to a total of 5500 accreditations, of which 1500 are to be institutional accreditations and 4000 programme accreditations.

As already mentioned, the agency assumes that the new ICT based processes will lead to efficiency gains, and therefore make this rather high increase in output possible. At the same time, the issue of increasing the number and quality of assessors is discussed.

The strategic plan is defining for the overall targets in the agency's Annual activity and budget document, and follow-up activities are conducted to ensure that targets are met.

The agency does not currently have an overall description of the internal QA system. Members of the Accreditation Council explained that the Council intends to define the internal QA system, and design it in such a way that it will fit the new organizational structure and the new accreditation system with a more outcome-oriented approach.

Currently, however, key areas of activity are monitored by the Executive Board, the Accreditation Council and the Ministry, respectively. Thus, the Executive Board is monitoring the work of the assessors through reading and scrutinizing the reports that the Executive Board receives as a basis for decision-making. The Accreditation Council is monitoring the general lines of activities of the Executive Board through the general report of activities the Council receives,

as well as through the general discussions of operational and strategic issues, that the Council and Executive Board members undertake from time to time. Finally, the Minister is monitoring the activities of the Accreditation Council and the Executive Board through the annual report, which BAN-PT submits to the Ministry, and which reports on the operations and financial accounts of BAN-PT.

Further, the finances of BAN-PT are subject to, and may thus be audited by, the State Auditor, and the finances are further audited by the Inspectorate General of the Ministry.

The panel notes that practices exist to ensure auditing of the financial situation of BAN-PT on a regular basis through yearly performance reviews.

The panel at the same time finds that internal quality assurance activities appear to be rudimentary and principally concerned with the general reporting of activities and some critical assessment of data received in decision-making processes. A more systematic approach based on a quality circle thinking has not yet been developed, but it may possibly, judging from the statement by Council members, be under consideration.

The panel would recommend that BAN-PT looks into the question of how to quality assure the future reports from the assessors, which with a more qualitative and rich content of assessments, may also prove to be more diverse, and hence, in need of a more systematic approach to ascertain a uniform quality of the reports, thereby ensuring the best conditions possible for the Executive Board to arrive to the consistent and well-founded decisions.

RECOMMENDATION

The panel strongly recommends that BAN-PT develops effective internal quality management systems, while taking into account the needs created by the new approach in accreditation.

Principle 1.10

The EQAA keeps the public informed of its current policies, procedures, criteria, standards and assessment results.

Guidance notes/Interpretation:

- The website/portal is kept up to date and accessible to the public.
- Timely issuance of circulars/notices, publications of QA documents, press release, and regular dialogues.

BAN-PT maintains a website, the www.banpt.or.id where information about the organization and its activities are published.

The website includes official documents and the various accreditation instruments and guidelines concerning programme accreditation as well as institutional accreditation. The website allows HEIs to monitor the processing of the applications for programme or institutional accreditation that they may submit to BAN-PT. The general public can check the accreditation status of individual programmes and institutions through the website.

The panel notes that the website and many key documents are only in Indonesian, which may limit the accessibility of the site to an international audience, including international students.

The higher education institutions find the website of BAN-PT very helpful. They found that it is kept up-to-date, and the quality of the website had been improved in recent years. It was overall assessed to work well. The higher education institutions found that it was easy to find what one was looking for, whether general information or specific information such as, for instance, the grading of individual programmes.

The panel therefore concludes that BAN-PT is making relevant information accessible to the general public and to the target audience of higher education institutions. Guidelines are published in the website, and the website is continuously updated, and organized in a manner, that allows the interested public to easily find what they are looking for.

The panel noted that the site did not seem to be used much as a means of interaction and dialogue with the target audiences or the public in general. BAN-PT may wish to consider whether a broader use of electronic communication could be a means of nurturing an even stronger public understanding and support for the activities of the agency.

RECOMMENDATION

The panel recommends that BAN-PT strengthens its communication with stakeholders and wider public through its website.

3.2 AQAF PRINCIPLE 2: EXTERNAL QUALITY ASSURANCE STANDARDS AND PROCESSES

Principle 2.1

Interest of the students and society should be at the forefront of external quality assurance processes.

Guidance notes/Interpretation:

The purpose and goals of the EQAA is to benefit both students and society. The declared purpose of QA therefore should be supported by QA frameworks and processes that provide the means to benefit both parties.

A functioning QA process in the form of accreditation system will be a very good way of ensuring a high quality HE that is beneficial to both the students and Indonesian society as a whole. Among the main purposes and functions of BA-PT are:

- to develop an accreditation system for HEIs in Indonesia
- to design and develop instruments for HEIs accreditation
- to do the actual accreditation process of study programs and HEIs
- to propose to MoRTHE the establishment of Self-accrediting Boards (Lembaga Akreditasi Mandiri, LAM) that will eventually take over the study programme accreditation

Those purposes and functions are necessary to ensure the study programmes offered and the HE system in Indonesia as a whole are of acceptable quality.

The main reference/benchmark in deciding the quality level of higher education for Indonesia is National Standard for Higher Education (SN-Dikti).

Some of the key documents that were referred prior to and during the site visit:

- Law No. 20/2003 on National Higher Education System, regulating the people rights and access to HE;
- Law No. 12/2012 on Higher Education, regulating the establishment and direction of Indonesian HE including quality assurance and accreditation;
- Regulation of Minister of RTHE No. 32/2016 on Accreditation of Study Programmes and Higher Education Institutions, HEIs;
- BAN-PT Regulation No.2/2017, on regulating the national standard for HEI and study programme accreditations.

In addition, BAN-PT website was also perused to look for corroborating (or conflicting) evidence of QA policies and practices done at BAN-PT vis-à-vis the provided documents. During the visit, interviews held with various groups were done to ascertain the accuracy of statements or the practices listed in the documents.

Based on those processes, it was clear that BAN-PT was thorough in their approach of ensuring the HEI's are bound by or comply with an external accreditation process to achieve a full nationwide compliance towards academic quality assurance. The laws and regulations are passed at the highest level of the government (the President's Office) and implemented by the MoRTHE. The current status requires:

- mandatory HEI and study program accreditations. Prior to the year 2012, HEI and study program accreditation are voluntary;
- both the HEI and study programs are to be accredited;
- establishment of an internal quality assurance system for HEI's as a mechanism to perform QA at the institutional level.

BAN-PT is the agency entrusted by the government to carry out the accreditation process. It is the understanding that an accreditation process offers a good path to achieving high quality academic offerings, thus putting high priority to society's and students' interest.

At the implementation stage, BAN-PT faces a big challenge due to the very large number of HEI's (and naturally a much larger number of study programs) that has to be accredited. BAN-PT has been very bold in setting the target of completing the process by the middle of 2018. The number of completed accreditation process done for institutions/HEI's since 2016 was reported as 1,132 (out of about 4472 HEI's) and 19,003 study programs (out of about 24,400 programs). Given the results so far, it is a commendable achievement. Resources and commitments provided both in term of manpower and finance must have been enormous in order to achieve those numbers. Hence it can be reasonably said that the society and students interest have been given a very high priority by BAN-PT in ensuring all study programmes offered have been assessed and categorised into a certain level of quality. That information is made public so that they are aware of the (quality) status of the study programmes offered and HEIs standing.

