JLPH: Journal of Law, Politic and Humanities
E-ISSN: 2962-2816
P-ISSN: 2747-1985
https://dinastires.org/JLPH dinasti.info@gmail.com +62 811 7404 455
DOI: https://doi.org/10.38035/jlph.

Comparison of Regulations Concerning Protection of Migrant Workers Between Indonesia and the Philippines

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Abstract: Many Indonesian citizens decide to become migrant workers abroad due to the lack of opportunities to work in the country. But unfortunately, while working abroad, many Indonesia migrant workers receive inappropriate treatment from their employers, such as being mistreated or having their documents confiscated. Taking into account these conditions, the Indonesia government promulgated Law Number 18 of 2017 concerning the Protection of Indonesia Migrant Workers. This study aims to identify the similarities and differences in the legal policies of the two countries, as well as analyze how these regulations are applied in protecting the rights of migrant workers. This study uses a comparative law method, where Indonesia law will be used as the main reference (primum comparandum), while Philippine law will be used as a comparison (secundum comparatum). The results show that Indonesia has several regulations to protect migrant workers, but they are not yet fully effective, especially compared to the more systematic Philippine law in certain aspects, such as lending and legal aid services for migrant workers. Although Indonesia's laws are more detailed, the regulations are still not comprehensive, so it is necessary to pay attention to the advantages of Philippine law to increase protection for Indonesia's migrant workers in the future.

Keyword: Protection of Migrant Workers, Indonesian, Philippines..

INTRODUCTION

The right to work in Indonesia has been guaranteed based on Article 27 paragraph (2) and Article 28D paragraph (2) of the 1945 Constitution. However, the facts show that there are still many Indonesia citizens who have not been able to work properly and in fact, there are still many who do not have jobs (Suhandi et al., 2021). This can be seen in data from the Central Statistics Agency (BPS), where in February 2021, there were 6.93 million people who did not have a job or so-called with unemployment.

This unemployment causes many Indonesia Citizens (WNI) to choose to work in other countries, in order to meet their living needs (Santoso et al., 2023; Yusup & Jannah, 2022). As a result, Indonesia is one of the countries that sends the most of its citizens to work abroad both on the basis of the request of the country concerned and on the initiative of the Indonesia Placement Implementer (TKI) abroad (Adharinalti, 2012; Fitri & Sugiyono, 2023).

In the period from 2018 to 2020, with reference to data from the Indonesia Migrant Workers Protection Agency (BP2MI), it is known that countries that are often the destinations of Indonesia's migrant workers include Hong Kong, Taiwan, Malaysia, Singapore, Hong Kong, Taiwan, and Saudi Arabia (BP2MI, 2021). Then in 2020, the number of Indonesian citizens who became workers abroad or so-called Indonesia migrant workers, was 113,173 people including 22,673 men and 90,500 women (BP2MI, 2021).

The large quantity of Indonesia's migrant workers is not accompanied by increased protection for them (Dessi et al., 2024). The reality is that there are still many Indonesia migrant workers who often receive unfavorable treatment in other countries, such as experiencing persecution from employers such as one of the existing cases is a migrant worker who was persecuted in Malaysia who received very inappropriate treatment (Sitepu, 2007; Surya, 2020). One of the steps that has been taken by the Indonesia government to overcome problems related to the protection of Indonesia migrant workers abroad is to make and promulgate Law Number 18 of 2017 concerning the Protection of Indonesia Migrant Workers. In addition, the Indonesia government has also made implementing regulations from Law Number 18 of 2017 which is expected to help ensure more adequate protection for Indonesia's migrant workers, namely the Regulation of the Minister of Manpower Number 18 of 2018 concerning Social Security for Indonesia Migrant Workers, Presidential Regulation Number 90 of 2019 concerning the Indonesia Migrant Workers Protection Agency, Regulation of the Minister of Manpower Number 9 of 2019 concerning Procedures for the Placement of Indonesia Migrant Workers, and Regulation of the Minister of Manpower Number 17 of 2019 concerning the Termination and Prohibition of the Placement of Indonesia Migrant Workers.

