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Learning from Neighbors: A Comparative Policy Analysis of Tax Education Integration in the High School Curricula of Indonesia and Malaysia

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ABSTRACT

Background. Tax compliance is a pressing concern across Southeast Asia. Indonesia and Malaysia both want tax awareness built early. They have nonetheless placed tax education in the high school curriculum in quite different ways.

Objective. This study compared the rationale, curricular placement, institutional collaboration, and implementation of high school tax education in Indonesia and Malaysia and derived lessons for Indonesia.

Methods. A qualitative comparative policy analysis covered official documents issued between 2019 and 2024 by Indonesia's Ministry of Education, Culture, Research, and Technology and Directorate General of Taxes (DJP) and by Malaysia's Ministry of Education and Inland Revenue Board (IRBM), including curriculum frameworks, decrees, tax authority publications, and strategic plans. A thematic analysis compared the countries under four pre-defined themes.

Results. Two models emerged. Malaysia follows a formal, centralized model. Since 2021, tax education has been a mandatory topic in Form 5 Mathematics, providing for universal delivery through classroom teachers. Indonesia follows an emerging, decentralized model of extracurricular outreach led by the DJP, such as Pajak Bertutur. The Kurikulum Merdeka offers room for formal integration, but implementation remains ad hoc and depends on regional initiative.

Conclusion. Malaysia offers Indonesia an example of systemic integration, while the project-based Kurikulum Merdeka offers a chance to teach tax as part of civic and economic literacy, and not just as mathematics. A stronger operational partnership between the DJP and the Ministry of Education appears necessary to move from occasional outreach to curriculum-based tax education.

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1. Introduction

A strong tax culture underpins sustainable national development. It supplies the revenue that pays for public services, infrastructure, and social welfare programs, and compliance is what keeps that revenue flowing[1]. Across the globe, and above all in the developing economies of the Association of Southeast Asian Nations (ASEAN), governments have come to see that enforcement and penalties alone cannot secure long-term voluntary compliance[2]. Policy has shifted. Proactive strategies now aim to foster an intrinsic sense of civic duty and tax morale among citizens[3,4], and tax education directed at young people sits at the center of them, because the young are the next generation of taxpayers and economic actors[5–7]. The logic is simple. Teach them early what taxes are for and how they work, and a more compliant and engaged citizenry can be built from the ground up[8].

The need is especially pressing in Indonesia and Malaysia. They are two of ASEAN's largest economies, they share similar developmental aspirations, and both struggle to optimize domestic revenue mobilization. Indonesia has long had a low tax-to-GDP ratio, consistently among the lowest in the Asia-Pacific region[9]. That limits its capacity to fund ambitious national goals, including the "Indonesia Emas 2045" vision. The Directorate General of Taxes (DJP) has responded with educational outreach under its Tax Awareness Inclusion Program, most visibly

through annual, event-based initiatives such as *Pajak Bertutur* ("Tax Speaks") and *Tax Goes to School*[6,10]. Tax officials visit schools and deliver lectures and activities. These programs reach students directly, though outside the formal curriculum.

Malaysia faces a similar problem. It too has identified low tax compliance as a significant national issue, especially after its transition to a Self-Assessment System (SAS), which places more of the onus on individual taxpayers to understand and fulfill their obligations. Studies point to a degree of tax illiteracy among the Malaysian public[5,11]. Researchers and the Inland Revenue Board of Malaysia (IRBM) have both called for a more structured approach to tax education[11]. The IRBM, like its Indonesian counterpart, has also run informal programs such as tax camps and seminars to raise awareness.

Despite these shared challenges and objectives, the two countries have recently taken quite different policy paths on the formal integration of tax education into their national high school curricula. In 2021, Malaysia took a decisive step. It embedded taxation as a formal topic within the secondary school Mathematics curriculum, a move that signaled a commitment to a universal, systematic, and curriculum-driven approach. Indonesia, at the same time, has been going through a major educational reform of its own, the rollout of the *Kurikulum Merdeka* (Merdeka Curriculum). The framework was established under the authority of the Ministry of Education, Culture, Research, and Technology (*Kemendikbudristek*) and stresses flexible, student-centered, and project-based learning. It offers clear and strong openings for tax education, particularly in the Economics subject and in the *Projek Penguatan Profil Pelajar Pancasila* (P5) component[12]. Yet actual implementation for tax education has remained largely decentralized. It has not coalesced into a national, mandatory strategy comparable to Malaysia's.