However, it is noted that the process of developing policies and guidelines related to academic quality assurance is heavily dominated by academics and government administrators with little inputs from private sector or industry players.

COMMENDATION

The panel commends BAN-PT for having shown tremendous resourcefulness, resilience and commitment to both the HEI and study programme accreditation process, based on the number of completed accreditation tasks within a relatively short time period.

RECOMMENDATION

The panel recommends that BAN-PT and MoRTHE engage with more private sector and industry players in developing policies and practices related to academic quality since the private sector is most likely the main beneficiary of the graduates from those study programmes.

Principle 2.2

Standards must be comparable to international good practices and related to internal quality assurance of higher education institutions.

Guidance notes/Interpretation:

- Development and selection of standards involve stakeholders, experts and are benchmarked or referenced with international best practices.
- It must be fit for purpose.
- The Institutional IQA requirement is part of the EQA standards whether for programme-based or institutional- based approach.

Standards used for accreditation assessment of higher learning have been developed by many institutions globally. Those standards are by and large cover similar areas and are intended to evaluate similar quality aspects of an academic programme or academic institutions. BAN-PT is presumed to be well aware of those scenarios, as shown in their choice of starting the development of their own standards via an INQAAHE-organised workshop in 2007. That step was followed by an extensive benchmarking process involving many other parties both in the ASEAN region and internationally. Some of those institutions are:

- ASEAN Quality Assurance Network (AQAN).
- Asia Pacific Quality Network(APQN)
- Malaysian Qualifications Agency (MQA)
- Commission on Higher Education, the Philippines
- Higher Education Division, Ministry of Education, Singapore
- Australian Universities Quality Agency (AUQA)
- New Zealand Qualifications Authority(NZQA)New Zealand
- Japan Accreditation Board for Engineering Education (JABEE)
- Korean Council for University Education
- European Association for Quality Assurance in Higher Education (ENQA)
- Quality Assurance for Higher Education (QAA)United Kingdom
- Alliance on Business Education and Scholarship for Tomorrow - a 21st Century Organization (ABEST21)
- National Institute for Academic Degrees and University Evaluation (NIAD-UE
- Association of Quality Assurance Agencies for Islamic World (AQAAIW)

However, it is noticed again that the involvement of private sector/industry stakeholders is lacking.

The end product is the development of Seven (7) Standards consisting of about 100 total elements/criteria that will be used for both the study programme and institutional assessments. The seven standards are:

Standard 1:   Vision, mission, objective, target, and strategy;
Standard 2:   Governance, leadership, management system, and quality assurance system;
Standard 3:   Students and alumni;
Standard 4:   Human resources (academic and non-academic staffs);
Standard 5:   Curriculum, teaching and learning processes, and academic atmosphere;
Standard 6:   Finance (including incomes), assets and facilities, and information system;
Standard 7:   Research (including publications), public service; and collaboration.

These standards address features of quality of higher education institutions and their programmes that not only cover the most relevant aspects of quality in higher learning but also form the basis of other agencies' standards. Hence, BAN-PT places its standards within the regional and global mainstream of external quality assurance

To assist the programme owners and HEIs prepare for the accreditation process, two instruments were developed, one instrument for study programme assessment and another for institutional assessment. Each instrument consists of a number of Books/Guidelines covering various aspects of preparation for accreditation process. The details of the process are described in the chapter about principle 2.5. As explained there more in detail, also these instruments are in line with current developments and good practice for external quality assurance procedures. Based on the observed process of multiple consultations and deliberation taken BAN-PT, the panel is of the opinion that the developed standards and guidelines used by BAN-PT are very comparable to international practices with the exception of the lack of private sector and industry input.

RECOMMENDATION

The panel recommends that BAN-PT and MoRTHE engage with more private sector and industry players in developing policies and practices related to academic quality since the private sector is most likely the main beneficiary of the graduates from those study programmes.

Notwithstanding the fact that the standards and procedures developed and used by BAN-PT are in line with international good practice the starting point and main reference for developing QA standards for Indonesian higher education is the government approved SN-Dikti (National Education Standards) which stipulates the specific national expectations regarding level and type of qualifications earned upon completion of higher education programmes in Indonesia. With that starting point, national and cultural issues are taken care of from the very beginning. Standards for accreditation assessment of study programmes and institutions were already established and used by BAN-PT as early as the year 2000. Subsequent improvements and revisions were later done to those standards involving various stakeholders from the government, academia, professional organisations and other stakeholders.

A major review of those standards was taken by the Indonesian government in 2007 via a project called *Indonesian Managing Higher Education for Relevance and Efficiency*, I-MHERE, with the assistance of INQAAHE, with the purpose to align external quality assurance standards with particular needs within the national context. The outcome of that project was further improved by benchmarking process with various reputable quality organisations/institutions such as ENQA, AUQA, CQAIE-Malcolm Baldrige and NCATE (USA). Regional/ASEAN QA bodies were also consulted. However, it is noticed that the involvement of private sector/industry stakeholders was lacking.

The end product of the I-MHERE project is the development of Seven (7) Standards consisting of about 100 total elements/criteria that will be used for both the study programme and HEI assessments. Those standards are:

Standard 1:   Vision, mission, objective, target, and strategy;
Standard 2:   Governance, leadership, management system, and quality assurance system;
Standard 3:   Students and alumni;
Standard 4:   Human resources (academic and non-academic staffs);
Standard 5:   Curriculum, teaching and learning processes, and academic atmosphere;
Standard 6:   Finance (including incomes), assets and facilities, and information system;
Standard 7:   Research (including publications), public service; and collaboration.

Based on the observed process of multiple consultations and deliberation taken BAN-PT, the panel is of the opinion that the developed standards and guidelines used by BAN-PT was well developed taking into account the national requirements and the vast cultural diversity and sensitivities. There was extensive consultation with local, regional and international stakeholders with the exception of the lack of (local) private sector and industry input. A more comprehensive involvement of stakeholders including the private sector could be very valuable with the possibility of identifying and refining future needs and demands in academic QA in general.

RECOMMENDATION

The panel recommends that BAN-PT and MoRTHE engage with more private sector and industry players in developing policies and practices related to academic quality since the private sector is most likely the main beneficiary of the graduates from those study programmes.

Principle 2.4
Standards must be made publicly available and applied consistently and with due regard for cultural diversity.
Guidance notes/Interpretation:

- The EQA standards must be properly developed, approved and well disseminated.
- Interpretation must be fit for purpose and consider its context.

The Standards used for study programme accreditation and institutional accreditation are well described by BAN-PT in the books provided. The seven Standards have in total about 100 elements/criteria used for study programme and institutional accreditations, and are described in relevant documents. Those documents are made available through BAN-PT website: https://banpt.or.id/

The panel found that the website is well designed and easily accessible except for the language issue. While it is understood that the website is used almost exclusively by Indonesian institutions and citizenry in general, it would be very helpful to have an English version of the website, at least with translated key documents involving policies and guidelines. The English version will serve BAN-PT and Indonesia well for foreign student recruitment as well as for general exposure/publicity. This assessor fortunately has a reasonably good understanding of Indonesian language, and therefore was able to understand most of the (Indonesian) documents provided in the website and also during BAN-PT site visit.

