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Regulatory Compliance and Passenger Safety Management in Indonesian Sea Transportation of People: A Maritime Management Stakeholder Analysis of Implementation Gaps

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Abstract: Indonesian sea transportation of people constitutes a critical national infrastructure serving archipelagic connectivity across more than 17,000 islands, yet the maritime management capacity to implement, monitor, and enforce the passenger safety regulatory framework governing this infrastructure remains empirically underexamined from the perspective of the managerial actors responsible for its execution. This study investigates the Passenger Safety Management Congruence Gap between the formal regulatory mandate—constituted by UU No. 17/2008 on Shipping, PM No. 7/2019 on Passenger Ship Safety Management Systems, and SOLAS Chapter III—and the organizational management reality experienced by maritime management practitioners at KSOP Tanjung Priok, Port and Shipping Management lecturers at STIP Jakarta, and maritime management graduates serving in shore-based managerial roles. Employing a qualitative design grounded in implementation gap theory, responsive regulation, and maritime management competency theory, the study conducted focus group discussions and interviews with twenty-seven participants across three stakeholder groups. Thematic analysis, cross-group comparison, and narrative synthesis were applied. Findings reveal a layered Passenger Safety Management Congruence Gap across three dimensions: regulatory knowledge asymmetry between KSOP supervisory and frontline management, maritime management curriculum-practice misalignment at STIP Jakarta, and documentation-oriented compliance motivation as the dominant organizational pattern across the ecosystem. The study proposes a tri-level maritime management reform framework for passenger safety implementation capacity.

Keywords: Passenger Safety Management, Maritime Management, Regulatory Compliance, KSOP Tanjung Priok, Implementation Gap.

Indonesian Abstract: Transportasi laut Indonesia merupakan infrastruktur nasional yang sangat penting untuk menghubungkan lebih dari 17.000 pulau di kawasan kepulauan. Namun, kapasitas manajemen maritim untuk mengimplementasikan, memantau, dan menegakkan kerangka peraturan keselamatan penumpang yang mengatur infrastruktur ini masih kurang diteliti secara empiris dari perspektif para pelaku manajerial yang bertanggung jawab atas

pelaksanaannya. Studi ini meneliti Kesenjangan Kesesuaian Manajemen Keselamatan Penumpang antara mandat peraturan formal—yang diatur oleh UU No. 17/2008 tentang Pelayaran, PM No. 7/2019 tentang Sistem Manajemen Keselamatan Kapal Penumpang, dan SOLAS Bab III—dan realitas manajemen organisasi yang dialami oleh praktisi manajemen maritim di KSOP Tanjung Priok, dosen Manajemen Pelabuhan dan Pelayaran di STIP Jakarta, dan lulusan manajemen maritim yang bertugas di posisi manajerial berbasis darat. Dengan menggunakan desain kualitatif yang berlandaskan teori kesenjangan implementasi, regulasi responsif, dan teori kompetensi manajemen maritim, studi ini melakukan diskusi kelompok fokus dan wawancara dengan dua puluh tujuh partisipan dari tiga kelompok pemangku kepentingan. Analisis tematik, perbandingan antar kelompok, dan sintesis naratif diterapkan. Temuan menunjukkan adanya kesenjangan keselarasan manajemen keselamatan penumpang yang berlapis di tiga dimensi: asimetri pengetahuan regulasi antara pengawas KSOP dan manajemen lini depan, ketidaksesuaian kurikulum dan praktik manajemen maritim di STIP Jakarta, dan motivasi kepatuhan yang berorientasi pada dokumentasi sebagai pola organisasi dominan di seluruh ekosistem. Studi ini mengusulkan kerangka kerja reformasi manajemen maritim tiga tingkat untuk kapasitas implementasi keselamatan penumpang..

Kata Kunci: Manajemen Keselamatan Penumpang, Manajemen Maritim, Kepatuhan Regulasi, KSOP Tanjung Priok, Kesenjangan Implementasi.

INTRODUCTION

Indonesia's position as the world's largest archipelagic state, encompassing 17,508 islands connected by 99,093 kilometers of coastline across one of the globe's most geographically complex maritime domains, means that sea transportation of people is not merely a commercial service among alternatives but the primary, and in many cases the only, connective infrastructure binding the national territory together as a lived social, economic, and political reality (Kementerian Kelautan dan Perikanan, 2022). This infrastructural centrality makes the safety and regulatory management of passenger sea transportation a matter of national consequence whose failures produce not merely individual tragedies but sever the connective tissue of a society organized across water. The National Transportation Safety Committee's maritime accident investigation records across the period 2018–2023 document a pattern of passenger vessel casualties disproportionate to the sector's share of national maritime traffic volume, with overloading, inadequate life-saving equipment serviceability, and departure clearance procedure failures recurring as primary contributing factors across successive accident investigations. This pattern raises a question that aggregate statistics cannot themselves answer: whether the formal regulatory management architecture governing passenger sea transportation constituted by UU No. 17/2008 on Shipping, PM No. 7/2019 on Passenger Ship Safety Management Systems, and SOLAS Chapter III requirements is generating the maritime management outcomes it is designed to produce, or whether the gap between its formal specification and operational implementation is systematically larger than the existence of documented compliance records would suggest.