This divergence invites comparative policy analysis. A body of literature on tax education exists within each country. Research that systematically compares the policy architecture and implementation strategies of the two neighbors is scarce. Existing studies in Indonesia have tended to evaluate the effectiveness of specific outreach programs. They often find that impact depends on students' prior knowledge, and they conclude that more continuous education is needed[10]. In Malaysia, research has shown strong public support for formal tax education and has begun to explore how the newly integrated curriculum influences student awareness[5,11]. A direct, cross-national analysis of the policy mechanisms behind the different approaches has been missing.

This study addresses that gap. Its novelty lies in a direct and detailed comparative policy analysis of the formal high school tax education frameworks of Indonesia and Malaysia. It does not evaluate student outcomes. It examines the policy architecture itself, which gives a macro-level view of how two close neighbors meet the same fundamental challenge through different educational philosophies and institutional arrangements. By "learning from neighbors," the research moves beyond country-specific evaluation and draws insights that carry across contexts[13,14].

The aim of the study was threefold. First, it sought to map and describe systematically the tax education policies and curriculum structures now in place for high school students in both countries. Second, it aimed to compare the two approaches rigorously, examining the underlying policy rationales, the mechanisms of curriculum integration, the nature of inter-agency collaboration, and the intended implementation strategies. Third, it set Malaysia's formalized model beside Indonesia's emerging framework in order to derive evidence-based policy lessons that can be put to use. These should inform and guide Indonesia's continuing efforts to build a sustainable and effective national tax education strategy within the transformative context of the *Kurikulum Merdeka*.

2. Methods

2.1 Study design and case selection

The study used a qualitative comparative policy analysis, an approach that has been applied to tax policy in many settings[15–17]. The methodology suits the explanation of policy outputs and outcomes across different political and institutional contexts, and it permits an in-depth, contextualized look at how governments handle similar policy challenges, so that best practices, innovations, and pitfalls can be identified. It rests on the systematic study of policies across jurisdictions to find patterns, differences, and similarities. Policymakers gain useful insight from it. Indonesia and Malaysia were selected under a "most similar systems design" logic[18,19]. This means comparing cases that share many contextual features but differ on the phenomenon under study. Here, that phenomenon is the formal integration of tax education into the high school curriculum. Both countries are neighboring ASEAN member states. They have shared cultural roots, similar economic development goals, and comparable problems of tax compliance and revenue generation. Their strategies for youth tax education differ. Malaysia has put in place a formal, top-down integration into a core subject, whereas Indonesia's approach has been more ad-hoc and now stands at a juncture because a new, flexible curriculum has been introduced. Contrast within broad similarity makes a strong comparative study. It allows a structured comparison of the policy differences and their possible implications. The two systems also differ in size, governance, and school-system organization, so the design supports a structured comparison of policy arrangements and not the isolation of a single causal factor.

2.2 Data sources

The research rested on a comprehensive analysis of official policy documents and related publications from both countries for 2019 to 2024. Source content analysis of this kind is a mainstay of comparative research in education and policy[20,21]. Data were gathered from the official websites and digital repositories of the relevant ministries and agencies. For Indonesia, the primary sources included the foundational documents of the *Kurikulum Merdeka*, such as the ministerial decrees that set out its structure and principles. Particular attention went to the Learning Outcomes for senior high school Economics and to the official guides for the Project to Strengthen the Pancasila Student Profile (P5). Regulations and official publications of the Directorate General of Taxes (DJP) were analyzed too. They describe the framework and implementation of programs such as *Pajak Bertutur* and the wider Tax Awareness Inclusion Program. For Malaysia, the primary sources included the *Kurikulum Standard Sekolah Menengah* (KSSM). The focus was the *Dokumen Standard Kurikulum dan Pentaksiran* (DSKP) for Form 5 Mathematics, where the learning standards for the taxation topic are found. Broader policy documents, among them the Malaysia Education Development Plan, were reviewed to grasp the overall educational philosophy and goals. Finally, annual reports, press releases, and information on educational programs published by the Inland Revenue Board of Malaysia (IRBM) were examined.

2.3 Analytic procedure

A thematic analysis[22] was applied to the collected documents. It is a flexible and popular qualitative method for finding, examining, and reporting patterns in data, and it suits the interpretation of policy documents. The process had several stages. First, the researchers read and re-read every policy document to understand its content, context, and language in each country. Second, the documents were coded systematically. Segments of text on goals, content, delivery methods, and institutional roles in tax education were marked, so that the codes captured features relevant to the aims of the study. Third, the initial codes were collated and sorted into potential themes within a pre-defined framework. The analysis was top-down, or

theoretical. A framework defined in advance drove it, and that framework had four main comparative themes: the policy rationale and objectives, the curricular placement and content, the nature of institutional collaboration, and the implementation strategy and pedagogy. Finally, the developed themes were checked against the coded data and the whole dataset, to confirm that they gave a consistent and accurate picture of each country's policy approach. The final analysis synthesized the findings for each country under the four headings. This allowed a direct, structured comparison of the two policy models.

