

Effectiveness of the Implementation of the Diploma Withholding Prohibition Policy in Yogyakarta City

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ABSTRACT

This study analyzes the effectiveness of implementing the policy prohibiting diploma withholding in senior high schools in Yogyakarta City, based on Daerah Istimewa Yogyakarta Regional Regulation No. 10/2013. Using a qualitative descriptive approach with data from interviews, observation, and documentation, the research applies Edward III's implementation model focusing on communication and disposition variables. Results show that while transmission of policy information is effective, clarity and consistency are not due to multi-interpretation among private school principals, unclear sanction actors, and differential treatment between public and private schools. Private school principals exhibit ambivalent dispositions, normatively supportive but substantively resistant, driven by financial dependence on tuition, different institutional status, and unclear sanction mechanisms. Consequently, diploma withholding persists through pseudo-compliance strategies, leaving hundreds of diplomas unpaid and unclaimed. The study concludes that policy implementation is ineffective and recommends issuing derivative regulations, consistent enforcement, and alternative financial mechanisms to protect students' rights without undermining private school viability.

Keywords: policy implementation; diploma withholding; education policy

ABSTRAK

Studi ini menganalisis efektivitas pelaksanaan kebijakan yang melarang penahanan ijazah di sekolah menengah atas di Kota Yogyakarta, berdasarkan Peraturan Regional Daerah Istimewa Yogyakarta No. 10/2013. Dengan menggunakan pendekatan deskriptif kualitatif dengan data dari wawancara, pengamatan, dan dokumentasi, penelitian ini menerapkan model implementasi Edward III yang berfokus pada variabel komunikasi dan disposisi. Hasil menunjukkan bahwa meskipun transmisi informasi kebijakan efektif, kejelasan dan konsistensi tidak disebabkan oleh multi-interpretasi di antara kepala sekolah swasta, aktor sanksi yang tidak jelas, dan perlakuan berbeda antara sekolah negeri dan swasta. Kepala sekolah swasta menunjukkan sikap ambivalen, secara normatif mendukung tetapi secara substansi keberatan, didorong oleh ketergantungan finansial pada biaya kuliah, status institusional yang berbeda, dan mekanisme sanksi yang tidak jelas. Akibatnya, pemotongan ijazah tetap terjadi melalui strategi pseudo-kepatuhan, sehingga ratusan ijazah tidak dibayar dan tidak diklaim. Studi tersebut menyimpulkan bahwa pelaksanaan kebijakan tidak efektif dan merekomendasikan penerbitan regulasi turunan, penegakan yang konsisten, serta mekanisme keuangan alternatif untuk melindungi hak-hak siswa tanpa merusak kelayakan sekolah swasta.

Kata kunci: pelaksanaan kebijakan; penahanan ijazah; kebijakan pendidikan

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INTRODUCTION

A diploma is an academic document that has an important position in the world of education as formal proof that a person has completed a certain level of education. This document is given after the student is declared to have passed and meets all the academic load required by the educational unit. In addition to serving as administrative proof of graduation, a diploma is also the main requirement to continue education to a higher level or enter the world of work. Thus, the possession of a diploma has direct implications for access to further education as well as opportunities to improve an individual's economic status.

A diploma is a student's right that should be obtained automatically after completing the education process. Therefore, the protection of the right to possess diplomas is the responsibility of all education stakeholders. However, in practice, the phenomenon of diploma detention by education units is still found, which is generally associated with arrears of education fees by students or parents.

Keppy et al.'s research in 2024 (Keppy et al., 2024) shows that the practice of holding diplomas is still occurring in the mode of making diplomas as collateral for students' financial obligations to be resolved. Schools still view this as the best mechanism to ensure the settlement of arrears, although this practice poses problems because students' rights to educational documents are hampered and have the potential to have further impacts.

From a basic perspective, the practice of holding diplomas has the potential to conflict with the principle of protecting children's rights. Gumulya in 2010 (Scott, 2010) revealed that this action is not in line with Article 9 of Law Number 23 of 2002 concerning Child Protection which guarantees the right of every child to receive education and teaching. This right includes not only the learning process, but also access to the accompanying administrative documents, including a diploma as formal proof of educational results.

The practice of withholding diplomas also has the potential to hinder the implementation of Article 6 of Law Number 20 of 2003 concerning the National Education System which requires every child to attend basic education. When the diploma is withheld, students who have completed their academic obligations cannot continue their education to the next level. Obstacles that are not directly related to this academic process can interfere with the fulfillment of basic education obligations.