This question is fundamentally a maritime management question before it is a legal or technical one. The effective translation of international and national passenger safety regulatory requirements into the operational management decisions, organizational culture, and institutional capacity through which safety is actually achieved in practice depends not on the regulatory text alone but on the quality of the maritime management actors and institutions responsible for that translation. At the regulatory enforcement end of this management chain, the Kantor Syahbandar dan Otoritas Pelabuhan (KSOP) the Harbor Master and Port Authority offices whose officers conduct passenger vessel inspections, issue departure clearances, and enforce PM No. 7/2019 provisions at the world's third busiest port cluster through KSOP

Tanjung Priok constitutes the institutional fulcrum upon which the passenger safety regulatory mandate's operational effectiveness depends. At the managerial formation end of this chain, Sekolah Tinggi Ilmu Pelayaran (STIP) Jakarta, as Indonesia's premier state maritime academy, is responsible for producing the Port and Shipping Management graduates who constitute the country's maritime management professional pipeline, including the shore-based managers who occupy organizational roles most consequential for passenger safety management quality (Bernadtua Simanjuntak, 2023). The quality and relevance of STIP Jakarta's Port and Shipping Management curriculum to the practical maritime management demands of passenger safety regulatory compliance therefore determines the professional formation quality of the managers upon whom effective implementation depends, constituting an educational dimension of the implementation gap question that existing regulatory compliance literature has not examined.

The maritime management literature has developed substantially in its engagement with safety management systems, port governance, and regulatory compliance, but has not yet produced an integrated, empirically grounded account of how these dimensions intersect specifically in the management of passenger sea transportation safety within an Indonesian institutional context. The ISM Code literature has examined safety management system implementation effectiveness across cargo shipping contexts (Bhattacharya, 2012; Olstedal & Wadsworth, 2010), but cargo safety management is institutionally and operationally distinct from passenger safety management: passenger operations involve the management of large numbers of non-expert human beings who are direct safety outcome bearers rather than cargo that can be managed through purely technical procedures, creating a passenger safety management challenge requiring the integration of procedural compliance management with human-centered service quality management in ways that cargo ISM frameworks do not capture. The broader public administration and governance literature has produced well-developed theoretical frameworks for understanding regulatory implementation gaps (Pressman & Wildavsky, 1973; Hill & Hupe, 2014) and compliance motivation (May, 2005; Ayres & Braithwaite, 1992), but the application of these frameworks to maritime management contexts remains at an early development stage, with existing literature on Indonesian maritime law and policy (Arsyad & Amin, 2021; Kementerian Perhubungan, 2023) offering regulatory analysis that is predominantly doctrinal rather than empirically grounded in management practitioner experience.

This study addresses these interconnected gaps through a multi-stakeholder qualitative investigation placing maritime management practice, education, and regulation at the center of empirical inquiry. The specific context of KSOP Tanjung Priok is selected because it handles the highest volume of passenger vessel departure clearances of any Indonesian harbor master office, making it the institutional site where the national regulatory architecture for passenger safety management most consequentially interacts with operational maritime management reality. The specific inclusion of STIP Jakarta's Port and Shipping Management lecturers and maritime management graduates alongside KSOP practitioners distinguishes this study from existing regulatory implementation literature, which has typically examined either regulatory enforcement actors or regulated industry actors without integrating the maritime management educational formation perspective that Bernadtua Simanjuntak and Habiburrochman (2023) and Simanjuntak et al. (2024) establish as central to understanding how the knowledge-practice gap in maritime regulatory compliance is reproduced across generations of management professionals.

The study pursues three objectives aligned with this integrated maritime management perspective. First, it examines how KSOP Tanjung Priok maritime management officers characterize the institutional capacity, organizational culture, and procedural quality of passenger vessel safety management implementation under the PM No. 7/2019 framework. Second, it investigates how Port and Shipping Management lecturers at STIP Jakarta perceive the adequacy of current maritime management curriculum for developing the specific

regulatory compliance management competencies that KSOP implementation reality demands, and how maritime management graduates assess the practical adequacy of their institutional formation for passenger safety management roles they have subsequently occupied. Third, it examines the convergence and divergence among these three maritime management stakeholder perspectives on the Passenger Safety Management Congruence Gap this study's analytically central construct and its organizational, educational, and regulatory design determinants.