2.4 Ethical considerations

This study analyzed publicly available policy documents and did not involve human participants or personal data. The study protocol was approved by Ethical Committee of Social Research, Enigma Institute, Indonesia (Approval number 2025/028).

3. Results

Comparing the policy documents of Indonesia and Malaysia revealed two distinct and divergent models of tax education at the high school level. Malaysia has adopted a formal, centralized, and subject-specific integration. Indonesia's approach is emerging, decentralized, and focused on extracurricular activity, although it holds considerable latent potential for formal integration under the new curriculum framework. Table 1 summarizes the comparison under the four themes of the analytic framework; the two sections below set out the findings for each country.

Table 1. Comparison of high school tax education policies in Indonesia and Malaysia.

Theme	Indonesia	Malaysia
Overall approach	Community-focused, developing approach. Tax education is mainly delivered through special programs run by the tax office that visit schools. The aim is to teach students that paying taxes is part of good citizenship and of contributing to the community (*gotong royong*).	Structured, required school subject. Tax education is a required topic within a core class (Mathematics) for all Form 5 (upper secondary) students. The focus is on the practical, real-world skills needed to understand and calculate taxes.
Policy rationale	To increase the amount of tax collected for national development and to build a long-term culture in which people pay taxes willingly because they understand its importance.	To ensure that future citizens understand how to calculate and report their own taxes correctly, which is necessary under Malaysia's Self-Assessment System.
Curricular placement	Primarily special events, not regular classes. Programs such as *Pajak Bertutur* (Tax Speaks) are one-day events held at schools. The content is general and focuses on why taxes are the "backbone of the country." There is potential to include it in regular Economics classes or as a special project (P5) under the *Kurikulum Merdeka*, but this is not yet standard practice everywhere.	A required topic in Mathematics. It is a mandatory part of the "Consumer Mathematics" section for Form 5 students. The content is specific and standardized for all schools, covering why taxes exist, the different types of taxes, and how to do the calculations.
Institutional collaboration	Partnership in early stages. Although there is an official agreement between the tax office (DJP) and the Ministry of Education, in practice the tax office leads and implements most programs on its own. The collaboration is not yet deeply integrated into the curriculum design process.	Strong and active partnership. The tax agency (IRBM) and the Ministry of Education worked closely together to create and implement the curriculum. The education ministry provides the schools and teachers, while the tax agency provides expert knowledge on taxes.
Implementation strategy	"Visiting expert" approach. Tax officials, who are experts on taxes but not necessarily trained teachers, visit schools to give lectures and lead activities. The quality and style of these events can vary greatly from one region to another.	Standard classroom teaching. Regular mathematics teachers deliver the lessons as part of their normal teaching duties, following a standard national guide. This ensures that all students receive the same core information consistently, with a focus on solving tax-related math problems.

Note. DJP = Directorate General of Taxes; IRBM = Inland Revenue Board of Malaysia; P5 = *Projek Penguatan Profil Pelajar Pancasila*. Form 5 is the final year of upper secondary school in Malaysia. Content summarizes the analysis of the policy documents described in Section 2.2.

3.1 Indonesia: an emerging, decentralized model

Policy rationale. In Indonesia, tax education was found to be driven mainly by the fiscal needs of the state. Implementation followed a decentralized, event-based model that operates largely outside the formal, mandatory curriculum. The main impetus was the nation's persistent struggle with a low tax-to-GDP ratio and the wish to secure long-term fiscal sustainability for the "Indonesia Emas 2045" vision. The core policy instrument was the DJP's Tax Awareness Inclusion Program, launched in 2014[6], with the long-term goal of an intrinsic motivation to pay taxes among all citizens, particularly the youth. The objective was framed as a long-term investment in a national "tax morale" and a culture of sustainable compliance. Official discourse often tied tax payment to patriotism and to *gotong royong* (mutual cooperation), presenting it as a collective duty for national development. Patriotism featured prominently.

