



## Comparison of Legal Protection of Labor in Indonesia and Pakistan

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### Abstract

*This article aims to conduct a comparative review of legal protections for workers in Indonesia and Pakistan, focusing on workers' rights and the sanctions imposed on companies that infringe upon these rights. The research serves to provide educational resources on labor protections for students and workers alike. Employing normative legal research methodology, both secondary and primary data were collected, with secondary data primarily sourced from literature reviews. Qualitative data analysis methods were applied to interpret information gathered from personal and official documents, as well as written sources, to derive conclusions. The findings highlight both similarities and differences in the implementation of workers' rights protections between Indonesia and Pakistan. Despite variations in approach, both countries demonstrate a commitment to upholding workers' rights within their respective legal frameworks. This study contributes to a deeper understanding of labor protections in diverse national contexts, offering valuable insights for academic study and practical application in the field of labor law and policy.*

**Keywords:** Labor, Legal protection, Legal comparison.

### A. INTRODUCTION

Every worker deserves the opportunity to secure employment that aligns with their abilities and skills, accompanied by a fair wage ensuring their own welfare and that of their families (Prasetio, 2021). This principle of work protection encompasses various measures, including guidance, compensation, and the promotion of human rights, ensuring both physical and socio-economic

security within the framework of company norms (Zamroni, 2018). These efforts aim to safeguard workers' rights and enhance their well-being in the workplace, fostering a conducive environment for sustainable economic and social development.

Enhancing labor protection is essential for all individuals engaged in direct or indirect work relationships, ensuring their safety and well-being. Companies recognize the significance of occupational safety and health (OSH) not only for the welfare of their employees but also for sustaining operational efficiency and profitability (Archibald, 2019). In dynamic business environments like those in Indonesia and Pakistan, where market demands often necessitate increased productivity, workers may face heightened risks of injury, including severe physical harm or even fatalities.

Workers have the fundamental right to a safe and comfortable workplace environment where their rights are respected, and employment opportunities are guaranteed. Recognizing workers as valuable assets, companies must prioritize Occupational Safety and Health (OSH) measures to mitigate risks associated with workplace hazards. Failure to provide adequate OSH protection can disrupt the employment relationship between workers and companies, jeopardizing both productivity and employee morale.

Thus, ensuring robust OSH practices not only safeguards the physical well-being of workers but also fosters a positive work environment conducive to sustainable business growth and ethical corporate practices. By investing in OSH, companies uphold their responsibility to protect employees and uphold their rights, thereby contributing to a more secure and productive workforce.

The Basic Constitutions of the Republic of Indonesia Article 27 paragraph (2) states that "every citizen has the right to work and a living that is worthy of humanity", which means that the state guarantees everyone's right to be protected and have comfort while working, intended to protect workers. and their families by providing equal treatment without discrimination while considering the evolution of the business industry and the needs of entrepreneurs and their families (Zulaiha, 2022). Apart from that, considering the times and progress of the business world and the interests of entrepreneurs. In Pakistan's Bonded Labor System Law of 1992 it is stated that "the Government of Pakistan prohibits all forms of forced labor against workers", the provisions of the two state laws can be seen as equally upholding human rights (Multiplier Pakistan, 2022).

Human rights themselves are basic rights that are necessary for humans and are of a general nature, therefore human rights need to be protected, they must not be ignored, reduced or contested by anyone (Vonk, Gijsbert, Bambrough, 2020). The government or legal state is obliged to uphold these human rights so that humans remain prosperous and prosperous.

For example, Indonesia has ratified it, namely through Law Number 80 of 1957 concerning Approval of International Labor Organization Convention No. 100 concerning wages for male and female workers for work of comparable value (hereinafter referred to as ILO convention 100), Law Number 21 of 1999 concerning Ratification of ILO Convention no. 111 Concerning Discrimination in Respect of Employment and Occupation (ILO Convention concerning Discrimination in Employment and Occupation) (hereinafter referred to as ILO Convention 111). As for Pakistan, as a developing country on the Asian continent,

Pakistan has a fairly complicated employment law system. According to the 18th Constitutional Amendment, jurisdiction over labor matters is administered by the provinces. Most trade unions function independently of government and political party influence. Labor leaders raised concerns about employers sponsoring management-friendly or on-paper-only unions—so-called yellow unions, to prevent the formation of effective unions. There are no reported cases of the government dissolving a union without due process, but unions can be “deregistered” administratively without judicial review. The ILO indicated that the Pakistani state and employers had used “crippling laws and repressive tactics” to discourage union formation and collective bargaining. The report compiled by the ILO in 2018 noted that there were a total of 7,906 registered trade unions with a total membership of 1,414,160 people (Skuad, 2024). However, this figure may not correspond to the actual figure because it relates to the number of members announced at the time of union registration. Labor NGOs assist workers by providing technical training and capacity building workshops to strengthen trade unions and trade organizations. They also work with established trade unions to organize workers in the informal sector and advocate for policies and legislation to improve the rights, working conditions and welfare of workers, including workers in the informal sector.