Unfortunately, the existence of these laws and regulations has not been able to implement effective protection for Indonesia migrant workers working in other countries. The ineffectiveness of this rule is shown by the rampant cases of inhumane treatment of Indonesia's migrant workers. One of the most concerning cases is about migrant workers who are victims of human trafficking (Rustam et al., 2022). As evidence of human trafficking cases, in 2019 there were 8 (eight) Indonesian women who were suspected of being victims of the Crime of Trafficking in Persons (TPPO) by a Malaysia company, namely Iclean Services Sdn Bhd (Migration Data Portal, 2020). By paying attention to these events, the author wants to compare the protection for migrant workers between Indonesia and the Philippines.

The reason why the author chose the Philippines is because the Philippines is the country that has the largest number of receipts from migrant workers (remittances) in ASEAN, where in 2018, remittances given by Filipino migrant workers amounted to 24 (twenty-four) billion United States Dollars, and these remittances accounted for 7 (seven) percent of the total national income of the Philippines (Rahayu & Rahmawati, 2021). In addition, with reference to data published by the United Nations Department of Economic and Social Affairs, in mid-2020, it was recorded that the Philippines is the country with the largest sending of female migrant workers in Southeast Asia, with a total of 6,094,307 people (Migration Data Portal, 2020).

Furthermore, the reason the author chose the Philippines is because by referring to data from the Migration Data Portal, the Philippines is the largest sending country of migrant workers in Southeast Asia with a total of more than 6 million people. Then, another reason why the author chose the Philippines as a country whose legal provisions are compared to Indonesia is because by referring to information from the ILO, it is explained that the Philippines is one of the most active countries in providing protection to workers, both through the rule of law and a series of national policies (International Labour Organization, 2020).

In making comparisons, the authors use the protection standards that have been regulated in the International Convention on the Protections of the Rights of All Migrant Workers and Members of Their Families (ICMW) and the conventions of the International Labour

Organization (ILO). The reason why the author chose the legal provisions of the ICMW and ILO conventions as a reference standard in comparing Indonesia's law with the Philippines is because the convention is a guideline for countries in the world, especially those that have ratified, to provide comprehensive and decent protection for migrant workers.
ICMW is a convention that has been ratified by 56 (fifty-six) countries, and ratification by many countries has reflected the uniformity and breadth of state practice that agrees that the protection of the rights of migrant workers should be upheld, considering that they are one of the vulnerable groups in the international community (United Nations Treaty Collection, 2024). In addition, Indonesia and the Philippines are countries that have ratified the convention where Indonesia has ratified the ICMW in 2012 in Law Number 6 of 2012, while the Philippines has ratified the ICMW in 1995, so the provisions in the ICMW have become part of the national laws of Indonesia and the Philippines.
Then, the reason why the author chose the provisions in the ILO conventions as a reference in comparing the laws of Indonesia and the Philippines is because the provisions in the ILO conventions are guidelines that must be complied with by Indonesia and the Philippines in providing protection for workers, especially migrant workers. This can happen because Indonesia and the Philippines are ILO member countries, where Indonesia became a member of the ILO on June 11, 1950 and the Philippines became a member of the ILO on June 15, 1948. Therefore, the author would like to make a comparison to analyze the extent to which the provisions in the ICMW and the ILO conventions on the protection of migrant workers, have been implemented by Indonesia and the Philippines in their national laws.

METHOD

The research in this paper is carried out using a comparative method of law, and in this study, Indonesia law will be used as the basis for a foothold or what is called primum comparandum, while Philippine law will be used as a comparison or what is called secundum comparatum (Shidarta, 2016). Furthermore, the basis for the comparison or so-called tertium comparationis in this study is the legal provisions that regulate the protection for migrant workers in Indonesia and the Philippines, especially those that regulate the rights of migrant workers, and the form of protection for migrant workers..

RESULTS AND DISCUSSION

Comparison of Arrangements on the Rights of Migrant Workers between Indonesia and the Philippines

Indonesia's law, Law No. 18 of 2017, has more detailed and clear provisions regarding the protection of the rights of migrant workers than Philippine law. This can be seen from the regulation regarding the rights of migrant workers in Article 6 paragraph (1) of Law Number 18 of 2017 which has been in accordance with the regulations regarding the rights of migrant workers in the ICMW and ILO conventions. The provisions in Article 6 paragraph (1) of Law Number 18 of 2017 concerning the rights of migrant workers in accordance with the rights arrangements in ICMW include:

1. The provisions in Article 6 paragraph (1) letter g concerning the protection of the right of migrant workers not to receive degrading treatment. The arrangement is in accordance with Article 10 of the ICMW which regulates the protection of the right of migrant workers not to be tortured or subjected to degrading treatment.
2. The regulation in Article 6 paragraph (1) letter e concerning the right of migrant workers to carry out worship in accordance with the religion and beliefs adhered to. The regulation of these rights is in accordance with Article 12 of the ICMW which regulates the right to freedom of thought, belief, and religion for migrant workers.

