Determining Factors in the Implementation of Corporate Social Responsibility (CSR) Policy of Partnership Program on the State-Owned Enterprise (SOE)

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ABSTRACT

In fairly a large number of attempts to involve business sectors or company businesses, the government has formulated a variety of public policies. One of the public policies that have been issued to regulate the relationship between business sectors (private sectors) and the public (civil society) is the policy on Corporate Social Responsibility (CSR) or also termed as the Social and Environmental Responsibility (also known as TJSL) of a company. The essence of this policy is that the state requires the companies operating in Indonesia to organize a sustainable CSR. This obligation applies to all companies that manage natural resources, either directly or indirectly in the production process. Corporate Social Responsibility has a close relationship with Good Corporate Governance, which can be seen from the implementation of Good Corporate Governance (GCG) in a company. Corporate governance "... is concerned with holding the balance between economic and social goals and between individual and communal goals. The governance framework is there to encourage the efficient use of resources. The aim is to align as nearly as possible the interests of individuals, corporations and society". In the practice, corporate governance refers to one principle, which is responsibility, which is related to the fulfillment of social responsibility of the company as a part of the community. In fulfilling their obligation, the company should be in accordance with the law and the legislations that are enforced, including the regulations on environment.
Keywords: Empowerment, Public Administration, Corporate Governance, Corporate Social Responsibility, Service and Social Rehabilitation

1. INTRODUCTION

Public policy is not specific or narrow, but broad and strategic, and therefore serves as a general guideline for special decisions underneath. According to Dye (1987), "public policy is whatever governments choose to or not to do. Note that we are focusing not only government action, but also government's inaction, that is, what government choose not to do. We contend that government's inaction can have just as great an impact on society as government action". This statement is reinforced by Peterson (2003), who states that public policy is "government's action to address some problem". The purpose of public policy is to solve public problems, as stated by Steward (2000): "a process or a series or pattern of governmental activities or decisions that are designed to remedy some public problems, either real or imagined". This statement is further attested by Anderson (2000), who states that public policy is the action of the actors in solving public problems. Therefore, the implementation stage as a process to realize the policy goals is often called critical stage because this stage is a link between the world of concepts and the world of reality, as stated by Grindle (1980) that to "establish a link that allows goals of public policies to be realized as outcomes of governmental activity". The world of concepts meant here is reflected on ideal condition, something that is aspired to be realized as formulated in the policy documents. The implementation of the policy that connects "the ideal world" and "the real world" must be followed up with concrete actions (action), as stated by Van Meter and Van Horn (1975), that the "policy implementation as actions done by individuals, groups or the public government or private officials is directed at achieving the objectives outlined in the policy decisions." This opinion is in accordance with that of Edwards III (1980), who stated that "policy implementation…is the stage of policy making between the establishment of a policy, … and the consequences of the policy for the people whom it's affect [sic]." The policy implementation is the stage of the policy process, between the policy and its consequences for the society affected by that policy. Grindle (1980) argued that "the assessment of the implementation's success can be seen from the process by questioning whether or not the program implementation is in accordance with what has been determined, i.e. seeing the action program from individual projects and whether or not the objectives of the program have been achieved." The same thing was observed by Lester and Stewart (2000) that "implementation as a process and an outcome (output). The success of policy implementation can be measured or seen from the process and the accomplishment of the final results (output), i.e. whether or not the desired goals are achieved."

Policy implementation according to Repley (1985) can be seen from two different perspectives, namely "implementation studies have two major focus: "compliance" and "what's happening?". The first perspective is compliance perspective, which is the success of implementation in the strict sense, i.e. as the compliance of the implementers in executing the policies stated in the policy documents. This aspect includes implementers' compliance in following the standard operating procedure (SOP). Meanwhile, the second perspective understands implementation more broadly. The inquiries to measure the success of implementation are: "What is it achieving? And what's happening? and why?" (Ripley, 1985:134). According to this perspective, the standard of a successful implementation is measured on the success in realizing the objectives of the policy, the real form of which is the emergence of the policy impact itself. That is, the implementer's compliance in implementing the policy in accordance with SOPs is not the only indication of the success of implementation. The compliance should be seen merely as a condition that has to be passed (a necessary condition) so that the policy goals can be realized, not the ultimate goal of the policy implementation, because it is influenced by other factors, namely the accuracy of the policy instruments, the adequacy of the policy outputs, the quality of the policy outputs, etc. One model of policy implementation is the model developed by George Edwards III (1980). According to Edwards III, "policy implementation is a crucial process, because no matter how good a policy is, if the implementation is not prepared well, then the goals of the public policy will not be realized. Likewise, no matter how good the preparation and the planning of a policy implementation is, if the policy is not formulated well, then the objectives of the policy will not be realized." Thus, the formulation and the implementation of a policy should be prepared and planned well. The success of the implementation of a public policy, according to Edwards III, is influenced by the following factors:

a. Communication: a good implementation will be effective if the decision makers have the knowledge about what they will do, which will run well if the communication is done properly. There are three indicators, namely: (i) Transmission: the distribution of good communication will result in a good implementation; (ii) The clarity of communication that is received by executors must be clear and not ambiguous

2

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www.ijmas.org

(ambiguous/dualistic); and (iii) Consistency: the orders given in the implementation of communication must be consistent and clear (to be implemented or executed).

b. Resources, which includes human resources, finance, and instruments that are needed to implement the policy. There are several elements: (i) staff: sufficient, competent, and adequate number; (ii) information: which consists of information that is related to the way of policy implementation, and information about the implementer's compliance towards the laws and the government's regulations that have been established; (iii) authority: which, in general, refers to the formal authority so that the orders can be executed; and (iv) facility: namely utilities and supporting infrastructures.

c. Disposition, namely willingness, desire, and the tendency of the policy stakeholders to implement the policy earnestly so that the policy objectives can be achieved. There are three elements of responses that can affect the desire and the willingness to implement the policy; they are: knowledge, understanding, depth, and the direction of the response whether it accepts, be neutral, or reject the policy. There are several elements (i) the appointment of bureaucrats: it should be someone that is dedicated to the established policy, more specifically to people's interests; and (ii) incentives: giving certain benefits or costs so that it can become supporting factors for the policy executors in implementing the orders properly.

d. The structure of bureaucracy, which includes aspects such as the structure of organization, authority distribution, the relation between organizational units within the related organization, the relation between the organization and the outside organizations, and so forth. The structure of bureaucracy includes dimensions of fragmentations and standard operating procedures that will facilitate and unify the actions of the policy executors in implementing what becomes their field of policy. This dimension asserts that fragmented bureaucratic structure can increase failure in communication. In other words, a fragmented organization will cause distortion in the policy implementation. There are two characteristics that can support the performance of the bureaucratic structure or organization into a better state, namely (i) SOPs (Standard Operating Procedures), which is a routine activity that allows staff (policy implementers) to work according to the established standards; and (ii) Fragmentation which is the attempts to spread the responsibilities of activities among several work units.

2. RESEARCH METHODS

This study used qualitative method since the focus of this study was dominant on a study on the process of CSR implementation, and not on the quantitative measurement of the impacts of the program on the target community. Similarly, this study did not test a hypothesis that was formulated since the beginning and derived from the theory, but deeply and comprehensively described the CSR policy implementation, especially the partnership program, which included the process of program implementation; the roles of each actor; supporting and hindering factors, and the model of program implementation.

This study was conducted on the State-Owned Enterprise, PT. Telekomunikasi Indonesia (Telkom-Indonesia, Tbk.). The data were collected using observation technique, indepth interviews, and documentations. The informants were selected using the techniques of quota sampling and judgment sampling. The collected data were then analyzed using interactive model data analysis of Miles, Huberman, and Saldana (2014). In practice, the methods used were by interactively and circularly combining data collection, data condensation, data display and then drawing conclusions and verifications (drawing/verification).