Seeing that Indonesia and Pakistan have ratified the ILO convention regarding worker protection proves that Indonesia and Pakistan respect and protect workers' human rights, and each country has regulations that are outlined in their respective countries' labor laws and regulations.

Until now, Indonesia still has a low level of occupational safety when

compared to developed countries which are aware of how important it is to implement regulations and regulations regarding occupational safety and health. This is demonstrated by the still high number of work accidents. Apart from that, it should be noted that work safety standards in Indonesia are the worst compared to Pakistan. For example, 16,931 cases of fatal work accidents in Indonesia in 2001, while 11,768 cases in Pakistan(Hufron, 2023).

The purpose of labor protection is to provide safety protection for workers/laborers while working, so that if a work accident occurs in the future, workers/laborers do not need to worry because there are already regulations governing work safety and procedures for compensation for work accidents.

This type of research is normative juridical research where the legal protection for workers based on the laws of the two countries Indonesia and Pakistan will be discussed. This research focuses on sources of legal materials in the form of literature studies which are based on secondary legal materials which will be linked to social justice(Amiruddin, 2014).

## **B. RESULT AND DISCUSSION**

### **Implementation of Legal Protection for Workers in Indonesia and Pakistan**

Basically, Indonesia and Pakistan are countries that respect workers' rights. Which is based on the constitutional foundations of both countries. Indonesia has protection for workers through Article 27 paragraph (2) of the Constitution of the Republic of Indonesia which reads "every citizen has the right to work and a decent living for humanity." Article 27 paragraph (2) of the 1945 Constitution is a reference for provide non-discriminatory treatment to workers(Mas Aryani et al., 2022).

Apart from Indonesia, Pakistan also has regulations governing labor which are stated in the Pakistan Bonded Labor System Law of 1992. The application of legal protection to female workers through legal protection is as follows:

a) Legal protection for workers in terms of age

Legal protection for workers regarding the age of maturity is a material requirement for workers to carry out their work. The following legal protections for the age of maturity of female workers are as follows:

- 1) Indonesia has provisions regarding the age of maturity for workers which are regulated in Article 68 of Law Number 13 of 2003. Article 68 states that the Manpower Law states "The minimum age limit for the category of dangerous or risky workers is 18 years", the author can conclude which is based on the article that the age of maturity for a person is 18 years.
- 2) In Pakistan, the age of maturity for workers defines children aged 15 (fifteen) years and less than 16 (sixteen) years as being able to work, but employers are required to report to the Ministry of Manpower and submit a medical report on the female worker. So the age at which a person is declared an adult is after 15 (fifteen) years of age (Zia-ud-Din Malik, Hamid Mukhtar, 2021).

From the description above, Indonesia and Pakistan have provided age protection at work. So that employers do not discriminate against their workers.

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protection at work. So that employers do not discriminate against their workers.

b) Legal protection for workers in terms of wages

- 1) The Indonesian government strives to realize harmonious, dynamic and just industrial relations. One of the efforts made is to regulate protection for workers/laborers through minimum wages, with the existence of Law no. 6 of 2023 concerning the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 concerning Job Creation also regulates the issue of minimum wages. Article 88 paragraph (2) of Law 6/2023 regulates that the central government determines wage policies as an effort to realize the rights of workers/laborers to a decent living for humanity (Manggali et al., 2023). This policy includes setting a minimum wage every year. Since Law 6/2023 was published, the minimum wage has been determined using a formula. Originally, Article 88D paragraph (2) of Law No. 11 of 2020 concerning Job Creation regulated the minimum wage calculation formula to include the variable economic growth or inflation. Furthermore, wage regulations including minimum wages as mandated by Law 11/2020 are regulated in Government Regulation (PP) No.36 of 2021 concerning Wages.
- 2) On April 11, 2022, Prime Minister Shehbaz Sharif announced a minimum wage of 25,000 rupees (\$110) per month. This minimum wage exceeds a person's poverty line income, as well as the World Bank's estimate of poverty level income (Malik & Mukhtar, 2021).