Saputri's findings in 2025 (Saputri, 2025) Strengthening this condition by showing that the practice of holding diplomas will continue to occur until 2025 due to school policies that require the payment of education fees for diploma taking. This condition is exacerbated

by the weak supervision of the Education Office, so that schools are free to make internal policies that are not in line with the principles of protecting students' rights.

Research by Safira et al. in 2025 (Safira et al., 2025) Finding that the lack of transparency and clarity of information from the school regarding the detention of diplomas can trigger misunderstandings and conflicts between schools and students and parents. This shows that organizational communication factors can play a role in muddying this problem.

Assabila and Harahap (Assabila & Harahap, 2025) in its research in 2025 identified that the detention of diplomas is a form of maladministration that is often reported to the Ombudsman. The final completion of the report is highly dependent on the extent to which the relevant agencies comply and follow up on the recommendations given by the Ombudsman. Latifah's research in 2025 (Latifah, 2025) emphasized that the Ombudsman's Examination Results Report does not have materially binding legal force, although it has strategic value in encouraging the settlement of diploma detention cases, so it has not been able to ensure optimal compliance of education units. This shows the limitations of external supervision mechanisms.

Some of the research results offer solutions based on administrative innovation. Kodir in 2025 (Kodir, 2025) It shows that the management of diplomas based on digital systems can improve administrative efficiency, data security, and reduce distribution delays. These findings are in line with the results of Sika's research in 2021 (Chicago, 2021) which states that the diploma distribution information system is able to increase transparency and accountability and minimize potential conflicts between schools and students. Thus, improving the administrative system can be a preventive strategy to reduce the practice of holding diplomas.

Widira in 2025 (Widira, 2025), in the results of his research found that the issue of diploma detention at school can have an impact on the decline of parents' trust in schools due to miscommunication. Handling through crisis communication strategies, such as public clarification and dialogue, has been proven to be able to reduce conflict and restore trust. These findings confirm that the practice of holding diplomas also affects the social legitimacy of educational institutions.

In general, previous research has focused more on normative aspects, such as violations of children's rights, maladministration, weak supervision, and organizational communication problems, with some offering technology-based administrative solutions. However, there has been no study that comprehensively analyzes the effectiveness of the

implementation of the policy prohibiting the detention of diplomas, especially at the level of education units as policy implementers.

Based on these gaps, this study positions an analysis of the effectiveness of the implementation of the policy prohibiting the detention of diplomas and its benefits in guaranteeing the rights of students. From a public policy perspective, implementation is a crucial stage that determines the success of policies in achieving goals. Policy effectiveness is highly dependent on implementation on the ground, including clarity of substance, implementation capacity, availability of resources, and quality of communication and coordination (Stuttgart, 2021).

Policy implementation is a complex, dynamic, and contextual process because it involves various actors and is influenced by social, economic, and political conditions. Its success is determined by the adaptability of implementers and the support of the policy environment, so it requires continuous monitoring and evaluation (Akib, 2010; Yuliah, 2020).

In this context, policy effectiveness is measured by the ability of policies to solve the public problems that underlie them. William N. Dunn (Dunn, 2000) states that effectiveness is related to the achievement of expected outcomes or impacts, so that assessment focuses not only on outputs, but also outcomes. Thus, policies are considered effective if the results achieved are in line with the goals that have been set.

Refers to George C. Edwards III's policy implementation model (Winarno, 2012), there are four main variables that affect the success of implementation, namely communication, resources, disposition or tendencies, and bureaucratic structure. This study focuses on communication variables and dispositions or tendencies because they both determine the level of understanding and commitment of implementers to policies. Clear and consistent communication is a prerequisite for implementation, while disposition determines the compliance of the implementer.

The purpose of this study is to analyze the effectiveness of the implementation of the policy prohibiting the detention of diplomas in high schools and vocational schools in Yogyakarta City. The selection of the location was based on ORI DIY and LODIY complaint data which showed a high number of cases of diploma detention in the region. Theoretically, this research is expected to enrich the study of the implementation of outcome-based education policies, while practically providing recommendations for local governments and education units in improving the effectiveness of policies and the protection of students' rights.

