



Critical Evaluation of the Partial Revision of Law Number 13 of 2003 on Labour in the Job Creation Law

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Abstract

The stages of the procedure for the formation of laws and regulations in Indonesia have been regulated in Law Number 12 of 2011 on the Formation of Laws and Regulations. In Indonesia there are three methods in the preparation or regulation of regulations in Indonesia, namely codification, unification, and modification. Modification of the labour cluster in the Job Creation Law has attracted public attention. This study critically evaluates how partial revisions are applied to Law Number 13 of 2003 on Labour through the omnibus law method in the Job Creation Law. The research method is normative legal research and prescriptive research with data source taken from primary legal materials and secondary legal materials. The result shows that there are quite a lot of forms of changes related to the Labour Law. It can be concluded that overall there are 72 articles from 7 chapters and 4 sections of changes to Law Number 13 of 2003 in Law Number 11 of 2020. The partial revision modifies the legal politics of labour law which was originally for the protection of workers into legal politics that benefit employers or investors.

Keywords: Partial Revision; Employment; Job Creation

A. Introduction

Law is a reference to community renewal as the concept put forward by Roscoe Pound in law as a tool of social engineering.¹ In this case, the law is formed and used for the public interest, in this case the people, to ensure their welfare. As the authorised party in making the

¹ Roscoe Pound and Marshall L. DeRosa, *An Introduction to the Philosophy of Law* (New Haven: Yale University Press, 1954) x.

Law, the Government is obliged to think about the life goals of the Nation and the People, and not to think about the life goals or benefits of a certain group or individual.

One form of maintaining the people's mandate by realising the preparation of laws and regulations. The government provides a legal umbrella, namely Law Number 12 of 2011 on the Formation of Legislation which was later amended by Law Number 15 of 2019 and Law Number 13 of 2022.

The definition of legislation according to Bagir Manan is any written decision made, determined and issued by state institutions and/or officials who have (carry out) legislative functions in accordance with applicable procedures.² According to Law Number 12 of 2011, the formation of laws and regulations is the making of laws and regulations that include the stages of planning, preparation, discussion, ratification or stipulation, and enactment.³ Based on Article 1 paragraph 3 of Law Number 12 of 2011, the Law is a statutory regulation formed by the House of Representatives with the joint approval of the President.⁴ According to Bagir Manan, the content material of a law can be determined based on the following general benchmarks:⁵ (1) Set out in the Constitution; (2) Stipulated in a previous law; (3) Enacted in order to repeal, supplement, or replace old laws; (4) The content material concerns basic or fundamental rights; and (5) The content material concerns the interests or obligations of the people.

In his inauguration speech on 20 October 2019, Joko Widodo shared his plan to use the omnibus law method in Indonesian legislation with the House of Representatives. The President proposed two laws, namely a law on job creation and a law on empowering Micro, Small and Medium Enterprises.⁶ Then in February 2020, the Government proposed the Job

² Bagir Manan, *Peranan Peraturan Perundang-undangan dalam Pembinaan Hukum Nasional* (Bandung: Armico, 1987), 13.

³ *Law Number 12 of 2011 on the Establishment of Laws and Regulations juncto Presidential Regulation of the Republic of Indonesia Number 87 of 2014 on the Implementation Regulation of Law Number 12 of 2011 on the Establishment of Laws and Regulations.*

⁴ Art. 1(3) Law No. 12 of 2011 on the Formation of Legislation.

⁵ Bagir Manan, *Dasar-Dasar Perundang-undangan Indonesia* (Jakarta: Ind Hill Co, 1992), 37, quoted in Bayu Dwi Anggono, *Perkembangan Pembentukan Undang-Undang di Indonesia* (Jakarta: Konstitusi Press, 2014), 65.