3. RESULTS AND DISCUSSION

The Process of the Implementation of Corporate Social Responsibility (CSR) Policy

CSR policy that is implemented today results from public issues about the company's obligation to implement their social responsibility to the society, especially those living in the company's working areas. Social responsibility as explained by Wahyudi and Azheri includes things related to the fulfillment of the social responsibility of the company as a part of the community (Wahyudi and Azheri, 2008:165-167). This policy issue on the corporate social responsibility is then developed and received supports from many experts that start to see CSR from the perspectives of the society (Whetten, et al., 2002; Roome, 2004; and Kotler and Lee, 2005). The company must have a commitment to improve the general public's well-being through discretionary business practices and the contribution of the company's resources. Therefore, the

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company must change their points of view by reviewing the position of their business in the society, by creating a better relationship with the stakeholders inside and outside the company.

The policy issues then drive the government to formulate a public policy in order to implement the company's social responsibility. The government argues that the corporate social responsibility should be a part of the company's good management (good corporate governance). As stated by Clarke (2004), corporate governance is related to CSR though the concept of stakeholder's participation. In the concept of corporate governance, the company needs to establish a relationship with the stakeholders on ongoing basis to realize the good corporate governance.

The importance of the roles of the regulations in CSR is also found in a study by Unang (2011) who stated that the roles of government in the implementation of CSR program are quite necessary, i.e. via the policy that is set in the forms of law or other regulations as an attempt to encourage businesses to be strongly motivated and consistent in implementing the CSR program. In this context, the government has issued some policies regulating Corporate Social Responsibility, namely: first, The Law of the Republic of Indonesia Number 19 Year 2003 on State-Owned Enterprises, which becomes the legal framework of CSR program implementation, which in Article 88 is stated that SOEs can dedicate some of their net profit for the needs of developing small businesses and cooperatives as well as the development of the local society around the SOEs. Second, The Law of the Republic of Indonesia Number 40 Year 2007 on Limited Liability Company. In this regulation, it is stated that social and environmental responsibility is of the company's commitment to taking part in the sustainable economic development to improve the quality of life and useful environment, both for the company itself and local community as well as for the people in general. Third, Minister Regulation on State-Owned Enterprises Number Per-05/Mbu/2007 about Partnership Program for State-Owned Enterprises with Small Businesses as well as Community Development Program. This regulation is a refinement of the Decree of Minister for State-Owned Enterprises Number Kep-236/MBU/2003 on Partnership Program for State-Owned Enterprises with Small Businesses as well as Community Development Program (also known as BL) that has existed before because it is considered not enough to give operational foundation for the improvement of the implementation of Partnership Program for State-Owned Enterprises with Small Businesses as well as Community Development Program. Fourth, The Regulation of the Government of republic of Indonesia Number 47 Year 2012 on Social and Environmental Responsibility of Limited Liability Company. In this government regulation, it is stressed that each company as a legal subject has social and environmental responsibility.

The legal provisions that are regulated in various laws and Government Regulations are then translated through the Decree of the Board of Directors of PT. Telekomunikasi Indonesia Tbk. Number: KD.21/PR000/COP-B0030000/2010 about The Management of Partnership Program and Community Development Program. This Decree of the Board of Directors of PT. Telkom regulates several basic provisions that are required in the Regulation of Minister for State-Owned Enterprises Number Per-05/Mbu/2007, especially the ones that regulate the obligation of supervising SOEs. Some important aspects of the load content of the decision of the board of PT. Telkom are:

1. The establishment of Executive Unit of Partnership Program and Community Development (also known as BL) Program of PT. Telkom; the establishment of Executive Unit of Partnership Program and Community Development (also known as BL) Program of PT. Telkom;
2. Formulating Standard Operating Procedures (SOPs) for the implementation of Partnership Program and BL program that is stated in the Decree of the Board of Directors; and formulating Standard Operating Procedure (SOP) for the implementation of Partnership Program and BL program that is stated in the Decree of the Board of Directors; and
3. Formulating a Work Plan and Budget (also known as RKA) of Partnership Program.

Based on the collected data, the three contents of the policy have been implemented by PT. Telkom, which can be seen from: (a) the specialized units for CSR implementation, namely Community Development Centre (CDC) and Community Development Area (CD Area); (b) various SOPs for CSR implementation, namely SOPs for loan application, SOPs for fund distribution; and SOP for the loan payments; (c) the Work Plan and Budget (RKA) that is formulated in each financial year. The importance of SOPs for the policy executors can be found in the view of Ripley (1985), who states that the policy's implementers should have a compliance with SOPs which Ripley calls compliance perspective, i.e. the compliance of the implementers in implementing the policies states in the policy documents.

