Asean Paradox: Between Asean's Commitment to Migrant Worker Protection and the Protection of Indonesian Migrant Workers

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ABSTRACT

ASEAN has created various instruments to protect migrant workers, such as the ASEAN Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007) and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017). However, despite these regional commitments, Indonesian migrant workers (PMI) continue to face exploitation, discrimination, and inadequate legal protection. This study aims to evaluate the effectiveness of ASEAN instruments in protecting migrant workers by analyzing the gaps between regional policies, national regulations, and bilateral agreements. Using a qualitative approach with document analysis, this research examines ASEAN instruments, Indonesian regulations, and bilateral agreements to identify implementation challenges, problems, and possibilities. The results show that ASEAN's ineffectiveness stems from the inadequate binding force of the instruments, lack of enforcement mechanisms, weak coordination among member states, and minimal participation of migrant workers in the policy process. These findings demonstrate significant disparities between stated commitments and actual protection outcomes for Indonesian migrant workers. This research makes theoretical contributions by enriching the literature on regional governance and practical implications by offering policy recommendations to strengthen the protection of migrant workers in the ASEAN region.

KEYWORDS	*ASEAN; Indonesian Migrant Workers; Protection.*
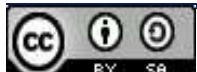
INTRODUCTION

The protection of migrant workers represents one of the most pressing challenges in contemporary Southeast Asian regional governance. The Association of Southeast Asian Nations (ASEAN) has long been known as a regional organization that plays a role in managing cross-border issues, including the protection and promotion of migrant workers' rights (Guinto et al., 2015). As one of the largest migrant worker-sending countries in the region (Arisman & Jaya, 2020), Indonesia has a very important role to play. Indonesian migrant workers contribute significantly to the economic development of their countries of origin and destination but simultaneously face various obstacles, such as exploitation, discrimination, and inadequate legal protection (Hidayat et al., n.d.). Similar challenges confront migrant workers from other ASEAN member states, reflecting broader systemic issues in regional labor mobility governance.

Responding to these persistent challenges, ASEAN has progressively developed multiple policy instruments aimed at enhancing migrant worker protection. The ASEAN

Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007) became a major milestone in migrant worker protection, emphasizing fair treatment, access to justice, and social welfare for migrant workers. A decade later, the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017) reinforced this commitment by providing a more comprehensive framework for member states to implement policies protecting migrant workers' rights. In addition to these primary instruments, ASEAN has adopted complementary frameworks, including the Declaration on Strengthening Social Protection (2013), the ASEAN Labour Ministers' Work Programme 2021–2025, and the ASEAN Socio-Cultural Community (ASCC) Blueprint 2025, which collectively affirm member states' obligations to improve the welfare and protection of migrant workers. However, although some of these commitments have been implemented, their effectiveness—specifically for Indonesian migrant workers—still requires deeper study.

Recent empirical evidence and government statistical data reveal a troubling gap between policy commitments and implementation outcomes. Various studies and Indonesian government statistics show that ASEAN instruments for protecting migrant workers' rights have not been fully implemented at the level of Indonesia as a country of origin or in other ASEAN countries as destinations for migrant workers. Indonesian migrant workers, who number among the largest groups in the region, still face significant challenges, including exploitation, limited access to justice, and inadequate social protection. Moreover, bilateral agreements between Indonesia and other ASEAN countries are not always fully aligned with the standards set out in ASEAN instruments (Palmer, 2024).

The divergent interests of member countries and varying socio-economic conditions significantly influence their implementation approaches and commitment levels. For example, the Mutual Recognition Agreement implemented by ASEAN puts Indonesian migrant workers in an increasingly disadvantaged position in labor competition with workers from other member countries (Isnarti et al., 2021). This competitive dynamic highlight the tension between economic integration objectives and worker protection goals within the ASEAN framework.

These persistent challenges raise critical questions about the actual effectiveness of ASEAN instruments in protecting Indonesian migrant workers. This research examines the problem by analyzing the gap between regional policy, national implementation, and bilateral agreements, and by measuring how well ASEAN is addressing the challenges faced by Indonesian migrant workers.

