



Employment or Exploitation? A Legal Comparative Study of Domestic Worker Protection in Singapore and Indonesia

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Abstract: This study aims to analyze the comparative legal protection systems for Domestic Workers (DWs) in Indonesia and Singapore, while highlighting the urgency of ratifying ILO Convention No. 189 as an international instrument to ensure decent work in the domestic sector. The research employs an empirical legal method, utilizing statutory, conceptual, and empirical approaches. The statutory approach involves reviewing national and international regulations related to labor and domestic worker protection. The data consist of primary data from observations and interviews, as well as secondary data from primary legal sources such as the 1945 Constitution of the Republic of Indonesia, Law No. 13 of 2003, the Draft Bill on Domestic Workers, the Employment of Foreign Manpower Act (EFMA), the Employment Act, and international instruments such as ILO Convention No. 189. The data are analyzed using descriptive-qualitative methods with deductive reasoning to identify normative and empirical gaps in the protection of domestic workers. The findings reveal that both Indonesia and Singapore have yet to provide comprehensive legal protection for domestic workers, particularly regarding formal employment status, basic rights, and access to justice. The ratification of ILO Convention No. 189 is considered crucial for both countries to improve national legal frameworks, raise protection standards, and enhance their diplomatic position and international reputation in upholding human rights and social justice.

Keywords: Domestic Workers; ILO Convention No. 189, Indonesia, Legal Protection; Singapore;.

1. Introduction

Indonesia holds the position as one of the largest sending countries of migrant domestic workers in Asia, with Singapore serving as a key destination state (Sudarmanto, 2022). The persistent outflow of Indonesian migrant domestic workers is primarily driven by structural factors, including limited employment opportunities within the country, generally low levels of education, the economic pull of destination states, and Indonesia's strategic geographical proximity to labor-receiving countries (Rahmasari et al., 2024). Conversely, Singapore demonstrates a high dependency on foreign labor to fulfill essential household functions, particularly in areas such as childcare, eldercare, and other routine domestic services. This dependency has fostered a strong and enduring bilateral labor migration dynamic between Indonesia and Singapore (Izzaty et al., 2024). According to data reported by AntaraNews, as of 2023, approximately 140,000 Indonesian migrant workers were employed in Singapore, the vast majority of whom were engaged in domestic work. Prior to 2023, the figure stood at an estimated 125,000 Indonesian domestic workers (Mahrofi, 2023). This trend reflects not only the strategic labor role of Indonesian domestic workers in Singapore's household economy but also highlights the reciprocal interdependence between the two nations in the transnational labor sector.

Each year, thousands of Indonesian domestic workers are deployed to Singapore through formal recruitment channels managed by the Indonesian Migrant Workers Protection Agency (BP2MI) in coordination with licensed placement agencies in both countries. Official data from 2015 to 2025 indicate a consistent increase in the number of Indonesian domestic workers in Singapore, reaching tens of thousands annually

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(Zhafira, 2025). Based on interviews conducted, Indonesian domestic workers in Singapore typically earn a monthly wage ranging from SGD 500 to 700, depending on their level of experience and the terms of their employment contract (Putri, 2024). In addition to monthly wages, basic entitlements such as weekly rest days and accommodation are provided. However, the protection of these rights remains suboptimal (Kumarr & Bal, 2024). Therefore, systemic reforms are required from both sending and receiving countries to enhance legal safeguards and ensure the welfare of Indonesian domestic workers.

According to data from the International Labour Organization (ILO), approximately 7% of Indonesian domestic workers in Singapore are subjected to conditions that meet the criteria of forced labor. Such conditions reflect exploitative practices, including excessive working hours, inadequate wages, and limited access to social and legal protection (Prasetyo & Azizah, 2024). Furthermore, a report by Human Rights Watch indicates that over 33% of interviewed Indonesian domestic workers reported experiencing unfair treatment and abuse of power by recruitment agencies in Singapore (Hindryati & Sirait, 2018). Forms of such abuse include passport confiscation, intimidation, physical violence, and placement in illegal or high-risk jobs (B. S. A. Yeoh et al., 2020). Data from Research Across Borders further reveals that around 60% of foreign domestic workers in Singapore are exposed to exploitative conditions by their employers, such as underpayment and long working hours. These practices are largely attributed to insufficient regulatory oversight, the workers' weak bargaining power during recruitment, and the structural vulnerabilities inherent in overseas employment (Rahmawati, 2019). Consequently, the heavy dependence of domestic workers on recruitment agencies and employers exacerbates the challenges in ensuring effective legal protection throughout their employment abroad.