⁶ Rizal Jawahir Gustav, "Omnibus Law Trail: From Jokowi's Inauguration Speech to Polemics over Job Creation Bill," *Kompas.com*, October 5, 2020, <https://www.kompas.com/>

Creation Bill to the House of Representatives with the hope that it could be realised within 100 days.⁷

Maria Farida Indrati defines the omnibus method through Latin language which means for all, thus Omnibus Law means one new law that contains a variety of substances and subjects as a simplification step from several laws that are still in effect.⁸ In various countries, legislation that uses the omnibus model is used to facilitate harmonisation of laws and regulations, save the cost of drafting and discussing and accelerate the legislative process.⁹ The government's goal in President Joko Widodo's second term is to improve investment prospects and make industrialisation in Indonesia more advanced. The efforts made include cutting bureaucratic channels and making it difficult to permit new activities.¹⁰

The government together with the House of Representatives then proposed the draft of Job Creation law in the 2020 legislative programme. The draft of Job Creation Law received protests from various elements, human rights groups, trade unions and environmental organisations because it tends to lead to oligarchic policies and limit people's civil rights.¹¹ Meanwhile, this draft was supported by the Chamber of Commerce and Industry.¹² After improvements were made, on Monday, 5 October 2020 the Job Creation Law was passed by the House of Representatives.¹³ In every lawmaking, there will always be interests that will determine the form and outcome of laws and regulations. This is important to observe carefully because the process of making laws and regulations does not only involve the government, but

⁷ Samboh Esther, "Guide to Omnibus Bill on Job Creation: 1,028 Pages in 10 Minutes," *The Jakarta Post*, February 24, 2020, <https://www.thejakartapost.com/>

⁸ Maria Farida Indrati, "Omnibus Law, a Sweeping Law?" *Kompas* (opinion column), January 4, 2020.

⁹ Stephanie Juwana, Gabriella Gianova, Gridanya Mega Laidha, Policy Brief 4 Omnibus Law Systems and Practices in Various Countries and Analysis of the Job Creation Bill from the Perspective of Good Legislation Making, Indonesia Ocean Justice Initiative, 2020. Page 2. Stephanie Juwana, Gabriella Gianova, and Gridanya Mega Laidha, *Policy Brief 4: Omnibus Law Systems and Practices in Various Countries and Analysis of the Job Creation Bill from the Perspective of Good Legislation Making* (Indonesia Ocean Justice Initiative, 2020), 2.

¹⁰ Dipna Videlia Putsanra, "Different Contents of Omnibus Law on Job Creation and Labour Law 13/2003," *Tirto.id*, October 6, 2020, <https://tirto.id/>

¹¹ Achmadi Julio, "Omnibus Is Throwing People and Democracy under the Bus," *Tempo.co*, February 2, 2020, <https://tempo.co/>

¹² Callistasia Wijaya, "Indonesia: Thousands Protest against 'Omnibus Law' on Jobs," *BBC News*, <https://bbc.com/>

¹³ Otti Ilham Khair, "Analysis of the Job Creation Law on Labour Protection in Indonesia," *Widya Pranata Hukum* 3, no. 2 (2021): 3.

also the role of the House of Representatives of the Republic of Indonesia which is filled with various political party memberships with diverse interests.¹⁴

Prior to the passing of the draft, there were protests by trade unions. In addition, there were also letters reminding the government of the harmful consequences of the bill for the environment from 35 investment companies.¹⁵ The passing of the Job Creation Law was supported by seven parties, namely: Indonesian Democratic Party of Struggle, Golkar Party, Gerindra Party, National Democratic Party, National Awakening Party, National Mandate Party and United Development Party. Two other parties rejected, namely the Democratic Party and Prosperous Justice Party.¹⁶ The Job Creation Law amends 82 laws, which includes Law Number 13 of 2003 on Labour, which is partially revised. Partial revision of a law is a process in which a small part of a law is changed, updated, or modified without overhauling the entire law. This can be done to improve certain provisions that are deemed necessary to be updated, adjusted, or improved without changing the overall structure or substance of the law. Partial revisions can be made due to changes in social, economic, technological conditions, or due to the need to adapt the law to the times, It is important to note that any revision, even if partial, can have a significant impact depending on the changes made to the law.

Revisions related to Law Number 13 of 2003 on Labour in Law Number 11 of 2020 on Job Creation are contained in 2 articles, namely in Article 80 which discusses general provisions related to amended legal provisions and Article 81 which stipulates the revisions of Law Number 13 of 2003 on Labour. The Job Creation Law, which in its discussion is generally known to have caused various issues and polemics, for this reason, the main problem in this research is to analyze the summary of changes in Law Number 13 of 2003 on Labour in Law Number 11 of 2020 as amended by Law Number 6 of 2023. The purpose of this research is to

¹⁴ Ari Lazuardi Pratama and Aloysius Uwiyono, "Legal Politics of the Labour Law Before and After the Constitutional Court Decision on the Formality Testing of the Job Creation Law Case 91/Puu-XVIII/2020," *Journal of Legal Sciences and Humanities* 9, no. 5 (2022): 2.