Since the standards were developed based on the Government Regulations on National Education Standards (1995) and Law No. 12/2012 on Higher Education (Exhibit 4), the issues of national requirements and Indonesia's vast cultural diversity have been taken into account, thus putting those Standards and the 100+ elements in those Standards in the appropriate national/local perspective.

In addition to the website access, BAN-PT also does occasional face-to-face meetings/engagements with focus groups such as HEIs representatives and regional coordinators for private HEIs, to explain the standards and elicit feedbacks for continuing improvements. The panel therefore finds that BAN-PT has communicated and publicised the standards well to the HEIs and the programme owners.

Consistent applications of regulations and standards is a core principle for professional and reliable conduct of accreditation procedures. BAN-PT uses various instruments to foster or assure consistent application. First and foremost, a series of so-called *Books* explain in detail how to process the various steps of the accreditation procedures and give useful guidance to all parties involved:

Book I: Academic Script
Book II: Accreditation Standard and Procedure
Book III A: Program Accreditation Form
Book III B: Program Implementing Unit Form
Book IV: Guidelines for Completing the Accreditation Instrument
Book V: Guidelines for Assessing the Accreditation Instrument
Book VI: Scoring Matrices
Book VII: Guidelines for Site Evaluation
Book VIII: Guidelines for Self Evaluation

As regards to consistent application of the regulations and standards, both the institutions and assessors are well guided. Based on the explanations in these books, higher education institutions are guided as regards the interpretation of standards and regarding the material to be provided in order to demonstrate compliance with the standards, also by providing templates. The assessors are guided on the scoring. In addition to this BAN-PT puts a lot of

emphasis in the training of assessors, which is referred to in more ~~in~~ detail in chapter on principle 2.7.

Another core means of assuring consistent application of the standard is the validation of assessment reports that takes place before a case is given to the Executive Board for decision. Senior assessors (with five or more years of accreditation experience and holding a management position in their respective universities) also act as validators. Validators review the reports of the assessors before BAN-PT issues the accreditation status and score of the program or the institution. Validators also review the report when a university makes an appeal on their accreditation status and score.

RECOMMENDATION

The panel recommends BAN-PT to consider launching an English version of its website.

Principle 2.5

The process normally includes a self-assessment report (SAR) of the programme or institution, site visit, feedback, formal decision, and follow-up procedures.

Guidance notes/Interpretation:

Outline the institutional process to produce a SAR in your country. This procedure is an accepted core process in QA practices – applicable for both programme and institutional accreditation. This requires institutions to have an internal system for quality assurance and conduct a proper audit to generate data and prepare a Report.

Both programme accreditation and institutional accreditation are based on regulations that cover all relevant phases of the procedures starting with the submission of the accreditation applications, the various steps of the assessment and leading to the decision making within BAN-PT. Three main documents relevant to this Principle were initially referred prior to and during the visit:

Exhibit-20: Accreditation Instrument for Study Program
Exhibit-21: Accreditation Instrument for Higher Education Institution, HEI
Exhibit-23: Standard Operational Procedures for Accreditation of Study Programs and HEIs

In addition, the Standards-Operation-Procedures (SOP) for study programme accreditation and institutional accreditation are well described by BAN-PT in a series of books provided which provide guidance on how to process the various steps.

The Study programme accreditation process requires the preparation of documents. This self-assessment is guided by the following books.

Book I: Academic Script
Book II: Accreditation Standard and Procedure
Book III A: Program Accreditation Form
Book III B: Program Implementing Unit Form
Book IV: Guidelines for Completing the Accreditation Instrument
Book VIII: Guidelines for Self Evaluation

Three documents needs to be submitted initially, namely:

a. Data, information, and performance sheet of the study program (a detailed form) provided in Book IIIA

b. Self-Evaluation Report of the Study Program (using guidelines given in Book VIII

c. Data, information, and performance sheet of the management unit (a detailed form) provided in Book IIIB

Based on that submission, the external assessment is conducted in two steps. Assessors are involved in both desk and site assessments of study programs and higher education institutions. There are usually two assessors for program accreditation and five to seven assessors for institutional assessment. The assessors conduct the assessment in universities that are not in their geographical region. First, a desk assessment is done by BAN-PT assessors and a decision will be made on whether the study programme qualifies for a field/site assessment. The desk assessment is partly of a formal nature focussing on completeness and partly focussing on quantitative core standards. Failure to qualify for field assessment will terminate the accreditation process, and the study programme owner will have to resubmit another application to be considered for a fresh accreditation process. No time frame is given for resubmission.

Field assessment is done according to the guidelines described in Book VII. Criteria used to assess the study programme are based on the seven (7) standards as described in Book II namely:

Standard 1:   Vision, mission, objective, target, and strategy;
Standard 2:   Governance, leadership, management system, and quality assurance system;
Standard 3:   Students and alumni;
Standard 4:   Human resources (academic and non-academic staffs);
Standard 5:   Curriculum, teaching and learning processes, and academic atmosphere;
Standard 6:   Finance (including incomes), assets and facilities, and information system;
Standard 7:   Research (including publications), public service; and collaboration.

Within each Standard, there are numerous detailed elements that will be used in guiding the assessment. The total number of standard elements (covering Standards 1 – 7) is about 100.

During the site/field assessment, a written report is prepared, based on the description of achievements of every element in the seven standards. A score of 1 – 4 (4 being the highest/best score) will be given for each element based on the level of achievement of the programme in satisfying the set criteria. As a whole, it can be seen that the process of assessment for study programme accreditation is very well described and will serve both parties (assessor and assesse) well.

The Institutional accreditation process is done in a very similar way as the study programme application, requiring the preparation SAR document based on the guidelines provided in the following seven (7) books.

Book I: Academic Script
Book II: Accreditation Standard and Procedure
Book III: Institution Accreditation Form
Book IV: Guidelines for Self Evaluation
Book V: Guidelines for Assessing the Accreditation Instrument
Book VI: Scoring Matrices
Book VII: Guidelines for Site Evaluation

Initially, two documents need to be submitted namely:

a. Data, information, and performance sheet of the study program (a detailed form) provided in Book III

b. Self-Evaluation Report of the HEI (prepared using guidelines given in Book V)

Based on that submission, a desk assessment is done by BAN-PT assessors and a determination will be made on whether the HEI qualifies for a field/site assessment.

Site visit assessment is done according to the guidelines described in Book VII. The rest of the process is identical to the study programme assessment.

During this panel's site visit to BAN-PT, various documents were inspected to verify the process that took place during a study programme and HEI assessment.

Based on the review of the documents provided including the sample accreditation reports, it was found that the accreditation process as practiced by BAN-PT is done in an orderly and systematic manner. Two versions of the reports are prepared, the first version contains only the description of the achievement of each of the 100+ standard elements (without the scoring). This is the version that the assessor and assesse has to agree on (by signing the report document) before the field assessment is completed.