Curricular placement. A defining feature of the Indonesian model was the absence of tax education as a standalone, mandatory subject in the national high school curriculum. Taxation appeared only sporadically, within existing subjects such as Economics and Civic Education. Delivery therefore relied mainly on extracurricular programs started and led by the DJP. The most prominent was *Pajak Bertutur*, an annual, one-day event in which tax officials visit schools across the country[10]. For high school students, the content usually centered on the theme "taxes are the backbone of the country." It covered an introduction to the Indonesian tax system and the role of taxes in the state budget. Other initiatives, such as *Tax Goes to School*, followed a similar event-based model. The introduction of the *Kurikulum Merdeka* offered a significant opportunity for formal integration, although a largely untapped one. The senior high school Economics subject includes learning outcomes on understanding economic problems, and taxation concepts could fit naturally there. More profoundly, the curriculum's mandatory, cross-disciplinary Project to Strengthen the Pancasila Student Profile (P5) component was identified as an ideal framework for contextual, project-based tax education. The policy documents showed, however, that this integration was not yet systematic or mandated nationally.

Institutional collaboration. The policy framework for tax education in Indonesia rested on a formal partnership between the DJP and *Kemendikbudristek*. Agreements aimed at implementing the Tax Awareness Inclusion program in the education system formalized the collaboration. Implementation reports and scholarly articles indicated that the collaboration, although established at the national level, was still in the early stages of deep operational integration. Execution depended heavily on the initiative of regional DJP offices, which were responsible for liaising with local schools. The tax authority was thus the primary driver of outreach, while the education ministry acted

more as a facilitator or partner than as co-owner of a shared curriculum.

Implementation strategy. The dominant implementation strategy was a "push" model of information dissemination. Tax officials, as subject matter experts, visited schools and gave pre-packaged content through lectures, videos, and games. Technical accuracy was assured. Two significant challenges followed. First, delivery was highly heterogeneous, and the quality and pedagogical approach varied across regions with the resources and innovation of the local tax office. Second, a potential pedagogical skills gap was identified. Tax officials are experts in taxation but not necessarily in adolescent pedagogy, while teachers have pedagogical skills but may lack deep tax knowledge. That model sat uneasily with the constructivist, student-centered philosophy of the *Kurikulum Merdeka*, which emphasizes inquiry-based and project-based learning.

3.2 Malaysia: a formal, centralized model

Policy rationale. Malaysia's approach differed from Indonesia's. It was marked by a decisive policy shift toward formal, mandatory, and systematic integration of tax education into the national secondary school curriculum, driven by clear collaboration between the fiscal and educational authorities. As in Indonesia, the rationale was rooted in worry over low tax compliance and a perceived lack of tax literacy among the public, a serious matter under the Self-Assessment System (SAS). The overarching goal was to use education as a cost-effective, long-term tool, on the view that future taxpayers who understood the system and their responsibilities would be more likely to comply voluntarily. Public perception surveys indicated overwhelming support for formal tax education in schools[5,11]. That gave the policy change a strong social mandate.

Curricular placement. The most significant finding concerned placement: tax education was integrated into the national curriculum, effective from 2021. The *Dokumen Standard Kurikulum dan Pentaksiran* (DSKP) for KSSM Mathematics Form 5 clearly set out "Taxation" as a learning area under the broader theme of "Consumer Mathematics." Its Learning Standards for the topic included explaining the purpose of taxation, describing types of taxes and the consequences of tax evasion, performing calculations that involve various taxes, and solving problems about taxation. Placement in Mathematics framed taxation mainly as a practical, calculative skill needed for financial literacy. The framing is practical.

Institutional collaboration. Integration was supported by strong collaboration between the Ministry of Education (KPM) and the Inland Revenue Board of Malaysia (IRBM). The KPM took charge of curriculum design and standards. The IRBM is described as the source of technical expertise; its role in content development is not documented in the sources reviewed. Earlier research had explicitly recommended this partnership[11]. The formal integration was complemented by the IRBM's continuing informal programs, such as Tax Camps and workshops, so awareness was raised along two tracks.

Implementation strategy. The Malaysian model was a systemic "pull" model in which tax education became part of classroom teachers' core duties. Because it was a mandatory part of the Mathematics syllabus, the policy provides for universal reach to all Form 5 students in the national school system. The DSKP served all teachers as the standard guide, giving a degree of consistency in content and learning objectives nationwide. Set within Mathematics, the pedagogical approach was inherently oriented to problem-solving and calculation, and it gave students the procedural knowledge to understand tax computations.