¹⁵ Achmadi Julio, "Omnibus Is Throwing People and Democracy under the Bus," *Tempo.co*, February 12, 2020, <https://tempo.co/>

¹⁶ Ghina Ghalia, "Indonesia Passes Jobs Bill as Recession Looms," *The Jakarta Post*, October 6, 2020, <https://www.thejakartapost.com/>.

provide a critical evaluation of the partial revision of the Labour Law from the Establishment of the Job Creation Law.

This research is normative legal research which is research by placing the law as a system of norms. A system of norms that examines principles, norms, rules and regulations, court decisions, agreements and doctrines.¹⁷ Normative legal research is used by the author, on the grounds that secondary data is data that the author obtains through library research. Based on its nature, the legal research used is descriptive analysis which reveals the laws and regulations relating to legal theories which are the object of research, as well as the law in its implementation in society with regard to the object of research.¹⁸ This research also uses prescriptive research. Namely research that aims to provide a description or formulate problems in accordance with existing facts associated with existing benchmarks or norms. Affirmed by Prasetyo Hadi Purwandaka, prescriptive research is a way to get suggestions in overcoming certain problems.¹⁹

B. Discussion

B. 1. Changes from the Partial Revision of Law Number 13 of 2003 on Labour in the Job Creation Law

The following is a summary of changes consisting of 72 partial changes amended in Law Number 13 of 2013 through the Job Creation Law:²⁰

No.	Revised Section	Revised Article	Partially Revised Substance
1.	Chapter V on Vocational	13, and 14	Arrangements for Educational Institutions that were previously only public and private were added to

¹⁷ Mukti Fajar and Yulianto Achmad, *Dualisme Penelitian Hukum Normatif dan Empiris* (Yogyakarta: Pustaka Pelajar, 2020), 153.

¹⁸ Zainudin Ali, *Metode Penelitian Hukum* (Jakarta: Sinar Grafika, 2019), 105.

¹⁹ Suteki and Galang Taufani, *Metodologi Penelitian Hukum (Filsafat, Teori dan Praktik)* (Depok: Rajawali Pers, 2018), 137.

²⁰ Agustianto, "Forms of Changes in Labour Law in Law Number 11 of 2020 concerning Job Creation," *Journal of Law Reform* 25, no. 2 (2021): 147–66.

	Training		Corporate Educational Institutions.
2.	Chapter VI on Labour Placement	37	Job placement organisers that previously had to be incorporated, after the revision no longer have to be incorporated, but must apply for a business licence to the central government.
3.	Chapter VIII on the Use of Foreign Labour	42, 43, 44, 45, 46, 47, 48, and 49	Simplify the process of accepting foreign workers and protect crucial positions in the company, and licensing of migrant worker placement companies must be taken care of by the central government.
4.	Chapter XI on Labour Relations	56, 57, 58, 59, 61, +61 A, 64, 65, and 66	The term of the Specified Time Work Agreement (<i>Perjanjian Kerja Waktu Tertentu</i> or PKWT) which was previously determined a maximum of 2 times with a maximum time of 3 years is revoked, the status of workers in outsourcing companies can be in the form of a PKWT, in essence the Job Creation Law provides flexibility for companies that apply PKWT.
5.	Protection, Wages, and Welfare Section 1 Protection Paragraph 4: Working Time	77, 78, 79	Implementation of working time for workers is regulated in Work Agreements, Company Regulations, or Collective Labour Agreements. Overtime working time which was previously 3 hours per day and 14 hours per week is changed to 4 hours per day and 18 hours per week. Provision of long breaks (for workers who have worked for 6 years) is left to the agreement of workers and employers in Work Agreements, Company Regulations, or Collective Labour Agreements. Exceptions for certain companies that must provide long breaks that were previously mandated to be regulated through Ministerial Regulations, post-revision are mandated through Government Regulations.
	Section 2 Wages	88, +88A, +88B, +88C, +88D, +88E, 89, 90, +90A, +90B, 91, 92,	Wages determined by agreement are affirmed in this revised regulation, although the agreement must still pay attention to the minimum provisions, and some articles are not enforced, and are rearranged in other articles.