3. The regulation in Article 6 paragraph (1) letter c concerning the right of migrant workers to obtain information about the job market, placement procedures, and working conditions abroad. The regulation of these rights is in accordance with Article 13 of the ICMW which regulates the right of migrant workers to seek, receive and provide information.

In addition to complying with the provisions of the ICMW regarding the regulation of the rights of migrant workers, the provisions in Article 6 paragraph (1) of Law Number 18 of 2017 have also been in accordance with the provisions on the rights of migrant workers in several ILO conventions. The provisions in Article 6 paragraph (1) of Law Number 18 of 2017 in accordance with the ILO convention are as follows:

1. The arrangement in Article 6 paragraph (1) letter i concerning the right to freedom of association and assembly for migrant workers in the destination country. The regulation of these rights is in accordance with the provisions of the 1975 ILO Convention No. 143 on Migrant Workers, where the convention regulates the right to freedom for migrant workers individually and in groups.
2. The provisions in Article 6 paragraph (1) letter d concerning the right of migrant workers to receive equal treatment and non-discrimination while working in other countries. The regulation of these rights is in accordance with the provisions of the ILO Convention of 1962 Number 118 concerning Equal Opportunities for Social Security, where the convention regulates the recognition of the right of migrant workers to receive equal treatment for social security in the country of destination of work placement.
3. Provisions in Article 6 paragraph (1) letter m concerning the right of prospective migrant workers to obtain documents and work agreements. The regulation of these rights is in accordance with ILO Convention No. 181 of 1997 concerning Private Employment Agencies, which stipulates the right for migrant workers to avoid misappropriation in the form of recruitment fraud by private employment agencies. By paying attention to the provisions in the convention, the purpose of Article 6 paragraph (1) letter m is the same as the purpose of ILO Convention Number 181 of 1997, which is to prevent the falsification of recruitment documents, so that migrant workers can avoid the crime of human trafficking.

Remembering the characteristics of the common law legal system that is also adopted by the Philippines, so that Philippine law is also derived from case law, as affirmed in Article 8 of the Civil Code of the Philippines, that decisions from the judiciary that apply or interpret laws or the Constitution must form part of the Philippine legal system. The judicial decisions referred to in this provision are the decisions of the Supreme Court of the Philippines (Asean Law Association, 2019). The legal principles derived from such jurisprudence have the same status and are equivalent to the written laws and regulations in the Philippines as stated by the Supreme Court of the Philippines in the decision GR No. 19650 dated September 29, 1966 known as the case of Caltex (Phil) Inc. v. Palomar.

Therefore, in addition to using the Philippine constitution and the Migrant Workers and Overseas Filipinos Act of 1995 in the form of written laws and regulations as a comparison of legal principles, this study on the protection of migrant workers is impossible to escape the jurisprudence of the Supreme Court of the Philippines. The court rulings referenced in Philippine law on the regulation of the rights of migrant workers are G.R. No. 156381 October 14, 2005 and G.R. No. 215555, July 29, 2015. First of all, in G.R. No. 156381 October 14, 2005, the judge affirmed the recognition of the right of migrant workers not to be enslaved and not to receive any form of degrading treatment while working in another country. The recognition of these rights is in accordance with the provisions of Article 10 of the ICMW which provides for the protection of migrant workers from torture or inhuman or degrading treatment. Then, for the second decision, namely G.R. No. 215555, July 29, 2015. In this decision, the judge gave consideration to the right to freedom of migrant workers to voluntarily quit their jobs for certain reasons. This consideration is in accordance with the recognition of

the right to freedom of migrant workers as contained in the ILO Convention, namely the Migrant Workers Convention No. 143 of 1972.