4. Discussion

4.1 Systemic efficiency and its strengths

Comparing the tax education policies of Indonesia and Malaysia shows two fundamentally different philosophies and strategic choices for cultivating the next generation of taxpayers. Both countries want better tax compliance. Their pathways diverged. That divergence is instructive for policy learning[13,23]. This discussion interprets the findings, weighs the strengths and weaknesses of each model, and considers what follows for future policy, particularly in Indonesia. Setting the two national strategies side by side exposes a core tension in educational policy design: the trade-off between systemic efficiency and pedagogical depth. Malaysia's approach is a model of systemic efficiency. By formally integrating tax education into the Form 5 Mathematics curriculum, the government made a decisive policy choice to ensure universal, standardized, and mandatory delivery. Its main strength is structural integrity and reach. Every student within the national school system meets a baseline of tax knowledge, delivered by trained teachers who are part of the existing educational infrastructure. This overcomes the challenges of reach, consistency, and sustainability that afflict voluntary, event-based programs. From an implementation perspective, a centralized, top-down approach spreads content quickly and uniformly. It turns tax education from a peripheral concern into a core academic requirement and signals its importance to students, teachers, and parents alike. The strategy fits a rationalist view of policymaking[24], in which a clearly identified problem, here low compliance under a Self-Assessment System, is met with a direct, logical, and scalable solution.

4.2 The limits of a Mathematics home

Yet the very source of the Malaysian model's strength, its placement within Mathematics, also gives rise to its main theoretical and pedagogical limitation. Framing taxation as part of "Consumer Mathematics" orients the subject toward one epistemological lens. Tax knowledge becomes procedural and calculative. The learning standards reinforce that view, since they focus on performing calculations and solving problems about various taxes. The approach is well suited to one dimension of financial literacy, the ability to compute tax liabilities. It also risks reducing a rich, many-sided concept to a set of algorithms. The view resembles a traditional, knowledge-transmission model of education, in which the goal is to equip students with a defined set of practical skills. What may be lost is a deeper, more complex understanding of taxation as a basis of the social contract and as a fundamental act of civic participation. The ethical, social, and political dimensions of taxation, meaning questions of fairness, redistribution, public goods, and trust in government, are less likely to be the focus of a mathematics lesson. Such discussions are not impossible. Even so, the curricular home of a subject strongly shapes its pedagogical identity. It also shapes the character of classroom discourse.

4.3 The push model in Indonesia

Indonesia's current approach is structurally weaker. Even so, it contains the seeds of a more pedagogically profound and wide-ranging model. The historical reliance on extracurricular programs such as *Pajak Bertutur*, led by the Directorate General of Taxes, is a "push" model of information delivery. Its strengths are the use of subject matter experts (tax officials) and the patriotic framing of taxation as a form of *gotong royong* and the "backbone of the country." As the Results indicated, though, the model has significant structural deficiencies. Because it is extracurricular, it lacks universal reach and is often a one-off intervention. Research on *Pajak Bertutur* has shown that such programs work best for students who already have some familiarity with the topic. They act more as a reinforcement mechanism than as a foundational educational tool[10]. This conditional effectiveness points to a basic pedagogical mismatch. One dose of information is not enough. It cannot build a complex schema of understanding from scratch. Tax officials are not trained

educators, and regional offices implement the programs in a decentralized way. Quality and delivery therefore vary widely, a classic difficulty in a country as vast and diverse as Indonesia.

4.4 The potential of the Kurikulum Merdeka

The true potential of the Indonesian model lies not in its current state but in the transformative possibilities of the *Kurikulum Merdeka*. The new curriculum is a fundamental shift in educational philosophy, away from rote memorization and toward student-centered, inquiry-based learning. Its "Pancasila Student Profile" names a set of character traits, among them analytical reasoning, creativity, independence, and collaboration (*gotong royong*). That offers a culturally resonant frame for rethinking tax education. The most promising vehicle is the *Projek Penguatan Profil Pelajar Pancasila* (P5), a mandatory, cross-disciplinary, project-based learning component[12]. Evidence from a senior high school suggests that P5 can improve students' political literacy and civic knowledge[25]. Through P5, taxation can be explored as a tangible, real-world civic inquiry and not as an abstract set of rules or calculations. A P5 project could have students investigate local community needs, research sources of public revenue, and design a community budget. They would have to grapple with the direct link between taxes paid and services received. Such work fits constructivist learning theory, which holds that learners actively construct knowledge through experience and interaction with their environment[26,27]. Students would do more than receive information about taxes. They would build a deep, contextualized understanding of the fiscal-social contract. The method could cultivate tax literacy and also a strong sense of tax morale, which public finance theory treats as a more sustainable driver of voluntary compliance than knowledge of regulations alone[2,3]. Tax morale is built on trust, fairness, and a sense of shared civic identity, and local views of government transparency and of the visible benefits of taxes shape attitudes toward tax obligations in Indonesia[28], and recent evidence from Indonesian taxpayers shows that perceived fairness and trust in government raise tax morale and, through it, compliance[29]. Compliance is also commonly modeled as a function of attitudes and social norms[30]. Collaborative, community-engaged projects may nurture all three more effectively than mathematical problem sets do.