The significance of this study extends across three registers. Theoretically, it advances the application of regulatory implementation gap theory, responsive regulation, and compliance motivation theory to maritime passenger safety management contexts, extending a conversation developed primarily in environmental and financial regulatory contexts into the critical domain of archipelagic transportation safety governance. Empirically, it generates the first multi-stakeholder, maritime-management-grounded account of KSOP Tanjung Priok passenger safety implementation reality and its connection to maritime management educational formation at STIP Jakarta. Practically, the study generates directly actionable reform evidence for KSOP Tanjung Priok's management development agenda, STIP Jakarta's Port and Shipping Management curriculum development, and Ministry of Transportation passenger safety regulatory policy fulfilling the research program commitment articulated in the parent proposal (Bernadtua Simanjuntak & Habiburrochman, 2023) to produce findings serviceable across academic, institutional, and policy reform purposes.

METHODS

This study employed a qualitative research design grounded in interpretive inquiry, selected because the study's objectives require rich, contextually grounded understanding of maritime management practice, institutional capacity, and educational formation adequacy that quantitative regulatory compliance metrics or documentary audit cannot adequately capture, particularly regarding the organizational culture, professional judgment, and management competency dimensions constituting the substantive quality of passenger safety management implementation (Creswell & Poth, 2018). The design combined semi-structured focus group discussions with individual semi-structured interviews, with individual interview format prioritized for KSOP management officer participants given the institutionally sensitive character of candid disclosure regarding organizational capacity constraints, and focus group format prioritized for STIP Jakarta lecturer and graduate groups to enable the comparative, collectively validated professional experience accounts that group discussion generates (Krueger & Casey, 2015).

The study population comprised twenty-seven participants drawn from three purposively selected stakeholder groups, each representing a distinct positional vantage point on the Passenger Safety Management Congruence Gap from within the maritime management ecosystem. The first group comprised nine KSOP Tanjung Priok maritime management officers, including harbor master office inspectors and administrative section heads with direct responsibility for passenger vessel departure clearance and safety inspection management, selected because their frontline institutional management experience positions them as the population whose organizational capacity perception is most central to this study's first research objective. The second group comprised nine Port and Shipping Management lecturers at STIP Jakarta responsible for maritime law, port management, safety management systems, and maritime regulation courses, selected for their educational formation vantage point on curriculum-practice alignment. The third group comprised nine maritime management graduates from STIP Jakarta's Port and Shipping Management program currently serving in shore-based management roles—including shipping company safety managers, port operations managers, and KSOP junior administrative officers—selected for their unique dual vantage

point as both products of STIP Jakarta's educational formation and current participants in the maritime management practice context this study examines.

Data were collected between April 2025 and April 2026 through semi-structured interview and focus group discussion protocols addressing three thematic areas: perceived institutional management capacity for passenger safety regulatory compliance, perceived curriculum-practice alignment in maritime management education, and compliance motivation and organizational safety culture dimensions of passenger safety management. Document analysis was conducted on PM No. 7/2019 implementation guidelines, KSOP Tanjung Priok departure clearance procedure documentation, and STIP Jakarta Port and Shipping Management curriculum and course syllabi to provide documentary triangulation for participant perception accounts. Sessions were conducted in Bahasa Indonesia and English, audio-recorded with consent, and transcribed for analysis.

Thematic Analysis following Braun and Clarke's (2006) six-phase procedure was applied to the full transcript corpus, generating thematic categories organized around the regulatory implementation gap, compliance motivation, and maritime management competency dimensions specified by this study's theoretical framework. Cross-group Comparison was systematically applied to identify convergence and divergence in maritime management assessment across the KSOP officer, STIP lecturer, and management graduate groups. Narrative Synthesis integrated these findings with documentary evidence into the coherent interpretive account presented in the Results and Analysis section, with credibility strengthened through member checking with four participants and reflexive analytical journaling throughout the research process (Lincoln & Guba, 1985).

RESULTS AND DISCUSSION

1. The Passenger Safety Management Congruence Gap: Three Dimensions

Thematic analysis of the full participant transcript corpus generated a structured account of the Passenger Safety Management Congruence Gap across three analytically distinct but organizationally interconnected dimensions: regulatory knowledge asymmetry within KSOP management, maritime management curriculum-practice misalignment at STIP Jakarta, and documentation-oriented compliance motivation as the dominant organizational orientation across the maritime management ecosystem. These three dimensions emerged inductively through thematic analysis and are subsequently interpreted through this study's theoretical framework.

Table 1 presents the cross-stakeholder group endorsement of principal thematic dimensions.