Both the federal and provincial governments implemented the increases. International companies looking to expand in Pakistan can take advantage of the low-income but skilled workforce. Global employers can decide their compliance strategy in recruitment based on the explanation of Pakistan's labor regulations, Pakistan's labor laws enforce 30 International Labor Organization (ILO) conventions that ensure employers' obligations to extend workers' basic rights, such as the legal minimum wage (approximately \$114 as of July 1, 2022).

From the description above, Indonesia and Pakistan have provided protection in the form of a decent minimum wage for work.

In Article 86 paragraph (1) letter (a) of Law Number 13 of 2003 concerning occupational health, it is one of the rights of workers to obtain protection for occupational safety and health. For this reason, entrepreneurs are required to implement it systematically and integrate it with the company's management system. Regarding this matter, companies are obliged to implement the working time provisions as intended in Article 77 paragraph (1) of Law no. 13 of 2003 which includes:

- 1) 7 (seven) hours 1 (one) day and 40 (forty) hours 1 (one) week for 6 (six) working days in 1 (one) week; or
- 2) 8 (eight) hours 1 (one) day and 40 (forty) hours 1 (one) week for 5 (five) working days in 1 (one) week.
- 3) Rest during working hours, at least half an hour after working for 4 (four) hours continuously and this rest period does not include



working hours.

4) Weekly rest 1 (one) day for 6 (six) working days a week or 2 (two) days for 5 (five) working days a week.

a) Various laws (as mentioned in the previous section) arise from the above sources and form the labor law regulations in Pakistan and the Pakistan employment regulations, the important provisions of the employment regulations in Pakistan. Includes working hours, namely:

- 1) Working hours as per Pakistani labor laws are limited to 48 hours a week.
- 2) Daily working hours can reach nine hours, including one hour for lunch and prayer breaks.
- 3) During the month of Ramadan, Pakistan's working hours law mandates employers to reduce working hours to six hours a day.
- 4) Working hours as per Pakistani labor laws are limited to six hours a day during the month of Ramadan.
- 5) During the month of Ramadan, Pakistan's working hours law mandates employers to reduce working hours to six hours a day.
- 6) Pakistani labor law requires employers to provide rest periods, that is, for every 6 hours of work, 1 hour of rest is provided.

Based on the description above, Indonesia and Pakistan have provided

protection for their workers in terms of working hours.

### **Implementation of Occupational Health Safety (K3) for Workers in Indonesia and Pakistan**

Occupational health and safety or K3 must be implemented by employers for their workforce, both inside and outside. In general, the definition of K3 is everything related to health, safety and welfare in a job so that institutions and companies are obliged to guarantee it (Cici Aprilliani, Fitria Fatma, 2022). The implementation of K3 itself is regulated in Law Number 1 of 1970, the objectives of which are (Sholikin & Herawati, 2020):

- a. Providing protection and ensuring the safety of every worker and other people in the work environment.
- b. Ensure that every existing production resource can be used safely and efficiently.
- c. Improving the welfare and productivity of human resources.

Of the three objectives of implementing K3 based on Law Number 1 of 1970, there must be harmony between employers or entrepreneurs, workers and also the government. If the three of them can work together to implement K3, of course the risk of work accidents, damage and loss in the work environment can be avoided as much as possible.

Whatever their status, be they workers, employees, or freelance workers, companies must be able to guarantee their health and safety. The K3 management system implemented must be able to prevent the risk of accidents and achieve maximum levels of work welfare. Apart from being written in Law Number 1 of 1970 concerning work safety, K3 is also

regulated in Minister of Manpower Regulation Number 5 of 2018. In the Minister of Manpower Regulation concerning K3 new guidelines are provided regarding threshold values or NAB related to chemical and biological factors. Not only that, the NAB also provides standard rules regarding psychological factors, ergonomics, hygiene and sanitation in the work environment.

The guidelines also regulate how companies must maintain air quality in the workplace so that it does not have an impact on the emergence of disease among their workforce. The Ministry of Manpower still records quite high cases of work accidents, namely 130,923 cases. Even though it shows a decrease in numbers from 2018 of 157,313 cases. The high number of cases cannot be separated from a lack of awareness from employers, workers and the community. In order to provide maximum work protection and safety, the Ministry of Manpower is implementing five national K3 programs and strategies for the 2020-2024 period. The five programs are the K3 Promotion Movement, Strengthening the Capacity of K3 Resources, Strengthening Supervision and Law Enforcement of K3 Norms, Strengthening the K3 Data and Information Reporting and Management System, and K3 Coordination, Synergy and Collaboration.