4

The load contents of the policy have been communicated and socialized to all implementers, from the ranks of executive-level managers to the Heads of Regional Telecommunication and staffs. The collected data also support that the load contents of the policy have been understood by the policy's implementers, both in the organizational structures of CDC and CD Area. Communication and socialization factors of the contents of the policy become one determining factor for the success of CSR-partnership in PT. Telkom. This is in line with the opinion of Edwards III (1980) who stated that one of the determining factors for the success of the implementation is communication factor. The policy implementation will be more effective if the decision makers have the knowledge about what they will do, which will run well if communication is done properly. Through the clarity of the tasks and functions that are governed in the organizational structures of CDC and CD Area, the communication occurs properly among the executors (transmission aspects); there is clarity of the tasks and functions for each general manager and also staffs in the organizations, as well as consistency in implementing the contents of the policy regulated in the Decree of the Board of Directors of PT. Telkom.

The importance of the load or the content of the policy as the determining factor for the success of the policy implementation is also mentioned in the policy implementation model developed by Grindle (1980). According to Grindle, the success of policy implementation is determined by the degree of implementation of the policy, namely content and context or the policy environment. Content of policy, includes:

a) Interest affected that is related to various interests that influence a policy implementation. In this study, it is found the government's interests that are decentralized through SOEs in the form of CSR and the interests of public that need help from the company in running their businesses.

b) Type of benefits. In this point, the content of policy attempts to explain that in a policy there should be several kinds of uses which give positive impacts on the target groups. In this study, it is found that the benefits are not only for the small business entrepreneurs as the supervised partners, but also for the company's sustainability in its working areas.

c) Extent of change envisioned, i.e. each policy has a target to be achieved. Content of policy that is to describe is how far the desired change from a policy must have a clear scale. CSR-partnership program has a clear target, which is making the small entrepreneurs independent entrepreneurs, and have knowledge in running their businesses that is obtained through the given coaching (training).

d) Site of decision making. Decision-making in a policy plays an important role in the implementation of a policy, so where the decision-making of the policy will be implemented must be explained. The regulation on who makes decisions about what have been explained in details in the SOPs and in the details of basic duties and functions of each policy implementer, as regulated in the Decree of the Board of Directors of PT. Telkom.

e) Program implementor in implementing a policy or a program must be supported by the competent policy implementers for the success of a policy. The policy implementers, both in the structures of CDC and CD Area, have been regulated separately from the implementers that implement CSR-partnership program.

Other factors that determine the success of policy implementation are resources, including human, infrastructures, and financial resources. Van Meter and Van Horn (1975) stated that the performance of policy implementation is influenced by several variables, namely human resources, finance, and time. Similarly, Grindle (1980) affirmed that committed resources that are used are one determining factor in supporting policy implementation.

Policy implementation model that explains in great detail about the urgency of resources in supporting the policy implementation is the policy implementation model by Edwards III (1980). According to Edwards, resources factor plays an important role in policy implementation, namely human resources, finance, and infrastructures needed to implement the policy. There are several elements of resources in policy implementation, namely (a) staff: sufficient, competent, and adequate number; (b) information: that is related to the methods of policy implementation, and information on the implementer's compliance with the established rules and government's regulation; (c) authority: namely the authority that is formal so that the orders can be executed; and (d) facilities: equipment and supporting infrastructures.

The results of this study show that in general human resources in PT. Telkom are categorized into three groups, which are:

a) Front Line Group as the striker in the front line, namely marketing and public relation;

b) Central Support Group, which is engaged in core business operations of PT. Telkom; and

5

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Vol. 5, No. 01, (01-12)
www.ijmas.org

c)   Back or Support Group, namely human resources that exist within the organizations of the company's business units.