In Indonesia, the formal recognition of domestic workers (PRT) as part of the national labor force remains incomplete, resulting in suboptimal legal protection. Although the Draft Law on the Protection of Domestic Workers (RUU Perlindungan PRT) has been under discussion for years, it has yet to be enacted as of 2025 (Anggraeni, 2024). This legislative gap has led to a legal vacuum that hinders comprehensive protection of domestic workers' rights. In the absence of adequate legal safeguards, both domestic and overseas Indonesian domestic workers remain vulnerable to exploitation, abuse, and violations of their fundamental rights (Hidayawati et al., 2023). The lack of a clear legal framework for sanctions and victim remedies further exacerbates the challenges in ensuring the protection and welfare of domestic workers. In contrast, Singapore has established a more robust regulatory framework to protect domestic workers. Legal protections in Singapore include regulations governing basic rights such as working hours, minimum wages, and entitlement to rest days (Parreñas et al., 2021). From a regulatory standpoint, Singapore provides legal protections through instruments such as the Employment of Foreign Manpower Act (EFMA) and the Foreign Worker Dormitories Act (Farwin et al., 2023).

In addition, Singapore enforces the Employment Agencies Act, which specifically regulates the obligations of employment agencies in the recruitment and placement of foreign domestic workers (FDWs), thereby strengthening legal protections for this labor sector (Yang et al., 2023). Protection for FDWs in Singapore is also guaranteed under the Work Permit for Foreign Domestic Workers, which outlines entitlements such as weekly rest days, reasonable working hours, and mechanisms to prevent employer abuse (Shivakoti et al., 2021). Consequently, the legal protections afforded to domestic workers in Indonesia and Singapore differ substantially, reflecting a significant disparity in labor policy and regulatory enforcement, particularly concerning the rights of domestic workers. This disparity is evident in Indonesia's ongoing regulatory vacuum regarding domestic worker protection, while Singapore has already implemented a comprehensive and enforceable legal framework. Such a framework includes provisions on minimum wage standards, occupational safety, and the assurance of a healthy and secure working environment (B. S. A. Yeoh et al., 2023).

On the other hand, both Indonesia and Singapore share a common shortcoming: neither has ratified ILO Convention No. 189 concerning decent work for domestic workers (Neo, 2022). This lack of ratification contributes to the relatively low standards of protection afforded to domestic workers in both countries. The absence of formal adoption of ILO Convention No. 189 limits the implementation of comprehensive legal safeguards for domestic workers across various employment sectors. ILO Convention No. 189 sets international labor standards to ensure the fundamental rights of domestic workers, including reasonable working hours, fair wages, entitlement to rest days, and protection from violence and exploitation (Lathofani & Eddyono, 2023). The failure of both Indonesia and Singapore to ratify this convention has created a legal gap that fosters uncertainty and increases the risk of exploitation by employers. Therefore, the ratification of ILO Convention No. 189 would constitute a strategic legal reform for both countries, serving to strengthen the overall legal framework for the protection of domestic workers.

Previous studies on the legal protection of domestic workers (PRT) in Indonesia have been conducted by several researchers. Azhari & Halim, (2021) found that the fundamental rights of domestic workers remain inadequately protected, highlighting the need for stronger regulatory frameworks. Pranoto, (2022) identified structural and regulatory barriers as key challenges in ensuring legal protection for domestic workers. Yasirwan et al., (2023) emphasized the urgency of legal certainty for domestic workers, incorporating Islamic legal perspectives as a normative foundation. Fajrianto, (2023) examined the link between constitutional rights and the obstacles to implementing legal protections for domestic workers. Meanwhile, Irfan, (2024) highlighted the importance of social security as a fundamental pillar for legal protection. While these studies share a common focus on the protection of domestic workers, this research introduces a novel perspective by adopting a comparative approach, analyzing legal protections for domestic workers in Indonesia and Singapore through the lens of international law, particularly ILO Convention No. 189.