		+92A, 94, 95, 96, 97, 98	
6.	Chapter XII on Termination of Employment	151, +151A, 152, 153, 154, +154A, 155, 156, 157, +157A, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172	Requiring workers to be notified of the reasons for dismissal, and providing an explanation of the various reasons for dismissal, and then not enforcing some articles, and regulating them in other articles.
7.	Chapter XVI on Criminal Provisions and Administraive Sanctions Section 1 on Criminal Provisions	184, 185, 186, 187, 188	The imposition of criminal sanctions for employers who do not fulfil the payment of severance pay and long service pay, but the criminal article threatened to employers who do not register pension plans for workers is no longer valid after the revision of this article and then narrowing the threat of punishment, namely revoking the imposition of criminal sanctions.
	Section 2 on Administrative Sanctions	190, and + 191A	The authority to impose sanctions previously vested in the Minister is transferred to the Central Government or Local Government, and wages for the first time after the Job Creation Law remain in accordance with the provisions of the old Labour Law.

Table 1. Changes of Law 13 of 2013 through the Job Creation Law

B. 2. Critical Evaluation of Partial Revision of Labour Law Number 13 of 2003 through the Regulatory Modification Method in the Ciptaker Law

Currently, regulations in Indonesia are overregulated, resulting in overlapping tens or even hundreds of laws that have created legal uncertainty. Philosophically, as mentioned by

Cicero, the more regulations there are, the less justice there will be for the people, the more laws the less justice.²¹

Efforts to deregulate through the Job Creation Law certainly do not always run smoothly. Apart from the aspect of its formation is not yet known in the Indonesian legislative system, the omnibus law method tends to be identical to legislative practices in countries that adhere to the Common Law System such as America, the Philippines, and others. The idea of forming laws using the omnibus law method first appeared in 2016, aiming to carry out bureaucratic reform by deregulating, namely simplifying regulations that are still needed, or eliminating regulations that are no longer needed,²² the concept of the omnibus law method in the formation of laws and regulations became very popular in Indonesia after the Job Creation Law. The government considers the omnibus law method to be a solution to disharmony/overlapping laws and regulations in Indonesia, although there have been precedents for the use of the omnibus law method in countries that adhere to the Civil Law System, but the method is only used in the closest terminology, namely "parent law" as in the Netherlands. Even the omnibus law method has not been regulated in its formality in the types and hierarchy in the Formation of Legislation Law, starting from the Constitution, MPR Decree, laws, government regulations, presidential regulations, to regional regulations.

In Indonesia we recognise three methods in the preparation or regulation of regulations in Indonesia, namely codification, unification, and modification.²³ In Indonesia is more likely to use the codification method, examples of codified legal products in the legal system in Indonesia are such as the Civil Code, Commercial Code, Criminal Procedure Code, Criminal Code before the revision of 2023, while the Omnibus Method is not the same as the codification method commonly used in Indonesia, this method is a modification method or more

²¹ M. Jeffri Arlinandes Chandra et al., "Juridical Review of the Formation of Systematic, Harmonious and Integrated Legislation in Indonesia," *Journal of Indonesia Legislation* 19, no. 1 (2022): 2.

²² Hamid S. Attamimi, *Law on Legislation and Policy Regulations (Regulatory Law)*, retirement speech of Permanent Professor, Faculty of Law, University of Indonesia, 1993, 39 (Depok).

²³ "Ulasan Mengenai Kodifikasi, Unifikasi, dan Modifikasi Hukum: Law Firm Dr. Iur. Liona N. Supriatna, S.H., M.Hum., Andri Marpaung, S.H., Partners," *Lawyersclub.com*, accessed December 11, 2023, <https://www.lawyersclubs.com/ulasan-mengenai-kodifikasi-unifikasi-dan-modifikasi-hukum-law-firm-dr-iur-liona-n-supriatna-s-h-m-hum-andri-marpaung-s-h-partners/>

specifically a "modification of legislation", as applied by the Philippines since 1987 (The Omnibus Investment Code of 1987).²⁴

Indonesia is currently clearly heading towards the development of legislative formation, which departs from the codification method to the modification method, this can be seen from the formation of the Job Creation Law using the omnibus law method, in this case the author highlights Law Number 13 of 2003 on Labour which has been amended in the Job Creation Law. Law Number 13 of 2003 has received a partial revision consisting of 72 Articles from 7 Chapters and 4 Sections. The partial revision made for the Labour Law with the omnibus law method aims to accelerate the national development process. This is clearly a change in political action that aims to determine the direction of development in the world of business and investment, in accordance with what Van der Vlies said, that the law now no longer has the main function to give crystallised form to the values that live in society, but is formed for political action that determines the direction of development of certain values.²⁵