Table 1. Passenger Safety Management Congruence Gap Thematic Endorsement by Stakeholder Group (N = 27)

Theme	KSOP Officers (n = 9)	STIP Lecturers (n = 9)	Mgmt Graduates (n = 9)	Total
Regulatory knowledge asymmetry within KSOP management	8/9	6/9	7/9	21/27
Curriculum-practice misalignment in maritime management education	5/9	9/9	8/9	22/27
Documentation-oriented compliance motivation dominant	7/9	7/9	9/9	23/27
Institutional resource constraint as primary implementation barrier	9/9	5/9	6/9	20/27
Safety culture deficit below documentation compliance surface	4/9	6/9	8/9	18/27

The near-universal endorsement of documentation-oriented compliance motivation (23/27) constitutes the study's most broadly convergent empirical finding and provides the analytical anchor for the interpretive account that follows.

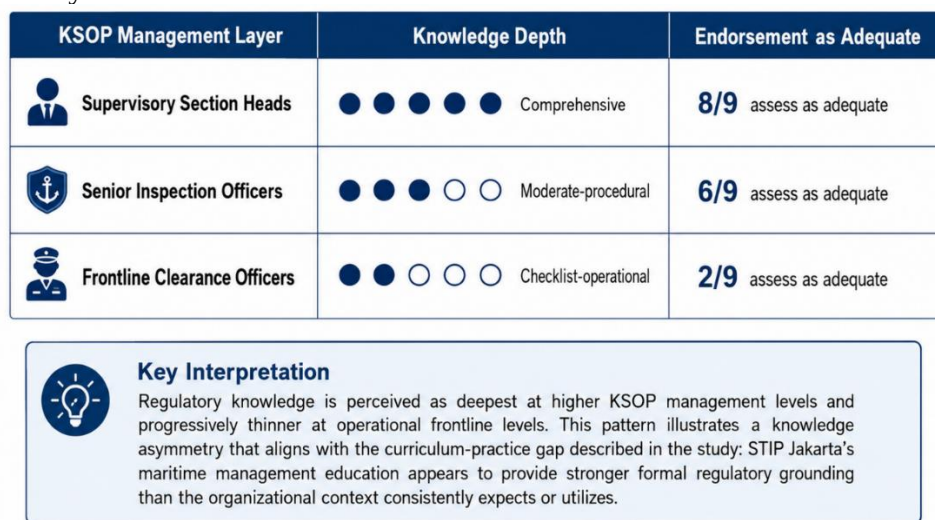
2. Regulatory Knowledge Asymmetry Within KSOP Maritime Management

The regulatory knowledge asymmetry theme, endorsed by twenty-one of twenty-seven participants, reveals a systematic difference in PM No. 7/2019 substantive regulatory knowledge between KSOP Tanjung Priok's supervisory management layer and its frontline inspection officer layer—a finding with direct implications for the quality of the inspection management oversight through which the passenger safety regulatory framework is operationally delivered.

Eight of nine KSOP officer participants described a knowledge distribution pattern in which supervisory section heads possessed detailed conceptual understanding of the PM No. 7/2019 regulatory architecture and the passenger safety management system requirements it specifies, while frontline departure clearance officers operated with more truncated regulatory knowledge focused on the checklist items and documentation requirements most immediately relevant to their daily clearance processing tasks. This truncation was characterized not as individual officer inadequacy but as a structural consequence of procedural specialization demanded by high-volume departure clearance processing: when an inspection officer is responsible for processing multiple departure clearances per working day, the temporal and cognitive demands concentrate professional attention on procedural checklist execution rather than the broader regulatory management framework whose purposes those checklists are designed to serve.

The management graduate group's endorsement of this theme (7/9) provides triangulating evidence from a distinctive vantage point: management graduates who had transitioned from STIP Jakarta formation into KSOP junior administrative roles described experiencing this knowledge asymmetry as the primary professional adjustment challenge—finding that their maritime management regulatory education had developed a more comprehensive conceptual framework for passenger safety regulatory management than the institutional culture of their KSOP deployment context expected or utilized. This educational-institutional knowledge mismatch constitutes a specific and theoretically important form of the curriculum-practice gap that Bernadtua Simanjuntak and Habiburrochman (2023) identify as central to the maritime education field, manifesting here not as a deficit of academic knowledge but as a surfeit whose deployment the institutional context does not support.

Figure 1 presents the knowledge asymmetry pattern as perceived across KSOP management layers.



 **Context:** Curriculum-practice misalignment was the study's most education-relevant finding, endorsed by 22 of 27 participants and unanimously by STIP lecturers.