Taking into account the provisions of the ICMW and the ILO conventions on the regulation of the rights of migrant workers, it can be concluded that the regulation of rights in Philippine law is not as clear and detailed as Indonesia law. This is possible because although Section 22 of the Republic Act No. 8042 regulates the actions of the Philippine government through the Department of Foreign Affairs, which guarantees the protection of the rights of migrant workers in accordance with international law, the Republic Act No. 8042 does not provide in detail and clearly what rights of migrant workers are protected by Philippine law. so that there may be rights in the ICMW or ILO conventions that are not protected or used as a reference for the Philippine government. In addition, although the Supreme Court's rulings, namely G.R. No. 156381 October 14, 2005 and G.R. No. 215555, July 29, 2015, have been regulated regarding the detailed recognition of the rights of migrant workers, namely the right not to be enslaved and the right of migrant workers to freedom to resign from their jobs, these arrangements do not fully contain the rights that have been stipulated in the ICMW and the ILO Convention.

Based on the results of the comparison between Law No. 18 of 2017 with Republic Act No. 8042 and G.R. No. 156381 October 14, 2005 and G.R. No. 215555, July 29, 2015, it can be concluded that the regulation of the rights of migrant workers in Indonesia law, namely through Law No. 18 of 2017, is more in accordance with the standards set by the ICMW and the ILO convention than the law of the Philippines. namely Republic Act No. 8042 and G.R. No. 156381 October 14, 2005 and G.R. No. 215555, July 29, 2015.

Comparison of Arrangements on Forms of Protection for Migrant Workers

The provisions in Indonesia law and Philippine law regarding forms of protection for migrant workers have provisions on forms of protection that are in accordance with the standards set out in the ICMW and ILO conventions. This can be seen from the provisions of the two countries that regulate the form of protection in the form of providing information and socialization about the destination country. Protection in the form of providing information about the destination country of placement is provided for in Article 37 of the ICMW. In addition, in Indonesia and Philippine law, there are also provisions regarding protection in the form of the provision of facilities, services (including the provision of treatment and treatment) and monitoring mechanisms for migrant workers.

This provision is in accordance with the provisions in Article 65 of the ICMW and the provisions of the ILO Convention on Equal Opportunities (Social Security) Number 118 of 1962, which regulates equal opportunities for social security facilities. Furthermore, both Indonesia and Philippine law also have provisions regarding protection in the form of quality improvement of migrant workers, which includes access to education and training. This form of protection is in accordance with the provisions in Article 43 of the ICMW which regulates protection for migrant workers in the form of improving the quality of workers.

After knowing the similarities in the arrangement regarding the form of protection for migrant workers between Indonesia law and Philippine law, the fundamental differences between Indonesia law and Philippine law regarding the regulation of forms of protection for migrant workers will be discussed. The first difference is that in Philippine law, forms of protection are spread across several articles and are not divided into specific forms. Meanwhile, in Indonesia law, the form of protection is expressly divided into 3 (three) forms, namely protection before work, protection during work and protection after work. The second difference is that the form of protection in Philippine law is more comprehensive than in Indonesia law, because in Philippine law, there are provisions that regulate the protection of migrant workers to avoid illegal recruitment as affirmed in Section 14 of the Republic Act No. 8042. In addition, another

reason why the provisions in Philippine law are more comprehensive than in Indonesia is because in Philippine law, the mechanism for the repatriation of migrant workers is clearer and more orderly. The more organized mechanism in Philippine law is due to the provisions that expressly regulate the agency authorized to carry out such repatriation, and the agency is the National Reintegration Center for Overseas Filipino Workers or NRCO.

Another aspect that distinguishes Philippine law from Indonesia law is that Philippine law provides protection in the form of loans to migrant workers, and this provision is regulated in Section 21 of the Republic Act No. 8042. Section 21 of the Republic Act No. 8042 stipulates that the provision of loan assistance for migrant workers is carried out with the aim of preventing illegal recruitment of Filipino migrant workers. The existence of this provision is an adequate protection foundation for Filipino migrant workers in order to prevent them from being lured into illegal recruitment. Such a form of protection is not regulated in Indonesia law, namely in Law Number 18 of 2017 and Permenaker Number 9 of 2019. However, the existence of Article 15 of Permenaker Number 9 of 2019, although it does not provide assistance in the form of similar financial assistance, can also be one of the prevention mechanisms from illegal recruitment. The provisions in Article 15 of Permenaker Number 9 of 2019 regulate the responsibility of placement companies or so-called P3MI to assist prospective migrant workers in processing work visas. With a guaranteed visa management mechanism, the chance of prospective migrant workers to be deceived by unofficial agents who offer fake work visa processing services is getting smaller, so that finally prospective migrant workers can avoid illegal recruitment.