This research aims to critically evaluate the effectiveness of ASEAN frameworks in protecting Indonesian migrant workers, with particular emphasis on the consistency between regional policies, national regulations, and bilateral agreements. By analyzing key ASEAN instruments—such as the ASEAN Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007) and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017)—as well as Indonesia's domestic regulations and bilateral agreements with other ASEAN member states, this research seeks to identify gaps and challenges in framework implementation. In addition, it assesses the extent to which ASEAN regional mechanisms have successfully addressed the vulnerabilities experienced by Indonesian migrant workers, such as exploitation, access to justice, and social protection. Ultimately, this research is expected to provide evidence-based recommendations to strengthen the protection of Indonesian migrant workers at the regional and national levels, while

contributing to the discourse on migrant workers' rights and regional governance in Southeast Asia.

Despite the growing literature on migrant worker protection in Southeast Asia, a considerable research gap remains regarding the effectiveness of the ASEAN framework specifically for Indonesian migrant workers. Existing studies often focus on broader regional mechanisms or common challenges faced by migrant workers, without delving deeply into the unique vulnerabilities of Indonesian migrant workers or the alignment between ASEAN regional policies and Indonesian national regulations. Furthermore, while protection instruments for migrant workers have been widely discussed, empirical studies on their implementation at the national level or incorporation into bilateral agreements between Indonesia and other ASEAN member states remain scarce.

This research provides a new perspective by integrating analyses of ASEAN regional policies, Indonesian national regulations, and bilateral agreements into a comprehensive study framework. Whereas previous studies have tended to focus on general aspects of migrant worker protection or regional policies in isolation, this study specifically examines the effectiveness of the ASEAN framework in the context of Indonesian migrant workers, the largest group in the region.

Through a review of specific instruments—such as the ASEAN Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007) and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017)—and by linking them to law enforcement at the national and bilateral levels, this research makes a significant contribution to understanding the opportunities and challenges in protecting Indonesian migrant workers. In addition, its conclusions are expected to form the basis for more effective policy development at the national and regional levels, while advancing academic discourse on the role of regional organizations in human rights and humanitarian issues. Therefore, this research is not only academically relevant but also has profound practical implications for migrant worker protection in Southeast Asia.

RESEARCH METHOD

This research employed a qualitative approach utilizing policy analysis and document analysis methods to systematically assess the effectiveness of the ASEAN framework in protecting Indonesian migrant workers. This methodological choice was justified by its capacity to provide an in-depth understanding of policy implementation dynamics, systemic problems, and structural gaps within the regional framework that quantitative approaches might overlook.

The research relied exclusively on secondary data sources, comprising official ASEAN documents, national regulations, and bilateral agreements. Specifically, the data corpus included the ASEAN Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007) and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017), as well as bilateral agreements between Indonesia and ASEAN countries. Indonesian national regulations, namely Law No. 18/2017 on the Protection of Indonesian Migrant Workers, were also analyzed.

Data collection employed multiple techniques to ensure comprehensive coverage of policy dimensions, including document analysis to examine principles and policies in official

ASEAN documents, national regulations, and bilateral agreements. Case studies of specific violations of Indonesian migrant workers' (PMI) rights in ASEAN countries were utilized to understand ground-level implementation dynamics and identify patterns of protection failures.

The analytical framework employed three complementary methods to ensure robust findings. Data analysis was conducted through content analysis to identify principles and policies in official documents (Talagala et al., 2024), comparative analysis to compare ASEAN regional policies with implementation at the national and bilateral levels (Hamanaka, 2025), and thematic analysis to identify recurring patterns, key themes related to implementation barriers, and potential solutions across different policy levels (Broderick et al., 2024). The analytical results were subsequently synthesized to address the research questions comprehensively and formulate evidence-based policy recommendations.

Several methodological considerations guided the research design to ensure analytical rigor. The selection of documents followed clear criteria: official status, relevance to Indonesian migrant workers, and temporal coverage spanning from 2007 to the present to capture policy evolution. The effectiveness assessment employed specific criteria, including consistency between stated principles and actual outcomes, existence of enforcement mechanisms, coordination quality among stakeholders, and responsiveness to migrant worker needs. This research uncovered gaps and barriers in ASEAN policy implementation and provided policy-based solutions to enhance migrant worker protection in the region. By integrating qualitative approaches with systematic policy analysis, it contributed theoretically to the literature on regional governance and generated actionable recommendations for ASEAN and the Indonesian government.

The study acknowledged certain methodological limitations. First, reliance on document analysis limited access to implementation experiences and perspectives of migrant workers themselves. Second, the focus on official documents may not have captured informal practices or undocumented bilateral arrangements. Third, the absence of primary data from destination countries constrained analysis of receiving-country perspectives. However, these limitations were partially mitigated through triangulation of multiple document sources and integration of case study evidence where available.