As an example, occupational safety and health in Indonesia has been implemented well, seen by one of the companies operating in the oil and gas sector, PT Puspita Cipta Group, which is located in the Kuningan area, West Java. The company has good K3 regulations, PT. Puspita Cipta Group in carrying out its business is guided by several rules that have been set within

the company. Regarding K3 for the company's own workers, it is guided by Law Number 1 of 1970 concerning Work Safety, Article 87 of Law Number 13 of 2003 concerning Employment. So for the rules regarding occupational safety and health for workers at PT. The Puspita Cipta Group already exists and is being run well. In providing K3 rights, this company is the first to provide BPJS to all workers, every year it also ensures the health of workers by carrying out medical check-ups to ensure that there are no illnesses that will cause harm (Hamid et al., 2022). The company always certifies equipment regularly in accordance with statutory regulations so that the tools can be used safely and can be used as intended by workers. Because if you don't check the work tools, it is very risky for the safety of workers. Apart from having the right to health, workers also have the right to safety, including being given personal protective equipment (PPE) that meets the criteria for good and correct PP(Hamidin & Alfitri, 2021). Because all PPE used when entering is tested first, starting from its strength and durability so that workers do not feel sick or tired and burdened when wearing PPE while working. Workers also have training rights, every year they provide training to employees so that employees are trained, accustomed to, and ultimately become professional. So when there is an incident they do not run away, but they will face it according to the main duties of their respective duties(Endyka et al., 2020).

Based on the description above, it can be concluded that regulations regarding worker safety and health at PT. Puspita Cipta Group Kuningan already exists, namely Law Number 1 of 1970 concerning Work Safety,

Article 87 of Law Number 3 of 2003 concerning Employment. Where every year the company also ensures the health of its workers by carrying out medical check-ups to ensure that there are no illnesses that will cause losses. The company always certifies equipment regularly in accordance with statutory regulations so that the tools can be used safely and can be used as intended by workers. The company also provides training by giving workers a schedule that does not interfere with their work, which aims to produce workers who are professional in their work because they see that the work they are carrying out is quite risky for the workers.

Occupational Safety and Health in Pakistan is regulated in the Constitution of Pakistan including a number of basic labor provisions, but the majority of the workforce falls under the jurisdiction of provincial labor laws. The Industrial and Commercial Employment (Standing Orders) Act 1968 regulates the relationship and contract between employers and employees (Zia-ud-Din Malik, Hamid Mukhtar, 2021). This regulation applies to all industrial and commercial establishments employing 20 or more workers. The Factories Act of 1934 regulates industrial working conditions in factories, which was amended by the provincial government in 2010 to cover factories employing five or more workers. In 2012, parliament passed an industrial relations law that took International Labor Organization (ILO) conventions into account, but due to the 18th amendment, the law only applies to the Islamabad Capital Territory and trade federations operating in more than one province. The only federal government agency with authority in labor matters is Pakistan's Ministry of

Foreign Affairs and Human Resources Development, whose role in domestic labor inspection is limited to collecting statistics to demonstrate compliance with ILO conventions.

Implementation of K3 standardization in Pakistan through law, there is no independent law regarding occupational safety and health (K3) regulations, although the Factories Act of 1934, the Hazardous Work Regulations of 1963, and laws passed down from the provincial level provide K3 standards for industries that have workers in factories and other related matters. workplace. Pakistan's Ministry of Foreign Affairs and Human Resource Development is the government agency responsible for implementing this law at the federal level, while the provincial ministry of labor implements it in the provinces. The law does not cover implementation in the informal sector, and enforcement of K3 standards in various employment sectors remains weak, particularly at the provincial level across the country. There is a serious lack of compliance with mine safety and health protocols. Many mines have only one opening for entry, exit, and ventilation. Workers cannot escape hazardous working conditions without risking losing their jobs. Workers in the informal sector, such as domestic workers and home workers, are very vulnerable to health and safety hazards (Prmono, 2020). There are no statistics regarding workplace deaths and accidents. Factory managers often cannot confirm the identities of victims of fires or other work-related accidents because these people are contract workers and are generally not recorded in records.

Labor rights activists stated that workers often had to work in

dangerous conditions and that private mining companies failed to provide health and safety facilities for workers. Coal mine workers have also been targets of militant attacks because of their ethnic or religious affiliation.

