


Comparative Legal Study on Gender Equality and Female Leadership in Indonesian and Dutch Higher Education

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Abstract

Introduction: This article explores the ongoing global issue of gender equality and female leadership in higher education. While many countries have adopted gender-inclusive policies, practical implementation remains inconsistent. Western countries such as the Netherlands demonstrate measurable progress, whereas Southeast Asian nations like Indonesia face persistent cultural and structural barriers. Prior studies tend to focus on sociological or institutional aspects, with limited comparative legal analysis.

Purposes of the Research: The aim of this study is to explore and compare legal guarantees, national policies, and institutional practices that affect women's access to leadership positions in universities in Indonesia and the Netherlands, to identify legal barriers and propose normative strategies in support of more inclusive academic leadership.

Methods of the Research: This research employs normative legal methods with a comparative law approach. It analyzes constitutional provisions, gender equality statutes, higher education regulations, and leadership policies from both countries, supported by literature review and document study.

Results of the Research: The findings show that the Netherlands has established stronger legal enforcement for gender equality in academic leadership through comprehensive legal instruments and monitoring mechanisms. In contrast, Indonesia, despite recognizing gender equality in its legal framework, lacks effective implementation mechanisms. The novelty of this research lies in its comparative legal perspective and its recommendation to integrate normative legal approaches with contextual cultural values to promote inclusive governance in higher education.

Keywords: Gender Equality; Legal Framework; Higher Education; Female Leadership; Comparative Law.

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INTRODUCTION

The issue of gender equality and women's leadership in higher education has increasingly attracted global attention, in line with the growing demands for more inclusive and representative governance of educational institutions.¹ Many countries, including Indonesia and the Netherlands, have adopted various policies supporting gender equality. However, the practical implementation of these policies still faces significant challenges, particularly in ensuring equal access for women to leadership positions in academia.² In the Netherlands, gender equality in higher education leadership has shown significant

¹ D. G. Smith, *Diversity's Promise for Higher Education: Making It Work* (Baltimore: Johns Hopkins University Press, 2024).

² Susan J. Bracken, Joann K. Allen, and Diane R. Dean, eds., *Women in Academic Leadership: Professional Strategies, Personal Choices* (New York: Taylor & Francis, 2023).

progress. According to the Women Professors Monitor 2024, the percentage of female professors at Dutch universities has reached 28.7%, an increase from 27.6% the previous year.³ However, the growth rate remains slow, and gender equality at the professor level is expected to be achieved by 2044 if this growth rate continues.⁴ Percentage of Female Rectors in Public Universities (PTN): Approximately 10% of the 183 public universities in Indonesia have female rectors. The number is higher in private universities (PTS), with around 500 female rectors out of a total of 3,975 private universities.⁵

In Western countries such as the Netherlands, gender equality in higher education leadership has shown more measurable progress, supported by comprehensive legal instruments and effective monitoring mechanisms.⁶ Meanwhile, in Southeast Asian countries like Indonesia, cultural and structural barriers, along with weak law enforcement, continue to hinder the advancement of women into leadership roles in higher education institutions.⁷ 1) *"Gender, Education, and Attitudes toward Women's Leadership in Three East Asian Countries: An Intersectional and Multilevel Approach"*. This study focuses on gender attitudes toward women's leadership in East Asia, revealing that education influences these attitudes differently for men and women, particularly in Japan. However, it does not specifically address legal studies on gender equality in higher education;⁸ 2) *"Multi-Level state interventions and gender equality in higher education institutions: The Irish case."* This study focuses on state interventions in Ireland to promote gender equality in higher education, highlighting initiatives such as Athena SWAN and the Gender Equality Taskforce. However, it does not conduct a comparative legal study on women's leadership across different contexts;⁹ 3) *"Women and Leadership in Higher Education: A Systematic Review,"* This study does not conduct a comparative legal analysis of gender equality and women's leadership in higher education. Instead, it focuses on the sociocultural construction of gender inequality and patterns of women's leadership roles in academia.¹⁰

Previous studies have generally focused on sociological or institutional aspects, with limited attention to a comparative legal analysis across countries.¹¹ There remains a significant gap in academic research in understanding how national legal frameworks, higher education regulations, and leadership policies influence women's access to strategic positions in universities.¹² In this context, this study is crucial to address the need for a comparative legal analysis that not only explores the similarities and differences between the legal systems of Indonesia and the Netherlands but also offers normative approaches to strengthen more equitable and inclusive higher education governance.