RESULT AND DISCUSSION

The Ineffectiveness of ASEAN Instruments: A Comprehensive Analysis

The analysis shows that although ASEAN has combined various instruments to protect migrant workers, namely the ASEAN Declaration Concerning the Protection and Promotion of the Rights of Migrante Workers (2007) and the ASEAN Consensus on Protection and Promotion of the Rights of Migrante Workers (2017), the implementation has not been fully maximised in protecting Indonesian migrant workers (PMI). There is a wider gap between the outcomes of ASEAN regional policies, Indonesian national regulations, and bilateral agreements with other ASEAN countries (Rother & Piper, 2015).

In addition, the lack of strong law enforcement mechanisms (Palmer, 2024), lack of coordination between member states (Sundrijo & Safitri, 2023), and limited active participation of migrant workers in the policy process (Auethavornpipat, 2019) are the main triggers for this ineffectiveness. These findings show that ASEAN has not been effective in providing adequate

protection for migrant workers, thus there is a need for a new, more effective and efficient approach to ensure migrant workers' rights are protected.

Although the ASEAN Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007 declaration) and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017 consensus) have become the main pillars in efforts to protect migrant workers in the ASEAN region, their success in protecting Indonesian migrant workers (PMI) has not been effective. The 2007 Declaration still has many weaknesses. The asymmetry of sending countries' sovereignty and limited scope (Tan & Shahrullah, 2017), the absence of strong enforcement mechanisms, and domestic issues in sending countries (Supli et al., 2019) have contributed to the lack of effective protection for migrant workers. The formation of the 2017 consensus as a renewal of the previous instrument has also not been able to overcome the various weaknesses that exist in the 2007 declaration.

National Implementation Challenges in Indonesia

In Indonesia, although Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers (UUPPMI) has been passed, its implementation on the ground is still weak. There must be greater commitment from all parties, better coordination between institutions, and stricter supervision to provide effective protection for migrant workers in accordance with the mandate of the law. Statistics from the Indonesian Migrant Workers Protection Agency (BP2MI) in 2024 show that PMI complaints from 2023 to 2024 tended to decrease. But surprisingly, only ASEAN countries (Malaysia) experienced an increase. If ASEAN countries get special attention from ASEAN through a joint agreement to increase the level of complaints while destination countries such as in the Middle East and other Asian countries do not have a joint agreement or other declarations related to the protection of migrant workers by state organizations, then this regional instrument needs to be evaluated.

Tabel 1. Grievances of migrant workers in the country of placement

Country	2023	2024	%	change	Proportion
Malaysia	379	424	▲	11,87% (45)	28,27%
Taiwan	367	270	▼	26,43% (97)	18,00%
Saudi Arabia	498	186	▼	62,65% (312)	12,40%
Hong Kong	216	72	▼	66,67% (144)	4,80%
Cambodia	39	71	▲	82,05% (32)	4,73%
Negara Lainnya	496	477	▼	3,83% (19)	31,80%

Source: Data and Information Center of the Ministry of Protection of Indonesian Migrant Workers/Indonesian Migrant Workers Protection Agency Www.Bp2mi.Go.Id

BP2MI data also reports that in 2024, complaint resolution will only reach 13.40% (201) of the number of PMI rights violation cases that can be addressed through legal mechanisms. This means that there are 86.60 per cent of complaints that cannot be managed due to various obstacles.

Table 2. Indonesian Migrant Worker Complaints in 2024 by Case Status

CASE STATUS	AMOUNT	PERCENTAGE
In process	1.299	86,60%
Receive Complaint	554	36,93%
Assignment of Clarificator by Leader	33	2,20%
Assignment of Validator by Leader	326	21,73%
Determination of Work Unit by Leader Clarificator	34	2,27%
Clarification	267	17,80%
Validation	85	5,67%
Mediation	0 0,	00%
FINISH	201	13,40%
Amount	1.500	100,00%

Source: Data and Information Center of the Ministry of Protection of Indonesian Migrant Workers/Indonesian Migrant Workers Protection Agency Www.Bp2mi.Go.Id

In addition, coordination between ASEAN countries in protecting migrant workers is still weak. BP2MI February 2025 report recorded 182 cases in February 2025 with an increase of 124.69% from February last year. Complaints are frequent in these countries especially in Malaysia, Saudi Arabia, and Myanmar with direct complaints being the main reporting trigger (Badan Perlindungan Pekerja Migran Indonesia, 2025).