The second version is a duplicate of the first version with the assessor scores included. This is the version used by BAN-PT in their deliberations on whether to grant accreditation to the study programme or HEI. The scores can be quickly tabulated and added to give the sum of total scores for all the 100 standard elements. Since the total number of elements is 100, and the score for each element can be in the range of 1 - 4, the maximum score possible is 400. The total score is categorised according to bands A - D:

A – Excellent/Very Good (total score 361 – 400)
B – Good (total score 301 – 360)
C – Satisfactory (total score 200 - 300
D – Unsatisfactory/Not accredited (Total score below 200)

The establishment of an Internal Quality Assurance Department/Section for every HEI has been made mandatory in order to pass the (minimum) institutional accreditation requirement. As such, all HEI have established its own IQA.

Following the completion of field assessment, the assessment panel's report will be forwarded to BAN-PT's main office for data entry of the standard items scores, the addition of scores and finally the assignment of band categories from A – D, based on those scores. The process is by and large mechanistic. However, prior to submitting the report to BAN-PT Executive Board for decision-making, there is a validation process of the assessment reports by Senior Assessors. Those Senior Assessors review the reports of the assessment panel and the assigned band scores (A – D) and make their recommendation, whether to agree or disagree with the assessment panel report. Finally, the full report is submitted to the Executive Board of BAN-PT for deliberation and decision making on the accreditation status with the specific band scores for the program or institution. The institution will be officially notified of the result in writing in the form of Surat Keputusan Akreditasi (Letter of Notification of Accreditation) and Sertifikat Akreditasi (Accreditation Certificate) signed by the Head of BAN-PT.

A mechanism for appeal of the accreditation is place but seldom used.

Looking forward, the introduction of an online accreditation process via a system named SAP-TO is timely and seen as a very good move given the huge size of Indonesia. The HEIs are distributed over an area of more than 10,000 km wide and hardcopy-based documentation process for accreditation is indeed very challenging. The online system has been very well received by the HEIs as shown during the meeting with HEIs representatives. Representatives coming from faraway places such as Makassar and Northern Sumatera were very excited about the development and have tried using the proses in the pilot study.

The panel could confirm that all steps of a procedure mentioned in this principle are compulsory parts of the accreditation procedures applied by BAN-PT.

COMMENDATION

The panel commends BAN-PT for providing all parties involved in accreditation with informative and transparent descriptions of the procedures and with helpful guidance on processing the various steps of accreditation.

Principle 2.6

Assessment must be objective, fair, and transparent and conducted within an appropriate time frame.

Guidance notes/Interpretation:

Assessors are seen to be the backbone of QA systems. Normally they are external peer experts and trained by the EQAA. The EQAA has specific criteria and training activities to oversee the quality of the reports and performance of its assessors.

Objective, fair, and transparent conduct of assessments is an indispensable principle of accreditation. BAN-PT uses various means of ensuring this principle, which are described in:

Exhibit-20: Accreditation Instrument for Study Program
Exhibit-21: Accreditation Instrument for Higher Education Institution, HEI
Exhibit-23: Standard Operational Procedures for Accreditation of Study Programs and HEIs
Exhibit-24: Assessor Code of Conduct

During the visit, interviews held with various groups were done to ascertain the accuracy of statements or the practices listed in the documents.

The reporting format for the accreditation process is relatively straightforward. It consists of a written report consisting of two columns, the first column being the description before the site visit and the second column, the report after the site visit. It is a commendable practice by BAN-PT that both the assessor team and the assesse (usually represented by the top administrator of the HEI or study program) would have to agree to the written report before the field assessment is concluded. The agreement is sealed with both parties signing the report document. This assures that the outcomes of an assessment are based on objective facts and findings that are agreed between both parties involved. In addition, this step assures that the assessments made based on facts that are known to both parties, which supports the transparency of the procedure. To the best of the panel's knowledge, this practice is not done anywhere else.

As part of the SOP, at the beginning of the field assessment visit, the head of the panel delegation will read an oath to carry out the assessment process professionally and to (explicitly) mention that they accept no gift in the process. Though symbolic, the practice can be seen as a standard-bearer of good practice and accountability.

The flow chart and time frame given by BAN-PT for the whole accreditation process is officially published in the document named ALUR PROSES AKREDITASI (ISO 9001: 2008) (Flowchart of Accreditation Process (ISO 9001 – 2008). The document is available on BAN-PT website and is also available in hardcopy version.

The time frame for the whole process is divided into four (4) sections starting with the date of receipt of the SAR document at BAN-PT:

Document checking, validation, filing and notification of acceptance to the applying institution. Time frame for completion (maximum) if there are no outstanding issues: 17 working days.

Preparation for accreditation process including the identification and agreement of assessors. Time frame for completion (maximum): 13 working days.

Assessment process: This section covers both the desktop assessment and field assessment. The previous process for desktop assessment is a big 3-day event held in one location whereby all the panel of assessors convene and assess the document on site. Based on that desktop assessment, a decision is made whether the study programme or institution qualifies for field assessment. With the current online system (SAPTO), the assessors will be working independently at their locality for the desktop assessment. The assessors will then perform the field assessment together and submitted the relevant report to BAN-PT, and data entry will immediately follows. Time frame (maximum) including performing the field assessment, 37 working days.

Validation of reports by Senior Assessors, decision making by Executive Board, data entry of results, printing of certificates and notification process. Time frame (maximum), 8 working days

The total working days involved for the whole process is 75 days. In general BAN-PT strive to complete the whole accreditation process within 100 days (including the weekends) after the receipt of the SAR documents. Based on the discussion with the representatives of HEIs, the time frame is very well adhered.

COMMENDATION

The panel commends BAN-PT for having in place a process whereby both the assessor team and the assesse need to agree to the written report before the field assessment is concluded. This step in the accreditation process will reduce the potential for arguments/dissatisfaction after the accreditation process has been completed. The panel also commends that BAN-PT for adhering to the time frame of the processes.

Principle 2.7

The EQAA provides appropriate training at regular interval for development of assessors.

Guidance notes/Interpretation:

Assessors are seen to be the backbone of QA systems. Normally they are external peer experts and trained by the EQAA. The EQAA has specific criteria and training activities to oversee the quality of the reports and performance of its assessor.

The success of BAB-PT's mandate will greatly depend on the assessors who are tasked to do the assessment or accreditation process in the different universities. As indicated in the SAR, Ban-PT has a core of around 1735 assessors. One thousand two hundred of them are actively involved in the accreditation process. Most of the assessors are university professors.

Exhibit 25 Standard Operational Procedure for Assessor Recruitment spells out the requirements needed to be an assessor. The assessor must have a doctoral degree except if the applicant will accredit vocational, arts or military related programs; highly competent in his/her subject discipline; knowledgeable in quality assurance; possess oral and written communication skills and analytical skills; adept with ICT; and exhibits high integrity.

BAN-PT undertakes recruitment by announcing via its website that application is open for assessors. BAN-PT also gets recommendations from higher education institutions. Interested applicants submit all documentation to BAN-PT. Applicants go through a screening or selec-

tion process. This process includes a review of the documents submitted by the applicant, a writing test to find out the writing ability and analytical capability of the applicant, a psychological assessment to identify applicants with high integrity, and an interview. Applicants are also tested on their ICT skills.