RESEARCH METHODS

The methodology used for this study is a qualitative methodology with a descriptive research design. The qualitative methodology was chosen because the purpose of this research is to gain an in-depth understanding of the implementation of the policy of prohibiting diploma retention as described in the Yogyakarta Special Region Regulation Number 10 of 2013. As described by Creswell (Creswell, 2017) Qualitative research serves to comprehensively investigate social phenomena, emphasizing the natural conditions of the subjects, the interactions among participants, and the interpretation of meanings constructed in social practice.

The time frame for the implementation of this research starts from February to May 2026 in the Yogyakarta City area. The focus of the research is related to the implementation of the policy, with informants consisting of the DIY Disdikpora, private high schools and vocational schools in Yogyakarta City, parents of students who have experienced diploma detention, and representatives of the Ombudsman of the Republic of Indonesia and the Ombudsman Institute of Yogyakarta. The selection of informants is carried out using *purposive sampling* techniques, the selected informants are parties who interact directly with the practice of diploma detention and who have experience related to diploma detention. Research activities are carried out sequentially, starting from the preparation stage, which includes initial data collection and informant mapping, then continued with the data collection process, both with interviews, collection of supporting documents, and observations, and finally the analysis of the results data.

The data collected in this study consisted of primary and secondary data. Primary data was obtained through interviews and observations, while secondary data was collected from policy-related documents sourced from the DIY Disdikpora, High School and Vocational High School in Yogyakarta City, and community report documents from the Ombudsman Representative of the Republic of Indonesia, as well as the DIY Ombudsman Institute. As is commonly done in qualitative research, the main instrument of this study is the researcher himself, in carrying out data collection, the researcher is equipped with guidelines for interviews and observations.

Data collection was carried out through observation, documentation and semi-structured interviews. The data analysis technique was executed with reference to an interactive model compiled by Miles and Huberman (Scott, 2024) emphasizing that data analysis is carried out continuously from data collection to research conclusions, this

process involves three main components, namely data sorting, data presentation and conclusion visualization/verification.

Data sorting (reduction) is a process to select, focus and simplify the initial data obtained from the research site. In this process, the researcher filters data that can be related to the focus of the research, makes a summary of important information, and sorts the data based on the research theme. The process of sorting the data is carried out during the research process, with the hope that the data produced will be more focused and easier when conducting analysis.

The data presentation displays a collection of information that has previously been sorted and then compiled systematically as a basis for drawing conclusions. Data presentation can take the form of a narrative, matrix, table, chart, or a description of the relationship between categories. Through the carefully organized presentation of data, researchers can discern the patterns, relationships, and trends that emerge from the data, making the next analytical step easier.

The last step is in the form of drawing conclusions and verification. In this step, the researcher begins the activity of formulating the meaning of the data that has been presented previously by looking for patterns, cause-and-effect relationships, or propositions that can effectively overcome the formulation of the research problem. The conclusions drawn at this early stage are temporary, but they will achieve greater resilience and validity after an ongoing verification process during the study. Verification is the activity of reviewing the data that has been obtained, the method used is triangulation both in terms of sources and methodology, so that the results of research can be scientifically proven.

RESULTS AND DISCUSSION

Communication

In Edward III's policy implementation model, communication is one of the key factors that determine the success or failure of a policy implementation. Communication in this context refers to the process of transferring information from regional-level policy implementers to field-level policy implementers. Edward III divided the variables of communication into three dimensions, namely transmission (information channel), *clarity*, and consistency. These three dimensions must function optimally so that policy implementers can understand and implement policy instructions correctly.

The first dimension is the transmission or distribution of information, the Head of the High School Division of Disdikpora DIY explained that the socialization of the policy prohibiting the detention of diplomas has often been carried out. One of the channels used to conduct socialization is the Principal's Work Meeting (MKKS), which is a routine forum that brings together all high school principals in Yogyakarta. This forum is held periodically every year, so that policy socialization is not only carried out once, but repeatedly every time there is a meeting. (Head of High School Division of Disdikpora DIY, personal communication, April 28, 2026)

This statement was corroborated by the Head of the Vocational School Division of the DIY Disdikpora, who stated that policy socialization has been carried out by almost every head of the office in office. This shows that the transmission of policy information does not depend on the leadership of certain individuals, but has become a routine agenda of the DIY Disdikpora. (Head of Vocational School Division of Disdikpora DIY, personal communication, April 28, 2026)