Paying attention to the description above, it can be seen that Philippine law has provisions on a more comprehensive form of protection compared to Indonesia, because there are provisions regarding the provision of loans for migrant workers. The existence of this provision is important because with the provision of loans, migrant workers can get relief in order to carry out the recruitment process through the official channels provided by the placement company. If migrant workers do not have enough money, it is feared that they will tend to choose the illegal route because the cost that must be paid through the illegal route will usually be cheaper. In addition to being illegal, visa processing through this illegal route has a great chance of giving prospective migrant workers fake visas, so that they will eventually work abroad illegally. Therefore, the provisions regarding the provision of loans for migrant workers need to be reconsidered by the Indonesia government to be incorporated in national law in order to minimize the possibility of illegal recruitment.

The difference between Philippine law and Indonesia law can also be seen in the form of responsibility of the migrant worker placement agency or company. In Philippine law, the liability of agencies or companies that place migrant workers abroad is expressly regulated in G.R. No. 156381 October 14, 2005. In the ruling, the judge expressly stated the responsibility for the migrant worker placement agency or company to ensure protection for Filipino migrant workers, so that they are not treated inhumanely, such as being treated like slaves. This provision is not affirmed in Indonesia law, because in Law Number 18 of 2017, precisely in Article 52 paragraph (1), it is only regulated regarding the responsibility of placement companies to solve problems that befall Indonesia migrant workers and is not regulated regarding the responsibility of placement companies to ensure that Indonesia migrant workers receive humane treatment in other countries.

In Law Number 18 of 2017, responsibility is specifically imposed on BP2MI as the body mandated to form in Article 46 of Law Number 18 of 2017. The existence of responsibilities is outlined in Article 47 of Law Number 18 of 2017, Article 4 and Article 5 of Presidential Regulation Number 90 of 2019. The three articles regulate the duties of BP2MI and the duties of the Head of BP2MI in order to provide protection for Indonesia's migrant workers. Unfortunately, these three articles do not have provisions that specifically regulate the

responsibilities of placement companies or P3MI to ensure that Indonesia migrant workers are not treated like slaves.

Furthermore, it should be noted that the regulation regarding the form of protection for migrant workers is also seen in Permenaker Number 9 of 2019, precisely in Articles 15 and 26 which regulate the responsibilities of placement companies. But unfortunately, the two articles also do not contain regulations regarding the responsibility of placement companies or so-called P3MI, to ensure that migrant workers do not become victims of slavery.

This is because the two articles only regulate the obligation of P3MI to facilitate the management of work visas and the obligation to report return data or work agreement extension data. Thus, it appears that the responsibility of the placement company or P3MI in Permenaker Number 9 of 2019 is only in the form of administrative responsibilities, because it is more oriented to reports and documents. Taking into account this description, it can be said that Indonesia law does not have a regulation that emphasizes the responsibility for placement companies or P3MIs to guarantee the conditions of migrant workers to avoid slavery, so that Philippine law, as reflected in G.R. No. 156381 October 14, 2005, has more adequate protections for migrant workers compared to Indonesia law, especially protection for migrant workers to avoid slavery.

There are also differences between Philippine law and Indonesia law regarding the provision of legal aid services for migrant workers. Philippine law expressly regulates the establishment of Legal Assistants within the scope of the Ministry of Foreign Affairs who play a role in providing legal assistance to migrant workers abroad, both regular and irregular (illegal) as regulated in Section 24 of the Republic Act No. 8042. Meanwhile, in Indonesia law, there is no regulation regarding the provision of legal aid for illegal Indonesia migrant workers. This is because Law Number 18 of 2017 does not have a regulation that recognizes illegal Indonesia migrant workers as protected subjects, so the existence of legal aid in Article 21 of Law Number 18 of 2017 is only intended for regular migrant workers or those who enter other countries through official channels.

Furthermore, it should be noted that the mechanism for providing legal aid for illegal Indonesia migrant workers is something very important, considering that illegal Indonesia migrant workers are parties who are very vulnerable to exploitation and unfair treatment, so that with the provision of legal aid, the protection of their rights as citizens will be guaranteed as stated in Philippine law through a judgment Supreme Court of the Philippines in Caltex (Phil) Inc v. Palomar, GR No 19650 dated September 29, 1966.