Since the assessors are the backbone of BAN-PT, it conducts capacity-building and systematic programs to develop the assessors' skills in accreditation. BAN-PT enumerates these programs in the SAR. One of these programs is the Assessor Training. It is designed to orient the new assessor with the current rules and regulations of government on Indonesian higher education, the quality assurance system of Indonesia, the National Accreditation System, and the knowledge and skills and processes in assessing the accreditation documents of a program or an institution. This training takes the form of a simulation of assessing a program or an institution (mock audit).The second program is the Assessor Refreshing Program. This is carried out twice a year. It is designed for assessors who did not perform well in their assignments. A review is conducted on the assessment and reporting processes undertaken during the visit so that lessons learned and best practices are discussed to help assessors avoid the mistakes in the next accreditation visit. Another program is the Oversees Training Program. Assessors are sent to participate in training of assessors conducted by NZQA and AUN-QA. The fourth program is Foreign Assignments. Assessors are invited by AUN-QA, EU-SHARE and NCAA to conduct assessments in universities in other countries. BAN-PT also conducts seminars and workshops on quality assurance for the assessors. BAN-PT holds an annual meeting for assessors, higher education institutions, the ministries and other stakeholders. Training cost for assessors are included in the budget of BAN-PT.

Assessors participated recently in the training of the Online Higher Education Accreditation System (SAPTO). Assessors found this helpful as it facilitated their work for the desk assessment portion.

The interview and discussion sessions with the Executive Board, the Accreditation Council and the assessors confirmed that BAN-PT has a defined recruitment and selection criteria and that BAN-PT conducts training activities to prepare the assessors for the accreditation process.

The heads of assessed higher education institutions and heads of academic quality of HEIs are aware that BAN-PT implements recruitment and selection criteria and that assessors participate in varied training sessions. They also state that the assessors meet the requirements for the assessment and do a good job in conducting the assessment visits. They state that the assessments undertaken by the assessors are fair. They do indicate that there is always room for improvement and that more capacity building trainings or refresher courses for all assessors will be helpful.

The assessors also acknowledge that they need retraining or updating seminars and workshops. They suggest that BAN-PT issue periodic newsletters to update them on BAN-PT activities and educational concerns/issues that could be helpful to them.

Although the panel was assured about the effectiveness of the trainings, it wishes to highlight that the upcoming new accreditation instrument and the shift from input to output and outcome focus calls for intensive training of new and also experienced assessors in order to familiarize them with the new approach.

The panel notes that BAN-PT adheres to Principle 2.7 as indicated in the SAR, the Strategic Plan of BAN-PT, the exhibits, and interviews conducted with the different stakeholders in Jakarta.

RECOMMENDATIONS

The panel recommends BAN-PT to

- Consider hiring assessors from industry as indicated in the executive summary of the SAR.

- Undertake a comprehensive training program on the new instrument and standards that will be implemented in 2018
- Conduct refresher training programs more regularly for assessors on the following topics:
  - Understanding the accreditation criteria and standards of BAN-PT
  - Understanding and conducting outcome-based accreditation
  - Knowing the context of the Indonesian higher education institution they are accrediting considering the size of the country and the diversity of cultures
  - Improving oral and written communication skills
  - Enhancing ICT skills
  - Knowing new developments in respective disciplines of assessors
  - Updating oneself in recent developments on quality assurance
  - Knowing global trends in higher education
- Initiate meetings or gatherings among assessors across different regions to share lessons learned and best practices in accreditation visits
- Continue recruitment of assessors considering the number of HEIs and study programs that still have to be accredited

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Principle 2.8

The EQAA ensures professionalism and ethical conduct of assessors.

Guidance notes/Interpretation:

Training should include professionalism and ethical matters. It may be useful to have a system to check and act on grievance issues and complaints.

BAN-PT puts a premium on the professionalism and ethical conduct of the assessors as stated in their SAR since the behaviours of the assessors will critically affect the credibility of BAN-PT. Certain measures are in place to ensure this principle. As part of the application to be an assessor, the applicant must take a psychological test with the purpose of identifying applicants with high integrity. Passing this assessment is an eligibility requirement. If the applicant fails this assessment, the applicant cannot proceed with the application process. This practice began in 2008.

BAN-PT emphasizes the exercise of professionalism and maintaining high integrity in their assessor training seminars. Assessors have to read aloud the Assessor Code of Conduct before beginning the site assessment. They also have to sign the integrity statement in front of the administrators of the HEIs (the assesse). This statement declares that there is no conflict of interest between the assessors and the assesse. The assesse is also requested to submit to BAN-PT their feedback on the accreditation process. Part of this feedback process is a signed statement from the assesse that the site assessment was carried out professionally by the assessors.

The heads of the academic quality of the HEIs state in the interview that the assessors are independent, objective, and professional. Assessors follow the criteria outline. The heads confirmed that the assessors read the Assessor Code of Conduct and that they give BAN-PT feedback on the accreditation process. Part of the site visit is for the assessors to have a closing or exit meeting with the administrators of the institution. The assessors communicate their findings clearly and provide room for discussion and explanation with the administrators.

Assessors are aware that BAN-PT solicits feedback from the HEIs. However, no specific feedback is given to the assessors. They will appreciate it if feedback is given to them.

The tone in the SAR concerning this principle gave the panel the impression that this is a serious problem in BAN-PT. Thus, during the discussion session with the Executive Board Director and Accreditation Council Chairman, the panel clarified this concern with the director and the chairman. Their response was that they were probably too strong on this since they take it seriously. However, they pointed out that they probably have around 10 cases. This number is not too alarming since there are around 1700 plus assessors. These assessors are not invited to be assessors while their cases are pending. They did point out that even if the number is small they still have to take it seriously since one case can affect the reputation and credibility of BAN-PT. The director and chairman acknowledged that ensuring the professionalism and maintaining the integrity of the assessors is a continuous challenge to them.

The panel notes that BAN-PT adheres to Principle 2.8 as indicated in the SAR, the Strategic Plan of BAN-PT, the exhibits, and interviews conducted with the different stakeholders in Jakarta.

RECOMMENDATION

The panel recommends that BAN-PT continue the practice of conducting psychological assessments, reading the Code of Conduct, the signed statement that assessor has no conflict of interest, and the signed statement from the assesse that the assessor conducted the assessment visit professionally.

Principle 2.9

Quality assurance activities and processes are assessed on a cyclical basis to promote continuous improvement.

Guidance notes/Interpretation:

- The EQAA should have a policy on the review of its QA standards and systems to keep its approach relevant and effective.
- There may be fixed cyclical reviews on issues arising from time to time.
- Feedback from stakeholders serve as an important basis for reviews.

The structure today of BAN-PT is significantly different from when it was established in 1994. The current structure and functions/ responsibilities of BAN-PT are brought about by significant changes in the education laws of Indonesia. The change in structure, activities and processes are influenced by Law No. 12/2012 on Higher Education, Law No.20/2013 on National Education System, Regulation of MoRTHE No.32/2016, Regulation of MoRTHE NO.62/2016, Regulation MoRTHE No. 100/2016, BAN-PT Regulation Numbers 1, 2, 3, and 4/2017. These laws enabled BAN-PT to improve its structure, functions, activities and processes beginning 2016.

The SAR and BAN-PT Regulation No.1/2017 (Organization and Governance of BAN-PT) state that there are two structures within BAN-PT that enables BAN-PT to engage in their work more efficiently. The Executive Board is responsible for the accreditation process and the daily management of the agency. The Accreditation Council is responsible for setting up accreditation policies, monitoring and evaluating the implementation of policies by the Executive Board. There is a clear delineation of functions and responsibilities between these two structures.