All private school principals interviewed in this study also confirmed that they received information about the policy prohibiting the detention of diplomas from the DIY Disdikpora. One of the principals of a private high school in Yogyakarta even mentioned that he had been invited to the office of the Yogyakarta Disdikpora to sign a statement of his ability to comply with the ban. This statement letter is an administrative instrument used by the DIY Disdikpora to bind the school's commitment so as not to withhold diplomas. (Informant from one of the Private High Schools in Yogyakarta, personal communication, April 2, 2026)

Based on the above findings, the transmission dimension in the communication of the policy prohibiting the detention of diplomas can be analyzed using several indicators. The first indicator is the presence of clear communication channels. The communication channels used by the DIY Disdikpora are quite clear, namely the MKKS forum and official circulars. The second indicator is the adequate frequency of delivery. Policy socialization is carried out every year, even though there is a change of the Head of Service. This annual frequency is considered adequate for permanent policies such as the prohibition of the detention of diplomas. The third indicator is comprehensive coverage. The DIY Disdikpora targets both public school principals and private school principals. In fact, the Office also targets foundations that oversee private schools. This wide reach is important because private schools have a different institutional structure than public schools. The fourth indicator is confirmation of receipt of socialization messages. All informants from private

school principals confirmed that they received policy information from the DIY Disdikpora. None of the principals stated that they did not know about this policy.

Analysis of these four indicators shows that the transmission dimension in the communication of the policy prohibiting the detention of diplomas can be called effective. No significant obstacles were found in the process of distributing information from the DIY Disdikpora to the school principal. This finding is in line with Edward III's argument that good transmission is the initial foundation for successful policy implementation. However, it should be noted that the effectiveness of transmission only measures the arrival of information, not the understanding of the information or the adherence to the policy.

Furthermore, the communication variable will be seen from the dimension of clarity, if you read the content of the policy prohibiting the detention of diplomas listed in the DIY Regional Regulation No. 10 of 2013 is classified as clear and unambiguous. Article 37 of the Regional Regulation explicitly states that educational units are prohibited from withholding diplomas based on financing reasons. However, what happened in the field emerged various interpretations of the content of this ban, especially among private school principals. Private schools understand exactly what the ban sounds like, but they are consciously looking for loopholes to maintain a bargaining position against parents who have arrears. This practice is a form of covert discretion, that is, formally the school claims to comply with the policy, but substantively they continue to do the same practice as the detention of diplomas.

One of the principals of a private high school in Yogyakarta who was interviewed, openly explained the strategy used by his school. He claimed that the school did not withhold diplomas, but imposed an administrative requirement that three-finger stamping could only be done after the student or parent paid off all administrative arrears. With this strategy, the school then said that they did not withhold the diploma, although in fact the student was still not able to take the diploma before paying off the payment. (Informant from one of the Private High Schools in Yogyakarta, personal communication, April 2, 2026)

The emergence of these various interpretations did not happen suddenly. The principal feels that he has the legitimacy to reinterpret the policy for several reasons. First, the DIY Disdikpora itself gave an ambiguous signal. The Head of the Yogyakarta Disdikpora High School Division explicitly stated that for the reason of respecting the foundation in private schools, his party could not be too strict in enforcing the prohibition of diploma withholding. Therefore, if it is found that there are private schools that violate,

they cannot take strict action. Second, there are no derivative rules or technical instructions from the DIY Regional Regulation No. 10 of 2013 that explains in detail the forms of violations, the mechanism for imposing sanctions, and the sanctioning actors. Without technical instructions, schools can claim that the strategy of requesting repayment before the three-finger stamp does not fall within the definition of diploma withholding.

The DIY Ombudsman provides additional perspective on why this multiinterpretation can occur. According to him, private schools often feel like independent entities and are not fully bound by the legal rules made by local governments. This feeling of "independence" may stem from the fact that private schools are established and financed by the community, not by the government. As a result, they feel they have greater autonomy in managing their internal affairs, including policies on diploma handover. (DIY Ombudsman Agency, personal communication, April 2, 2026)

The most fundamental weakness in the dimension of clarity is the ignorance of all parties about the details of sanctions and the actors authorized to enforce them. This finding is very significant because it involves the DIY Disdikpora itself as the institution responsible for supervising the implementation of the policy. If the DIY Disdikpora itself does not know the mechanism of sanctioning and the sanctioning actors, then it is impossible for them to enforce the policy effectively. (Head of High School Division of Disdikpora DIY, personal communication, April 28, 2026)