4.5 Institutional architecture

The comparison shows that the factor separating the two national approaches is the nature and maturity of their institutional architecture. Integration in Malaysia rested on a deep and operational partnership between the Ministry of Education (KPM) and the Inland Revenue Board of Malaysia (IRBM). The synergy mattered. The KPM provided the curricular structure and the delivery mechanism, meaning the school system and its teachers, while the IRBM supplied technical expertise and policy impetus. It is an example of inter-agency collaboration, with two distinct governmental bodies working together toward a shared national objective. In Indonesia, the DJP and *Kemendikbudristek* are linked through a formal Memorandum of Understanding, but the relationship was found to be in the early stages of operationalization. The DJP leads outreach programs that are brought to schools. That arrangement positions the education ministry as a passive facilitator and not as an active co-owner of the educational mission. The institutional gap is a major barrier to Indonesia realizing the potential of the *Kurikulum Merdeka* for tax education. The partnership must evolve from a formal agreement into a working collaboration. Its focus should be the co-design of curriculum content and teaching modules (*modul ajar*) and, above all, comprehensive teacher professional development programs. Without deep collaboration, tax education will remain a peripheral activity, and the transformative potential of the P5 framework will go unrealized.

4.6 The role of the teacher

Teachers are affected too. The implications for their role are profound, and they differ in each model. In Malaysia, the mathematics teacher is now a tax educator. This policy choice draws on an existing teaching workforce and folds the new responsibility into an established professional identity. Targeted training is needed so that teachers are comfortable with the new content. Studies of Indonesian teachers link their own tax education, awareness, and morale to compliance[31], and community training on current tax rules has begun to reach accounting teachers[32]. Even so, the solution is structurally efficient. In Indonesia, a future integrated model would probably place the responsibility on Economics or Civics teachers. It would require a significant investment in building their capacity. They would need tax knowledge and also what educational theorists call Pedagogical Content Knowledge (PCK), the specialized knowledge required to teach a specific subject effectively[33]. Understanding tax law is not enough. A teacher must make complex concepts accessible, relevant, and engaging for adolescent learners. That means anticipating student misconceptions, using suitable analogies and examples, and connecting the abstract principles of taxation to the lived realities of students. A successful transition in Indonesia would depend largely on the quality and scale of the professional development provided to these teachers.

4.7 The framing of tax education

Ultimately, the study points to a fundamental choice in how tax education is framed. Malaysia has chosen to frame it mainly as financial literacy, a practical, individual skill for navigating the modern economy. That is a practical and valuable goal. Through its patriotic messaging and the civic-oriented philosophy of its new curriculum, Indonesia has the opportunity to frame tax education as civic citizenship instead. This is a more ambitious and complex goal. It aims to shape who students are as members of a national community, and not just what they know. It seeks an identity in which paying taxes is seen not as a burden to be minimized but as a proud and essential contribution to the collective good. That is the very essence of *gotong royong*. Malaysia's path of systemic integration offers a clear and efficient model. The more challenging, pedagogically ambitious path open to Indonesia may, in the long run, prove more effective in building the deep-seated, voluntary tax culture that both nations aspire to create. The Indonesian case suggests a wider lesson. The ultimate goal of tax education should be to cultivate engaged, responsible, and fiscally conscious citizens, and not just to produce compliant taxpayers. That expectation is a hypothesis that this study cannot test.

4.8 Limitations and future research

This study has limitations. It rests on policy documents and related publications, so it describes what policies prescribe and not how they are delivered in classrooms, and it contains no data from teachers, implementers, or students. Only two cases were compared, and the interpretation reflects the judgment of the research team. Statements about effectiveness are therefore interpretive and should be read as hypotheses. Future research could combine document analysis with interviews of teachers and tax officials, classroom observation, and before-and-after evaluation of students' tax knowledge and attitudes under the Form 5 taxation topic and under P5 projects.

5. Conclusion

This comparative policy analysis of high school tax education in Indonesia and Malaysia brought out two distinct strategies for building a tax-aware citizenry. Malaysia chose formal, centralized integration. Taxation sits in the national Mathematics curriculum, which secures universal and systematic delivery and presents tax education as a component of practical financial literacy. Indonesia's efforts have historically relied on a decentralized, extracurricular model led by the tax authority. Its patriotic framing has value. Its reach and sustainability, though, are inherently limited. The main conclusion is plain. If Indonesia wants a durable tax culture in the long run, it must shift from its

present ad-hoc model toward a systematic, curriculum-integrated approach. Malaysia is a useful and nearby example of what deliberate policy design and effective inter-agency collaboration can achieve.