The current accreditation instrument (2009 edition) is the result of a review done on the accreditation instruments used from 1996 – 2007. The review was undertaken because of Law

Number 20/2003, Government Regulation 19/2005, and lessons learned by BAN-PT from various regional and international networks with other accrediting agencies.

BAN-PT is currently drafting an accreditation instrument that is more outcome-based. BAN-PT expects to implement this new instrument by 2018. It is, however, running behind schedule. Consultations with stakeholders are currently on going.

One can see from the above narrative that intentions for continuous improvement is brought about by external factors rather than internal intentions.

The panel gathered some internal initiatives undertaken by the current management of BAN-PT to ensure quality through the interview and discussion sessions. BAN-PT reviews its QA standards and systems through weekly plenary meetings of the Executive Board and the Accreditation Council. The Executive Board submits an annual report to the Accreditation Council. The Accreditation Council uses this report as a basis for evaluating the Executive Board. BAN-PT complies with the auditing requirements of the government. BAN-PT also submits to the Ministry of RTHE its targets and updates on its progress. The Executive Board and Accreditation Council has coordination meetings with the ministry. BAN-PT hold an annual meeting with assessors, HEIs, the ministry, and other stakeholders. BAN-PT uses this meeting as an opportunity to update stakeholders on new developments (new policies and assessment practices) in BAN-PT, education, and quality assurance and to get feedback from the stakeholders.

In terms of feedback from stakeholders, administrators and heads of academic quality offices of the tertiary education institutions state that they fill out the evaluation form requested by BAN-PT. The evaluation form elicits feedback on the conduct of the assessors and the accreditation process. The HEIs do not get a response from BAN-PT from the feedback given. Meetings between BAN-PT and HEIs are initiated by the ministry. Involvement of HEIs with BAN-PT activities is dependent upon the invitation of the ministry. Academicians are invited to be assessors or to help in developing the new standards/instruments

BAN-PT communicates with state HEIs via circulars. Communication with private universities is done via the 14 regional coordinators. Assessors desire that BAN-PT would communicate with them more regularly. Not all assessors can attend the annual meeting since they have teaching and administrative responsibilities in their respective universities.

The panel notes that BAN-PT needs to address Principle 2.9 in a more structured and formal manner as indicated in the SAR, the Strategic Plan of BAN-PT, the exhibits, and interviews conducted with the different stakeholders in Jakarta.

RECOMMENDATION

The panel recommends BAN-PT to design and implement an internal quality assurance framework and system that is more focused, well-defined and following a specific timeline; and to design and implement a communication program for all its stakeholders (ministry, HEIs, assessors, employers, students, secretariat) to enable BAN-PT to get more substantive feedback from all stakeholders

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Principle 2.10

An appeal mechanism is established and accessible to all.

Guidance notes/Interpretation:

EQAA should provide appropriate appeal mechanisms, policies and procedures, which are disseminated publicly.

There are protocols to follow for appeals pertaining to decisions made by the EQAA.

According to the SAR, Regulation of MoRTHE No. 32/2016, and BAN-PT Regulation NO.1/2017 the appeal system was first established in 2009. BAN-PT has guidelines on the appeals procedure as shown in Exhibit 29. Exhibit 30 shows the draft of the revised guidelines. The revised draft is aligned with the new regulations and the BAN-PT organizational structure. The appeals guidelines and process is clear. The process described is followed by the Executive Board and Accreditation Council.

Based on the interviews of the panel, most of the appeals are from HEIs whose scores are borderline. These HEIs want a higher score. BAN-PT gets around 200 appeals a year. This is manageable according to BAN-PT as the appeals do not come at the same time. It takes BAN-PT around 3 months to process and appeal. The HEIs are aware of the appeals process and the assessors have participated as validators in the appeals process.

The panel notes that BAN-PT adheres to Principle 2.10 as indicated in the SAR, the Strategic Plan of BAN-PT, the exhibits, and interviews conducted with the different stakeholders in Jakarta.

RECOMMENDATION

The panel recommends BAN-PT to finalize the revised draft of the appeals guidelines so that this can be disseminated at the soonest possible time.

4. CONCLUSION

After thorough analysis of the SAR and the various interviews during the Site Visit, the panel concluded that BAN-PT is a well-established agency that reaches a high level of alignment with quadrants 1 and 2 of the ASEAN Quality Assurance Framework (AQAF).

The panel wants to highlight in particular the organizational set-up of the agency, which provides for an independent and professional conduct of BAN-PT's work and design of the accreditation procedures in line with international good practice and the transparent guidance for all parties involved in the accreditation procedures, which supports a professional and consistent conduct of the procedures. Related to this BAN-PT is to be commended for the intended shift from an input-oriented approach towards a more output and outcome-oriented approach to accreditation, which will support the enhancement dimension of quality assurance.

The panel also makes some recommendations, which are to be understood as supporting BAN-PT to strengthen its future developments in particular as regards the implementation of the new approach, which is going to be a challenge for parties involved, the higher education institutions, the assessors and also the staff of BAN-PT. The panel would suggest that BAN-PT also makes a thorough analysis of the impact of introducing new accreditation instruments which according to the SAR will define a new approach to accreditation with more emphasis on qualitative data, and providing more room for the assessors to use their expertise to make more comprehensive discussions of strengths and areas for improvement in programmes and institutions. The panel believes that such a new approach will not only significantly change the expectations to the capability of the assessors, but may also create new pressures on BAN-PT to ensure consistency in assessments and to ascertain that active means are employed to ensure equal treatment of equal circumstances when programmes or institutions are assessed. In the current system, it can be argued that the high reliance on quantitative data inputs that are turned into points based on a fixed scale, creates a transparent and simple system, where institutions can check whether they have got the right assessment based on the points given, and reflecting input factors. In the new system as described, the assessors will have more scope for making assessments and judgments that cannot always as easily be referring back to objective facts: A greater focus on qualitative input and less tangible factors such as outcome will therefore imply assessments, which will be more open to interpretation.

It is the panel's view, that BAN-PT in the new context would benefit from reflecting on the possible needs to have a stronger internal quality assurance assessment capacity to take care of these new demands, including for instance checking consistency among the assessments made in accreditations, developing the training of assessors, and increase the internal capacity to make general QA assessments and developing accreditation instruments. This would likely imply the recruitment of a number of new staff members, of which some would have formal qualifications in evaluation and others in quality assurance, to support the work currently undertaken by the Executive Board, and assisting in developing new capacity in the agency, to deal with the new challenges that the new approach vested in the new accreditation instruments may create.

Further recommendations address BAN-PT's collaboration with external stakeholders namely employers and students which should be intensified and formalized on a regular basis and its internal quality management system which also should be developed and implemented on a regular basis.

SUMMARY OF COMMENDATIONS

1.5/1.6 The panel commends BAN-PT for shifting its accreditation procedures from an input towards an output and outcomes oriented approach.

1.8 The panel commends BAN-PT for collaborating actively with international partners.

2.1 The panel commends BAN-PT for having shown tremendous resourcefulness, resilience and commitment to both the HEI and study programme accreditation process, based on the number of completed accreditation tasks within a relatively short time period.