The representative of the Ombudsman of the Republic of Indonesia also underlined this weakness as one of the factors inhibiting the implementation of the policy. According to him, administrative sanctions have never been given strictly and consistently. As a result, there is no deterrent effect for violators. Schools that violate the policy never feel any consequences, so they have no reason to change their behavior. (Ombudsman Representative of the Republic of Indonesia, personal communication, May 2026)

The lack of clarity on sanctions and the absence of clear actors to enforce the rules create a situation where offenders are not afraid to violate because there are no threatening consequences. Under these conditions, compliance with the policy becomes voluntary, not compliance enforced by sanctions enforcement. However, voluntary compliance will only occur if the implementer has an internal motivation to comply. In the case of private schools that rely heavily on payments from parents, internal motivation to comply becomes low, as compliance with such prohibitions will threaten their financial survival.

Thus, the dimension of clarity in policy communication can be said to be ineffective. There are at least two identified causes. First, there is a multi-interpretation of the content

of the policy by private school principals, which then creates pseudo-compliance practices. Second, there is a lack of clarity on sanctions and sanctioning actors, which then creates conditions where the offender is not afraid because there are no real threatening consequences. These findings can enrich the analysis model with Edward III's theory, where the clarity of sanctions and their enforcement actors is a critical sub-dimension that should be separated from the dimension of clarity of policy content.

The next dimension is consistency, the most significant finding in the consistency dimension is the existence of a marked difference in treatment between public schools and private schools. This difference is openly acknowledged by the DIY Disdikpora itself. The Head of the High School Division of Disdikpora DIY explicitly stated that the policy is very effective in public schools, while for private schools, Disdikpora DIY cannot be firm because it is justified to respect the foundation. This statement shows that the Education Office consciously gives leniency to private schools on the grounds of respecting the autonomy of the Foundation. (Head of High School Division of Disdikpora DIY, personal communication, April 28, 2026)

One of the principals of a private vocational school in Yogyakarta, tried to explain the root of the problem of this difference. According to him, public schools hardly feel the negative impact of this policy because all their operational costs (such as teacher salaries, learning media, and buildings) have been borne by the government. Instead, private schools have to finance everything themselves. As a result, when a policy prohibiting the withholding of diplomas is enforced, private schools have the potential to lose significant revenue. (Informant from Private Vocational Schools in DIY 2, personal communication, April 14, 2026)

One of the principals of a private high school in Yogyakarta added that the difference in the employment status of educators and education staff makes public schools more afraid to violate. The principal of a public school is a State Civil Apparatus (ASN) who is subject to the rules of ASN discipline. If they are found to be in violation of the policy, they may be subject to administrative sanctions that impact their careers. In contrast, private school principals are under the foundation, and sanctions from the DIY Disdikpora have no direct impact on their status. (Informant from one of the Private High Schools in Yogyakarta, personal communication, April 2, 2026)

However, even so, in terms of preventing the practice of diploma withholding, the DIY Disdikpora has made efforts by showing that they have incentive instruments to force compliance of private schools. This can be seen when private school principals are asked

to sign a statement of regret that they do not withhold their diplomas. Although at first the compact refused to sign the statement, in the end the letter was still signed. This happened because the statement letter is a condition for the disbursement of school operational assistance funds (BOS) from the Yogyakarta Regional Government Budget. This mechanism shows that the DIY Disdikpora uses financial incentives, and not sanctions, as an instrument to encourage compliance.

The dependence of private schools on regional BOS funds, although the nominal amount is much smaller than the real needs, is a determining factor for compliance. Private schools realize that refusing to sign a statement letter means denying local BOS funds, which will further exacerbate their financial difficulties. Thus, although resistance did occur, compliance was ultimately forced by economic necessity, not by legal awareness or the threat of sanctions.

These findings suggest that the effectiveness of policy implementation does not always depend on sanctions (punishments), but can also be driven by incentives (rewards). In these cases, the regional BOS fund serves as an instrument that attracts schools to comply because there are benefits obtained. However, the effectiveness of this instrument is limited, as it only binds schools that still need regional BOS funds, while schools that already have alternative funding sources may still be able to avoid it. (Informant from one of the Private High Schools in Yogyakarta, personal communication, April 2, 2026)

Another factor that causes inconsistency in the implementation of the policy prohibiting the detention of diplomas and is systemic is the absence of derivative rules or technical instructions from the DIY Regional Regulation No. 10 of 2013. Without derivative rules, policy implementation becomes dependent on the interpretation and initiative of each actor on the ground. Each school can interpret policies according to its own interests, and the DIY Disdikpora does not have sufficient guidelines to carry out uniform supervision and enforcement of sanctions. The Yogyakarta Ombudsman institution stated that the absence of derivative rules is a policy loophole, so that its implementation is less effective in the field. The implementation of the policy is not uniform, one school applies one interpretation, another school applies a different interpretation. (DIY Ombudsman Agency, personal communication, April 2, 2026)

The Head of the Vocational School Division of the DIY Disdikpora also admitted that he felt uneasy because there was no clarity about who was authorized to take action against violations. This confusion caused the DIY Disdikpora to prefer not to act rather than take risks beyond its authority.