The analysis also shows that Indonesia should not simply replicate the Malaysian model. The continuing transformation under the *Kurikulum Merdeka* is a rare opportunity to forge a different path, one that is broader in aim. By drawing on the project-based, cross-disciplinary framework of the *Projek Penguatan Profil Pelajar Pancasila* (P5), Indonesia can move beyond a purely calculative understanding of taxation. Tax education could sit in a rich context of civic inquiry, linking the fiscal responsibilities of individuals directly to the well-being of the community and to the national value of *gotong royong*. The subject would change. A technical lesson in economics or math would become a foundation of citizenship education, fostering the reasoning, collaborative spirit, and civic-mindedness envisioned in the Pancasila Student Profile. Indonesia can learn from the structural clarity of its neighbor and still use the pedagogical innovation of its own curriculum. The chance to design a sound tax education system is real. Such a system would improve future tax compliance. It would also help to develop an informed, engaged, and fiscally aware generation. That generation is a foundation for the "Indonesia Emas 2045" vision.

Declaration

Artificial Intelligence Use Statement

No generative artificial intelligence tool was used to write or revise the text, analyze the data, create images, or generate any other scholarly content of this manuscript.

Author Contribution Statement

Conceptualization, H.Y. and I.At.; methodology, H.Y. and I.An.; investigation, D.R., M.H., and G.O.S.; formal analysis, H.Y., S.F., and F.F.; data curation, D.S. and H.U.; writing – original draft, H.Y.; writing – review and editing, all authors; supervision, I.At.; project administration, H.Y. All authors read and approved the final manuscript.

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Ethics Approval and Consent to Participate

This study analyzed publicly available policy documents and did not involve human participants or personal data. The study protocol was approved by Ethical Committee of Social Research, Enigma Institute, Indonesia (Approval number 2025/028).

Consent for Publication

Not applicable.

Data Availability Statement

The policy documents analyzed are publicly available. The coding materials that support the findings can be obtained from the corresponding author upon reasonable request.