³ Number of women professors slightly increases once again | Radboud University

⁴ Invh-presents-the-2024-women-professors-monitor - LNVH

⁵ Ahmad Effendi, Rektor Perempuan Mulai Banyak Bermunculan, Pertanda Apa Ini?

⁶ José A. Moreira and Cláudia Sales Oliveira, "Quantifying for Qualifying: A Framework for Assessing Gender Equality in Higher Education Institutions," *Social Sciences* 11, no. 10 (2022): 478.

⁷ Khin Sandar Maw, *Factors Influencing the Career Success of Women Lecturers in Private Sector Higher Educational Institutions in Myanmar* (2024).

⁸ W. Liao and L. Luo, "Gender, Education, and Attitudes toward Women's Leadership in Three East Asian Countries: An Intersectional and Multilevel Approach," *Social Sciences* 11, no. 3 (2021): 103, <https://doi.org/10.3390/soc11030103>.

⁹ Pat O'Connor and Kate White, *Gender Equality in Higher Education: The Slow Pace of Change* (Cham: Palgrave Macmillan, 2021), 1-23, https://doi.org/10.1007/978-3-030-69687-0_1.

¹⁰ María del Carmen Meza-Mejía, María A. Villarreal-García, dan Claudia Ortega-Barba, "Women and Leadership in Higher Education: A Systematic Review," *The Social Science* (2023), <https://doi.org/10.3390/socsci12100555>.

¹¹ M. Siems, *Comparative Law* (Cambridge: Cambridge University Press, 2022).

¹² G. Maheshwari and R. Nayak, "Women Leadership in Vietnamese Higher Education Institutions: An Exploratory Study on Barriers and Enablers for Career Enhancement," *Educational Management Administration & Leadership* 50, no. 5 (2022): 758-75.

LITERATURE REVIEW

A. Gender Equality in Legal Perspective

Gender equality is a fundamental principle in both international and national law that guarantees equal rights for men and women in all aspects of life, including education and leadership.¹³ The Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), ratified by Indonesia and supported by the European Union, including the Netherlands, serves as a crucial foundation in promoting gender-based policies.¹⁴ In the Indonesian context, Law No. 7 of 1984 and its derivative regulations, such as Presidential Regulation Number 59 of 2017, affirm the state's commitment to achieving the Sustainable Development Goals (SDGs), including gender equality.¹⁵

B. Women's Leadership in Higher Education

Women's leadership in higher education remains a challenge across many countries. In Indonesia, patriarchal culture and limited access to strategic positions have resulted in low female representation in structural academic roles.¹⁶ Research by Thelma indicates that structural barriers, gender stereotypes, and the burden of dual roles are major hindrances.¹⁷ Meanwhile, in the Netherlands despite its progressive reputation the European Institute for Gender Equality (EIGE) still reports disparities in female representation in university leadership positions.¹⁸

C. Comparative Legal Study

The comparative legal study method is a relevant approach to examine legal practices and policies in two countries with different social, cultural, and legal backgrounds.¹⁹ This approach allows for the identification of differences and similarities in policies, as well as the effectiveness of gender equality and women's empowerment implementations in the higher education sector. According to Zweigert and Kötz, comparative legal studies not only compare written legal norms but also consider the social and institutional practices that influence their application.²⁰

D. Legal and Policy Frameworks in Indonesia and the Netherlands

Indonesia and the Netherlands adopt different legal approaches in addressing gender issues. Indonesia and the Netherlands have distinct legal approaches to gender equality. As of 2023, Indonesia's Gender Inequality Index (GII) stands at 0.447, indicating a significant gender gap, with 54.5% of women aged 15 and above participating in the labor force.²¹ In

¹³ N. L. Chance, "A Phenomenological Inquiry into the Influence of Crucible Experiences on the Leadership Development of Black Women in Higher Education Senior Leadership," *Educational Management Administration & Leadership* 49, no. 4 (2021): 601-23.

¹⁴ N. Ahmad, Z. H. Zamri, and N. S. Omarali, "Islamic Nations' Approaches to Combating Gender Discrimination Against Women: An Examination of the Southeast Asia Region," *De Jure: Jurnal Hukum dan Syaria'iah* 16, no. 2 (2024): 501-30.