The absence of this derivative rule actually contrasts with the fact that the Regional Regulation has been more than a decade old since it was enacted in 2013. In this long period, the local government should have had enough time to prepare the necessary technical instructions. However, until the time this study was conducted, derivative rules have not been published. This raises the question of whether the implementation of this policy is the top priority of the local government or not.

Thus, the consistency dimension in policy communication is not entirely effective. Based on preliminary data and verification through *member checks*, there are three main problems. First, there is a difference in treatment between public and private schools, public schools are forced to obey because the principal has ASN status, while the private sector is "respected" by its foundation. Second, there is a gap between administrative compliance and substantive compliance. The DIY Disdikpora succeeded in forcing the signing of a statement that it would not withhold diplomas because it was a condition for disbursing regional BOS funds, but private schools continued to practice withholding diplomas in the field. Third, the absence of derivative rules from the Regional Regulation causes each school to interpret the policy according to its own interests without binding guidelines.

Disposition

Edward III identified three indicators of disposition that influenced policy implementation. First, the implementer's understanding of the values and objectives of the policy. Implementers who understand and agree with the underlying values of policies tend to implement them better than implementers who do not understand or even oppose the policy. Second, the direction of the response (*direction of response*), i.e. the tendency of the implementer to support or reject the policy. Implementers who support policies will implement them voluntarily, while implementers who refuse will look for ways to avoid or modify implementation. Third, the intensity of the response (*intensity of response*), That is, how strong the attitude of the implementer is to the policy. The stronger the positive attitude of the implementers, the more likely they are to implement the policy seriously. (Isnanda & Tukiman -, 2021; Milka, 2022)

In this study, the disposition analyzed is the disposition of school principals as field level policy implementers. The focus on school principals is particularly relevant because they are the leading actors who directly interact with students and parents, and have the authority to issue or withhold diplomas. Without the will and commitment of the school

principal, the policy of prohibiting the detention of diplomas will never be realized in the field, even though the DIY Disdikpora has carried out good socialization.

The results of the field search showed that private school principals cognitively understood the value and purpose of the policy prohibiting the detention of diplomas. They know that a diploma is a state document that is the absolute right of the student, and that this policy was created to protect the student. These understandings are not superficial, but rather profound enough because they can rationally explain why the policy is important. One of the principals of a private vocational school in Yogyakarta explicitly stated his understanding of this policy position. (Informant from Private Vocational Schools in DIY 1, personal communication, April 6, 2026)

However, a good understanding of the values and objectives of these policies does not necessarily result in compliance because there is a clash between the values of the policy, namely the protection of students' rights, and other values that are considered more urgent, namely the survival of the school and the welfare of teachers. (Informant from Private Vocational Schools in DIY 1, personal communication, April 6, 2026)

The above statement shows that private school principals understand and recognize the benefits of policies to protect children's rights. However, they feel that this policy is unbalanced because it only focuses on one side, namely children's rights, but ignores the other side, namely the rights of schools and teachers. This feeling of injustice becomes an important factor that affects their disposition.

This clash of values creates a condition called a conflict of values in policy implementation. On the one hand, private school principals recognize that morally, students are entitled to a diploma regardless of their payment status. On the other hand, they feel an equal moral responsibility to teachers who depend on salaries paid from school fees. In a situation of value conflict like this, compliance with policies becomes not easy because the implementer has to choose between two obligations that contradict each other.

The results of other field searches show that private school principals have an ambivalent response to the policy of prohibiting the detention of diplomas. Verbally, they expressed support for the policy and acknowledged that it was important to protect students' rights. However, behaviorally, they resist by creating various strategies to maintain a bargaining position against parents who have arrears.

The school selectively implements its internal policies, complying for things that are not detrimental to the school such as providing photocopies, paying in installments, but not complying for things that are considered detrimental such as handing over the original

diploma (Informant from Private Vocational Schools in DIY 2, personal communication, April 14, 2026).

