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Governance Architecture and Inclusive Education in ASEAN: A Comparative Study of Indonesia and Malaysia

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ABSTRACT

Inclusive education has emerged as both a moral imperative and a strategic economic instrument within the Association of Southeast Asian Nations (ASEAN), yet translating regional policy declarations into effective classroom realities remains profoundly uneven across the bloc. This study critically examines how divergent national governance architectures shape the delivery of inclusive education for persons with disabilities within the ASEAN context. Employing a qualitative comparative case study methodology grounded in document analysis and a systematic review of Scopus-indexed literature published between 2020 and 2026, this article contrasts Indonesia's highly decentralised regional autonomy model with Malaysia's centralised federal governance structure across four analytical dimensions: legal and institutional frameworks, resource allocation and financing, teacher preparation, and socio-cultural attitudes. Anchored in a tripartite theoretical framework integrating the Social Model of Disability, Human Capital Theory, and Multi-level Governance Theory, the analysis demonstrates that decentralisation in Indonesia fosters community-responsive adaptations but produces severe geographic disparities, while Malaysia's centralisation ensures structural uniformity but suppresses pedagogical flexibility, resulting in systemic 'procedural inclusion' without genuine participation. Both cases reveal persistent tensions between policy rhetoric and implementation, underscored by inadequate teacher training, stigma, and fragmented data systems. In light of the forthcoming ASEAN Community Vision 2045, this article argues for an 'adaptive centralisation' governance model, disability-inclusive financing reforms, and systemic Universal Design for Learning integration as foundations for a paradigm shift from a charity model to a rights-based investment approach.

Keywords: *inclusive education; ASEAN; multi-level governance; Social Model of Disability; Human Capital Theory; comparative policy analysis*

1. INTRODUCTION

Inclusive education has become one of the most consequential domains of educational reform in the twenty-first century, driven by the universally affirmed recognition that equitable access to quality learning is an inalienable human right. Across the global policy landscape, the agenda for inclusion has been most forcefully articulated in the United Nations Convention on the Rights of Persons with Disabilities (CRPD) (United Nations, 2006) and the Salamanca Statement and Framework for Action on Special Needs Education (UNESCO, 1994), both of which constituted a fundamental normative break from the segregationist logic that had historically governed special education in most jurisdictions. Within the Association of Southeast Asian Nations (ASEAN), this global momentum has translated into a regional policy architecture of considerable ambition, most prominently expressed in the ASEAN Enabling Masterplan 2025: Mainstreaming the Rights of Persons with Disabilities (ASEAN Secretariat, 2019).

The demographic and economic stakes of inclusive education in Southeast Asia are extraordinary. As of the most recent regional estimates, ASEAN's total population exceeds 700 million persons, of whom approximately 90 million live with disabilities of varying nature and severity (Economic

Research Institute for ASEAN and East Asia [ERIA], 2022). These individuals have frequently been described in regional development discourse as the 'Missing Millions,' a designation that captures not merely their demographic magnitude but the systemic invisibility to which they are subjected within economic, social, and political life (Sitompul et al., 2023). The macroeconomic consequences of this exclusion are substantial. Research on low- and middle-income economies consistently indicates that failure to integrate persons with disabilities into educational systems and labour markets costs national economies between 3 and 7 percent of gross domestic product (GDP) annually through lost productivity, heightened welfare expenditures, and diminished tax revenues (Mitra et al., 2013). Globally, among the estimated 240 million school-age children living with disabilities, approximately 47 percent remain excluded from primary education and 33 percent from lower-secondary education (UNESCO, 2021), a pattern reproduced, with context-specific variations, across Southeast Asia.

The adoption of the ASEAN Enabling Masterplan 2025 at the 33rd ASEAN Summit in Singapore in November 2018 marked a watershed in regional disability governance. Building upon the foundational commitments of the Bali Declaration on the Enhancement of the Role and Participation of Persons with Disabilities (ASEAN Secretariat, 2011) and the ASEAN Decade of Persons with Disabilities 2011-2020, the Masterplan operationalises the CRPD across the three community pillars of ASEAN: the Political-Security Community (APSC), the Economic Community (AEC), and the Socio-Cultural Community (ASCC) (ASEAN Secretariat, 2019). Inclusive education is principally housed within the ASCC pillar, which has since generated 76 Key Action Points (KAPs) aimed at mainstreaming disability across regional sectoral bodies. Despite universal CRPD ratification by all ten member states, however, the translation of these regional aspirations into tangible educational outcomes at the national and classroom levels has been strikingly uneven, mediated by vast disparities in governance capacity, economic development, and cultural context (Forlin & Chambers, 2011; Opertti et al., 2014).

Against this backdrop, the present study advances three principal arguments. First, that governance architecture is a primary determinant of inclusive education quality, not merely its administrative vehicle. Second, that the dominant binary in ASEAN educational governance between centralisation and decentralisation produces distinctive implementation pathologies in each case, and that neither model is inherently superior in producing substantive inclusion. Third, that the forthcoming ASEAN Community Vision 2045 represents a critical policy juncture at which regional leaders must craft governance frameworks capable of reconciling standardisation with local autonomy. To substantiate these arguments, the article employs a comparative case study of Indonesia and Malaysia, two nations that share profound historical, linguistic, and cultural ties while representing diametrically opposed models of educational governance. This comparison provides maximum analytical leverage for isolating the specific effects of administrative structure on policy outcomes.

2. THEORETICAL AND CONCEPTUAL FRAMEWORK

To comprehensively analyse the governance of inclusive education in ASEAN, this study is anchored in a tripartite conceptual architecture that synthesises the Social Model of Disability, Human Capital Theory, and Multi-level Governance Theory. Rather than employing these frameworks independently, this study operationalises them in an integrated manner: the Social Model provides the normative foundation for what constitutes genuine inclusion; Human Capital Theory furnishes the geoeconomic rationale for state investment in that inclusion; and Multi-level Governance Theory provides the analytical apparatus for examining how institutional structures mediate between normative goals and material outcomes. The articulation of this integrated framework is itself a theoretical contribution, as existing literature tends to deploy these paradigms separately.