¹⁵ R. Subekti, T. A. Husna, and P. B. Salsabila, "Questioning Food Security in Green Constitution Conception: Realizing Sustainable Development Goals (SDGs) in Indonesia," *Padjadjaran Jurnal Ilmu Hukum (Journal of Law)* 11, no. 2 (2024): 254-73.

¹⁶ M. J. Arquisola, "'The Ties That Bind': Indonesian Female Academic Leaders' Agency and Constraints in Higher Education," *European Journal of Educational Management* 3, no. 2 (2020): 37-50.

¹⁷ C. C. Thelma and L. Ngulube, "Women in Leadership: Examining Barriers to Women's Advancement in Leadership Positions," *Asian Journal of Advanced Research and Reports* 18, no. 6 (2024): 273-90.

¹⁸ S. Sant-Geronikolou, "Investigating The Greek Higher Education Gender Equality Policy Landscape Under an Enhanced Critical Frame Analysis Lens" (2023).

¹⁹ Y. K. Dwivedi et al., "Metaverse Beyond the Hype: Multidisciplinary Perspectives on Emerging Challenges, Opportunities, and Agenda for Research, Practice and Policy," *International Journal of Information Management* 66 (2022): 102542.

²⁰ J. Husa, "The Traditional Methods of Comparative Law," in *The Cambridge Handbook of Comparative Law*, eds. M. Siems and F. Jen Yap (forthcoming, 2023).

²¹ United Nations Development Programme (UNDP) Indonesia, "Kesetaraan Gender dan Inklusi Sosial," diakses 30 April 2025, https://www.undp.org/indonesia/gender?utm_source

contrast, the Netherlands has a much lower GII of 0.059, reflecting a gender gap of only 5.9%, and 68.9% of Dutch women are economically active. Furthermore, women in the Netherlands hold 29.2% of management positions and 40.7% of seats in parliament, demonstrating more advanced gender representation in leadership compared to Indonesia.²²

Indonesia applies a mixed legal system (customary law, Islamic law, and Western law),²³ while the Netherlands follows a civil law system based on Continental European tradition.²⁴ These differences influence the formulation and implementation of gender equality policies in each country. The Netherlands has a mandatory Gender Equality Plan (GEP) for higher education institutions receiving EU research funding,²⁵ while Indonesia relies more on affirmative action programs and gender mainstreaming strategies in national policies.²⁶

E. Theoretical Framework: Legal Feminism and Representation Theory

This research also adopts the legal feminism approach, which highlights how legal systems can reproduce gender injustice. Additionally, representation theory Pitkin, is relevant to analyze the importance of women's presence in leadership positions, both symbolically and substantively.²⁷ Substantive representation emphasizes that female leaders should not only be present in number but also bring women's interests and perspectives into decision-making processes.²⁸

METHODS OF THE RESEARCH

This study employs a normative legal research method, as the focus of the analysis stems from the issue of blurred legal norms in the implementation of gender equality and women's leadership in higher education.²⁹ The research aims to examine how written legal norms are applied within the context of institutional practices in Indonesia and the Netherlands. The approaches used in this research include: 1) Statute approach, by analyzing national regulations such as laws, government regulations, and university policies in each country; 2) Conceptual approach, by referring to theories of gender equality, women's leadership, and legal feminism; 3) Analytical approach, to assess the alignment between prevailing legal norms and their implementation in practice through case studies and secondary data. The legal material collection technique is conducted through documentary study, which involves tracing various primary and secondary legal sources, such as statutory regulations, international conventions (e.g., CEDAW), reports from governmental and international institutions (e.g., UNESCO, EIGE), and previous research

²² Statistics Netherlands (CBS), "SDG 5: Gender Equality," *Monitor of Well-being and the Sustainable Development Goals*, accessed April 30, 2025, https://www.cbs.nl/en-gb/visualisations/monitor-of-well-being-and-the-sustainable-development-goals/sdg-s/sdg-5-gender-equality?utm_source

²³ L. T. A. L. Wardhani, M. D. H. Noho, and A. Natalis, "The Adoption of Various Legal Systems in Indonesia: An Effort to Initiate the Prismatic Mixed Legal Systems," *Cogent Social Sciences* 8, no. 1 (2022): 2104710.

²⁴ R. Abduh and I. Hanifah, "Certainty of Jurisdiction Law in Civil Law System," *Randwick International of Social Science Journal* 1, no. 2 (2020): 271-76.