Figure 1. Perceived PM No. 7/2019 Regulatory Knowledge Distribution Across KSOP Management Layers (KSOP Officer Perception, n = 9)

3. Maritime Management Curriculum-Practice Misalignment at STIP Jakarta

The curriculum-practice misalignment theme, endorsed by twenty-two of twenty-seven participants and achieving unanimous endorsement among STIP lecturers, constitutes the study's most directly education-relevant empirical finding. All nine STIP lecturer participants endorsed this theme, describing the Port and Shipping Management curriculum as providing strong coverage of the formal regulatory framework the structure of UU No. 17/2008, the requirements of PM No. 7/2019, the IMO's SMS Code provisions alongside comparatively weaker coverage of the organizational management dimensions of safety regulatory compliance: how to build and maintain safety reporting cultures within maritime organizations, how to design compliance management systems sustaining safety performance rather than merely generating compliance documentation, and how to exercise the regulatory management judgment that effective KSOP inspection and shipping company safety management requires.

Management graduate participants' near-unanimous endorsement (8/9) provides experiential validation from the demand side: graduates consistently described finding, upon entering maritime management roles involving passenger safety compliance responsibility, that they possessed more regulatory knowledge than the role required for documentation compliance functions, and less organizational management judgment than the role required for genuine safety management oversight. This convergent curriculum-practice gap diagnosis from both supply side (lecturers assessing curriculum) and demand side (graduates assessing formation adequacy) provides strong triangulated evidence for curriculum reform.

Table 2 presents curriculum adequacy assessment across maritime management competency domains.

Table 2. STIP Jakarta Port and Shipping Management Curriculum Adequacy Assessment by Competency Domain (N = 18 Lecturers + Graduates)

Maritime Management Competency Domain	Lecturers (n=9) Adequate	Graduates (n=9) Adequate	Convergent Assessment
Formal regulatory framework knowledge (PM 7/2019, UU 17/2008, SOLAS)	8/9	7/9	Strong
Passenger safety management system design and audit	4/9	3/9	Weak
Safety compliance culture building and management	2/9	1/9	Very Weak
Compliance motivation assessment and responsive enforcement	3/9	2/9	Weak
Organizational maritime management judgment and decision-making	3/9	2/9	Weak

The pattern in Table 2 is unambiguous: formal regulatory knowledge is the curriculum's acknowledged strength, while organizational management competency dimensions most consequential for genuine safety management effectiveness are systematically underdeveloped

4. Documentation-Oriented Compliance Motivation as Dominant Organizational Pattern

The documentation-oriented compliance motivation theme, with its near-universal endorsement (23/27) across all three stakeholder groups, is the study's most broadly convergent and practically significant finding. Management graduate participants, unanimously endorsing this theme, provided the most specific experience-grounded account: nine of nine graduates described observing or participating in maritime management processes in which the preparation of passenger safety documentation ISM compliance records, safety drill logs, departure clearance checklists was treated as an organizational objective in itself rather than as an evidence record of substantive safety management activity. Several participants described documentation being completed after rather than as a record of the activity it purported to

document a practice none characterized as deliberate falsification but rather as a collectively normalized management accommodation to the administrative demands of high volume compliance documentation under resource-constrained organizational conditions.

Figure 2 presents compliance motivation orientation distribution across stakeholder groups.