Human resources supporting the CSR-partnership policy implementation are categorized in the third group, which is supporting group (supporting), i.e. resources in the organization of CDC and CD Area. Structurally in the headquarters, PT. Telkom is directed by a Senior General Manager of CDC that supervises four Senior Managers (SMs), namelyn SM of Partnership (Partnership Program), SM of Community Development, SM of Finance, and SM of Planning and Control. Senior Manager of Partnership supervises three managers, namely Manager of Distribution and Development, Manager of Evaluation and Analysis, and Account Manager. Each manager is supported by 1 officer and 1 supporting person.

Human resources existing in the level of Regional Division (also known as Divre) especially in the level of Regional Telecommunication (also known as Witel) or Regional Office of Telecommunication (also known as Kandatel) are still lacking in numbers so that the implementation of CSR activities is not yet maximal. The number of the supervised partners that send out application are plenty but the number of the officers is little but in the reality, not all structures of CDC are filled. There are some barriers in doing the socialization especially by the executors of CSR activities in each area of Witel/Kandatel Telkom, because the number of personnel in assuming the responsibilities of an officer is only one, and the officers of Community Development Center Area (CDCA) of Telkom are only two non-permanent employees, namely the Company's Outsourced Workers (also known as TKPP). The challenge that is faced remains the extent of territory that should be reached by CDC officer while the number of the personnel is very limited. For instance, CDSA in Pontianak covers eight regencies, the far distance between which causes the personnel of CDSA Telkom difficulties to execute the partnership program activities maximally. To reach one region, sometimes it takes two-to-three-day roundtrip journey and one full day to select new prospective supervised partner.

Another element mentioned in the model by Edwards III, which plays an important role in the success of policy implementation, is facilities and infrastructures. The results of this study reveal that PT. Telkom has provided the needs of those facilities and infrastructures adequately. In order that the existing human resources can work maximally in a conducive environment, PT. Telkom also provides office facilities and infrastructures for its employees. At manager level, they are facilitated with official vehicles, and for the use of private vehicles, the managers receive money for rent every month. Meanwhile, staff officers who use private vehicles or take public transportation will be reimbursed by the company.

Another thing that is urgent in the model by Edwards III, in addition to facilities, is the authority in working. In general, the authority is formal so that the orders can be executed. All planning activities become the authority of the managers and then are proposed to the respective senior manager. The authority of determination lies on the Senior General Manager (SGM). For instance, the authority of an account manager is proposing the problematic supervised partners annually, but its determination is the authority of SGM. The Planning and Control Management has the authority to create a Management Contract, i.e. one-year-period planning, and determine the target of distribution and collection. To avoid overlapping in the implementation of CSR program, a regular meeting by Budget Committee is held once every three months, which is joined by the levels of manager and above nationally.

Another element of resources that determines the success of implementation is financial support or the budget availability. In the context of the implementation of CSR-partnership program, the things related to budget availability are regulated in Article 8 of The Regulation of the Board of Directors of PT. Telkom No.PD.702.00/r.00/PR000/CDC-A1040000/2015, which states that the fund sources of partnership program are:
1)   The available balance of the fund from the partnership program of the previous year;
2)   The amount of new allocation that is calculated from the net profit after tax which is set in the AGM (also known as RUPS) of the company, in accordance with the established legal regulations;
3)   Installments of the loan principal;
4)   Administration services for loan/margin/revenue share of the partnership program;
5)   The deposit interest and/or payment of interest from the established fund of partnership program and/or;
6)   Other sources that are valid according to the legal regulations.

Overall, the total budget for supervised partners that has been implemented since 2002 up to 2015 has reached more than two trillion Indonesian rupiahs. For the implementation of CSR-Partnership program,

since 2002 to 2015, PT. Telkom has spent budget for credit fund as much as IDR 2.545 trillion distributed to 114,359 small and medium-sized entrepreneurs from 2002 to 2015. The largest budget is received by CD of Regional Division 5 of East Java and Madura, as much as IDR 487.720 billion or 19.16 percent of the budget total that is spent, which is distributed to 20.339 MB. Meanwhile, the lowest is received by CD Divre 7 of Sulawesi, Bali, NTT and NTB as much as IDR 236.510 billion or 9.29 percent of the budget total of CSR-Partnership of PT. Telkom.