The formation of the Labour Law was coloured by various implications, where the implications of the 1998 Reformation and changes to the 1945 Constitution, which then gave birth to more laws that tend to make the basic fulfilment of citizens' human rights. One of the regulations that underwent changes was the labour sector. Beginning in 1998 during the reign of President Habibie where the state ratified the International Labour Organization (ILO) convention No. 87, then ratified five other ILO basic conventions 2 years later. Furthermore, after 2000, three labour related laws were passed in addition to the Labour Law, namely Law Number 21 of 2000 on Trade Unions/Labour Unions and Law Number 2 of 2004 on Settlement of Industrial Relations Disputes. The enactment of Law Number 13 of 2013 on Labour at that time did not mean that it had been accepted by consensus by the trade unions. The existence of

²⁴ "Menggagas Perbaikan UU Cipta Kerja," *Kompas.id*, accessed December 11, 2023, <https://www.kompas.id/baca/opini/2021/12/15/menggagas-perbaikan-uu-cipta-kerja>

²⁵ Mastorat, *Pengantar Ilmu Perundang-Undangan* (Surabaya: Scopindo Media Pustaka, 2021), 90.

the draft of Labour Law at that time was also marked by controversy, especially from the labour community, which rejected the passing of the bill.²⁶

In the formation of the Law Number 13 of 2003, a small team was formed that negotiated together with representatives of employers to provide a draft view of the existing bill to the DPR RI which was formulating the Labour Bill and later became the current Labour Law. Although there have been efforts to involve elements of trade unions by forming a small team, the Labour Law still regulates several issues that have become polemics and caused debates among trade unions, including the regulation of the concept of worker service provision agreements and contracting companies and Specified Time Work Agreements (PKWT) so that in the end the rejection of various parties to the Labour Law led to the holding of constitutional tests to the Constitutional Court formally and materially.²⁷

In 2006, during the administration of President Susilo Bambang Yudhoyono, there was a discourse to revise the Labour Law, which at that time was massively rejected by trade unions, especially from Indonesian Trade Union (*Serikat Pekerja Seluruh Indonesia* or SPSI) and Indonesian Trade Union Confederation (*Konfederasi Serikat Pekerja Indonesia* or KSPI). Likewise, in 2019 there was also discourse to revise the Labour Law, but although there was a definite effort to revise the Labour Law, and it was not included in the agenda of the national legislation program. In the end the revision effort appeared in the idea of an omnibus law during the second administration of President Joko Widodo. Changes in the national legal politics of the Labour Law that are deconstructed in the partial revision of the Job Creation Law are appropriate changes and lead to modification methods aimed at creating an investment climate that has always lagged behind other ASEAN countries, such as Malaysia, Thailand, Singapore, and Vietnam. Objectively, the licensing bureaucracy is one of the obstacles to increasing investment through ease of doing business, this can be seen from the ease of doing business (EoDB) report conducted by the World Bank for 190 countries, including Indonesia. It is recognised that Indonesia's EoDB ranking during the period 2015 to 2019 tends to continue to

²⁶ Ari Lazuardi Pratama and Aloysius Uwiyono, "Legal Politics of the Labour Law Before and After the Constitutional Court Decision on the Formality Testing of the Job Creation Law Case 91/Puu-XVIII/2020," *Journal of Law and Humanities* 9, no. 5 (2022): 3.

²⁷ *Ibid.*, 4.

increase. For example, from 114th (2015) to 109th (2016), 91st (2017), 72nd (2018), and 73rd (2019).²⁸

However, the problem is the interest of these changes which is the political change of law which according to the author is not appropriate, where the defeat of the interests of protecting rights is bad by the interests of employers. From the Job Creation Law it is clear that the government is trying to create social dumping, namely making rules to attract foreign investment to Indonesia by suppressing or weakening previous labour laws, so as to create policies that benefit employers or investors and eliminate protection and welfare to workers.