2.1 The Social Model of Disability and the Rights-Based Approach

The Social Model of Disability, elaborated most systematically in the foundational works of British disability scholars Mike Oliver and Colin Barnes, constitutes a radical epistemological departure from

the medical or individual model that preceded it. Where the medical model locates disability within the individual as a biological impairment requiring clinical correction, the Social Model reconceptualises disability as the product of the interaction between an individual's functional characteristics and socially constructed barriers, including physical environments, attitudinal norms, institutional arrangements, and communicative systems (Oliver, 1990; Barnes, 2012). Disability, under this framework, is not a property of the person but a relationship between a person and an excluding society. As Oliver (1996, p. 22) argued,

> *"it is society which disables physically impaired people. Disability is something imposed on top of our impairments by the way we are unnecessarily isolated and excluded from full participation in society."*

When applied to educational policy, the Social Model mandates a decisive institutional shift. Pedagogical systems, curricula, physical environments, assessment frameworks, and attitudinal cultures must be redesigned to accommodate diverse learning needs, rather than compelling students with impairments to conform to a standardised norm designed around a non-disabled majority (Armstrong et al., 2011). This repositioning is operationalised internationally through the rights-based approach to inclusive education, which is most forcefully articulated in Article 24 of the CRPD. Article 24 obliges state parties to ensure that 'persons with disabilities can access an inclusive, quality and free primary education and secondary education on an equal basis with others in the communities in which they live' (United Nations, 2006, Article 24, para. 2b). Critically, this is framed as a non-derogable legal entitlement, not a welfare benefit contingent upon state benevolence.

Within ASEAN, the practical adoption of the Social Model faces profound structural resistance. The dominant historical paradigm in most member states has been a biomedical or charity model, wherein disability is understood through the dual lenses of individual deficit and family burden. In many Southeast Asian communities, disability is additionally filtered through frameworks of karmic retribution, spiritual inadequacy, or ancestral transgression, phenomena deeply embedded in local cosmological and religious traditions across Buddhist, Islamic, and Hindu communities (Yuwono, 2017; Meekosha & Soldatic, 2011). These culturally specific layers of stigmatisation interact with the institutional legacies of segregated special education systems to constitute a formidable barrier to rights-based, community-integrated inclusion, even where progressive legislation formally exists.

2.2 Human Capital Theory and the Geoeconomics of Inclusion

Human Capital Theory, foundationally articulated by Gary Becker (1964) in his seminal work Human Capital: A Theoretical and Empirical Analysis, with Special Reference to Education, posits that investment in education and training enhances individual productivity and, through aggregate effects, drives national economic growth. From this perspective, public expenditure on education constitutes not mere social spending but a productive investment with measurable economic returns. The theory has powerfully shaped international development discourse, providing the economic legitimacy for universal primary education campaigns and human development indices adopted by multilateral organisations including the World Bank and the United Nations Development Programme.

However, as Mitra et al. (2013) and Elwan (1999) have demonstrated, classical Human Capital Theory has consistently failed to account for persons with disabilities, operating on the implicit assumption that their productive potential is inherently limited and therefore unworthy of equivalent investment. This exclusion is not merely an academic lacuna but a consequential policy bias. Contemporary research, however, fundamentally challenges this assumption. When inclusive education systems are properly resourced and effectively implemented, students with disabilities demonstrate substantial cognitive development and achieve meaningful labour market participation, generating positive returns both individually and macroeconomically (Buckup, 2009; ERIA, 2022).

This study advances a revised, inclusive iteration of Human Capital Theory as a central analytical and normative pillar. Under this revision, investment in inclusive education is simultaneously a fulfilment of human rights obligations and a rational geoeconomic strategy. The ERIA (2022) has documented

extensively that the exclusion of persons with disabilities from formal education and the labour market constitutes a significant and measurable drag on regional GDP. Conversely, mainstreaming disability inclusion across educational and economic institutions represents an opportunity to unlock a vast reservoir of untapped human capital. For ASEAN's member states, which are collectively navigating the middle-income transition and contending with demographic ageing in several economies, the mobilisation of this human capital is not optional but economically imperative (World Bank, 2021). The revised framework thus reframes disability inclusion not as charity but as investment, not as welfare expenditure but as economic infrastructure.

2.3 Multi-level Governance Theory

The theoretical architecture is completed by Multi-level Governance (MLG) Theory, which provides the analytical vocabulary for examining how political authority, fiscal resources, and policy mandates are distributed and negotiated across multiple tiers of government and between governmental and non-governmental actors. Originating in the scholarship of Gary Marks and Liesbet Hooghe on European integration (Marks, 1993; Hooghe & Marks, 2003), MLG theory has since been applied extensively to federal and decentralising states in the Global South, where it has proven particularly productive for analysing the disjunctures between central mandates and local implementation (Faguet, 2014; Smoke, 2015).

The core analytical distinction in MLG scholarship is between 'Type I' governance, in which jurisdictions are relatively stable, non-overlapping, and hierarchically ordered, and 'Type II' governance, in which task-specific jurisdictions overlap and governance responsibilities are shared among actors at multiple levels simultaneously (Hooghe & Marks, 2003). In the ASEAN context, inclusive education governance exhibits characteristics of both types. Formal legislative authority is distributed vertically between regional (ASEAN), national, subnational, and local levels, but the practical implementation of inclusive classrooms also depends critically on horizontal networks of schools, civil society organisations, Disabled People's Organisations (DPOs), teacher training institutions, and the private sector.