The 2017 ASEAN Consensus, while more inclusive by absorbing principles such as equality and social protection, has also experienced serious difficulties in implementation. The consensus is not legally enforceable, so its implementation depends on the political will of individual member states (Auethavornpipat, 2017).

There are several factors that contribute to ASEAN's inability to provide protection to migrant workers. Judging from the position of this ASEAN instrument, there are several weaknesses in implementation, namely: Firstly, the instrument is a declaration and consensus that states the commitment of member states to implement the agreed matters. The instrument does not have strong binding power. This instrument also does not require ratification like international conventions or agreements that have a very strong binding force. Secondly, the content of the instrument is about the rights and obligations of member states regarding the protection of migrant workers. The instrument does not discuss sanctions for violating countries, law enforcement mechanisms, human resources and infrastructure to enforce the implementation of the instrument. The logical consequence is that the problems of migrant worker protection that arise are difficult to solve using the instrument. Migrant workers cannot claim anything for their losses due to violations of the instrument committed by member states so that in the end the settlement with government intervention or privately becomes more effective.

These two factors have resulted in member states responding to the instrument in accordance with the interests of their respective countries, which are broadly divided into sending and receiving countries of migrant workers. Two positions that tend to have conflicting interests will make it difficult to implement the instrument as a whole. Member countries tend to be protective of their country's interests so that it will be more flexible and concrete when the agreement is made bilaterally with concrete and in-depth discussions.

In terms of national regulations, the protection of migrant workers is regulated in Law Number 18 Year 2017 on the Protection of Indonesian Migrant Workers (UUPPMI). The role of the government in the protection of migrant workers while working is only limited to data collection, supervision, fulfilment of rights, advocacy in certain fields and repatriation and is carried out in accordance with the provisions of laws and regulations, laws of the country of placement, and international laws and customs. The government does not take over the risk of criminal or civil actions of PMI and (Article 21).

This regulation regulates the Indonesian government to provide protection to migrant workers in a limited manner and is highly dependent on the national laws of the receiving country. The use of international laws and customs is very conditional depending on the interests of the sending and receiving countries. From the aspect of legal protection, migrant workers can only work in destination countries that have regulations on the protection of foreign workers, have an agreement between the Indonesian government and the government of the destination country that has a Social Security or insurance system that protects foreign workers (Article 31). This restriction of PMI to destination countries reinforces that the orientation of PMI protection by the Government of Indonesia is based on the national regulations of Indonesia and the destination country. From the aspect of placement implementation, the UUPPMI requires the Indonesian Migrant Worker Placement Company to make a cooperation agreement with the business partner or employer of the destination country. This cooperation agreement must not conflict with national regulations both in Indonesia and the destination country. These national regulations further place ASEAN instruments in a less prominent position in the protection of migrant workers.

Therefore, strategic steps are needed to improve the instrument. Stronger law enforcement mechanisms, better coordination, active participation of migrant workers, and increased government capacity (Kunarti et al., 2023) are needed to ensure more effective protection for migrant workers.

Discussions

The results of the study expose that although ASEAN has developed several instruments for the protection of migrant workers, from the 2007 Declaration to the 2017 Consensus, the development still uses the old pattern of leaving the instrument without strong binding power as well as not completing law enforcement tools. As a result, these instruments have not been able to provide effective protection for Indonesian migrant workers (PMI).

The analysis found that disparities between ASEAN instruments, national Indonesian regulations, and bilateral agreements with ASEAN member destination countries and the practice of violating regulations and agreements between Indonesian Migrant Worker Placement Companies and business partners or employers are the main causes of this ineffectiveness. While ASEAN instruments emphasise principles such as fair treatment and access to justice, implementation at the national level is not always consistent, nor do bilateral agreements fully address these principles. In addition, poor coordination between member states further exacerbates the situation. These findings are in line with previous research, especially in relation to the 2007 declaration, which highlighted the implementation of regional policies at the national level (Nguyen, 2021). However, this study adds a new perspective by specifically examining the additional ASEAN instrument (2017 consensus) in the context of

Indonesia, ASEAN's largest migrant worker sending country. Thus, the results of this study not only confirm previous findings, but also enrich the understanding of the complexity of regional policy implementation, especially the 2017 consensus in a more specific context.