Over all, on average, the supervised partners received loan as much as IDR 22,259,000 but if seen from each CD of Regional Division, the largest amount of the loan is received by the supervised partners in the regions of CD Divre 2 DKI Jakarta, Banten and Botabek, as much as IDR 26,342,000 in average. The supervised partners in the regions of Regional Division 3 of West Java receive the smallest amount among other CDs of Regional Divisions, which is IDR 19,872,000 on average.

Based on that analysis and discussion, it seems that the content of the policy that is communicated well among the policy implementers (CDC and CD Area) and also to the policy target (the supervised partners) has influenced the performance of the implementation of CSR-partnership policy of PT. Telkom. Similarly, the elements in the resources variable, which consists of human resources, authority, facilities and infrastructures, as well as financial elements have given real effects in the implementation of CSR-partnership program of PT. Telkom. Hence, some variables in the Policy Implementation Model by Edwards III are coherent or in accordance with the data in this study.

One of the elements that received less attention in the Model of Edwards III is the attention to the importance of the load or content of the policy that also influences the policy implementation, as revealed in the analysis on the findings of this study. Therefore, things that are related to the load or content of the policy are more suitable for the Model by Mazmanian and Sabatier (1983), who stated that the clarity of the policy content will help the policy implementers in accurately structuring the process of policy implementation, so that the process of policy implementation can succeed properly.
Based on the results of analysis and discussion above, it can be formulated a proposition as follows:
Proposition (1):
The performance of the policy implementation process is determined by the content of the policy that is properly communicated to the policy implementers, and the support of various factors such as human resources, facilities and infrastructures, as well as budget availability.

3.1 Supporting and Hindering Factors
This study has been able to identify at least three supporting factors and three hindering factors. The supporting factors consist of policy factor, financial factor, and organizational and personnel factor. Meanwhile, the hindering factors consist of problematic credit loans, the change of policy on the organizational structures, and the increase in loan administration services.
The results of this study show that the policy issued by the government and the supervising SOE (PT. Telkom) in the implementation of CSR-partnership program has become one of the supporting factors in the success of policy implementation. The content or the load of the policy is one supporting factor to achieve the policy goals that have been normatively formulated in the policy. Referring to the theory of classic policy implementation by Smith (1973), one variable that influences the policy implementation is idealized policy or policy that is made ideal. If the content of the policy has been formulated properly, and the roles of all implementers have been well explained too, then the objectives of the policy can be achieved. The results of this study show that the job description of the policy implementers have been formulated in the Decree of the Board of Directors of PT. Telkom, and the implementers understand their respective jobs well enough in implementing the CSR-partnership policy.

Relevant to the above discussion, the results of this study is coherent with the view of Ripley (1985) who stated that one perspective to measure the success of policy implementation is compliance perspective, i.e., the compliance aspect of the policy implementers in following the standard operating procedures (SOPs). The results of the study revealed that: (a) implementers have obeyed the established procedures; (b) the implementation of the activities is in accordance with the arranged schedule, as stated in the Action Plan and Budget of CSR-partnership; (c) the target groups that are reached are in line with the criteria set up by the policy, which are small entrepreneurs; (d) the quality of the policy output that is delivered to the target groups conforms to the standards established in the Regulation of Minister for SOEs as well as the Decree of

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Vol. 5, No. 01, (01-12)
www.ijmas.org

the Board of Directors of PT. Telkom; and (e) the implementers do not violate against the prohibitions in various regulations governing CSR.

Financial factors are one main instrument in implementing the CSR-partnership policy because in order to give credits to small entrepreneurs that will become the supervised partners, there should be sufficient budget available from the company (PT. Telkom). According to Erwan (2012), one of the determining factors of success or failure of the process of policy implementation is the adequacy of policy input especially budget. A policy or program will not achieve its goals or targets without adequate budgetary support. Similar to the view of Hogwood and Gunn (1984), policy implementation will be realized if the resources are adequately available.

