

Evaluating Minimum Service Standards in Maritime Education and Training Delivery Units: A Secondary Data Analysis

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Abstract

Minimum Service Standards (Standar Pelayanan Minimal, SPM) provide an administrative and operational benchmark for ensuring that public service organizations deliver services with defined levels of quality, timeliness, accessibility, accountability, and user orientation. In maritime education and training, these standards have additional significance because service quality is directly connected to seafarer competence and maritime safety. This study evaluates the SPM framework applied to maritime education and training delivery units in Indonesia using secondary data and documentary analysis. The analysis draws on national public service legislation, Ministry of Transportation regulations, institutional service-standard documents, and the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW). The documents were coded into six evaluation dimensions: service accessibility, learning-process reliability, instructor competence, facilities and training infrastructure, assessment and certification, and accountability and user satisfaction. The findings indicate that the Indonesian regulatory framework provides a relatively comprehensive normative foundation, particularly through service standards covering admission, instructional processes, facilities, competency assessment, service time, costs, and complaint handling. However, the framework is stronger in specifying procedural and input requirements than in demonstrating outcome-based performance. The study therefore identifies the need for measurable service targets, periodic disclosure of performance results, stronger user-feedback mechanisms, and closer integration between public-service standards and STCW-based competency assurance. SPM effectiveness should be assessed not only by formal compliance but also by whether service standards consistently produce competent graduates, timely certification, transparent costs, and reliable user experiences.

Keywords: minimum service standards; maritime education and training; public service; seafarer training; service evaluation

1. Introduction

Public service standards are an important mechanism for converting general administrative obligations into concrete service commitments. In Indonesia, Law No. 25 of 2009 on Public Services requires public-service providers to organize services according to clear standards, including requirements, procedures, service time, costs, facilities, complaint handling, and performance evaluation. The logic of service standards is therefore not merely procedural. Standards are intended to protect users, improve administrative predictability, strengthen accountability, and provide measurable criteria against which service performance can be evaluated.

These concerns are particularly important in maritime education and training. Maritime training institutions do not only provide educational services; they also form and assess competencies that have direct implications for shipboard safety, occupational risk, environmental protection, and the international mobility of seafarers. The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) establishes internationally recognized minimum requirements for the training, certification, and watchkeeping competence of seafarers. Consequently, the quality of maritime training services must satisfy two overlapping demands: public-service quality and professional competency assurance.

In Indonesia, the Ministry of Transportation has issued several instruments governing service standards in maritime education and training institutions. Earlier Minimum Service Standards for maritime training units specified dimensions such as graduate quality, timeliness, affordability, service

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availability, and user satisfaction. More recent regulations, including Minister of Transportation Regulation PM 19 of 2017, provide general guidance for the formulation and implementation of service standards within the Ministry of Transportation. Institution-specific standards also exist. For example, Minister of Transportation Regulation PM 1 of 2018 establishes service standards for the Politeknik Ilmu Pelayaran Makassar and covers education and training services, competency testing, health certification, facility rental, and other related services.

Despite this regulatory architecture, the existence of a service standard does not by itself demonstrate that the standard is effective. A service standard may be formally complete but weakly monitored, difficult to measure, insufficiently linked to outcomes, or poorly communicated to service users. In maritime education and training, this distinction is important because a unit can comply administratively with procedures while still experiencing problems in service timeliness, instructor availability, simulator access, certification processing, or participant satisfaction.

This study therefore evaluates the SPM framework for maritime education and training delivery units through secondary data. Rather than claiming empirical compliance by a specific institution without primary operational data, the study evaluates the design, evaluability, and implementation logic of the standards found in authoritative regulatory and institutional documents. The central research question is: To what extent does the existing SPM framework provide an adequate basis for ensuring effective, accountable, and competency-oriented maritime education and training services?

The study contributes to public administration by connecting service-standard evaluation with a safety-critical professional education context. It argues that SPM effectiveness in maritime training should not be reduced to procedural compliance. Effective standards must link inputs and processes to demonstrable service outcomes, including reliable completion times, transparent costs, adequate learning resources, valid competency assessment, responsive complaint handling, and user confidence in the training and certification process.

2. Methods

This research employed a qualitative secondary-data design based on documentary analysis. The unit of analysis was the regulatory and administrative framework governing minimum or formal service standards in maritime education and training delivery units in Indonesia. No survey, interview, observation, or institution-specific performance dataset was used.