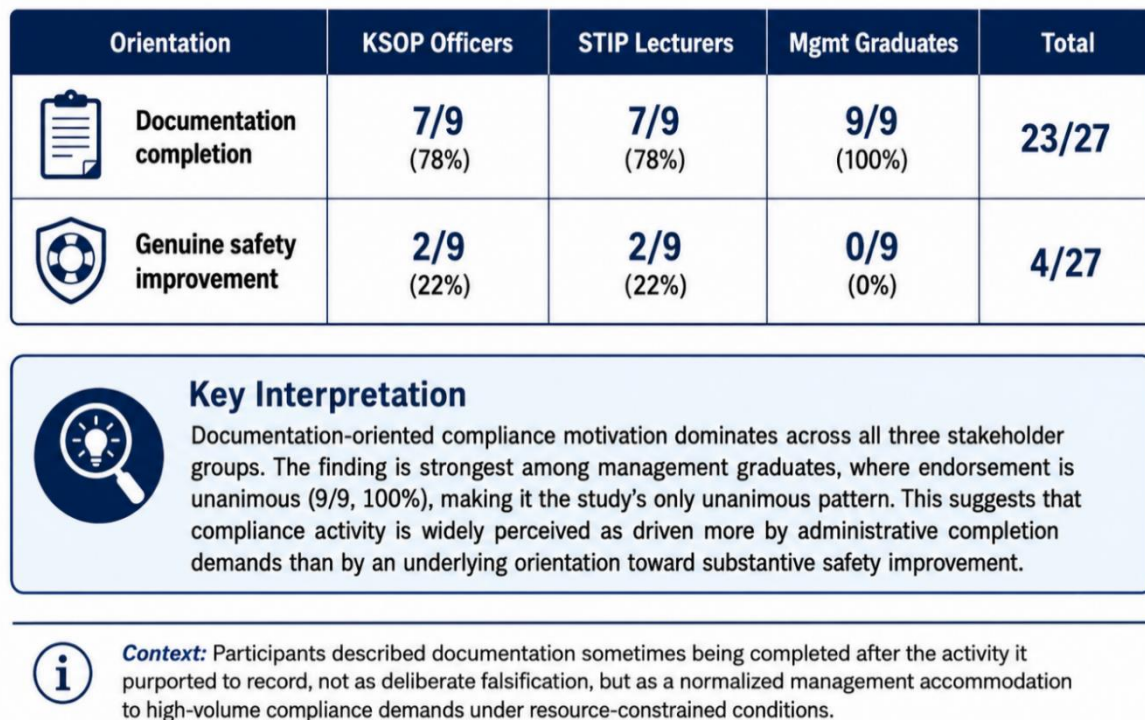


Figure 2. Compliance Motivation Orientation Distribution by Stakeholder Group (N = 27)

The 100% management graduate endorsement of documentation-oriented compliance motivation—the study's only unanimous finding—is analytically significant because it comes from the participant group with most direct and proximate organizational experience of actual maritime management compliance behavior.

5. Institutional Resource Constraint and Safety Culture Deficit

The institutional resource constraint theme, endorsed by all nine KSOP officer participants, provides the organizational mechanism explanation for the documentation orientation pattern. All KSOP officer participants described current inspection staffing as insufficient relative to departure clearance volume, with several characterizing the practical consequence as a compression of inspection depth: "we check what can be checked in the time available, which means we check what can be seen and documented." The safety culture deficit theme, endorsed by eighteen of twenty-seven participants with highest endorsement among management graduates (8/9), identifies the organizational consequence of documentation orientation: a systematic gap between the safety documentation record presented to KSOP inspection and the underlying organizational safety practice reality it purports to represent.

Figure 3 presents the integrated Passenger Safety Management Congruence Gap model, synthesizing the four thematic dimensions into a conceptual representation of the implementation gap structure this study has documented.