2.5 The panel commends BAN-PT for providing all parties involved in accreditation with informative and transparent descriptions of the procedures and with helpful guidance on processing the various steps of accreditation.

2.6 The panel commends BAN-PT for having in place a process whereby both the assessor team and the assese need to agree to the written report before the field assessment is concluded. This step in the accreditation process will reduce the potential for arguments/dissatisfaction after the accreditation process has been completed. The panel also commends that BAN-PT for adhering to the time frame of the processes.

SUMMARY OF RECOMMENDATIONS

1.1 The panel recommends BAN-PT to involve stakeholders in future processes of evaluating and revising its mission and vision.

1.2 The panel recommends that BAN-PT proactively initiates or supports the establishment of LAMs in order to be able to focus on its core mandate.

1.4 The panel recommends BAN-PT to initiate discussions with the ministry about modifying Regulation No. 32/2016 of MoRTHE in order to facilitate stakeholder representation in the Executive Board and particularly in the Accreditation Council.

1.5 The panel recommends that BAN-PT conducts a thorough analysis whether organizational changes are necessary to better support the new demands that are likely to emanate from the changes of the accreditation instruments from input to output and outcome approaches.

1.7 The panel recommends that BAN-PT reflects on the possible needs for more capacity in the agency to deal with the new challenges that the new approach vested in the new accreditation instruments may create. This might imply a new staff structure.

1.8 The panel strongly recommends that BAN-PT strengthens its general collaboration with national stakeholders including employers and students on a regular basis.

1.9 The panel strongly recommends that BAN-PT develops effective internal quality management systems, while taking into account the needs created by the new approach in accreditation

1.10 The panel recommends that BAN-PT strengthens its communication with stakeholders and wider public through its website.

2.1/2.2/2.3 The panel recommends that BAN-PT and MoRTHE engage with more private sector and industry players in developing policies and practices related to academic quality since the private sector is most likely the main beneficiary of the graduates from those study programmes.

2.4 The panel recommends BAN-PT to consider launching an English version of its website.

2.7 The panel recommends BAN-PT to

- Consider hiring assessors from industry as indicated in the executive summary of the SAR.
- Undertake a comprehensive training program on the new instrument and standards that will be implemented in 2018
- Conduct refresher training programs more regularly for assessors on the following topics:
    - Understanding the accreditation criteria and standards of BAN-PT

- o Understanding and conducting outcome-based accreditation
- o Knowing the context of the Indonesian higher education institution they are accrediting considering the size of the country and the diversity of cultures
- o Improving oral and written communication skills
- o Enhancing ICT skills
- o Knowing new developments in respective disciplines of assessors
- o Updating oneself in recent developments on quality assurance
- o Knowing global trends in higher education
- Initiate meetings or gatherings among assessors across different regions to share lessons learned and best practices in accreditation visits
- Continue recruitment of assessors considering the number of HEIs and study programs that still have to be accredited

2.8 The panel recommends that BAN-PT continue the practice of conducting psychological assessments, reading the Code of Conduct, the signed statement that assessor has no conflict of interest, and the signed statement from the assesse that the assessor conducted the assessment visit professionally.

2.9 The panel recommends BAN-PT to design and implement an internal quality assurance framework and system that is more focused, well-defined and following a specific timeline; and to design and implement a communication program for all its stakeholders (ministry, HEIs, assessors, employers, students, secretariat) to enable BAN-PT to get more substantive feedback from all stakeholders

2.10 The panel recommends BAN-PT to finalize the revised draft of the appeals guidelines so that this can be disseminated at the soonest possible time.
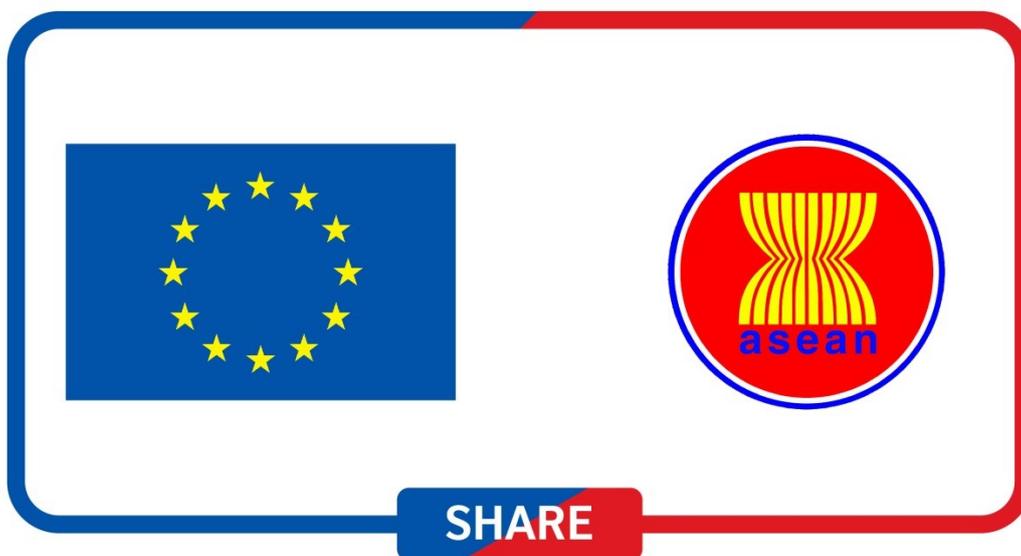
5. ANNEX

AGENDA of the SITE VISIT, 19 – 21 NOVEMBER 2017

19.11.2017		
3 P.M.	Panel's preparatory meeting	
20.11.2017		
TIME	**AGENDA**	**INTERVIEWEE(S)**
09:00	Interview and discussion session with Director of the Executive Board, BAN-PT	Prof. T. Basaruddin
09:45	Review Panel's private discussion	
10:00	Interview and discussion session with the Self-Assessment Report (SAR) Team	Dr. Agus Setiabudi, M.Si Prof. Bambang Suryoatmono, Ph.D. Domo Pranoto, S.E.
10:30	Review Panel's private discussion	
10:45	Interview and discussion session with the Executive Board of BAN-PT	Prof. T. Basaruddin Dr. Agus Setiabudi, M.Si. Prof. Dr. SM. Widyastuti Prof. Akhmad Fauzy, Ph.D Sugiyono, Ph.D.
11:45	Interview and discussion session with Accreditation Council, BAN-PT	Prof. Dwi Wahyu Sasongko, Ph.D Bambang Suryoatmoro, PhD Prof. Dr. Imam Buchori Dr. Setyo Pertiwi Dr. Iwan Mulyawan
12:45	Lunch Break	
13:30	Interview and discussion session with Head of Secretariat of BAN-PT	Dr. Ir. Agus Indarjo, M.Phil. (Head of Secretariat) Rany Andi Sulianingati, SE (Secretariat Manager)
14:00	Review Panel's private discussion	
14:45	Interview and discussion session with key staff from Accreditation Division; Development and Cooperation Division; Data Processing and	Utami B.R. Hariyadi, M.Lib., M.Psi.T (Technicak Assistant for Administration) Eko Pramono, S.Kom (Evaluation Divison)