Furthermore, by looking at the partial revision of the Labour Law with the rights of workers as outlined in the Preamble of the 1945 Constitution paragraph IV and Article 27 paragraph (2) and Article 28D paragraph (2) of the 1945 Constitution where it has been mandated to the State to provide protection to workers in order to realise the right to work and a decent livelihood for workers and their families, and not merely prioritise the interests of investors in order to get investment, seen through the Critical Notes Policy Paper on Law Number 11 of 2020 on Job Creation published by the Faculty of Law, Gadjah Mada University in 2020, there are several crucial problems in the Labour aspect of the Job Creation Law:²⁹ (1) the disappearance of the maximum time limit provision in the Specified Time Work Agreement (PKWT); (2) the elimination of the phrase "decent living needs" as a reference for calculating the minimum wage which has an impact on shifting the concept of wage protection broadly;³⁰ (3) the elimination of restrictions on the types of work that can be done by outsourcing; (4) the paradigm shift of termination of employment becomes easier because it opens the possibility of layoffs only through notification of employers to workers without being preceded by negotiations; (6) the Job Creation Law also greatly reduces state control over labour relations, because many things are returned to the mechanism of agreement between the parties, such as the time limit of PKWT and the right to long breaks that can be agreed upon in the work

²⁸ "UU Cipta Kerja dan Kepastian Hukum Iklim Investasi," *Kompas.id*, accessed December 12, 2023, <https://www.kompas.id/baca/opini/2023/01/10/uu-cipta-kerja-dan-kepastian-hukum-iklim-investasi>

²⁹ Faculty of Law, Gadjah Mada University, *Policy Paper: Critical Notes on Law No. 11/2020 on Job Creation*, 2nd ed., November 5, 2020, 6.

³⁰ *Ibid.*, 7.

agreement; (6) the Job Creation Law is not friendly to persons with disabilities who are workers. This law provides injustice for workers who become disabled due to work accidents who are then easily terminated. This arrangement is counterproductive to the provisions in Law Number 8 of 2016 on Persons with Disabilities. Sociologically-empirically, such arrangements are very detrimental to workers because the inequality between workers and employers makes workers not have sufficient bargaining power in conducting fair two-way negotiations.³¹

Then, when looking at the latest revision of the Job Creation Law there are 3 changes to the Job Creation Law in the labour cluster. First, expert power or outsourcing in Article 64, which re-regulates the provisions regarding the transfer of part of the implementation of work to other companies. Second, the change of the phrase disability to disability in Article 67, where employers who employ workers with disabilities are obliged to provide protection in accordance with the type of disability. Third, related to regulations related to minimum wages stipulated in Articles 88c, 88d, 88f, and Article 92 of the latest revision, the author believes that it only provides minor changes to the labour cluster.

Thus, the Job Creation Law does not resolve crucial issues that do exist in Law Number 13 of 2003 on Labour, such as the absence of informal workers such as homeworkers, domestic workers, or workers who are in non-standard employment relationships, and many other shortcomings. The partial revision made by the Job Creation Law to the Labour Law is a very dominant patchwork format, so the modification method applied only tends to be like patchwork which actually creates new problems that have a negative impact on worker protection.

C. Conclusion

Considering that partial changes tend to have the nature to change only some of the contents or some provisions in a law partially in accordance with the context desired in the partial amendment law or in accordance with certain legal politics that are to be highlighted

³¹ “Awat Salah! Ini Perubahan Terbaru pada UU Cipta Kerja,” *CNBC Indonesia*, March 21, 2023, accessed December 12, 2023, <https://www.cnbcindonesia.com/news/20230321152538-4-423611/awat-salah-ini-perubahan-terbaru-pada-uu-cipta-kerja>

from the amendment law. In the context of the Job Creation Law, whose legal political direction is more or less generally seen in the consideration section and more specifically in the context of partial changes to the Labour Law, which cannot be separated from the tendency to support the investment ecosystem, the partial changes to the Labour Law in the Job Creation Law become inseparable from biases that tend to the interests of investment sustainability and also in turn do not rule out the possibility of various critical views on the partial changes to the Labour Law and the conditions surrounding the changes in the Job Creation Law. As mentioned earlier, it can be said that the partial changes to the Labour Law in the Job Creation Law have not resolved the crucial issues that do exist in Labour Law, such as the absence of informal workers such as home workers, domestic workers, or workers who are in non-standard employment relationships, and many other shortcomings. The partial revision made by the Job Creation Law to the Labour Law is a very dominant patchwork format, so the modification method applied only tends to be like patchwork which actually creates new problems that have a negative impact on worker protection.

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