The analytical power of MLG for this study lies in its capacity to reveal how governance architecture shapes policy outcomes independent of the content of the policies themselves. A well-designed inclusive education policy adopted at the ASEAN regional level may be progressively weakened, distorted, or entirely transformed as it descends through national ministries, provincial education departments, district authorities, and finally individual schools. This process of 'policy sedimentation' or 'street-level bureaucratic discretion' (Lipsky, 2010) is particularly consequential in nations with weak administrative capacity, inadequate fiscal transfers, and limited accountability mechanisms at subnational levels. MLG theory thus provides the conceptual tools to systematically explain why both Indonesia and Malaysia, despite formal policy commitments to inclusive education, exhibit significant gaps between normative aspiration and classroom reality.

3. METHODOLOGY

3.1 Research Design

This study employs a qualitative comparative case study design, a methodological approach that Robert Yin (2018) defines as an empirical inquiry that 'investigates a contemporary phenomenon in depth and within its real-world context, especially when the boundaries between phenomenon and context may not be clearly evident' (p. 15). Comparative case study methodology is particularly well suited to educational policy research because it enables the systematic examination of how similar policies produce different outcomes under different institutional conditions, a question that purely quantitative cross-national studies are structurally unable to answer with the required analytical granularity. Following the logic of a 'most similar systems' comparative design, also known in political

science as the method of difference (Mill, 1843), the study identifies cases that share significant background similarities, namely historical, linguistic, and cultural ties, CRPD ratification, and ASEAN membership, while differing sharply on the key independent variable of governance architecture.

3.2 Case Selection Rationale

Indonesia and Malaysia were purposively selected on the basis of four criteria. First, both nations share a common Austronesian cultural and linguistic heritage, deep historical interconnection through the Malay world, and comparable post-colonial institutional trajectories, which effectively controls for broad cultural and historical variables. Second, both are among the larger, more economically significant members of ASEAN, with substantial domestic policy capacity, making them influential cases for regional policy diffusion. Third, both have formally ratified the CRPD (Indonesia in 2011; Malaysia in 2010 via accession) and made explicit commitments under the ASEAN Enabling Masterplan 2025, ensuring comparability of the formal normative environment. Fourth, and most critically for this study's analytical purposes, Indonesia operates under a radical decentralisation framework established by Laws No. 22 and 25 of 1999 and subsequently refined through Law No. 23 of 2014, which devolves substantial educational authority to provincial and district governments (Kristiansen & Pratikno, 2006). Malaysia, conversely, maintains a highly centralised federal system in which the Ministry of Education in Putrajaya retains near-total authority over curriculum, teacher training, and resource allocation (Lee & Samuel, 2019). This structural divergence provides the maximum possible analytical leverage for assessing the specific effects of governance architecture on inclusive education delivery.

3.3 Data Sources and Scoping Review

Data collection followed a triangulated approach encompassing three categories of sources. Primary policy documents analysed include the ASEAN Enabling Masterplan 2025 (ASEAN Secretariat, 2019); the Draft Midterm Review Report of the ASEAN Enabling Masterplan 2025 (ASEAN Secretariat, 2026); Indonesia's Law No. 8 of 2016 on Persons with Disabilities, Ministry of National Education Regulation No. 70 of 2009, and Government Regulation No. 13 of 2020; and Malaysia's Education Act 1996, Persons with Disabilities Act 2008, and Malaysia Education Blueprint 2013-2025. Secondary academic literature was identified through a systematic scoping review of the Scopus database, using Boolean search strings combining terms including 'inclusive education,' 'ASEAN,' 'disability,' 'multi-level governance,' 'Indonesia,' and 'Malaysia,' filtered to publications between 2018 and 2026. Search results were screened for relevance, methodological rigour, and source quality, with preference given to articles in Scopus-indexed journals with CiteScore above 1.0. Grey literature from UNESCO, the World Bank, ERIA, and the ASEAN Secretariat was incorporated to contextualise statistical data and policy developments not yet captured in peer-reviewed scholarship.

3.4 Analytical Framework

Thematic analysis of collected data was structured using an adapted version of the UNESCO (2021) Framework for Disability-Inclusive Education, which organises analytical indicators into two broad domains: Enabling Environments (encompassing legal frameworks, institutional mechanisms, financing, and data systems) and Service Delivery (encompassing teacher preparation, curriculum adaptation, physical infrastructure, and community engagement). Cross-case comparison was conducted using a structured analysis matrix that systematically assessed each nation across these dimensions, enabling the identification of convergent patterns, divergent outcomes, and causal mechanisms linking governance architecture to policy results.

4. THE ASEAN REGIONAL POLICY LANDSCAPE: FRAMEWORKS, STATISTICS, AND EMERGING CHALLENGES

4.1 Historical Evolution of Regional Disability Frameworks

The institutional genealogy of disability inclusion in ASEAN reflects a gradual but discernible normative evolution over three decades. Initial regional engagement with disability was largely humanitarian in orientation, framed within the broader agenda of social welfare, and addressed primarily through declarations with limited enforcement mechanisms (Puyat et al., 2020). The Bali Declaration on the Enhancement of the Role and Participation of Persons with Disabilities in ASEAN Community (2011) and the establishment of the ASEAN Decade of Persons with Disabilities 2011-2020 represented early milestones in this trajectory, institutionalising disability on the regional political agenda while establishing coordination mechanisms among member states.