The results of this study indicate that to guarantee budget availability in the process of the implementation of CSR-partnership program, it is stipulated in the Regulations of the Board of Directors of PT. Telkom No.KD.30/PR000/COP-B0030000/2007, which is then renewed with the Regulations of the Board of Directors No.KD21/PR000/COP-B0030000/2010 about the Management of Partnership Program and Community Development Program. This regulation governs various things that are technical and administrative related to the budget, which includes: (i) source of funds; (ii) use of fund; (iii) distribution of fund; (iv) credit management; and (v) operational expense of the partnership program implementation. Thus, it can be said that financial support, which is the ability of PT. Telkom in providing budget for the implementation of CSR-partnership program, taken from the net profit of PT. Telkom, is one supporting factor for the success of the CSR-partnrship policy implementation.

Organizational and personnel factors are also supporting factors for the success of CSR-partnership policy implementation, because the regulations have explicitly governed the authority, responsibility, and duties of each implementer actors, namely CDC, CD Area and also supervised partners. As stated by Erwan (2012:85-86), one such factor determining the success of policy implementation is the capacity of the implementers in organizational structures, the support of human resources, coordination, and supervision.

On the other hand, the hindering factors of CSR-partnership policy implementation consist of problematic credit loans, the change of policy on the organizational structures, and the increase in loan administration services. These three factors can be reduced into two based on its sources, namely hindering factors resulting from the target group, which is the supervised partners, in the form of inability to repay their loans; and factors resulting from the policy of PT. Telkom, namely the change in the organizational structures and the increase in the loan administration services. The second perspective from Ripley (1985) can be used to explain the hindering factors resulting from the target group (supervised partners). According to Ripley, the inquiries to measure the success of implementation are: "What is it achieving? And what's happening? and why?" (Ripley, 1985:134). According to this perspective, the standard of the success of implementation can be measured from their success in realizing the policy objectives, the real form of which is the emergence of the policy impacts. The data in this policy show that not all target groups can realize the policy goals, i.e. their ability in becoming independent entrepreneurs and ability to repay their loans. Based on the data obtained in 2011 up to 2014, the amount of problematic credit loans has been increasing. In 2011, it was recorded as much as IDR 39.069 billion; in 2012 as much as IDR 57.912 billion; and then drastically increasing in 2013 to IDR 308.246 billion or increasing as much as 432.26 percent; and in 2014 it increased again to IDR 506.562 billion or 64.34 percent. The huge amount of problematic credit loans becomes an obstacle for CSR-partnership program implementation, because the fund that is supposed to be available for distribution to other supervised partners becomes less.

Based on Repley's perspectives, such points of views are very relevant when in the reality, a case is found, in which the delivery of the policy output to the target groups (supervised partners) has been in line with the established procedures, but the fate of the target groups does not change much. In other words, the policy implementation is not maximal in achieving the established policy goals, namely changing the fate of the target groups from one condition to another that is better as expected in the policy documents. Whereas according to a study by Purba (2008), the objectives of policy implementation will be achieved if there is balance and harmonization between the company and the local community and the people in general, in the forms of mutual-benefit patterns and encouraging joint advancement.

A change in the organizational structure of the manager of CSR-partnership program also become hindering factors for CSR policy implementation of PT. Telkom. As the data of the findings show, since 2014, there has been some changes in the organizational structures from authority centralization that was

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previously on CDC into decentralization onto Regional Divisions (DivRe). Accordingly, central CDC no longer has a line of command or order to the Regional Divisions (Divre) so that there is no authority for operational command for CDS program especially partnership program. Everything is fully handed to Divre, Witel, and Kandatel. The workload in CDC has been delegated to the respective areas of Divre in the Province level and Witel in the regency/city level. Thus, nationally, the policy is in the hand of the central office, while all operations in the regions have become the authority of the respective Divre. Meanwhile, the Central CDC just decides the policy and the strategies for CSR implementation that then become the guidelines for Divre in their implementation. The obstacles resulting from the change in organizational structure are the difficulties in coordination; central CDC cannot directly command Divre, while the policy formulation and decision-making is in the hand of the central office. This condition is relevant to the views of Van Meter and Van Horn (1975), which states that the factor influencing the performance of policy implementation is the communication in the organization and coordination among the implementers. If the coordination among the work units in the organization is weak, and the communication does not run effectively, then it will be difficult to achieve the policy goals. Van Meter and Van Horn even mentions that coordination is a powerful mechanism in the policy implementation so that if the coordination does not run well due to the change of policy in the organization, then the achievement of the policy performance will be disturbed.