On April 19, 2020, three workers in Orakzai, Khyber Pakhtunkhwa, died after a water reservoir collapsed inside the mine, filling the work space. On July 6, eight miners died after rainwater piled up nearly 60 feet inside the mine. According to statistics from the Pakistan Central Mines Workers' Federation, in July at least 90 workers had lost their lives in 60 mine-related accidents. The government does not enforce OSH laws effectively; penalties for violations of these laws are disproportionate to penalties for crimes such as negligence. On May 31, the Khyber Pakhtunkhwa Assembly passed the Khyber Pakhtunkhwa Occupational Safety and Health Bill, 2022.

A comprehensive OSH law passed by Sindh Province in 2017 still could not be implemented by the end of this year. In 2020, the Punjab government enacted the Medical Teaching Institutes (Reforms) Act, which amended several existing healthcare laws and created a board of governors consisting of private sector professionals for state-run teaching hospitals. Mayo Hospital Lahore, the largest state-run teaching institution in Punjab, became the first public sector teaching institution to implement the rule. The board of governors assumed administrative and financial control of the hospital.

Based on the description above, it can be seen that the standardization of Occupational Safety and Health in Pakistan still cannot be said to be good, because seen from the policy through the government which enforces

the Labor Law, it only applies in some parts of the region, then seen from the responses of labor activists in Pakistan, it is clear that workers often have to work in dangerous conditions and that private mining companies fail to provide health and safety facilities for workers.

### **Similarities and Differences in Legal Protection for Workers in Indonesia and Pakistan**

According to Rudolf B. Schlesinger, comparative law is a method of investigation with the aim of gaining deeper knowledge (Buana, 2024). Comparative law is not a set of rules and legal principles and not a branch of law, but rather a way to resolve foreign legal elements of legal problems(Lukito, 2022).

The author will conduct research on the similarities and differences in Indonesia and Pakistan in the scope that regulates the types of work that are prohibited for workers, types of criminal acts that violate workers' rights, the age of maturity of workers, workers' wages, and workers' working hours.

The author chose to review these similarities and differences because it is one of the factors that is very influential in the formation of legislation regarding employment in the two countries. The following is an overview of the similarities and differences in this research which are depicted in the following table:



**Table. 1**  
**Equality of Legal Protection for Workers in Indonesia and Pakistan**

<b>No</b>	<b>Equation Review</b>	<b>Indonesian Provisions</b>	<b>Pakistan Provisions</b>
1.	Types of work that are prohibited for workers	- Any work in the form of slavery or similar. - Any work that utilizes, provides or offers children for prostitution, pornography production, pornographic performances or gambling	- Work that smacks of slavery and human traffickin
2.	Types of criminal acts involving violations of workers' rights	Criminal offense	Criminal offense

The differences between the provisions of Indonesia and Singapore can be described in the following table:

**Table. 2**  
**Differences in Legal Protection for Workers in Indonesia and Pakistan**

<b>No</b>	<b>Equation Review</b>	<b>Indonesia Provisions</b>	<b>Pakistan Provisions</b>
1.	Ages	18 Years Old	15-16 Years Old
2.	Salary	According to the Central Statistics Agency (BPS), the average salary of Indonesian workers/employees/employees in August 2023 will reach around IDR 3.18 million per month	According to Pakistani labor law as of July 1, 2022, the legal minimum wage is around \$114, if converted into rupiah it is around 6,382.35 rupiah per month
3.	Working hours	8 hours 1 day and 40 hours 1 week, for 5 working days in 1 week	Working hours as per Pakistan Labor Law are limited to 48 hours in a week

Source: CNBC Indonesia, 2023 and Multiplier Pakistan, 2022 (Krismiyarsi, 2021)

The table above shows the similarities and differences in worker provisions in Indonesia and Pakistan.

### C. CONCLUSION

Based on the research results, it can be concluded that both countries, Indonesia and Pakistan, both provide legal protection for workers in their respective countries, but there are similarities and differences in this legal protection. So, the author will explain it in detail as follows: Indonesia and Pakistan have provided legal protection by determining several regulations such as types of work that are prohibited for workers, comparisons of working age, working time, and minimum wage rights. There are similarities in the provisions for workers in Indonesia and Pakistan, namely, the prohibition of work with the concept of slavery, as well as similarities in criminal acts of violation of workers' rights. Apart from the similarities above, there are differences, namely working age, work wage rights and working hours. And also the terms of employment for workers in Indonesia are generally regulated in the Labor Law, whereas in Pakistan they are regulated in the Pakistani Constitution.

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