²⁵ H. Roos, J. Mampaey, J. Huisman, and J. Luyckx, "The Failure of Gender Equality Initiatives in Academia: Exploring Defensive Institutional Work in Flemish Universities," *Gender & Society* 34, no. 3 (2020): 467-95.

²⁶ D. Anggraini, I. Havifi, L. P. Sari, and A. Gunawan, "Analyzing the Effectiveness of 30% Gender Affirmative Action Policy in Indonesia," *KnE Social Sciences* (2024): 305-15.

²⁷ Joni Lovenduski, "The Political Representation of Women: A Feminist Institutional Perspective," in *Research Handbook on Political Representation*, ed. Maurizio Cotta and Federico Russo (Cheltenham, UK: Edward Elgar Publishing, 2020), 210-21.

²⁸ M. M. Diaz, *Representing Women?: Female Legislators in West European Parliaments* (Colchester, UK: ECPR Press, 2024).

²⁹ S. Clavero and Y. Galligan, "Delivering Gender Justice in Academia through Gender Equality Plans? Normative and Practical Challenges," *Gender, Work & Organization* 28, no. 3 (2021): 1115-32.

findings.³⁰ The analysis in this study is carried out qualitatively, focusing on the interpretation of the content of legal documents and the relevance of institutional practices within the framework of comparative legal studies.³¹ The comparison is made between the legal systems of Indonesia and the Netherlands, taking into account historical, social, and cultural aspects that influence the implementation of gender equality policies in each country.

RESULTS AND DISCUSSION

The study findings indicate that both Indonesia and the Netherlands share a commitment to gender equality embedded in their national legal frameworks, although their approaches differ. In Indonesia, commitment to gender equality is demonstrated through the ratification of CEDAW and various national regulations such as Law Number 7 of 1984 and Presidential Regulation Number 59 of 2017.³² However, the implementation of these norms remains suboptimal due to weak monitoring mechanisms and limited funding for gender-affirmative programs. In contrast, the Netherlands enforces gender equality policies more systematically through the Gender Equality Plan (GEP), which is a prerequisite for research funding and institutional policy support. Regulations in the Netherlands are more binding at the institutional level, especially for universities receiving public funding and European Union grants.

Table 1. Comparison of Gender Equality Legal Frameworks

Aspect	Indonesia	Netherlands
Legal Basis	Law Number 7 of 1984, Presidential Regulation Numer 59 of 2017	EU Gender Equality Plan, Dutch Equal Treatment Act
Institutional Implementation	Gender Mainstreaming Program (PUG) in Ministries	Gender Equality Office in each institution
Monitoring& Evaluation	Weak, unsystematic	Structured and mandatory reporting to the EU
Campus Involvement	Still limited and uneven	Mandatory for grant eligibility and institutional accreditation

A. Representation of Women in Higher Education Leadership

The study also reveals significant differences in the representation of women in leadership positions at higher education institutions. In Indonesia, women continue to face structural barriers and a patriarchal culture that hinders their participation in decision-making roles.³³ At the same time, in the Netherlands, although the gender representative in the leading role is still developing, the policies of the University of Internal University and the quota system have significantly increased the number of women in the position of the principal and the head of the department. For example, although the main management positions in Indonesian universities, such as public universities, are mainly male, universities in the Netherlands, such as Leiden University, appointed a number of women as heads and

³⁰ F. K. Stephenie, *Legal Impact of International Law in the Prevention of Gender-Based Violence: A Case of CEDAW* (2024).
³¹ Jaakko Husa, *Introduction to Comparative Law* (2023).
³² S. Sudaryat, D. Yuanitasari, and S. D. Judiasih, "Policy and Implementation of Gender Equality in Indonesian Mining Companies as an Approach to Achieve the Goals of Indonesian SDGs," *Cogent Social Sciences* 10, no. 1 (2024): 2400602.
³³ F. Firdaus and R. A. Wulandari, "Implications of Low Women's Representation: Strategies and Challenges Towards Gender Equality in Indonesian Politics," *Indonesian Journal of Religion and Society* 5, no. 2 (2023): 138-53.

deputy directors in the past decade. This contrast is reflected in broader gender equality indicators, where, as of 2023, Indonesia's Gender Inequality Index (GII) stands at 0.447, highlighting a significant gender gap, while the Netherlands boasts a much lower GII of 0.059, with 68.9% of Dutch women economically active and holding 29.2% of management positions and 40.7% of seats in parliament.³⁴ These measurements emphasize the more progressed gender representation in authority parts within the Netherlands compared to Indonesia. Comparison of Gender Equality in Higher Education Leadership between Indonesia and the Netherlands:

Table 2. Comparison with Previous Studies

Aspect	Indonesia	Netherlands
Percentage of Female Graduates	> 60%	Specific data not available, but high female representation in universities
Percentage of Leadership Positions	< 20% in top leadership positions in universities	30% in professorial positions, 28% in university board seats
Policy Approach	Lack of strong institutional policies, influenced by patriarchal culture	Structured policies like “Talent to the Top” and annual gender monitoring
Main Challenges	Weak institutionalization of gender equality policies, social norms that limit access	Policy support, annual monitoring, and strengthening regulatory capacity

These discoveries adjust think about in Indonesia, which found that women's representation in campus authority is hampered by gender generalizations and the burden of residential duties.³⁵ Be that as it may, this inquire about highlights that organization and lawful framework components moreover play a pivotal part in quickening or ruining gender equality an perspective that has not been broadly investigated in prior thinks about.³⁶ Meanwhile, the discoveries reinforce the European Commission's report expressing that the Gender Correspondence Arrange within the Netherlands has significantly contributed to increased female representation in academia – an approach that has however to be completely received in Indonesia.

B. Structural and Cultural Challenges in Women’s Leadership

In spite of regulatory development and universal commitments to gender introduction uniformity, women in Indonesia still go up against basic and social challenges in getting to specialist positions in higher education.³⁷ This study finds that such obstacles incorporate conventional recognitions of gender parts, predispositions in authority choice forms, and a need of regulation bolster for women's career advancement.³⁸ On the other hand, within the Netherlands, challenges are more related to oblivious inclination and limited openings in particular academic areas (such as STEM). In any case, endeavors to overcome these boundaries are more progressive. For illustration, the usage of gender inclination preparing

³⁴ P. L. L. Priska and L. Karjoko, "Role and Position of the Minister of Women's Empowerment and Child Protection's," in *Proceedings of the International Conference on Cultural Policy and Sustainable Development (ICPSD 2024)* (Springer Nature, 2024), 205.

³⁵ E. Prihatini, *Challenges to Equal Representation: Female Deputies in the Indonesian National Parliament* (2019).

³⁶ J. N. Goh, S. A. Bong, and T. Kananatu, *Gender and Sexuality Justice in Asia* (Singapore: Springer, 2021).

³⁷ L. Dube, *Women and Kinship: Comparative Perspectives on Gender in South and South-East Asia* (Tokyo: United Nations University Press, 1997).

³⁸ M. van den Brink and Y. Benschop, “Gender Practices in the Construction of Academic Excellence: Sheep with Five Legs,” *Organization* 19, no. 4 (2012): 507–524.

and mentorship programs has become portion of regulation techniques at many Dutch universities.

Table 3. Comparison of Challenges Faced by Women in Academic Leadership

Challenge Aspect	Indonesia	Netherlands
Patriarchal Culture	Still strong, influences public perception	More open, but subtle biases remain
Career Support	Limited, minimal development programs	Abundant mentoring and training programs
Double Burden (Domestic)	Major hindrance	Accommodated through flexible policies
Access to Leadership	Relies on personal relations & seniority	More competitive and transparent

C. Institutional Strategies and Innovations in Promoting Women’s Leadership

This study also found that universities in the Netherlands actively develop institutional strategies to promote women’s involvement in leadership—ranging from the implementation of gender quotas and leadership training to annual gender-based evaluations. In contrast, such strategies in Indonesia are still incidental and have not yet become part of a structured institutional policy.³⁹ Inside the past five a long time, some Indonesian colleges have showed up extending commitment to gender introduction adjust, in show disdain toward of the truth that it has in any case to finished up a standard organization execution pointer.⁴⁰ At Universitas Gadjah Mada (UGM), female unused understudy enrollment come to 6,346 in 2024, beating male enrollment at 4,332.⁴¹ At Universitas Airlangga (UNAIR), 72% of the 9,247 modern undergrads in 2022 were women.⁴² In the mean time, the Staff of Financial matters and Commerce at Universitas Indonesia (FEB UI) detailed 856 female graduates in 2021, compared to 678 male graduates.⁴³ Broadly, Indonesia's Gender Imbalance List (GII) improved from 0.465 in 2021 to 0.447 in 2023, reflecting consistent advance.⁴⁴ However, unlike Leiden University, which needs an yearly gender correspondence report as portion of organization accreditation, most Indonesian higher education institutions including private ones have however to receive gender balance as a center marker of regulation success.⁴⁵ These findings enrich previous research by Wulandari , which stated that the gender paradigm shift in Indonesian higher education tends to be symbolic.⁴⁶ In any case, this consider includes a unused commitment by emphasizing that the part of the lawful framework and organization plan