Edwards III (1980) also explained in detail the effects of communication on the achievement of policy performance. According to Edwards III, the good implementation will be effective if decision makers have the knowledge about what they will do, which can run well if communication is done properly. In this case, there are three indicators of communication variables that affect the process of policy implementation, i.e., (a) transmission: the distribution of good communication will result in the good implementation as well; (b) the clarity of the communication received by the implementers should be clear and not confusing (ambiguous/dualistic); and (c) consistency: the order given in the implementation of a communication should be consistent and clear (to be applied or implemented). This explanation is reinforced by the results of a study by Markinde (2005), which explained that one factor causing the failure of policy implementation is the absence of coordination and monitoring in the policy implementation.

Thus, based on the above analysis and discussion, a change of policy, both in the organizational structures and the increase in the loan administration services of the supervised partners can influence coordination and communication among the work units of CSR implementers, so that it influences the achievement of policy performance, i.e. more increase in the problematic credit loans in CSR-partnership implementation. Thus, the results of this study support the policy implementation model by Edwards III in terms of the influence of communication components in the policy implementation. Nevertheless, the results of this study find antecedent variable that affects communication, namely a change in the policy content.
Based on that analysis and discussion, the researchers can formulate a proposition as follows:
Proposition (2):

The policy change that affects coordination and communication among the executive units in the organizations can be hindering for the achievement of the policy goals. In contrast, if the policy content does not affect the coordination and communication, and there is financial support as well as personnel in the process of policy implementation then the policy objectives can be maximally achieved.

4. CONCLUSION

(1)   Based on the results of analysis and discussions, the researchers can draw some conclusions. First, the success of the process of policy implementation is determined by factors such as (a) the policy content that is properly communicated to the policy implementers, which means that the policy content does not only govern the clarity of the basic duties and functions of each policy implementer, but must also be understood properly by those implementers, and coordinated in the implementation process; (b) the support of factors of human resources, facilities and infrastructures, i.e. the adequate availability in terms of quantity and quality of the resources so that they can support the process of policy implementation; and (c) budget availability, not only to support operationalization of the activities but also to fund the work programs in relation to the target groups or the target of the policy.

(2)   Secondly, there are three supporting factors for the policy implementation process, namely: (a) policy factor, i.e. the policy the content of which comprises several aspects: (i) regulating in details and clearly the duties and functions of the implementers as well as the rights and the responsibilities of the target groups;

(ii) the target and the measurement of policy performance; and (iii) some methods for problem solving; (b) financial factor, i.e. there is clarity of the budget source to fund the program operationalization and available in adequate amount, not to mention that there is a clear accountability mechanism; and (c) organizational and personnel factor, i.e. there is a clear organizational structure that shows the relationship and the clear path of authority from the people in that structure; and there are adequate number of personnel and representative qualifications for the policy implementation.

(3) Meanwhile, the factors hindering the process of CSR policy implementation consists of: (a) problematic credit loans, it is because the more the problematic credit loans are, the less the amount of fund will be distributed in the following year, and the fewer the number of the supervised partners will be; (b) the policy change in the organizational structures from centralization to decentralization have results in the weakening of supervising functions as the impact of the absence of authority for operational commands of CSR program implementation; and (c) the increase in loan administration services, because it burdens the target groups (supervised partners), and decreases the ability to return the distributed fund that has been received.

(4) Based on the hindering factors that have been identified in this study and the result of analysis as well as discussion on those factors, the researchers can then propose some suggestions as follows:

(5) It requires more creditor personnel than that present nowadays to monitor and evaluate the paying ability of the supervised partners, and then carefully selects among the supervised partners that are still "able" and the supervised partners that are really unable to repay the loans so that it can decrease the number of problematic credit loans.

(6) Even though there is a change in the organizational structure of CSR managers, it needs specific work units to monitor and evaluate at the level of Witel, so that the change brings no impacts on the weakening of supervising aspects, but can strengthen CSR-partnership implementation at the level of Witel;

(7) The loan administration services should be determined based on the skill of each supervised partners, not equally done towards others, and thus it needs classification of the supervised partners based on their business capital.

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