Based on the above findings, it can be concluded that the direction of the response of private school principals to the policy of prohibiting the detention of diplomas is ambivalent, with a tendency to refuse. Verbally they support policies or at least not openly oppose, but behaviorally they engage in covert resistance and not open and confrontational. However, they created a new procedure that is formally different from diploma detention but is substantially the same. Covert resistance like this is more difficult to detect and act on because formally the school does not violate the sound of the Regional Regulation in question.

The next dimension to measure disposition is the intensity of the response, this measures how strong the implementer's attitude is towards the policy. The stronger the positive attitude of the implementers, the more likely they are to implement the policy seriously. The stronger the negative attitude of the implementer, the more likely they are to resist.

The intensity of the response can be measured by the language that implementers use when talking about policies, whether they use weak or strong words, from the actions they take whether they are doing only *minimal compliance* or really trying, and from their willingness to sacrifice personal interests for the sake of policy.

The results of field data collection showed that the intensity of the response of private school principals to the policy prohibiting the detention of diplomas was very strong, but in a negative direction or rejected the substance of the policy. They are not simply passively disobedient, but actively create strategies to avoid substantive compliance. The intensity of this resistance is reflected in three things, namely 1) the language used to describe the impact of the policy, 2) the creative strategies created to maintain the bargaining position, and 3) the delivery of the financial impact.

First, in terms of language. An informant from a private high school in Yogyakarta used the word "very disturbing" to describe the impact of the policy on private schools (Informant from one of the Private High Schools in Yogyakarta, personal communication, April 2, 2026). This statement indicates high intensity. It is not just a mild discomfort, but a serious disturbance that is felt intensely and continuously. The statement also indicates that this policy touches on the fundamental aspects of the operational continuity of private schools.

Second, in terms of the creative strategy created, this private school actively creates a strategy related to the requirements for repayment of fees before stamping the three fingers of the diploma. This strategy is consciously designed to create pseudo-compliance, the school formally claims not to withhold diplomas, but substantively still does not hand over diplomas prior to administrative repayment (Informant from one of the Private High Schools in Yogyakarta, personal communication, April 2, 2026).

Third, in terms of financial impact. Informants from one of the Private Vocational Schools in Yogyakarta showed a very high intensity of response by mentioning the magnitude of the financial impact felt by the school. He revealed that the total arrears at his school reached around five hundred million rupiah, and that this amount was equivalent to five months' salary. He also stated that the delay in the payment of teachers' salaries is a real consequence of this policy (Informant from Private Vocational Schools in DIY 2, personal communication, April 14, 2026).

This statement shows that the intensity of the resistance of private school principals cannot be separated from the magnitude of the economic impact they feel directly. The figure of five hundred million rupiah is not a small nominal, and this is money that should be the right of schools and teachers, but is lost because of the policy prohibiting the detention of diplomas. The greater the negative impact of the policy on schools, the stronger the intensity of the resistance they carry out.

The head of another private vocational school in Yogyakarta also highlighted the unjust aspect of this policy, which further strengthened the intensity of the resistance (Informant from Private Vocational Schools in DIY 1, personal communication, April 6, 2026). This suggests that in addition to economic factors, there are also factors of perception of injustice that reinforce the intensity of resistance. Private schools feel that this policy is too one-sided to only protect the rights of school children but ignore the rights of schools and teachers and their families.

Based on the above findings, it was concluded that the intensity of the response of private school principals was very strong with a negative direction. This resistance is driven by the huge financial impact and perception of policy injustice. This condition shows that private schools are under double pressure from the policy itself and from the financial need for the survival of the school, this results in a pseudo-form of compliance.

Based on the above analysis, this study found at least three factors that affect the disposition of private school principals. First, financial dependence on the payment of the student's parents. All school operational costs such as teacher salaries, building

maintenance and the purchase of private school equipment are still very much dependent on payment from students' parents. In contrast to public schools where all costs are borne by the government, the policy of prohibiting the detention of diplomas has the potential to eliminate instruments that have been effective for private schools to ensure the repayment of parental obligations.

Second, differences in institutional status. Violations of the implementation of policies in public schools are very risky for the principal, because the employment status is that of the State Civil Apparatus (ASN), the threat of administrative sanctions is easier to give. In contrast, private school principals are under the auspices of the foundation, so sanctions from the Education Office have no direct impact on their status and careers. This difference in institutional status creates differences in incentives and the threat of inherent sanctions.