The results of this research have broad theoretical and practical implications. Theoretically, the research expands the body of knowledge on regional governance by highlighting the problems of regional policy implementation at the national level, especially in the context of the protection of Indonesian migrant workers. The results support the theory that regional organisations such as ASEAN in general tend to face difficulties in translating regional policies into effective national practices (Jones & Hameiri, 2020).

Policy-wise, the results of this study suggest the need for policy changes at the ASEAN and national levels. In particular, there is a need for a strong enforcement mechanism to ensure that the principles set out in the 2007 Declaration and 2017 Consensus are consistently implemented in each member state. Thus, coordination among member states needs to be more intense to ensure that bilateral agreements are in line with the regional framework.

In addition, the active participation of Indonesian Migrant Worker Placement Companies and Indonesian migrant worker organisations in the policy-making process is also key to ensuring that the policies formulated are truly responsive to the needs and challenges they face. Thus, this research not only provides theoretical contributions, but also offers practical recommendations that can be the basis for more effective policy development in the future.

This research is not free from several limitations, namely: Firstly, limited access to empirical data related to policy implementation at the national and bilateral levels, which affects the quality of the analysis. While official ASEAN documents and Indonesian national regulations are accessible, information on field implementation, such as examples of migrant worker rights violations, is limited. Secondly, research that is specific to the Indonesian context may reduce the ability to generalise findings to all ASEAN countries. However, Indonesia being the largest migrant worker sending country in ASEAN, the dynamics and challenges in other countries may be different. Thirdly, as there was no direct participation of migrant workers in this study, it may have affected the sharpness of the analysis in relation to the facts sourced from their voices and observations. Nonetheless, these limitations do not diminish the overall significance of the findings, but rather open up opportunities for more comprehensive follow-up research. Future research can address these limitations by expanding the scope of the study to other ASEAN countries, using participatory methods to directly involve migrant workers, and delving deeper into the role of non-state actors such as NGOs and international labour organisations in promoting the protection of migrant workers.

Based on the findings and limitations of this study, several suggestions can be made for future research, namely, first, future research can conduct comparative research with other ASEAN countries to understand the diversity in implementing the 2017 consensus. This will provide a more comprehensive picture of the effectiveness of the ASEAN framework at the regional level. Secondly, applying a participatory approach by involving migrant workers directly in the research process can provide a deeper understanding of their issues and needs. The active participation of migrant workers will ensure that the research is more responsive to field conditions. Third, future research could explore the role of non-governmental actors such as NGOs, international labour organisations, and the private sector, in promoting the protection

of migrant workers in the ASEAN region. Research with data sources from these actors could reveal alternative mechanisms to improve the effectiveness of migrant labour protection policies. By addressing the limitations of the current study and following these suggestions, future research is expected to make a more significant contribution to the development of migrant worker protection policies and practices in ASEAN.

The findings of this research also have further social and ethical implications, particularly in terms of the protection of human rights and social justice for Indonesian migrant workers (PMI). ASEAN's inability to protect migrant workers not only reflects policy failures, but also structural vulnerabilities felt by migrant workers, such as exploitation, discrimination, and violations of basic rights. This situation raises ethical questions about the responsibility of states and regional organisations in ensuring the protection of the welfare of migrant workers, a vulnerable group that contributes significantly to the regional economy. The findings of this study confirm the importance of a more inclusive and human-centred approach in formulating migrant worker protection policies. This approach should ensure that the needs of migrant workers are at the centre of the policy-making process, so that the resulting policies are not only technically effective but also socially just. Thus, this research is not only academically relevant, but also has strong moral implications, recommending concrete actions to improve the conditions of Indonesian migrant workers in particular and in the ASEAN region in general.

CONCLUSION

This research revealed that, despite ASEAN's development of key instruments like the ASEAN Declaration on the Protection and Promotion of the Rights of Migrant Workers (2007) and the ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers (2017), their implementation remains inadequate for protecting Indonesian migrant workers (PMI), primarily due to gaps between regional policies, Indonesian national regulations, and bilateral agreements with ASEAN member states. Compounding factors include the absence of robust enforcement mechanisms, weak coordination among member states, and low migrant worker participation in policy processes, underscoring ASEAN's ongoing failure to deliver sufficient protection and the need for more effective, efficient approaches. The study enriches literature on regional governance and migrant worker protection while emphasizing inclusive, human-centered policy formulation. For future research, empirical studies incorporating primary data from migrant workers and destination-country stakeholders could further validate these gaps and test proposed enforcement innovations.

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