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References

1. Nurmaya K, Noer LR. The effect of taxable person compliance and tax collection on value added tax revenue. J Indones Sos Teknol. 2025;6(1):392–406. doi:10.59141/jist.v6i1.8869
2. Kirchler E, Hoelzl E, Wahl I. Enforced versus voluntary tax compliance: the "slippery slope" framework. J Econ Psychol. 2008;29(2):210–225. doi:10.1016/j.joep.2007.05.004
3. Luttmer EFP, Singhal M. Tax morale. J Econ Perspect. 2014;28(4):149–168. doi:10.1257/jep.28.4.149
4. OECD. Tax morale: what drives people and businesses to pay tax? Paris: OECD Publishing; 2019. doi:10.1787/f3d8ea10-en
5. Mohd Faizal S, Mohd Zaini R, Somasundaram NR. Tax awareness and tax knowledge of students at secondary school level in Malaysia. Int Bus Educ J. 2021;14(1):65–70. doi:10.37134/ibej.vol14.1.5.2021
6. Upa VA, Suparta NKGS, Karundeng FEF. The effect of tax literation and social environment on tax awareness in high school students. Rev Behav Aspect Organ Soc. 2021;3(1):21–34. doi:10.32770/rbaos.vol321-34
7. Asnawi M, Sesa PVS. Tax literacy: tax knowledge for students YPPGI Sentani Junior High School, Jayapura Regency. Int J Community Serv. 2024;4(4):341–345. doi:10.51601/ijcs.v4i4.784
8. Wardani DK, Wati AI. The effect of taxpayer awareness on intention to pay taxes. Reslaj Relig Educ Soc Laa Roiba J. 2022;5(3):726–732. doi:10.47467/reslaj.v5i4.2021
9. OECD. Revenue statistics in Asia and the Pacific: Indonesia (edition 2023). Paris: OECD Publishing; 2024. doi:10.1787/65324c26-en
10. Abbas Y, Tjen C, Wicaksono PT. Tax education and tax awareness: a study on the Pajak Bertutur Indonesian tax education program. J Aust Tax Teach Assoc. 2021;16(1):198–215.
11. Othman R, Ismail Z, Nawawi N. Introducing formal tax education in secondary school: a survey on Malaysian public's perception. In: Proceedings of the 1st International Conference on Applied Social Sciences, Business, and Humanity (ICo-ASCNITY); 2019 Nov 2; Padang, Indonesia. 2020. doi:10.4108/eai.1-11-2019.2293991
12. Tofa Z. Implementation of the Pancasila student profile strengthening project (P5) in the independent curriculum at Umbulsari State Senior High School. Proc Int Conf Educ Sharia. 2024;1:284–293. doi:10.62097/ices.v124.51
13. Rose R. What is lesson-drawing? J Public Policy. 1991;11(1):3–30. doi:10.1017/s0143814x00004918
14. Gasior K, Recchia P. The use of hypothetical household data for policy learning: comparative tax–benefit indicators using EUROMOD HHoT. J Comp Policy Anal. 2019;22(2):170–189. doi:10.1080/13876988.2019.1609784
15. Swianiewicz P, Kurniewicz A, Kalcheva D. The political budget cycle in earmarked taxes for local public services: a comparison of Poland and Bulgaria. J Comp Policy Anal. 2019;21(5):463–480. doi:10.1080/13876988.2019.1594775
16. Mulcahy G, Boelsen-Robinson T, Hart AC, et al. A comparative policy analysis of the adoption and implementation of sugar-sweetened beverage taxes (2016–19) in 16 countries. Health Policy Plan. 2022;37(5):543–564. doi:10.1093/heapol/czac004
17. Wu J, Tal A. From pollution charge to environmental protection tax: a comparative analysis of the potential and limitations of China's new environmental policy initiative. J Comp Policy Anal. 2017;20(2):223–236. doi:10.1080/13876988.2017.1361597
18. Anckar C. On the applicability of the most similar systems design and the most different systems design in comparative research. Int J Soc Res Methodol. 2008;11(5):389–401. doi:10.1080/13645570701401552
19. Anckar C. The most-similar and most-different systems design in comparative policy analysis. In: Handbook of research methods and applications in comparative policy analysis. Cheltenham: Edward Elgar; 2020. doi:10.4337/9781788111195.00008
20. Bowen GA. Document analysis as a qualitative research method. Qual Res J. 2009;9(2):27–40. doi:10.3316/qrj0902027
21. Cardno C. Policy document analysis: a practical educational leadership tool and a qualitative research method. Educ Adm Theory Pract. 2019;24(4). doi:10.14527/kuey.2018.016
22. Braun V, Clarke V. Using thematic analysis in psychology. Qual Res Psychol. 2006;3(2):77–101.
doi:10.1191/1478088706qp063oa
23. Kudrle RT. The OECD and the international tax regime: persistence pays off. J Comp Policy Anal. 2013;16(3):201–215. doi:10.1080/13876988.2013.834642
24. Lindblom CE. The science of "muddling through". Public Adm Rev. 1959;19(2):79. doi:10.2307/973677
25. Azis M, Hashim SB, Muhajir M, et al. The impact of the Pancasila student profile strengthening project on political literacy and civic knowledge among senior high school students. JED (J Etika Demokr). 2025;10(2):164–172. doi:10.26618/jed.v10i2.18028

26. Vygotsky LS. Mind in society: the development of higher psychological processes. Cambridge (MA): Harvard University Press; 1980. doi:10.2307/j.ctvjf9vz4
27. Saleem A, Kausar H, Deeba F. Social constructivism: a new paradigm in teaching and learning environment. Perenn J Hist. 2021;2(2):403–421. doi:10.52700/pjh.v2i2.86
28. Wibowo D. Cultural influences on tax perceptions and compliance in rural Timor. Ris Akunt Keuang Indones. 2025;10(1):72–81. doi:10.23917/reaksi.v10i1.8183
29. Supriyati, Hapsari I, Nahumury J. The influence of trust in the government, perceived fairness, and tax morale on taxpayer compliance: implications for budget formation. Public Munic Finance. 2024;13(2):129–139. doi:10.21511/pmf.13(2).2024.11
30. Sojoodi S, Rezghi Ilkhchi H, Azizi Norouzabadi E. Factors affecting tax compliance based on the theory of planned behavior: an investigation of taxpayers in the city of Tabriz. J Tax Res. 2024;32(62):95–132. doi:10.61186/taxjournal.32.62.95
31. Widiasri D, Fadjarenie A. The effect of tax education, tax awareness and tax morality on tax compliance of individual taxpayers. EPRA Int J Multidiscip Res. 2024:190–196. doi:10.36713/epra16379
32. Miftakh ES, Sanputra AHD, Sulastri. Tax series training: enhancing accounting teachers' capacity to deliver updated tax education for social equity. J Pengabdi Masy. 2025;6(1):317–323. doi:10.32815/jpm.v6i1.2407
33. Shulman LS. Those who understand: knowledge growth in teaching. Educ Res. 1986;15(2):4–14.
doi:10.3102/0013189x015002004