Third, the unclarity of the sanctioning actors. In the DIY Regional Regulation No. 10 of 2013, there is indeed an article that contains the threat of sanctions for educational units that violate the prohibition on the detention of diplomas. However, based on interviews with the DIY Disdikpora, the Representative of the Ombudsman of the Republic of Yogyakarta, and the DIY Ombudsman Institution, it was found that the actors authorized to impose sanctions were not clearly mentioned in the Regional Regulation.

Due to the unclarity of the sanctioning actors, the sanctions that normatively exist in the Regional Regulation do not function in the field. There is no deterrent effect felt by private schools that violate, because they know that no obvious actor will take action against them. The resistant disposition of private school principals is increasing with the ambiguity of this actor. Unlike public schools whose principals have ASN status and are threatened with administrative sanctions, private schools do not have the same fears. Thus, institutional factors and regulatory factors (the unclarity of sanctioning actors) together form the disposition of private school principals who tend to be resistant.

Discussion

The variables of communication and disposition in the implementation of the policy prohibiting the detention of diplomas in this study can be said to have a close relationship. The ineffectiveness of communication on the dimension of clarity, especially the sub-dimension of the ambiguity of the sanctioning actor and the dimension of consistency, namely in the different treatment between public and private schools, further increases the resistance disposition of private school principals. When private schools know that the

sanctioning actors are unclear and that the DIY Disdikpora treats them differently from public schools, they feel they have room to reinterpret the policy according to their interests.

Conversely, a strong resistant disposition further exacerbates the ineffectiveness of implementation, as private schools take the initiative to create strategies to avoid substantive compliance. These two variables reinforce each other in creating a vicious cycle of implementation, poor communication encourages a resistant disposition, and a resistant disposition further complicates effective communication.

CONCLUSION

This study analyzes the implementation of DIY Regional Regulation No. 10 of 2013 concerning the Prohibition of Diploma Detention using the Edward III model, focusing on communication variables and disposition in the implementing bureaucratic chain.

The results of data analysis on communication variables are known that in the transmission dimension, communication runs effectively, policy information is successfully distributed from the DIY Disdikpora to all school principals through MKKS every year. However, in the dimension of clarity, communication is ineffective because there is a multi-interpretation of the content of the policy among private school principals, for example, the emergence of a strategy that cannot be stamped with three fingers if it has not paid off the arrears of education fees, and the sanctioning actors are not clearly mentioned in the DIY Regional Regulation Number 10 of 2013 so that sanctions have never been enforced. The consistency dimension is also not fully effective because there is different treatment between public and private schools, there is administrative compliance that must be carried out by "coercion", is a condition for the disbursement of regional BOS funds and there is no substantive compliance, because there is still a practice of not being able to stamp three fingers if you have not paid off the arrears of education fees, and there are no derivative rules from the DIY Regional Regulation No. 10 of 2013.

The results of data analysis on the disposition variable showed that private school principals had an ambivalent disposition, that is, they seemed to support policies normatively but were actually resistant in practice. The three main factors influencing this disposition are financial dependence on parental payments, differences in institutional status (public and private schools under foundations), and unclear sanctioning actors. Resistance is manifested in the form of pseudo-compliance where schools comply with policies administratively but not substantively.

The cumulative findings of this study are that in the private schools studied, there are still almost a hundred student diplomas that have not been taken, with a total arrears of hundreds of millions of rupiah. Most of the diplomas that are still kept by the school have not been taken because there is a problem with arrears of education fees, and a small part has not been taken for reasons other than arrears, because there are also students who have not taken their diplomas even though they have paid off all their education expenses. Informants from a private high school in Yogyakarta kept around twenty diplomas.

Based on the above conclusions, this study recommends several things. First, the Yogyakarta Regional Government must immediately issue derivative rules that explicitly regulate sanctioning actors and sanctioning mechanisms. Second, the DIY Disdikpora must implement policies consistently without distinguishing between state and private status. Third, supervision should not stop at the examination of administrative documents, but must ensure substantive behavior changes in the field. Fourth, alternative mechanisms are needed that do not harm private schools while still protecting students' rights, such as the cross-subsidy assistance program or the installment payment scheme facilitated by the DIY Disdikpora. Fifth, policy socialization needs to be carried out directly to parents and students, not only relying on schools as intermediaries.

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