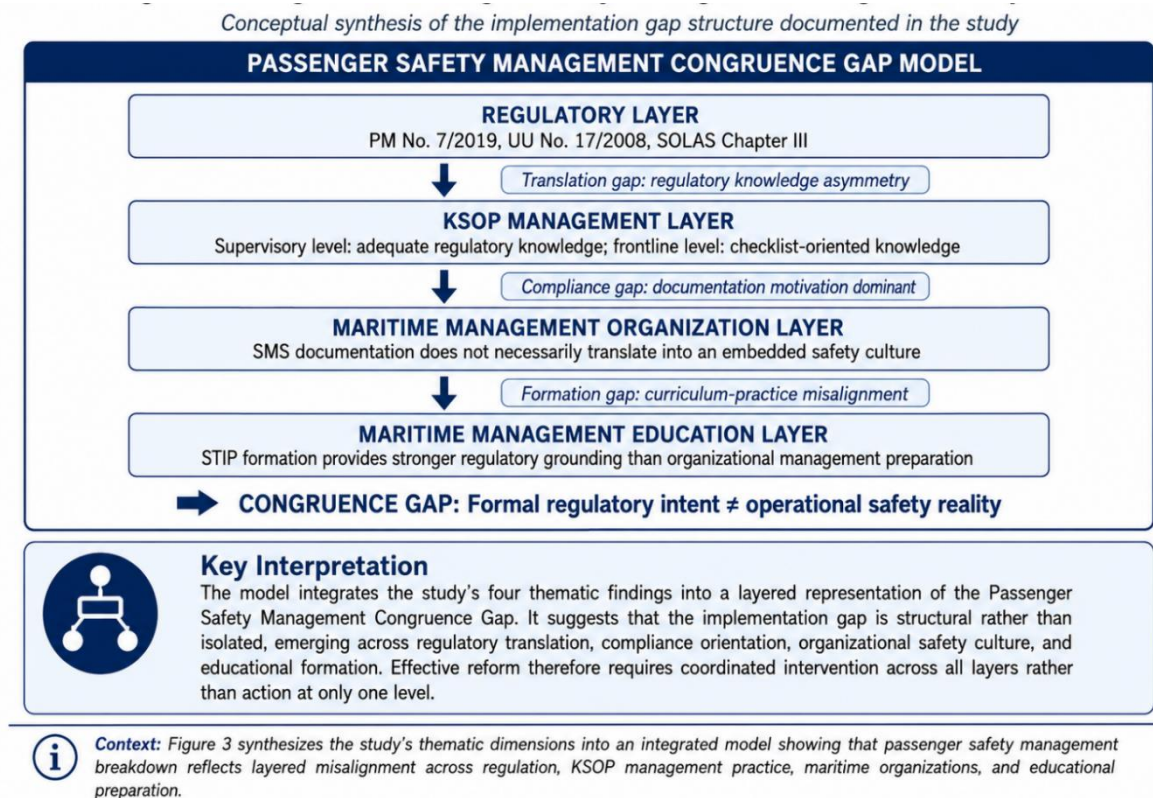


Figure 3. Integrated Passenger Safety Management Congruence Gap Model

Figure 3 synthesizes the study's four thematic findings into an integrated implementation gap model making visible the structural layering of the Passenger Safety Management Congruence Gap. The model indicates that the congruence gap cannot be addressed through intervention at any single layer but requires simultaneous, coordinated maritime management reform across all three management and educational formation levels.

Discussion

The findings of this study provide empirically grounded, multi-stakeholder evidence of a Passenger Safety Management Congruence Gap within Indonesian sea transportation of people that operates simultaneously at three analytically distinct but organizationally interconnected maritime management levels: the regulatory management knowledge distribution within KSOP, the organizational compliance motivation orientation across the maritime management ecosystem, and the maritime management educational formation quality at STIP Jakarta. These three levels are not independent management failures but interdependent structural conditions reinforcing each other in a manner that institutional reform targeting any single level cannot adequately resolve a structural integration finding with direct implications for how the policy reform agenda for Indonesian passenger sea transportation safety management must be designed.

The regulatory knowledge asymmetry finding at the KSOP management level directly confirms and contextually extends Pressman and Wildavsky's (1973) foundational implementation gap theory. This study's finding provides a specific, institutionally grounded specification of where within the KSOP's internal management hierarchy the most consequential gap occurs: at the transition from supervisory-level comprehensive regulatory knowledge to frontline-level checklist-operational regulatory knowledge. This is not merely a training gap, though training investment would address one dimension; it is a management architecture gap, in which the organizational design of the departure clearance function concentrated inspection workload, limited time per vessel, no formal mechanism for frontline officers to escalate regulatory interpretation questions to supervisory expertise in real time structurally prevents comprehensive regulatory knowledge from being operationalized at the

management level where passenger safety inspection decisions are made. Hill and Hupe's (2014) distinction between first order and second order implementation is precisely applicable: KSOP achieves first order implementation of PM No. 7/2019 through formally documented departure clearance procedures, while the regulatory knowledge asymmetry documented in this study suggests that second order implementation is substantially compromised by the frontline knowledge limitation the management hierarchy produces.

The documentation oriented compliance motivation finding, the study's most broadly convergent empirical result, extends May's (2005) compliance motivation typology into the Indonesian maritime passenger safety management context with a nuance that theoretical prediction alone does not anticipate: the documentation orientation is not the product of cynical rational calculation by compliance aware actors deliberately exploiting the gap between what inspection can verify and what safety requires, but rather as management graduate accounts most clearly reveal a collectively normalized organizational accommodation to resource constraint conditions. This distinction between deliberate gaming and normalized accommodation is theoretically important because it demands a qualitatively different regulatory management response: where deliberate gaming requires strengthened detection and sanction, normalized accommodation requires organizational culture change reorienting management system attention from compliance documentation completion to safety performance outcome, a change that Reason's (1997) safety culture literature establishes requires sustained organizational leadership investment. Morrison and Milliken's (2000) organizational silence framework provides the complementary mechanism: when documentation completion becomes collectively normalized as the compliance standard, the organizational silence that suppresses discussion of the gap between documentation and safety reality is not individual dishonesty but institutionally reinforced acceptance of a collectively maintained fiction that no individual organizational actor is positioned to challenge alone.

The curriculum-practice misalignment finding, achieving unanimous lecturer endorsement and near unanimous graduate endorsement, provides this study's most direct contribution to the STIP Jakarta maritime management reform agenda and directly engages the uploaded proposal's (Bernadtua Simanjuntak & Habiburrochman, 2023) central concern. The finding is not that the Port and Shipping Management curriculum fails to develop regulatory knowledge by all accounts, regulatory coverage is the curriculum's acknowledged strength but that the organizational management competency through which regulatory knowledge is translated into safety management decisions, culture-building investments, and compliance oversight judgments is systematically underdeveloped. Boyatzis's (1982) distinction between underlying competency and surface performance is directly applicable: the curriculum successfully develops the surface performance of regulatory knowledge recitation and examination success while failing to develop the underlying competency structure organizational judgment, safety culture assessment capacity, compliance motivation analysis that distinguishes a genuinely competent maritime safety management professional from a regulatory knowledge holder who cannot manage an organization toward genuine safety performance improvement. Simanjuntak et al.'s (2024) finding that maritime education reform requires systematic engagement with both educational and industrial stakeholders directly informs this study's reform agenda.