This study is limited to analyzing the protection of domestic workers (PRT) in Indonesia and Singapore through the framework of ILO Convention No. 189, and does not extend to comparisons with other countries. The research focuses specifically on regulatory aspects and provides an in-depth evaluation of how the implementation of these regulations affects the actual conditions of domestic workers in both countries. As such, the study offers a valuable contribution to understanding the legal protection disparities between Indonesia and Singapore, while underscoring the urgency of adopting ILO Convention No. 189 as an international standard for domestic worker protection. The findings of this research serve as a critical reference for efforts to strengthen legal frameworks in Indonesia and to raise awareness of the need for fairer and more rights-oriented policy reforms for domestic workers.

2. Materials and Methods

This study employs an empirical legal research method, which examines how law operates in society. The approaches used include the statutory approach, the conceptual approach, and the empirical approach (Benuf & Azhar, 2020). The statutory approach involves analyzing laws and regulations relevant to the legal issue under investigation. The conceptual approach is grounded in legal theories and doctrines developed within the field of law. Meanwhile, the empirical approach is based on direct experience, observation, experimentation, and concrete, observable realities (Tan, 2021). This study utilizes both primary and secondary data.

Primary data were collected through direct observation and in-depth interviews with key informants, including domestic workers and placement agency representatives. Secondary data consist of primary legal materials, secondary legal materials, and tertiary legal materials obtained through literature review. These include: the 1945 Constitution of the Republic of Indonesia, Law No. 13 of 2003 on Manpower (despite not explicitly regulating domestic workers), the Draft Bill on the Protection of Domestic Workers (RUU PPRT), Ministerial Regulations on informal employment relations, the Employment of

Foreign Manpower Act (EFMA), the Employment Act (EA), Work Permit Conditions for Foreign Domestic Workers (FDWs), reports from Human Rights Watch, policies from Singapore's Ministry of Manpower (MOM), ILO Convention No. 189 concerning Decent Work for Domestic Workers (2011), and ILO Recommendation No. 201 (2011). All data were obtained through library research and analyzed using a descriptive-qualitative method. The reasoning applied in this study is deductive in nature, ultimately aiming to solve specific legal issues (Disemadi, 2022).

3. Results and Discussion

3.1 *Legal Framework Governing the Protection of Domestic Workers in Indonesia and Singapore*

Domestic workers occupy a crucial position within the social structure of modern societies, particularly in Southeast Asian countries such as Indonesia and Singapore (Nugraha & Maura, 2023). Despite their significant contributions, many domestic workers remain excluded from equal legal protections afforded to formal sector employees, exposing them to exploitation, discrimination, and violations of fundamental rights (Jaehrling et al., 2024). This legal gap underscores the importance of critically examining the regulatory frameworks governing domestic work. Indonesia and Singapore adopt distinct legal approaches to domestic worker protection, reflecting differing policy orientations (Komarudin et al., 2023). A comparative legal analysis is therefore essential to identify best practices and address regulatory shortcomings in both jurisdictions.

In Indonesia, domestic workers (PRT) are not yet fully recognized as formal workers under Law No. 13 of 2003 concerning Manpower. The exclusion of domestic workers from the scope of this legislation results in weak protection of their fundamental labor rights across various sectors (Andreansyah & Rusdiana, 2023). Consequently, domestic workers face significant limitations in accessing fair wages, reasonable working hours, and social protection. Although a Draft Bill on the Protection of Domestic Workers (RUU PPRT) has been proposed, it remains unratified as of 2025. The absence of comprehensive regulation places domestic workers in a legally vulnerable position, lacking adequate protection (Parvez et al., 2022). In contrast, Singapore has established regulatory frameworks specifically addressing domestic workers, particularly those from foreign countries. The country implements a special work visa scheme for Foreign Domestic Workers (FDWs), administered by the Ministry of Manpower (MOM). Although FDWs are not covered under the Employment Act, they are protected through standardized employment contracts and clear administrative regulations (Lim & Paul, 2021). Employers are required to meet specific criteria, including the provision of mandatory training and rest periods for domestic workers. This administrative approach reflects a structured effort to regulate domestic work, though it still falls short of the comprehensive protections granted under formal labor legislation (Kaur-Gill et al., 2021).