The ASEAN Enabling Masterplan 2025, adopted in November 2018, marked a qualitative shift in this trajectory by embedding disability mainstreaming within the constitutional architecture of all three ASEAN community pillars. The Masterplan contains 76 Key Action Points (KAPs), structured around a rights-based framework explicitly aligned with the CRPD's general principles (ASEAN Secretariat, 2019). Ortuoste (2023) has analysed this architecture and concluded that the Masterplan represents ASEAN's most sophisticated attempt at institutionalising disability rights, though she notes the fundamental challenge of implementation within a bloc characterised by the principle of non-interference and significant diversity in domestic legal systems. The Secretary-General of ASEAN at the time of the Masterplan's adoption articulated the animating political philosophy in the following terms:

> *"The ASEAN Community Vision 2025 showcases ASEAN's resolve in realising an inclusive and responsive community that ensures its peoples enjoy human rights and fundamental freedoms. It also envisions a resilient community that engenders equitable development and inclusive growth (ASEAN Secretariat, 2019, p. iii)."*

This statement reflects a strategic reframing of disability inclusion as integral to, rather than separate from, the ASEAN economic and developmental project. It signals an important discursive shift from a welfare to an investment paradigm at the highest levels of regional political authority, even as implementation on the ground remains considerably more contested.

4.2 Statistical Evidence from the 2026 Midterm Review

The most comprehensive empirical assessment of regional progress to date is provided by the Draft Midterm Review Report of the ASEAN Enabling Masterplan 2025 (ASEAN Secretariat, 2026), which presents a self-assessment conducted by 22 ASEAN Sectoral Bodies and all member states. The aggregate data indicate that of 379 tracked contributions across the Masterplan's three community pillars, 71 percent were assessed as either 'largely completed' or having 'significant action' undertaken. This headline figure, however, masks profound inter-pillar disparities that are analytically consequential. Table 1 presents a disaggregation of progress by community pillar.

Table 1. ASEAN Enabling Masterplan 2025 Midterm Review Progress by Community Pillar (2026)

ASEAN Community Pillar	Largely Completed	Significant Action Taken	Initial / Limited Action	Completion Rate (%)
Political-Security (APSC)	114	31	20	**88%**
Socio-Cultural (ASCC)*	70	31	30	**77%**
Economic (AEC)	62	9	18	**37%**

*Note. Compiled and adapted from ASEAN Secretariat (2026). *The ASCC pillar houses the Key Action Points directly related to inclusive education.*

The data in Table 1 reveal a pattern that is simultaneously encouraging and alarming. The high completion rates in the Political-Security (88%) and Socio-Cultural (77%) pillars suggest that regional member states have made meaningful progress in establishing legal frameworks and institutionalising educational initiatives. Milestones documented in the ASCC pillar include the

Philippines' modification of its National Early Learning Curriculum to systematically reduce developmental barriers for children with disabilities, Vietnam's promulgation of a National Action Plan on inclusive education, and Brunei Darussalam's institutionalisation of sign language within its formal educational system, supported by public awareness campaigns extending to national broadcast media (ASEAN Secretariat, 2026).

However, the catastrophically low 37 percent completion rate in the Economic Community pillar constitutes perhaps the most consequential finding of the entire Midterm Review. Under the analytical lens of Human Capital Theory, the economic pillar is the ultimate destination of educational investment. If ASEAN member states successfully reform inclusive education systems under the ASCC and graduate cohorts of students with disabilities equipped with knowledge and skills, but the AEC simultaneously fails to create accessible, non-discriminatory labour markets to absorb them, then the entire investment rationale for inclusive education collapses. The current Secretary-General of ASEAN, Dr. Kao Kim Hourn, acknowledged this challenge directly in the report's preface, stating,

> *"Through regional cooperation, we strive to dismantle systemic barriers and address complex challenges so as to mainstream the rights of persons with disabilities in all dimensions of life (ASEAN Secretariat, 2026, p. iv)."*

The critical tension between aspirational rhetoric and measured implementation, exposed so starkly by the AEC data, underlines the urgency of the cross-pillar coordination mechanisms this study recommends in Section 8.

4.3 The Post-Pandemic Educational Disruption and the Digital Divide

The contemporary inclusive education landscape in ASEAN cannot be assessed without accounting for the profound structural disruptions wrought by the COVID-19 pandemic. The pandemic functioned as a stress test of exceptional severity for educational equity systems globally, and within Southeast Asia it systematically revealed and exacerbated pre-existing structural inequalities in educational access. UNESCO's 2023 Southeast Asia Regional Report on Technology in Education documented that children with disabilities were disproportionately excluded from emergency remote learning protocols due to an acute lack of accessible digital infrastructure, prohibitive costs of assistive technologies, and the wholesale absence of digitally adapted pedagogical materials suited to diverse learning needs (UNESCO, 2023).

While the pandemic accelerated the adoption of digital governance tools and remote service delivery models across ASEAN, the application of these tools to inclusive education in developing-country contexts remains deeply problematic. Nawawi et al. (2024) conducted a systematic review of post-pandemic digital governance transformations in Indonesia and identified a pervasive 'Structured Optimism Bias' among national and subnational policymakers. Their study found that governments systematically overestimated the reach and efficacy of digital inclusion programmes while failing to adequately account for foundational infrastructural deficits, a pattern the authors termed a 'Sustainability Trap' in which temporary technological interventions fail to translate into durable improvements in educational access or poverty reduction. This finding carries direct analytical implications for this study's examination of Indonesia's decentralised framework, where fiscal and infrastructural disparities across thousands of island districts make equitable digital inclusion particularly difficult to achieve without robust central coordination.