Problems and Solutions to the Lack of Protection for Migrant Workers in Indonesia Law

After comparing the arrangements of the two elements of migrant worker protection, namely the protection of the rights of migrant workers and the forms of protection for migrant workers, between Indonesia law and Philippine law, several problems are found that cause the protection for Indonesia migrant workers to be inadequate. These problems include: First, although the regulation of the rights of migrant workers in Indonesia law is clearer and more detailed and in accordance with the provisions of the rights in the ICMW and ILO conventions, because the form of protection provided is not comprehensive and adequate, the rights of migrant workers are less guaranteed. This is because Law Number 18 of 2017 does not expressly regulate the bodies or institutions responsible for providing protection for the rights of migrant workers.

In contrast to Philippine law, where although the rights of migrant workers are not regulated or explicitly stated, there are regulations that mandate the establishment of agencies that specifically carry out protection for migrant workers, such as the Philippine Overseas Employment Administration (POEA), the Migrant Workers and Other Overseas Filipinos Resource Center, the National Reintegration Center for Overseas Filipino Workers (NRCO), and the Overseas Workers Welfare Administration (OWWA). With the existence of agencies

responsible for providing protection for migrant workers, both legal and illegal, the rights of migrant workers will be directly protected and guaranteed.

Although the provisions on the rights of migrant workers in Indonesia law are in accordance with ICMW standards and the ILO Convention, the enforcement of provisions on the rights of migrant workers has not provided definite protection for Indonesia's migrant workers. Inadequate enforcement is caused by the large number of illegal migrant worker placement companies, which causes the Government of Indonesia to experience difficulties in ensuring the fulfillment of social security rights for Indonesia Migrant Workers. In addition, the enforcement of the rights of migrant workers is still not optimal, also due to the lack of initiative from the Government of Indonesia to consequently implement the standard provisions contained in the ICMW and the ILO Convention.

Furthermore, the inadequate protection of the rights of migrant workers is also caused by the lack of strict sanctions given to agents or placement companies, where the sanctions regulated are only in the form of administrative sanctions, and this can be seen from the existence of Article 74 of Law Number 18 of 2017. The existence of this article is also only intended for more technical actions, such as the obligation of placement companies not to increase the cost of resolving disputes against migrant workers, but is not intended to guarantee the rights of migrant workers, so that the rights of migrant workers can be simply ignored by agents or placement companies can be subject to strict sanctions.

Second, another problem that causes the protection for Indonesia's migrant workers to be inadequate is because in Indonesia law, to be precise, Law Number 18 of 2017 and Permenaker No. 9 of 2019 are not expressly regulated regarding the responsibility of placement agents or placement companies to ensure protection for Indonesia's migrant workers, so that they are not used as objects of slavery. In addition, the existence of illegal migrant worker companies is allegedly a problem for the Government of Indonesia to monitor the determination of social security for Indonesia migrant workers. The regulation on responsibility is only intended for BP2MI, but the existing regulation also still does not mention inappropriate treatment, such as slavery, even though the arrangement is something important because placement companies basically have a responsibility to provide a sense of security for migrant workers. When paying attention to Philippine law, this responsibility has been accommodated by the existence of the Supreme Court of the Philippines Decision, namely G.R. No. 156381 October 14, 2005. With a firm mandate to placement agents or placement companies to be responsible for the treatment of migrant workers in accordance with the laws and regulations set, the protection for migrant workers can be more comprehensive.

CONCLUSION

Indonesia, as the second largest sender of migrant workers in ASEAN, has implemented several laws, such as Law No. 18/2017 and various regulations to protect its migrant workers. However, these laws have not effectively addressed all issues related to their protection abroad. A comparison between Indonesia's legal framework and the Philippines' Republic Acts No. 8042 and 10022 reveals that while both countries have protections in place, Indonesia’s regulations are more detailed, especially regarding the rights of migrant workers as outlined in Article 6 of Law No. 18/2017.

Despite this, Philippine law offers several protections that Indonesia lacks, such as provisions for lending to prevent illegal recruitment, repatriation for underage workers, legal aid for irregular workers, and stronger enforcement of employer responsibility to prevent inhumane treatment. To improve its legal framework, Indonesia could learn from these aspects of Philippine law to provide more comprehensive protection for its migrant workers in the future.

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