One of the key strengths of Singapore's domestic employment system is the implementation of written employment contracts, which serve as the legal foundation for defining the rights and obligations of both domestic workers and employers (Amrith, 2022). These contracts comprehensively outline terms such as working hours, rest days, and accommodation arrangements, providing a clear legal basis for resolving disputes in the event of violations. In addition, the Singaporean government mandates that employers purchase health and work injury insurance for domestic workers, offering additional protection against occupational risks (Ng, 2022). However, the exclusion of domestic workers from the Employment Act limits their access to formal labor rights, including end-of-contract compensation and formal mechanisms for labor dispute resolution (Zainal & Barlas, 2022).

In contrast, the legal status of domestic workers in Indonesia remains inadequately recognized, resulting in a formal protection gap. The absence of specific legislation governing the employment relationship between domestic workers and employers significantly weakens the legal standing of domestic workers within the national labor system (Naben, 2023). Although certain local governments have issued regional regulations

aimed at protecting domestic workers, their limited scope and weak enforceability have rendered them largely ineffective. In the absence of written employment contracts and minimum labor standards, domestic workers are increasingly vulnerable to exploitation, including excessive working hours, abuse, and wage insecurity (Safitri & Wibisono, 2023). The continued informality of domestic work further deepens the disparity in legal protection when compared to workers in the formal sector.

The absence of protection under Indonesia's Manpower Law is further exacerbated by the limited effectiveness of labor inspection institutions in safeguarding the rights of domestic workers (Nirmalah, 2021). Supervision of employment relationships in the domestic sector is often hindered by the prevailing perception that household matters fall within the private domain, rendering them difficult to regulate. This perception significantly hampers the government's ability to provide protection and take action against violations of domestic workers' rights, particularly in cases of physical abuse and harassment (Fadila & Purba, 2021). Without strong legal instruments and effective enforcement mechanisms, both preventive and repressive legal protections remain severely compromised. Nevertheless, several civil society organizations in Indonesia—such as the National Commission on Violence Against Women (Komnas Perempuan), the National Human Rights Commission (Komnas HAM), the Indonesian Child Protection Commission (KPAI), and others—have actively advocated for the recognition and enhancement of legal protections for domestic workers. These efforts include promoting the passage of the Draft Law on the Protection of Domestic Workers (RUU PPRT) and raising public awareness about the need to treat domestic workers fairly. The draft law includes provisions on working hours, minimum wages, rest periods, and protection from violence (Kurniawan et al., 2024). However, the continued failure to enact the RUU PPRT reflects a lack of state commitment to ensuring legal protection and respect for the rights of domestic workers.

In Singapore, although legal protections for domestic workers are administrative in nature, their implementation is carried out with discipline and strict enforcement. The government imposes severe penalties on employers found guilty of arbitrarily revoking work permits, committing acts of violence, or exploiting domestic workers (Parreñas, 2021). Additionally, dedicated hotlines and complaint centers are available to facilitate the reporting of rights violations by domestic workers. This approach underscores the state's active role in maintaining a balance between employers' interests and workers' rights (Ho et al., 2022). However, in practice, domestic workers still face limited space to assert their rights freely due to their dependence on their employers.

This comparison demonstrates that although Singapore has yet to incorporate domestic workers (PRT) within its Employment Act, the country implements a relatively stronger protection system compared to Indonesia. Strict administrative measures and standardized employment contracts play a crucial role in ensuring minimum protections for domestic workers (B. S. Yeoh & Lam, 2022). In contrast, the absence of a formal legal framework in Indonesia renders domestic workers more vulnerable to exploitative practices. This underscores the essential role of the state in establishing and enforcing minimum labor standards in the domestic sector (Alfariszi & Ahsan, 2024). Furthermore, Singapore's administrative approach offers valuable lessons for Indonesia in developing an adaptive and pragmatic protection system for domestic workers.