Documents were selected purposively when they met at least one of three criteria: (1) they established general public-service obligations applicable to government service providers; (2) they regulated service standards in the Ministry of Transportation or maritime training institutions; or (3) they established international competence and quality requirements for seafarer training and certification. The principal sources included Law No. 25 of 2009 on Public Services, Government Regulation No. 96 of 2012, Minister of Transportation Regulation PM 19 of 2017, Minister of Transportation Regulation PM 1 of 2018 on service standards at the Politeknik Ilmu Pelayaran Makassar, earlier maritime-training SPM instruments such as Ministerial Decree KM 17 of 2010 for BP2IP Surabaya, and the STCW Convention and Code.

The analysis proceeded in three stages. First, the documents were read to identify explicit service commitments and performance criteria. Second, these provisions were coded into six analytical dimensions: (a) accessibility and admission, (b) reliability and timeliness of the training process, (c) instructor and personnel competence, (d) facilities and learning infrastructure, (e) assessment and certification integrity, and (f) accountability, costs, complaints, and user satisfaction. Third, the provisions were assessed using three evaluative questions: whether a standard was clearly specified, whether it could be measured in operational practice, and whether it was linked to a meaningful service or competency outcome.

Because documentary evidence does not provide direct evidence of actual service performance in every maritime training unit, the findings are interpreted as an evaluation of the SPM framework and its implementation requirements rather than as a quantitative ranking of institutional compliance. This distinction prevents unsupported claims while still allowing an assessment of whether the regulatory design provides a sufficient basis for effective public-service management.

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3. Results

3.1 Regulatory Architecture of Maritime Training Service Standards

The documentary analysis shows that maritime training service standards are embedded in a layered regulatory structure. At the general level, Law No. 25 of 2009 establishes the obligation to provide transparent and accountable public services. Government Regulation No. 96 of 2012 operationalizes this obligation, while Minister of Transportation Regulation PM 19 of 2017 requires service units within the Ministry of Transportation to formulate, establish, and implement standards for each service type. At the sectoral level, maritime training standards add requirements that are specific to seafarer education and competence. Earlier SPM instruments for maritime training institutions explicitly connected service quality with graduate quality, timeliness, affordability, service availability, and user satisfaction. Ministerial Decree KM 17 of 2010 for BP2IP Surabaya, for example, treated the SPM as a quality benchmark covering content, processes, graduate competence, educators and education personnel, facilities, management, financing, and educational assessment.

Institution-specific regulation further converts these broad categories into concrete service types. PM 1 of 2018 for the Politeknik Ilmu Pelayaran Makassar covers formation training, upgrading training, training services, competency testing, health certification, facility rental, and other services. This demonstrates that maritime training service standards are not confined to classroom instruction. They encompass an integrated service chain extending from admission and training to testing, certification, and supporting administrative services.

The STCW framework adds an international competency dimension. STCW establishes minimum international standards for seafarer training and certification and requires quality assurance in the implementation of training and assessment. The documentary evidence therefore indicates that an effective Indonesian SPM must operate simultaneously as a public-service instrument and as part of a professional safety and competency-assurance system.

Table 1. Documentary basis for evaluating maritime training SPM

Document	Administrative function	Relevant SPM dimension	Evaluation implication
Law No. 25/2009 on Public Services	General legal framework for public-service delivery	Standards, transparency, complaints, costs, performance	Service standards must protect users and be measurable.
Government Regulation No. 96/2012	Implementation framework for public services	Formulation and application of service standards	SPM requires operational procedures and organizational responsibility.
Minister of Transportation Regulation PM 19/2017	Guidance for service standards within the Ministry of Transportation	Service components and standard-setting process	Maritime units should maintain explicit standards for each service type.
Ministerial Decree KM 17/2010	Minimum service standards for BP2IP Surabaya	Graduate quality, timeliness, cost, satisfaction, training inputs and processes	Provides a multidimensional model for maritime training service evaluation.
Minister of Transportation Regulation PM 1/2018	Service standards for Politeknik Ilmu Pelayaran Makassar	Training, testing, health certification and support services	Shows institution-level translation of public-service standards.
STCW Convention and Code	International minimum standards for seafarer competence	Training quality, assessment, certification, quality standards	SPM effectiveness must be aligned with competency and safety outcomes.