5. CASE STUDY ONE: THE DECENTRALISED PARADIGM OF INDONESIA

5.1 Legal and Institutional Frameworks

Indonesia operates under a constitutional and legislative framework for inclusive education that is broadly progressive and closely aligned with international human rights standards. The foundational national mandate is established by the Constitution of the Republic of Indonesia 1945, which

guarantees every citizen the right to education in Article 31. This constitutional guarantee was operationalised for persons with disabilities through two landmark legislative instruments. The Minister of National Education Regulation No. 70 of 2009 on Inclusive Education first institutionalised the obligation to provide inclusive schooling, mandating that every sub-district must designate at least one primary, one junior secondary, and one senior secondary school to implement inclusive education practices. This mandate was substantially strengthened and reframed by Law No. 8 of 2016 on Persons with Disabilities, which represented a paradigmatic shift from the charity model embedded in earlier legislation (including Law No. 4 of 1997) to an explicitly rights-based framework guaranteeing inclusive, non-discriminatory, and quality education as a legal entitlement. Technical provisions for the accommodations required in inclusive settings were subsequently elaborated in Government Regulation No. 13 of 2020.

At the institutional level, Indonesia's decentralised governance structure, established under Laws No. 22 and 25 of 1999 and reformed through Law No. 23 of 2014 on Regional Administration, devolves primary administrative authority over education to provincial and district-level (kabupaten/kota) governments (Kristiansen & Pratikno, 2006). The national Ministry of Education, Culture, Research, and Technology (Kemendikbudristek) retains responsibility for national curriculum frameworks, national examinations, and teacher certification standards but relies substantially on regional governments for implementation. This structural arrangement has profound implications for inclusive education policy execution, as it distributes both the fiscal burden and the administrative responsibility to over 500 district-level governments with vastly different capacities, revenue bases, and political priorities.

5.2 Implementation Realities: Between Flexibility and Fragmentation

The empirical literature on inclusive education implementation in Indonesia consistently identifies a paradoxical dynamic: the same decentralised framework that theoretically enables culturally responsive, community-integrated education simultaneously generates severe and growing regional disparities in educational quality. At the service delivery level, the Indonesian model relies heavily on the institution of the Guru Pembimbing Khusus (GPK), or Special Guidance Teacher, who is envisioned as the pedagogical bridge between mainstream and special education. The GPK is tasked with designing Individualised Learning Programs (Program Pembelajaran Individual, PPI), supporting regular classroom teachers in adapting curriculum content, and liaising between the school, the student with disabilities, and the family (Al-Mahdy & Emam, 2025; Fauziyah et al., 2025). In urban centres with adequate resources, this model has demonstrated meaningful results.

Fauziyah et al. (2025) conducted a systematic review of inclusive education initiatives across fourteen Indonesian provinces, encompassing both urban centres and rural districts. Their findings reveal a dramatic polarisation of outcomes. In well-resourced urban districts in Java and Sulawesi, local governments have established functional Units for Disability Services (Unit Layanan Disabilitas, ULD) in schools and maintained relatively regular in-service training programmes. In these settings, more than 70 percent of surveyed educators reported feeling adequately prepared to support students with special educational needs. However, in rural and peripheral districts in eastern Indonesia and remote areas of Kalimantan, the picture is starkly different. Chronic revenue shortfalls at the district level mean that schools frequently cannot fund GPK positions, physical infrastructure remains largely inaccessible for students with mobility impairments, assistive technologies are absent, and the vast majority of regular teachers report having received no specialist training in inclusive pedagogy. The result, as Fauziyah et al. (2025) document, is that fewer than 45 percent of regular teachers in these underresourced districts feel equipped to manage neurodivergent classrooms.

From the perspective of Multi-level Governance Theory, this pattern represents a classic 'fiscal federalism failure.' The central government in Jakarta has discharged its normative obligation by enacting progressive legislation, but the absence of adequate, ring-fenced fiscal transfers to subnational governments and the lack of rigorous compliance monitoring mechanisms mean that the

practical burden of realising the constitutional right to inclusive education falls disproportionately on the least capable administrative units. Ridwan et al. (2025) observe in their comparative analysis that this dynamic effectively transforms inclusive education into a 'lottery of geographic fate' in which the quality of support a student with disabilities receives is determined not by legal entitlement but by the accident of district-level political will and budgetary capacity.

A further structural weakness is the over-reliance on the GPK model as the primary mechanism of inclusion. Todapa (2024) found in research conducted in North Sulawesi that GPK teachers frequently lack formal qualifications in special education, having been appointed on the basis of general teacher certification supplemented by minimal short-course training. Furthermore, the GPK model, by concentrating specialist knowledge in a single designated teacher, unintentionally absolves regular classroom teachers of inclusive pedagogical responsibility, perpetuating rather than dismantling the binary between mainstream and special education cultures. Erdayani et al. (2023) similarly document that when GPK positions are unfilled due to budget constraints or staff shortages, which occurs with troubling frequency in rural districts, students with disabilities in nominally 'inclusive' schools may receive no differentiated support whatsoever.

5.3 Socio-Cultural Dynamics: Gotong Royong as Asset and Stigma as Barrier

Indonesia's social fabric offers a distinctive and analytically significant cultural resource for inclusive education in the form of Gotong Royong, the deeply embedded national ethos of communal mutual assistance. This cultural norm provides a potentially powerful foundation for community-based inclusive education initiatives, enabling schools to mobilise local social networks, parent groups, neighbourhood associations, and community leaders in support of students with disabilities (Al-Mahdy & Emam, 2025). In several documented cases, community-initiated support systems for children with disabilities have emerged organically from Gotong Royong traditions, providing social and material assistance that supplements inadequate state provision.

However, this cultural asset exists in profound tension with pervasive and persistent stigma regarding disability. Research across multiple Indonesian provinces has documented the continued prevalence of misconceptions attributing disability to supernatural causation, parental sin, or spiritual failing, beliefs that profoundly shape family willingness to enrol children with disabilities in mainstream schools and that generate hostile social environments within those schools once enrolment occurs (Yuwono, 2017; Sitompul et al., 2023). Children with visible physical or cognitive impairments face elevated risks of peer bullying and social marginalisation. Furthermore, even in communities where parental attitudes are positive, Al-Mahdy and Emam (2025) document that parental involvement frequently remains 'administrative rather than collaborative,' limited to formal enrolment procedures rather than sustained engagement with the child's learning process. This pattern reflects low levels of disability rights literacy among parents and a residual tendency to defer to medical and educational authority in defining their child's educational trajectory.