³⁹ C. Bjork, “Decentralisation in Education, Institutional Culture and Teacher Autonomy in Indonesia,” *International Review of Education* 50 (2004): 245–262.

⁴⁰ S. E. Wieringa, “Gender Harmony and the Happy Family: Islam, Gender and Sexuality in Post-Reformasi Indonesia,” *South East Asia Research* 23, no. 1 (2015): 27–44.

⁴¹ Sulthan S., “UGM Publication of SDG 5 Reports,” *UGM SDGs Center*, November 14, 2023, <https://sustainabledevelopment.ugm.ac.id/2023/11/14/ugm-publication-of-sdg-5-reports/>.

⁴² Universitas Airlangga, “SDG 5 – Student Access Measures,” *Impact UNAIR*, diakses April 30, 2025, <https://impact.unair.ac.id/sdgs-5/>.

⁴³ Fakultas Ekonomi dan Bisnis Universitas Indonesia, “SDG 5 – Gender Equality,” *FEB UI*, diakses April 30, 2025, <https://feb.ui.ac.id/sdg-5-2021/>.

⁴⁴ Badan Pusat Statistik (BPS), “Gender Inequality Index (GII) 2022,” *BPS-Statistics Indonesia*, 1 Agustus 2023, <https://www.bps.go.id/en/pressrelease/2023/08/01/2042/gender-inequality-index--gii--2022.html>.

⁴⁵ E. Brewis, “Fair Access to Higher Education and Discourses of Development: A Policy Analysis from Indonesia,” *Compare: A Journal of Comparative and International Education* 49, no. 3 (2019): 453–470.

⁴⁶ M. A. Mutho'am and H. Heriyanto, “Women's Leadership in the Indonesian Context: From Interpretative Discourse to Contemporary *Fiqh Siyasah*,” *Muwazah*, no. [nomor volume dan edisi jika ada] (2023): 130–154.

is profoundly persuasive in either progressing or ruining gender equality itself. Leiden University, actualize organized methodologies such as obligatory yearly gender balance reports as portion of regulation accreditation. In differentiate, most Indonesian universities need formal components, coming about in ladies being underrepresented in administration in spite of making up a larger part of graduates. This hole is driven by social standards and constrained regulation support.

CONCLUSION

This consider concludes that whereas both Indonesia and the Netherlands have legitimate systems supporting gender equality, their down to earth viability to a great extent depends on the administrative procedures and socio-cultural settings of each nation. In Indonesia, the essential challenges stem from the powerless institutionalization of gender equality approaches inside higher instruction teach and the tireless impact of patriarchal standards. In differentiate, the Netherlands illustrates relative victory through the usage of organized regulation methodologies, vigorous lawful commands, and schedule assessments of women's participation in academic authority. This comparative investigation uncovers that the success of gender uniformity in higher instruction leadership isn't exclusively subordinate on the presence of lawful standards, but rather on the degree to which those standards are operationalized through concrete administrative measures and organization hones. The discoveries offer important commitments to the advancement of higher education policy particularly in Indonesia, by recommending: 1) The formulation of gender equality activity plans at the institutional level; 2) The strengthening of regulatory capacity through preparing, mentoring, and gender-sensitive assessment frameworks; and 3) The transformation of recruitment and advancement instruments to guarantee merit-based and gender bias-free forms. This research too opens roads for future observational thinks about, such as in-depth interviews with women leaders in academia, to assist investigate the psychosocial and social variables forming women's leadership directions.