	Information Services Division	Fauzi M. Herlambang, S.Si (Evaluation Divison)
		Qadar Burhanuddin, S.Pt. (Finance Divison)
		Ikhwanul Hakim, B.Ict. (International Affaires)
15:45	Review Panel's private discussion	
16:00	Interview and discussion session with the representatives of Ministry of Research, Technology and Higher Education	Ir. Ridwan, M.Sc.
		Dr. Totok Prasetyo, B.Eng., M.T
16:45-17:30	Review Panel's private discussion	

21.11.2017		
TIME	AGENDA	INTERVIEWEE(S)
08:30	Review Panel's private discussion	
09:00	Interview and Discussion with Heads of Assessed Higher Education Institutions	Dr. Hizir Sofyan (Vice Rctor for Academic Affaires, Universitas Syiah Kuala, Banda Aceh)
		Prof. Dr. Ir. Djagal Wiseso Marseno, M.Agr (Vice Rector for Academic Affairs Universitas Gadjah Mada, Yogyakarta)
		Prof. Dr. Adang Suhendra, SSI, SKomm MSc. (The Chairman of information Technology Study Program,
		Universitas Gunadarma, Depok)
		Dr. Ir. Paula Santi Rudati, M.Si. (Vice Director for Academic Affairs Politeknik Negeri Bandung, Bandung)
10:00	Review Panel's private discussion	
10:15	Interview and discussion with Heads of Academic Quality Assurance of HEIs	Prof. Dr. drg. Hanna H.B. Iskandar, Sp. RKG (Head of Academic Quality Assurance, Universitas Indonesia)
		Dr. Sururin, MA (Head of Academic Quality Assurance
		Universitas Islam Negeri Syarif Hidayatullah Jakarta)
		Dr. Dra. Ienneke Indra Dewi, S.Th., M.Hum. (Head of Academic Quality Assurance Universitas Bina Nusantara, Jakarta)
		Dr. Phil. Nat. Sri Widodo, ST., MT. (Division Head of Accreditation, Universitas Hasanuddin, Makassar)
11:00	Review Panel's private discussion	

11:15	Interview and discussion session with representatives of Assessors	Suharyadi Pancono, Dipl.Ing., MT. (ssessor for Study Program/ Politeknik Manufaktur Negeri Bandung, Bandung)
		Suparto, M.Ed.,Ph.D (Assessor for HE Institution)
		Saepudin Nirwan, S.Kom., M.Kom. (Assessor for Study Program)
		Ir. Waziz Wildan, M.Sc., Ph.D (Assessor for HE Institution)
		Dr. Drs. P.Th. Basuki Hadiprajitno, MBA., MSAcc. Akt. (Assessor for HE Institution)
12:15	Lunch Break	
13:00	Interview and discussion session with Stakeholders (Employer; professional association, representative of society)	Ibu KOMPOL Sri Utami (Selection Section, Police Dept. Regional Jakarta)
		Bapak Ahmad Firdaus (CEO Ecomindo)
		Bapak Muhammad Faishal Hanif SH: (Recruitment and Assessment Staff)
14:00	Review Panel's private discussion	
14:15	Interview and discussion session with students (3 students of Group F)	Ika Novita Sari (University of Indonesia)
		Alief Ghazali Gustiawan (Gunadarma University)
		Tuti Awaliyah (Syarif Hidayatullah State Islamic University)
15:00	Review Panel's private discussion; provisional conclusions and listing issues to be clarified	
15:15	Interview and discussion session with EB Director and AC Chairman regarding any pending/undiscussed issues, and debriefing session.	Prof. T. Basaruddin
		Prof. Dwi Wahyu Sasongko, Ph.D
15:30-18:00	Wrap-up Meeting of Review Panel and provisional assessment results.	

Pilot external review of the
National Accreditation Agency for Higher Education (BAN-PT)
by the European Association for Quality Assurance in Higher Education (ENQA)

Memorandum of Understanding
November 2016

I, undersigned **T. Basaruddin** Director of the Executive Board of the National Accreditation Agency for Higher Education in Indonesia, hereby commit to participate in the pilot external review process carried out in the framework of the "SHARE" project, and led by the British Council. The SHARE consortium partner in charge of the pilot external reviews of quality assurance agencies is the European Association for Quality Assurance in Higher Education (ENQA), which carries out this activity in cooperation with the German Academic Exchange Service (DAAD).

I understand that this pilot project will carry out an evaluation of my agency that is designed to put the AQAF to test and provide feedback for its further development. A summary report submitted by ENQA, as an out-

come of the work of the external review panel, will enable the agency to reflect on its own practices and pro-cesses and to provide an opportunity to benchmark its operations against regional standards. In addition, a feedback report from the agency will be submitted to ENQA to contribute to the further development of the framework.

I understand that the self-assessment report (SAR) and the review report will be circulated only among the reviewed agency, the review panel members, and the SHARE project team involved in the coordination of the activity. While the SAR and external review reports will not be published, I understand that the project team may produce and publish a report on the overall findings of the review activities carried out.

I also understand that the success of the exercise is contingent upon the willingness of the staff of the agency, as well as its main stakeholders, to take part in the exercise and to communicate openly and honestly during the review process.

I confirm that my agency is committed to:

- Nominating two representatives to attend the preparatory training for agencies, organised in Manila (the Philippines) on 21-23 November 2016. These two representatives will be involved also in coordinating the agency's evaluation in the course of 2017.

    Bambang Suryoatmono, Member of Accreditation Council – BAN-PT

    Agus Setiabudi, Secretary of Executive Board – BAN-PT

- Welcoming a pilot review of the agency, conducted by an international expert team composed of 3-5 members, and undertaking all preparatory work related to this evaluation, as specified in the Guidelines for agencies – including:

    • Promote commitment to this evaluation among all constituencies of the agency (including management, staff and main stakeholders at the national level)

    • Conduct a self-evaluation process within the agency following the Guidelines provided, and deliver a subsequent feedback report to the evaluation team

    • Organise the meetings during the two-day site visit according to the draft programme of the visits agreed between the agency and the review team

    • Offer logistical support for the site visit, including accommodation, meals and local transportation for experts during the two-day site visit, and provide a venue for the site visit and the related interview sessions

    • Liaise with the ENQA Secretariat whenever necessary during the evaluation process, so to ensure a smooth running of the evaluation, including nomination of an agency contact person (such as a project officer) who manages the day-to-day preparation, conduction and follow-up of the site visit

- Participating in the project final dissemination conference, which will be organised in in the second half of 2018 (place tbc).

SHARE-project covers all main costs of the review procedure as follows:

    • Preparatory training in Manila (the Philippines), 21-23 November 2016:
    - Travel costs and accommodation for all participants (2 per selected agency)

- Meeting venue, materials and meals

- Site visits at the respective agency, dates tbc (foreseen for Oct-Nov 2017):
- Travel costs, accommodation and honoraria for ASEAN and European reviewers

The agency is expected to cover the following costs:

- local transportation for the review panel and interviewees
- meals/ coffee breaks during the site visit
- rent of the meeting room, if needed
- printing costs which might occur concerning the provision of requested materials

T. BASARUDDIN
Director – Executive Board
National Accreditation Agency for Higher Education - Indonesia
Jakarta, 12.11.2016

Maria Kelo
Director
European Association for Quality Assurance in Higher Education, Belgium
Manila, 22.11.2016