6. CASE STUDY TWO: THE CENTRALISED PARADIGM OF MALAYSIA

6.1 Legal and Institutional Frameworks

Malaysia's approach to inclusive education is structured by a centralised federal governance architecture in which the Ministry of Education (Kementerian Pendidikan Malaysia), headquartered in Putrajaya, exercises near-total authority over curriculum design, teacher training and certification, budgetary allocation, and policy implementation across all public schools in the thirteen states and three federal territories (Lee & Samuel, 2019). This centralisation is constitutionally grounded in List I of the Ninth Schedule of the Federal Constitution, which places education within the exclusive federal legislative domain.

The foundational legal instruments governing inclusive education are the Education Act 1996, which provides the general framework for public schooling and contains provisions for special educational needs, and the Persons with Disabilities Act 2008 (Act 685). The latter formally defines disability, establishes the National Council for Persons with Disabilities under the Ministry of Women, Family, and Community Development, and mandates equal access to public services. Analysts including Khairuddin and Aziz (2021) and Idros (2025) note, however, that the Persons with Disabilities Act 2008 is primarily aspirational in character: it does not establish justiciable rights to specific educational accommodations, and its enforcement mechanisms in the educational domain are procedurally weak.

The strategic operationalisation of inclusive education ambitions is most comprehensively articulated in the Malaysia Education Blueprint 2013-2025. This landmark policy document established a definitive national target of integrating 75 percent of students with special educational needs (SEN) into mainstream educational settings by 2025, a target that reflected the federal government's recognition that the historical system of largely segregated Special Education Schools was inefficient, costly, and inconsistent with the CRPD's rights-based framework (Ministry of Education Malaysia, 2013). The Blueprint also committed to standardising teacher training in inclusive pedagogy, developing assistive technology infrastructure, and creating quality assurance mechanisms for SEN provision.

6.2 Service Delivery: Structural Efficiency and Substantive Limitations

The Malaysian inclusive education system formally delineates three service delivery tiers. The first and most segregated tier consists of fully residential Special Education Schools, which serve students with more severe or complex disability profiles. The second and predominant tier is the Special Education Integrated Programme (Program Pendidikan Khas Integrasi, PPKI), in which students with disabilities study in dedicated special classes within mainstream school buildings, sharing canteen facilities and some co-curricular activities with the broader student body but following a separate curriculum delivered by specialist teachers. The third and most fully inclusive tier is the Inclusive Education Programme (Program Pendidikan Inklusif, PPI), in which students with disabilities are fully integrated into regular mainstream classrooms (Khairuddin & Aziz, 2021).

Statistical data from the Department of Statistics Malaysia (2024) indicate that enrolment of students with special educational needs has grown steadily across all educational levels over the past decade, reflecting the federal government's success in expanding the structural capacity of the formal system to receive SEN students. However, a critical reading of these enrolment statistics reveals a significant analytical problem: the overwhelming majority of SEN students in Malaysia are accommodated within the PPKI tier, meaning they are physically located within mainstream school compounds but practically segregated in dedicated, separate classrooms with limited interaction with the general student population (Khairuddin & Aziz, 2021). This arrangement is procedurally consistent with the Education Blueprint's integration targets but does not meet the substantive inclusion standard required by Article 24 of the CRPD, which specifies meaningful participation in the academic and social life of the mainstream school community.

The tension between procedural and substantive inclusion is further compounded by the structural rigidities imposed by centralised standardisation. Malaysian mainstream schools operate under intense pressure to perform on national standardised assessments, particularly the Ujian Penilaian Sekolah Rendah (UPSR) at primary level and the Sijil Pelajaran Malaysia (SPM) at secondary level. Regular classroom teachers, whose professional evaluations are partly linked to class performance metrics, frequently lack both the pedagogical competency and the institutional incentive to differentiate instruction for students with disabilities within the mainstream setting (Bailey et al., 2015). The result is a structural tendency toward what researchers have termed 'unconscious inclusion': a condition in which students with hidden or invisible disabilities, including mild autism spectrum disorder, dyslexia, dyscalculia, or mild intellectual disabilities, attend local mainstream

schools but are never formally identified, assessed, or provided with any accommodations, navigating a demanding standardised curriculum without differentiated support until academic failure or psychological distress forces a crisis response (Khairuddin & Aziz, 2021; Lee & Samuel, 2019).

Idros (2025) has examined the systemic failure of early identification and screening mechanisms in Malaysian mainstream schools, documenting that many students with mild or invisible disabilities pass through the entire primary education cycle without formal SEN assessment, largely because class sizes in public schools frequently exceed thirty students, teachers lack training in developmental screening, and referral pathways to school-based support teams are inadequately institutionalised. This systemic blindspot represents a profound failure of the centralised model: the Ministry's capacity to implement structural reforms uniformly is not matched by equivalent capacity to ensure responsive, individualised assessment and support at the level of the individual classroom.

6.3 Cultural and Attitudinal Dimensions

While Malaysia's centralised system is less susceptible to the geographic disparities that characterise Indonesia's decentralised model, it is not immune to the socio-cultural barriers that pervade inclusive education across ASEAN. Research by Meekosha and Soldatic (2011) and Sitompul et al. (2023) demonstrates that the biomedical framing of disability remains dominant in Malaysian educational culture, particularly at the level of parents and classroom teachers. Parents of children with disabilities frequently report experiencing stigmatisation from school staff and other parents, and several studies have documented instances in which school administrators actively discouraged enrolment of SEN students in regular classes to protect school-level performance metrics (Bailey et al., 2015).