REFERENCES

- Abduh, R., and I. Hanifah. "Certainty of Jurisdiction Law in Civil Law System." *Randwick International of Social Science Journal* 1, no. 2 (2020): 271–276.
- Ahmad Effendi. "Rektor Perempuan Mulai Banyak Bermunculan, Pertanda Apa Ini?" [Media source needed].
- Ahmad, N., Z. H. Zamri, and N. S. Omarali. "Islamic Nations' Approaches to Combating Gender Discrimination Against Women: An Examination of the Southeast Asia Region." *De Jure: Jurnal Hukum dan Syar'iah* 16, no. 2 (2024): 501–530.
- Anggraini, D., I. Havifi, L. P. Sari, and A. Gunawan. "Analyzing the Effectiveness of 30% Gender Affirmative Action Policy in Indonesia." *KnE Social Sciences* (2024): 305–315.
- Arquisola, M. J. "'The Ties That Bind': Indonesian Female Academic Leaders' Agency and Constraints in Higher Education." *European Journal of Educational Management* 3, no. 2 (2020): 37–50.
- Askin, K. D., and D. Koenig. *Women and International Human Rights Law: Volume 3*. Leiden: Martinus Nijhoff Publishers, 2023.

- Badan Pusat Statistik (BPS). "Gender Inequality Index (GII) 2022." BPS-Statistics Indonesia. August 1, 2023. <https://www.bps.go.id/en/pressrelease/2023/08/01/2042/gender-inequality-index--gii--2022.html>.
- Bjork, Christopher. "Decentralisation in Education, Institutional Culture and Teacher Autonomy in Indonesia." *International Review of Education* 50 (2004): 245–262.
- Bracken, Susan J., Joann K. Allen, and Diane R. Dean, eds. *Women in Academic Leadership: Professional Strategies, Personal Choices*. New York: Taylor & Francis, 2023.
- Brewis, Emily. "Fair Access to Higher Education and Discourses of Development: A Policy Analysis from Indonesia." *Compare: A Journal of Comparative and International Education* 49, no. 3 (2019): 453–470.
- Chance, N. L. "A Phenomenological Inquiry into the Influence of Crucible Experiences on the Leadership Development of Black Women in Higher Education Senior Leadership." *Educational Management Administration & Leadership* 49, no. 4 (2021): 601–623.
- Clavero, S., and Y. Galligan. "Delivering Gender Justice in Academia through Gender Equality Plans? Normative and Practical Challenges." *Gender, Work & Organization* 28, no. 3 (2021): 1115–1132.
- Diaz, M. M. *Representing Women?: Female Legislators in West European Parliaments*. Colchester, UK: ECPR Press, 2024.
- Dube, Leela. *Women and Kinship: Comparative Perspectives on Gender in South and South-East Asia*. Tokyo: United Nations University Press, 1997.
- Dwivedi, Y. K., et al. "Metaverse Beyond the Hype: Multidisciplinary Perspectives on Emerging Challenges, Opportunities, and Agenda for Research, Practice and Policy." *International Journal of Information Management* 66 (2022): 102542.
- Fakultas Ekonomi dan Bisnis Universitas Indonesia. "SDG 5 – Gender Equality." FEB UI. Accessed April 30, 2025. <https://feb.ui.ac.id/sdg-5-2021/>.
- Firdaus, F., and R. A. Wulandari. "Implications of Low Women's Representation: Strategies and Challenges Towards Gender Equality in Indonesian Politics." *Indonesian Journal of Religion and Society* 5, no. 2 (2023): 138–153.
- Goh, Joseph N., Sharon A. Bong, and Tash Aw Kananatu. *Gender and Sexuality Justice in Asia*. Singapore: Springer, 2021.
- Husa, Jaakko. *Introduction to Comparative Law*. 2023.
- Husa, J. "The Traditional Methods of Comparative Law." In *The Cambridge Handbook of Comparative Law*, edited by M. Siems and F. Jen Yap. Forthcoming, 2023.
- Lovenduski, Joni. "The Political Representation of Women: A Feminist Institutional Perspective." In *Research Handbook on Political Representation*, edited by Maurizio Cotta and Federico Russo, 210–221. Cheltenham, UK: Edward Elgar Publishing, 2020.
- Maheshwari, G., and R. Nayak. "Women Leadership in Vietnamese Higher Education Institutions: An Exploratory Study on Barriers and Enablers for Career Enhancement." *Educational Management Administration & Leadership* 50, no. 5 (2022): 758–775.