The layered Congruence Gap structure documented in Figure 3 makes a theoretical contribution that extends beyond any single theoretical tradition this study draws upon: it demonstrates that regulatory implementation gaps in complex sociotechnical safety management systems are not reducible to any single causal mechanism regulatory clarity, enforcement resource, management knowledge, or educational formation but are generated by the interaction of deficits across multiple simultaneously operating organizational levels. This multi-level, interactively generated gap structure is consistent with Sabatier's (2007) policy implementation framework's emphasis on the joint determination of implementation quality by

mandate clarity, agency capacity, and actor commitment, while extending it by adding the educational formation level whose role in reproducing or disrupting implementation gaps across successive management professional generations the existing implementation literature has not examined.

This study's principal strengths include its multi-stakeholder design generating triangulated institutional evidence from regulatory, educational, and management practice vantage points simultaneously, and its explicit integration of the maritime management educational formation dimension that is essential for understanding how the compliance capacity constraints documented at the KSOP management level are reproduced. Principal limitations include the qualitative, single-port design limiting generalizability beyond Tanjung Priok, and the sample's concentration within a single institutional educational context. Future research should pursue quantitative validation across multiple KSOP offices nationally; longitudinal investigation of whether STIP Jakarta curriculum reform produces measurable improvement in graduates' organizational safety management competency; and comparative analysis examining whether the documentation-oriented compliance motivation pattern generalizes across ASEAN passenger sea transportation maritime management contexts.

CONCLUSIONS AND RECOMMENDATIONS

Conclusion

This study has demonstrated that the Passenger Safety Management Congruence Gap in Indonesian sea transportation of people operates as a structurally layered maritime management phenomenon across three interconnected institutional levels: regulatory knowledge asymmetry between KSOP supervisory and frontline management that prevents comprehensive regulatory understanding from reaching the inspection decision point; documentation-oriented compliance motivation dominant across the maritime management ecosystem, producing compliance record adequacy without corresponding safety culture quality; and maritime management curriculum-practice misalignment at STIP Jakarta, where regulatory knowledge development substantially exceeds organizational management competency development in a manner reproducing the implementation gap at each successive generation of maritime management professionals. These findings extend regulatory implementation gap theory, responsive regulation, and maritime management competency scholarship into the Indonesian maritime passenger safety management institutional context, generating an empirically grounded, multi-stakeholder diagnostic providing the evidence foundation for coordinated institutional reform across KSOP management development, STIP Jakarta curriculum enhancement, and Ministry of Transportation maritime safety governance policy.

Recommendations

This study's findings carry direct and actionable implications for three institutional audiences. For KSOP Tanjung Priok's management development agenda, the regulatory knowledge asymmetry finding suggests that the most consequential capacity investment is not additional regulatory training for frontline inspection officers alone but the development of real-time supervisory consultation mechanisms enabling frontline officers to access supervisory regulatory expertise during inspection encounters rather than only in pre-inspection briefing contexts. This structural management redesign addresses the specific organizational architecture gap this study identifies as the mechanism through which supervisory knowledge fails to reach the management level where inspection decisions are made. Additionally, the documentation-oriented compliance motivation finding suggests KSOP should develop differentiated regulatory engagement strategies aligned with responsive regulation principles, distinguishing operators whose compliance history evidences normative safety orientation from those whose pattern suggests calculation-based documentation

management, and calibrating inspection depth and frequency accordingly to concentrate compliance management resource where genuine safety improvement potential is greatest.

For STIP Jakarta's Port and Shipping Management curriculum development, the unanimous lecturer and near-unanimous graduate endorsement of curriculum-practice misalignment in organizational management competency dimensions demands a specific and measurable curriculum reform response: the development of maritime safety management organizational case study units, simulation-based compliance culture assessment exercises, structured KSOP practitioner engagement modules, and Kolbian experiential learning placements specifically designed around passenger safety management organizational judgment development. The maritime management graduates who constitute STIP Jakarta's most informative curriculum feedback channel are unequivocal: regulatory knowledge is adequate; organizational management judgment is not. For Ministry of Transportation maritime safety regulatory policy, the layered Congruence Gap structure documented in this study indicates that regulatory mandate revision alone will not resolve an implementation gap whose primary drivers are management knowledge distribution, organizational compliance culture, and maritime management formation quality rather than regulatory design inadequacy. The policy reform priority is institutional capacity investment across all three levels simultaneously: KSOP management development, STIP Jakarta maritime management curriculum reform, and structured maritime safety management mentorship pathways connecting STIP Port and Shipping Management graduates to KSOP practitioner supervision as a formalized component of both educational formation and KSOP human resource development.

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