The federal government has acknowledged these attitudinal barriers and has incorporated awareness-raising campaigns into the Education Blueprint's implementation agenda. The ASEAN Secretariat (2026) credits Malaysia with making measurable progress on attitudinal change initiatives at the national level. However, attitudinal transformation is, by its nature, a long-term social process that resists rapid administrative change. The standardised nature of Malaysia's governance system, while effective at mandating structural changes, is inherently less well suited to the contextually nuanced, relationship-based interventions that attitudinal transformation requires.

7. CROSS-CASE SYNTHESIS AND DISCUSSION

The comparative analysis of Indonesia and Malaysia yields findings that resist the temptation of a simple verdict in favour of either centralisation or decentralisation as the superior governance model for inclusive education. Rather, as Table 2 systematically illustrates, each model exhibits characteristic strengths and characteristic pathologies that mirror each other in instructive ways.

Table 2. Comparative Dimensions of Inclusive Education Governance in Indonesia and Malaysia

Analytical Dimension	Indonesia (Decentralised)	Malaysia (Centralised)
Legal Framework	Law No. 8/2016; Permendiknas No. 70/2009	Education Act 1996; PWD Act 2008; Blueprint 2013-2025
Governance Architecture	Radical decentralisation to 500+ district governments	Centralised federal ministry control
Primary Strength	Flexibility; community-responsive adaptation; Gotong Royong	Structural uniformity; rapid national policy deployment
Primary Pathology	Severe geographic disparities in quality and resource distribution	'Procedural inclusion'; suppressed pedagogical flexibility

Analytical Dimension	Indonesia (Decentralised)	Malaysia (Centralised)
Support Model	GPK (Guru Pembimbing Khusus) and PPI systems	PPKI (integrated special classes) and PPI (mainstream)
Teacher Preparation	Highly variable; stronger in urban districts only	Nationally standardised but insufficiently specialised
Data Systems	Fragmented; no national disaggregated disability database	Centralised data collection; limited granularity on SEN outcomes

Note. Synthesised from Ridwan et al. (2025), Fauziyah et al. (2025), Khairuddin and Aziz (2021), and Idros (2025).

The most fundamental analytical finding of this comparison is the distinction between 'procedural inclusion' and 'substantive inclusion.' Both Indonesia and Malaysia exhibit versions of this distinction, though its manifestations differ. In Indonesia's decentralised context, the procedural-substantive gap is primarily spatial and fiscal: the formal designation of 'inclusive schools' across the sub-district system does not guarantee the presence of trained teachers, accessible infrastructure, or adapted curricula, and the quality of the resulting educational experience varies enormously across geographic locations. In Malaysia's centralised context, the procedural-substantive gap is primarily pedagogical: the federal system's success in mainstreaming SEN enrolment statistics does not guarantee that students are genuinely participating in meaningful, individualised learning within the mainstream classroom.

Both cases thus illustrate, through different mechanisms, the central argument of this study: that governance architecture shapes, but does not determine, educational outcomes. The content, funding, monitoring, and cultural contexts of policy matter enormously. The Social Model of Disability provides the normative framework for understanding why this distinction matters: if inclusive education is reconceptualised as a human rights obligation rather than an administrative target, then procedural compliance without substantive participation represents a rights violation, not a policy success. As UNESCO (2021, p. 14) states, 'inclusion is not about placing children with disabilities in regular classrooms. It is about transforming schools to make them genuinely welcoming, supportive and effective for all learners.'

From a Human Capital Theory perspective, the geoeconomic consequences of this failure are equally significant. Investment in inclusive education that produces graduates with disabilities equipped with marketable skills yields the dual dividends of rights fulfilment and economic productivity. Investment in inclusive education that produces only procedural compliance, without meaningfully enhancing cognitive, social, or vocational development, generates the administrative costs of inclusive infrastructure without realising its economic benefits. The 37 percent completion rate in the ASEAN Economic Community pillar, documented in the Midterm Review, suggests that even where educational inclusion is advancing at the ASCC level, the economic integration necessary to translate educational investment into productive employment remains profoundly underdeveloped across the region as a whole.

A further critical synthesis finding concerns the role of teacher preparation as the most proximate determinant of inclusive education quality at the classroom level, and simultaneously the dimension on which both case countries exhibit the greatest deficiencies. In Indonesia, teacher preparation for inclusive settings is severely uneven across districts; in Malaysia, it is nationally standardised but substantively inadequate in depth and practical applicability. Both patterns reflect the persistent influence of a training paradigm in which inclusive pedagogy is treated as specialist knowledge relevant only to dedicated special education teachers, rather than as a foundational professional competency for all educators. Armstrong et al. (2011) have argued persuasively that this pedagogical segregation is itself a product of the medical model's institutional legacy, which constructs disability as a specialised clinical problem requiring expert management rather than a dimension of human diversity that a universally competent teacher can accommodate through flexible practice.

Dismantling this institutional legacy requires not merely additional training hours but a fundamental reconceptualisation of what it means to teach.

8. STRATEGIC POLICY RECOMMENDATIONS FOR THE ASEAN COMMUNITY VISION 2045

The evidence synthesised in this study generates four strategic recommendations for regional policymakers, educational administrators, and civil society actors engaged in shaping the inclusive education dimensions of the forthcoming ASEAN Community Vision 2045. These recommendations are grounded in the tripartite theoretical framework and derive from the specific implementation failures and institutional strengths identified across both case studies.