- Meza-Mejía, María del Carmen, María A. Villarreal-García, dan Claudia Ortega-Barba. "Women and Leadership in Higher Education: A Systematic Review." *The Social Science* (2023). <https://doi.org/10.3390/socsci12100555>.
- Moreira, José A., and Cláudia Sales Oliveira. "Quantifying for Qualifying: A Framework for Assessing Gender Equality in Higher Education Institutions." *Social Sciences* 11, no. 10 (2022): 478.
- Mutho'am, M. A., and Heriyanto. "Women's Leadership in the Indonesian Context: From Interpretative Discourse to Contemporary Fiqh Siyasah." *Muwazah* (2023): 130-154.
- O'Connor, Pat, and Kate White. *Gender Equality in Higher Education: The Slow Pace of Change*. Cham: Palgrave Macmillan, 2021. https://doi.org/10.1007/978-3-030-69687-0_1.
- Prihatini, Evi. *Challenges to Equal Representation: Female Deputies in the Indonesian National Parliament*. 2019.
- Priska, P. L. L., and L. Karjoko. "Role and Position of the Minister of Women's Empowerment and Child Protection's." In *Proceedings of the International Conference on Cultural Policy and Sustainable Development (ICPSD 2024)*, 205. Springer Nature, 2024.
- Roos, H., et al. "The Failure of Gender Equality Initiatives in Academia: Exploring Defensive Institutional Work in Flemish Universities." *Gender & Society* 34, no. 3 (2020): 467-495.
- Sant-Geronikolou, S. "Investigating The Greek Higher Education Gender Equality Policy Landscape Under an Enhanced Critical Frame Analysis Lens." 2023.
- Siems, M. *Comparative Law*. Cambridge: Cambridge University Press, 2022.
- Smith, D. G. *Diversity's Promise for Higher Education: Making It Work*. Baltimore: Johns Hopkins University Press, 2024.
- Statistics Netherlands (CBS). "SDG 5: Gender Equality." *Monitor of Well-being and the Sustainable Development Goals*. Accessed April 30, 2025. <https://www.cbs.nl/en-gb/visualisations/monitor-of-well-being-and-the-sustainable-development-goals/sdg-s/sdg-5-gender-equality>.
- Subekti, R., T. A. Husna, and P. B. Salsabila. "Questioning Food Security in Green Constitution Conception: Realizing Sustainable Development Goals (SDGs) in Indonesia." *Padjadjaran Jurnal Ilmu Hukum (Journal of Law)* 11, no. 2 (2024): 254-273.
- Sudaryat, S., D. Yuanitasari, and S. D. Judiasih. "Policy and Implementation of Gender Equality in Indonesian Mining Companies as an Approach to Achieve the Goals of Indonesian SDGs." *Cogent Social Sciences* 10, no. 1 (2024): 2400602.
- Sulthan, S. "UGM Publication of SDG 5 Reports." *UGM SDGs Center*. November 14, 2023. <https://sustainabledevelopment.ugm.ac.id/2023/11/14/ugm-publication-of-sdg-5-reports/>.
- Thelma, C. C., and L. Ngulube. "Women in Leadership: Examining Barriers to Women's Advancement in Leadership Positions." *Asian Journal of Advanced Research and Reports* 18, no. 6 (2024): 273-290.
- United Nations Development Programme (UNDP) Indonesia. "Kesetaraan Gender dan Inklusi Sosial." Accessed April 30, 2025. <https://www.undp.org/indonesia/gender>.

- Universitas Airlangga. "SDG 5 – Student Access Measures." *Impact UNAIR*. Accessed April 30, 2025. <https://impact.unair.ac.id/sdgs-5/>.
- Van den Brink, Marieke, and Yvonne Benschop. "Gender Practices in the Construction of Academic Excellence: Sheep with Five Legs." *Organization* 19, no. 4 (2012): 507–524.
- Wardhani, L. T. A. L., M. D. H. Noho, and A. Natalis. "The Adoption of Various Legal Systems in Indonesia: An Effort to Initiate the Prismatic Mixed Legal Systems." *Cogent Social Sciences* 8, no. 1 (2022): 2104710.
- Wieringa, Saskia E. "Gender Harmony and the Happy Family: Islam, Gender and Sexuality in Post-Reformasi Indonesia." *South East Asia Research* 23, no. 1 (2015): 27–44.
- W. Liao and L. Luo, "Gender, Education, and Attitudes toward Women's Leadership in Three East Asian Countries: An Intersectional and Multilevel Approach," *Social Sciences* 11, no. 3 (2021): 103, <https://doi.org/10.3390/soc11030103>.

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