Despite social and demographic differences, Indonesia can adopt standardized employment contracts and a structured monitoring system. Such regulation provides legal certainty and promotes a dignified and professional employment relationship. The regulatory disparities between Indonesia and Singapore regarding domestic workers reflect differing legal, political, and cultural approaches to domestic labor (Liem et al., 2024). Comparative legal analysis is essential for formulating contextual and realistic legal protection strategies. By understanding best practices from each country, domestic worker protection policies can be designed more effectively. The government must play an active role in clarifying the legal status of domestic workers and ensuring the fulfillment of their fundamental rights (Liang, 2023). Accordingly, this comparative legal study

underscores the necessity of enacting protective regulations for domestic workers in Indonesia, alongside a comprehensive evaluation of the migrant domestic worker protection system in Singapore.

3.2 The Implementation of Domestic Worker Protection in Indonesia and Singapore Compared to International Standards under ILO Convention No. 189

ILO Convention No. 189 establishes international standards for decent work for domestic workers, including rights to fair working conditions, social protection, rest periods, and freedom of association (Anugrah & Ruslie, 2024). This convention serves as a key benchmark in assessing a country's commitment to protecting domestic workers—an informal labor group vulnerable to exploitation and human rights violations. As of 2025, Indonesia has not ratified ILO Convention No. 189, resulting in the country's domestic worker protections not fully aligning with international standards. The absence of specific legislation on domestic workers means that legal protection is limited and primarily reliant on general labor regulations, which inadequately address the unique conditions of domestic work (Izzati, 2024).

Although the Domestic Workers Bill (RUU PPRT) has been proposed since 2004, it has yet to be enacted. This bill is designed as a legal framework aligned with ILO Convention No. 189, guaranteeing recognition of domestic work, fair wages, reasonable working hours, and protection against violence and harassment (Sonhaji, 2020). The absence of clear regulation is exacerbated by weak monitoring mechanisms and limited access for domestic workers to complaint institutions. As a result, many domestic workers work without contracts, without defined working hours, and experience social isolation, increasing their vulnerability to exploitation (Jordhus-Lier, 2017). In contrast, although Singapore has not ratified ILO Convention No. 189, it implements a more structured protection system for domestic workers through the Employment of Foreign Manpower Act and other administrative policies (Lenard, 2022). Foreign domestic workers are required to have employment contracts, are entitled to weekly rest days, and must undergo orientation before commencing work.

Singapore enforces mandatory employment contracts and weekly rest days for domestic workers, in line with the principles of the ILO Convention. Although the provision of weekly rest days was initially uneven, regulations were subsequently strengthened to require employers to grant one day off per week or provide monetary compensation if the rest day is not given (Parrenas, 2021). Singapore has established a stringent legal framework to address cases of abuse and violence against domestic workers, imposing harsher criminal penalties when the perpetrator is the employer. This approach reflects substantive protection and serves as an important reference for Indonesia in strengthening its legal system to better safeguard domestic workers (Thi et al., 2021). While domestic workers in Singapore are not included in the formal employment insurance scheme, the government mandates employers to provide basic health insurance and work accident insurance. In contrast, social security protection for domestic workers in Indonesia remains minimal and largely dependent on voluntary participation, resulting in inadequate coverage.

Additionally, Singapore provides pre-employment training for domestic workers through the Foreign Domestic Worker Orientation Programme, which helps each worker understand their rights, obligations, and the available protection mechanisms (Yin, 2024). This highlights the importance of an educational approach in implementing domestic worker protections—an approach that has yet to be systematically adopted in Indonesia. As the sending country, Indonesia, and Singapore, as the receiving country, must enhance their synergy in addressing the challenges of domestic worker migration. Strong bilateral collaboration is essential to safeguard the rights of migrant workers and to combat human trafficking and forced labor in accordance with the provisions of ILO Convention No. 189 and the Palermo Protocol (Muhammad, 2025).

Compared to ILO Convention No. 189, Singapore's protections for domestic workers already incorporate several fundamental principles, such as protection against violence,

regulation of working hours, and provision of rest days. In contrast, Indonesia remains behind in meeting these standards due to the absence of a clear and binding legal framework. This comparison demonstrates that although Singapore has not ratified ILO Convention No. 189, it has adopted many of its principles within domestic policy. Conversely, Indonesia is still at an early stage in developing an adequate protection system for domestic workers. Harmonizing national policies with international standards is essential to ensure justice and welfare for domestic workers, who remain vulnerable to unfair treatment.