8.1 Adopting an Adaptive Centralisation Governance Model

The central policy lesson of the Indonesia-Malaysia comparison is that neither pure decentralisation nor strict centralisation constitutes an adequate governance model for inclusive education in isolation. What is required is a hybrid architecture that this study terms 'adaptive centralisation': central governments must retain firm authority over the enforcement of foundational human rights standards, the establishment of binding minimum service thresholds, the credentialing of special education competencies in teacher training, and the ring-fenced fiscal transfers to subnational governments. However, within this central framework, local educational authorities and individual schools must be granted the pedagogical and operational flexibility to adapt curricula, modify assessment modalities, and deploy resources in response to the specific cultural context, community composition, and individual learner profiles of their settings. This model parallels the 'constrained discretion' frameworks that have shown effectiveness in other social policy domains, including conditional cash transfer programmes in Indonesia and Brazil (Faguet, 2014; Smoke, 2015).

8.2 Institutionalising Universal Design for Learning Across Teacher Education

The most consequential structural reform available to ASEAN member states is the comprehensive integration of Universal Design for Learning (UDL) principles into both pre-service teacher education programmes and in-service professional development systems. UDL, developed at the Center for Applied Special Technology (CAST) and operationalised in the educational literature by Rose and Meyer (2002), provides a proactive framework for designing learning environments that are inherently flexible and responsive to diverse learner needs, rather than retrofitting accommodations for individual students after universal systems have already failed them. Its three core principles, multiple means of representation, multiple means of action and expression, and multiple means of engagement, provide a practically applicable pedagogical scaffold that can be embedded across all subject areas and year levels.

The transformative potential of UDL integration lies in its capacity to dissolve the institutional boundary between mainstream and special education as epistemological cultures. When all educators are trained to design and deliver flexible learning experiences as a professional norm rather than an exceptional accommodation, the structural need for separate GPK systems, PPKI classes, and other parallel mechanisms diminishes progressively. Operetti et al. (2014) have argued that this pedagogical universalisation is, in fact, the sine qua non of substantive inclusion: without it, administrative reforms in governance, finance, and enrolment remain procedural shells. ASEAN ministries of education should collectively commit to a regional UDL Competency Framework as a condition of teacher certification by 2030.

8.3 Establishing Disability-Inclusive, Equity-Based Education Financing

The political economy of inclusive education requires targeted structural reforms in education financing to address the perverse incentives that current funding models generate. Output-based

general education funding formulas that reward schools for aggregate academic performance create structural disincentives for enrolling students with disabilities, who may require more teaching time, adapted materials, and specialist support. Conversely, equity-based, weighted per-capita funding models that allocate additional, strictly ring-fenced resources to schools proportional to the enrolment and support needs of students with disabilities create positive structural incentives for inclusion and resource mobilisation (World Bank, 2021).

Indonesia specifically requires the establishment of a national Disability Education Fund with protected fiscal transfers to district governments, conditioned upon the submission of verifiable implementation data and linked to minimum service thresholds. Malaysia requires the development of a more granular, needs-based allocation formula within its federal education budget, moving beyond enrolment-based metrics to finance the quality infrastructure, including trained teachers, assistive technologies, and accessible physical environments, that substantive inclusion demands. Both reforms require the development of robust national disability data systems, incorporating internationally standardised measures such as the Washington Group Questions on Disability, to provide the disaggregated evidence base that equitable financing demands.

8.4 Cross-Pillar Economic Integration and Labour Market Mainstreaming

The catastrophic gap between ASCC and AEC pillar completion rates in the ASEAN Enabling Masterplan 2025 Midterm Review demands urgent structural attention. Inclusive education must be embedded within a broader, coherent human capital strategy that connects educational systems to accessible, non-discriminatory labour markets. The development of inclusive Technical and Vocational Education and Training (TVET) pathways, articulated with mainstream inclusive school systems, represents the most immediate structural bridge available. Beyond TVET, ASEAN member states must collectively commit to measurable disability employment targets, enforceable anti-discrimination employment legislation with real penalties, and public-private partnership frameworks that incentivise private sector employers to adopt accessible workplaces and flexible employment modalities. Without this cross-pillar alignment, the educational investments documented in this study will fail to generate the human capital returns that both rights-based and economic frameworks demand.

9. CONCLUSION

This study has demonstrated that the governance of inclusive education in ASEAN is not reducible to questions of policy content or political will alone. The institutional architecture through which policy is administered, financed, monitored, and implemented at the classroom level is itself a primary determinant of educational outcomes for students with disabilities. The comparative analysis of Indonesia and Malaysia reveals that decentralisation and centralisation each generate characteristic implementation pathologies: Indonesia's model maximises local flexibility and cultural responsiveness while producing severe geographic inequities; Malaysia's model maximises structural uniformity and enrolment scale while suppressing the pedagogical individualisation that substantive inclusion requires.

These findings carry significant theoretical implications. They support and extend the Multi-level Governance literature by demonstrating that governance architecture produces systematic rather than random variations in inclusive education outcomes, and that the mechanisms of this relationship are analytically tractable through comparative case study methodology. They reinforce the Social Model of Disability's insistence that systemic, institutional barriers are the primary cause of educational exclusion, by identifying governance architecture as a central mechanism through which such barriers are reproduced or dismantled. And they contribute to the inclusive iteration of Human Capital Theory by documenting the economic costs of both governance pathologies: geographic

inequity in Indonesia and procedural inclusion in Malaysia represent foregone human capital investment with quantifiable macroeconomic consequences.

As the ASEAN region prepares to chart the architecture of the ASEAN Community Vision 2045, the empirical evidence and theoretical framework advanced in this study argue for a decisive paradigm shift: from a charity model to a rights-based investment model; from procedural compliance to substantive inclusion; from governance fragmentation to adaptive, multi-level coordination. The approximately 90 million persons with disabilities across Southeast Asia constitute not a burden on regional development but an immense and largely unmobilised reservoir of human potential. The realisation of that potential, through genuinely inclusive, well-resourced, and pedagogically responsive educational systems, is simultaneously a moral obligation and a geoeconomic imperative. The ASEAN Community Vision 2045 offers the region a generational opportunity to honour both.

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