3.2 Evaluation Across Six Service Dimensions

Accessibility and admission. The standards provide a clear administrative basis for announcing entry requirements, registration procedures, legal-document requirements, health requirements, and other prerequisites. This supports procedural transparency. However, an effective evaluation also requires evidence on whether information is easily accessible, whether application procedures are understandable, and whether applicants can complete registration without unnecessary administrative repetition.

Training-process reliability and timeliness. Timeliness is one of the most explicit SPM concerns in the maritime training documents. Course duration, training schedules, assessment stages, and certification

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processes can therefore be translated into measurable service-time indicators. The weakness is that regulatory documents typically define expected processes more clearly than they disclose actual achievement rates. Without routine reporting on delays, completion times, and schedule deviations, timeliness remains a formal commitment rather than a demonstrated performance result.

Instructor and personnel competence. The SPM framework includes qualifications for instructors and education personnel, while maritime professional standards require instructors and assessors to possess appropriate technical and instructional competence. This is a strong design feature because training quality depends heavily on the competence of those delivering and assessing instruction. The evaluative challenge is ensuring that qualification records are continuously updated and that instructor competence is assessed not only from certificates but also from teaching performance and relevance to current maritime technology.

Facilities and learning infrastructure. Maritime training is equipment-intensive. Laboratories, simulators, safety equipment, classrooms, libraries, and practical-training facilities are therefore essential service inputs. The documents recognize these requirements, but effective SPM evaluation should go beyond the existence of facilities. Availability, functionality, maintenance, learner-to-equipment ratios, and alignment with current industry technology are more meaningful indicators of service readiness.

Assessment and certification integrity. The SPM framework recognizes educational evaluation and competency assessment as core service components, while STCW makes competence assurance central to international seafarer certification. This area is especially important because weak assessment can create safety risks. Effective implementation therefore requires standardized assessment procedures, qualified assessors, reliable documentation, secure certification processes, and timely issuance of results and certificates.

Accountability, cost transparency, complaints, and satisfaction. Earlier maritime SPM instruments explicitly referred to affordable costs and customer satisfaction, while the public-service framework emphasizes complaint handling and accountability. This dimension is crucial for evaluating the user experience. Nevertheless, satisfaction should not be treated as a substitute for technical quality. A maritime training service may be convenient and well received while still failing to meet competency standards. The strongest evaluation model therefore combines user-oriented indicators with objective training-quality and competency indicators.

Table 2. Proposed evaluation matrix for SPM implementation

Dimension	Illustrative indicator	Evidence needed	Main risk if not monitored
Accessibility	Clarity of requirements; registration completion; information availability	Service announcements, SOPs, registration records	Administrative barriers and unequal access
Timeliness	Training starts as scheduled; assessment and certification completed within target time	Schedules, completion records, certificate processing logs	Delays and reduced service reliability
Instructor competence	Qualified instructors/assessors; current professional credentials	Personnel files, licenses, training records	Weak instructional quality and outdated competence
Facilities	Functional simulators, laboratories and safety equipment; adequate access ratios	Asset records, maintenance logs, utilization schedules	Training becomes formalistic or insufficiently practical
Assessment and certification	Standardized assessment; traceable results; secure and timely certificates	Assessment instruments, assessor records, certificate logs	Invalid competence decisions and safety risks
Accountability and satisfaction	Transparent fees; complaint resolution; user satisfaction; public reporting	Tariff information, complaint logs, surveys, annual reports	Low trust and weak corrective feedback

3.3 Main Strengths and Weaknesses of the SPM Framework

The principal strength of the existing framework is its multidimensional scope. The standards recognize that maritime training quality depends on more than classroom instruction. Admission, curriculum, instructors, facilities, assessment, financing, service time, and user satisfaction are all relevant. This gives managers a broad administrative basis for controlling service quality.

A second strength is the potential compatibility between Indonesian service standards and STCW requirements. Both frameworks emphasize quality assurance, structured training, competence assessment, and documented procedures. This compatibility allows maritime training units to integrate public-service management and professional quality systems rather than operating them as separate administrative obligations.

The main weakness is the limited visibility of outcome-based performance in the documentary framework. Many standards specify what must exist or what procedure must be followed, but they do not necessarily provide publicly visible evidence about whether targets are consistently achieved. For example, a standard may require adequate facilities, but an outcome-oriented evaluation asks whether participants actually obtain sufficient simulator time. Similarly, a standard may prescribe a certification process, but a service-performance evaluation asks what proportion of certificates are issued within the promised time.