3.3 The Urgency and Benefits of Ratifying ILO Convention No. 189 for Indonesia and Singapore

ILO Convention No. 189 establishes standards for decent work for domestic workers and serves as an international instrument designed to guarantee equality of rights, legal protection, and humane working conditions for domestic workers. As part of the international labor law framework, ratification of this convention reflects a country's commitment to social justice values and respect for human rights (Miyazaki, 2023). States that have ratified the convention are obligated to incorporate its principles as the fundamental basis for national legal reforms aimed at optimal worker protection. Without ratifying ILO Convention No. 189, both Indonesia and Singapore remain under international pressure to reform domestic policies in alignment with global commitments to domestic workers' rights (Liem et al., 2024). Beyond a mere formality, ratification represents a strategic step toward comprehensive reform of the protection system for domestic workers.

The ratification of ILO Convention No. 189 constitutes an official acknowledgment by the state that domestic workers are entitled to fair, decent, and legally protected working conditions. Protection of domestic workers forms an integral part of fulfilling human rights obligations enshrined in various international human rights instruments, including the Universal Declaration of Human Rights and the International Covenant on Economic, Social and Cultural Rights (Coe & Glaser, 2024). Neglecting protections for domestic workers reflects a state's failure to safeguard one of the most vulnerable labor groups at high risk of exploitation. Ratification of this convention strengthens both the moral legitimacy and legal foundation for states to realize comprehensive protections for domestic workers (Dewi & Widiyastuti, 2023). Both Indonesia and Singapore must demonstrate their commitment to vulnerable populations as part of their social responsibilities. The implementation of international standards serves as a crucial benchmark in building a credible global reputation.

For Indonesia, the ratification of ILO Convention No. 189 can serve as a strategic foundation to accelerate the enactment of the Domestic Workers Bill (RUU PPRT), which has long been pending in Parliament. Ratifying this convention would strengthen the political legitimacy and normative basis of the bill by demonstrating Indonesia's commitment to international labor protection standards (Azhari & Halim, 2021). Thus, the ratification of ILO Convention No. 189 becomes a crucial catalyst in expediting the harmonization of national regulations to ensure comprehensive protection for domestic workers. Furthermore, ratification will enhance Indonesia's standing and legitimacy at the international level as a country committed to protecting and guaranteeing the rights of vulnerable workers (Eyongndi et al., 2024). In the long term, ratification will help eliminate stigma and reduce systemic violence faced by domestic workers by providing formal recognition through national positive law.

Moreover, ratification will obligate the state to align its legal instruments and law enforcement practices with the principles of ILO Convention No. 189. This includes drafting technical regulations, establishing dedicated labor inspection mechanisms for the domestic sector, and enhancing domestic workers' access to complaint and redress systems (Fish, 2021). A clear legal framework provides certainty for law enforcement authorities to consistently address violations against domestic workers and fosters trust among workers in the national legal protection system. Without ratification and sup-

porting regulations, protections for domestic workers risk remaining symbolic and ineffective (Marchetti et al., 2021).

There are significant social and economic benefits for Indonesia in ratifying this convention, particularly in fostering a shift in public perception of domestic work. Domestic workers should be recognized as professionals deserving of legal protection, rather than merely informal labor without regulation (Sacha, 2022). Economically, ratification enables Indonesia to enhance productivity in the informal sector through improved welfare for domestic workers. Moreover, this step strengthens Indonesia's bargaining position in bilateral labor negotiations as a labor-sending country. Adequate protection for domestic workers also contributes to improving the national image, especially in the areas of labor migration and combating human trafficking (Sedacca, 2022). As one of the largest sending countries of migrant domestic workers in Southeast Asia, Indonesia can reinforce its diplomatic standing by ratifying ILO Convention No. 189. This move provides a solid foundation to demand fair treatment for its citizens abroad, including in Singapore.