A further weakness is the potential separation of customer satisfaction from competency assurance. User satisfaction is important for public-service accountability, but maritime training is a safety-critical service in which technical standards cannot be relaxed simply to maximize satisfaction. The appropriate model is therefore dual: service users should receive timely, transparent, accessible, and respectful services, while competency decisions remain rigorous and aligned with STCW.

4. Discussion

The results indicate that SPM in maritime education and training should be understood as a performance-governance instrument rather than merely an administrative checklist. This distinction is important in public administration. A checklist confirms whether procedures, facilities, or documents exist; a performance instrument asks whether those arrangements produce reliable and publicly defensible outcomes.

From a service-management perspective, the Indonesian framework already contains the essential building blocks of such an instrument. Law No. 25 of 2009 establishes the public-service accountability logic, PM 19 of 2017 provides a standard-setting framework within the Ministry of Transportation, and institution-specific regulations translate these obligations into maritime education and training services. The STCW framework adds the non-negotiable requirement that training and certification preserve professional competence and maritime safety.

However, the effectiveness of the framework depends on measurement. Terms such as quality, timeliness, affordability, and satisfaction become administratively useful only when they are translated into indicators, targets, data sources, reporting intervals, and corrective actions. For example, 'timely service' should be represented by a defined target for registration, course scheduling, examination processing, and certificate issuance. 'Adequate facilities' should be represented by functionality, utilization, maintenance, and participant-access indicators. 'User satisfaction' should include not only a score but also a mechanism linking complaints and feedback to service improvement.

This interpretation also has implications for institutional accountability. Maritime training units are public or public-regulated service providers whose outputs have consequences beyond the immediate participant. Employers, shipping companies, regulators, passengers, and the marine environment all depend on the competence of trained seafarers. Therefore, the stakeholder base for SPM evaluation is broader than enrolled trainees. Service evaluation should include evidence that graduates and certificate holders meet professional competency expectations and that assessment processes remain credible.

An important administrative implication is the need for an integrated dashboard or performance matrix that links each service standard with a measurable indicator. Such a system could combine service-volume indicators, service-time indicators, instructor and assessor qualification indicators, facility-readiness indicators, assessment outcomes, complaint-resolution indicators, and satisfaction measures. Periodic publication of these results would strengthen transparency and make SPM a genuine

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accountability tool rather than an internal regulatory document.

The study also suggests that continuous evaluation is particularly important because maritime technology and international competency requirements change over time. The STCW Convention has been repeatedly amended to respond to new technologies, operational risks, and training needs. Service standards that remain static risk becoming administratively compliant but professionally outdated. Therefore, SPM review should be linked to changes in national regulation, STCW requirements, instructional technology, simulator standards, and industry demand.

Finally, the evaluation highlights the difference between compliance effectiveness and substantive effectiveness. Compliance effectiveness refers to whether a unit follows the required procedures and maintains required resources. Substantive effectiveness concerns whether these arrangements actually result in competent graduates, reliable service times, transparent costs, credible assessment, and satisfactory user experiences. A mature SPM system should measure both.

5. Conclusion

This study evaluated the Minimum Service Standards framework for maritime education and training delivery units in Indonesia using secondary data and regulatory documents. The analysis shows that the framework is normatively comprehensive. It covers important dimensions of public-service delivery, including accessibility, instructional processes, educator competence, facilities, assessment, financing, timeliness, and user satisfaction, while also operating within the international competency framework established by STCW.

The central limitation of the current documentary architecture is not the absence of standards but the risk that standards remain input- and procedure-oriented. Effective SPM implementation requires measurable targets and routinely reported evidence showing whether services are delivered on time, facilities are operational and accessible, instructors and assessors remain competent, assessments are reliable, certification processes are timely, costs are transparent, and complaints are resolved.

Accordingly, maritime education and training units should develop an integrated SPM performance matrix that links each standard to indicators, targets, data sources, reporting responsibilities, and corrective actions. Public reporting and periodic review should be strengthened, and user-satisfaction measures should be combined with objective competency and service-quality indicators. Under this approach, SPM becomes more than a formal administrative requirement: it becomes a mechanism for ensuring accountable public service, credible seafarer competence, and ultimately safer maritime operations.

The study is limited by its reliance on secondary documentary evidence and does not measure the actual performance of a named maritime training unit. Future research should test the proposed evaluation matrix using institutional records, service-time data, complaint records, participant surveys, instructor data, facility audits, and competency outcomes across one or more maritime education and training institutions.

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