Currently, weak domestic protections undermine Indonesia's bargaining power in bilateral agreements with destination countries, particularly Singapore. Through ratification, Indonesia would demonstrate its commitment to defending the rights of migrant domestic workers and encourage destination countries to fully uphold their protection obligations toward Indonesian domestic workers (Cheung et al., 2023). On the other hand, although Singapore has a structured administrative mechanism, the absence of ratification limits the effectiveness of formal legal accountability in the country. Ratifying ILO Convention No. 189 would elevate domestic worker protections from mere administrative policies to legally binding state obligations (Shah, 2022). This is essential within the rule of law framework to ensure that protections do not rely solely on government goodwill. With ratification, Singapore can ensure consistency between its international commitments and national regulations to strengthen protections for domestic workers.

Moreover, although Singapore has implemented mandatory orientation programs, basic health insurance, and weekly rest days for domestic workers, the rights to freedom of association and comprehensive social security have not yet been formally recognized. Ratifying ILO Convention No. 189 would compel Singapore to strengthen its commitment to domestic workers' protections, particularly in relation to the right to organize and fair working hours (Muslim et al., 2024). Such ratification would also enhance civil society engagement in monitoring domestic workers' rights and reinforce Singapore's image as a developed nation that consistently upholds the principles of social justice and labor rights at the global level. As an expression of global solidarity, the international community—through the ILO and human rights organizations—continues to urge states to ratify Convention No. 189 in order to guarantee the rights and welfare of domestic workers (Fraga, 2024).

ASEAN member states are increasingly recognizing the importance of protecting domestic workers as an integral part of achieving sustainable and high-quality human development (Paul, 2024). Moral pressure and the imperative to uphold international reputation demand that both Indonesia and Singapore proceed with the ratification of ILO Convention No. 189 without further delay. International support for this convention underscores that the protection of domestic workers is a global concern requiring the commitment of all nations. States that fail to act face growing public scrutiny and risk undermining the trust of international partners (Komarudin et al., 2023).

By ratifying ILO Convention No. 189, Indonesia and other ASEAN member states can promote stronger policy harmonization in the protection of domestic workers (Prasetyo & Azizah, 2024). The Convention has the potential to serve as a foundational framework for developing regional cooperation mechanisms that ensure the effective protection of migrant workers' rights. This initiative is particularly relevant given the increasing mobility of domestic workers within Southeast Asia. As a major sending country, Indonesia, and Singapore as a receiving country, can play a central role in es-

establishing regional standards for domestic worker protection. Such policy harmonization would reduce legal protection gaps between countries and help prevent exploitation arising from imbalances in national systems (Austin, 2022).

The ratification of ILO Convention No. 189 constitutes both a strategic imperative and a necessary step for Indonesia and Singapore in establishing a fair, humane, and sustainable system of protection for domestic workers. Beyond merely fulfilling international obligations, ratification represents a concrete commitment to advancing social justice for millions of domestic workers. It provides states with a clear legal foundation, political legitimacy, and international support to develop comprehensive and effective regulatory frameworks. As such, the ratification of ILO Convention No. 189 reflects a state's genuine commitment to recognizing domestic work as a vital pillar in fostering human capital development and driving national economic growth.

4. Conclusions

ILO Convention No. 189 serves as a critical foundation for strengthening the global protection of domestic workers, particularly for countries such as Indonesia and Singapore, which heavily rely on domestic labor—both from nationals and migrant workers. In Indonesia, many domestic workers remain vulnerable due to the absence of written contracts, lack of social protection, and exposure to exploitation and abuse resulting from weak legal frameworks. In contrast, while Singapore maintains an orderly labor system, it still faces challenges in guaranteeing the fundamental rights of foreign domestic workers, including working hours and access to justice. The ratification of ILO Convention No. 189 would provide both a strong legal and moral basis to drive progressive regulatory reform and formally recognize domestic work as an integral part of the labor sector. Beyond fulfilling international obligations, ratification would enhance both countries' diplomatic standing in protecting migrant workers, improve their human rights reputation, and support the harmonization of protection standards within ASEAN. It would also strengthen mechanisms for monitoring and complaints, while promoting the professionalization of the domestic work sector through training and certification. Improved protection would foster stable employment relationships, reduce labor conflicts, and enhance both the productivity and dignity of domestic workers—particularly women, who are disproportionately vulnerable to gender-based violence. Without ratification, Indonesia and Singapore risk facing international criticism and falling behind in the global movement toward recognizing and upholding the rights of domestic workers.

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