

Southeast Asia Against Human Trafficking by the Sea:
Comparison between Indonesia and The Philippines

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Article	Abstract
<p>Keywords: Human trafficking; law enforcement; regional cooperation.</p> <p>Article History Received: Nov 20, 2024; Reviewed: Mar 05 2025; Accepted: Mar 07 2025; Published: 18 Mar 2025.</p>	<p>This study compares efforts to prevent human trafficking (TPPO) via maritime routes between Indonesia and the Philippines. TPPO is a transnational crime involving sexual exploitation, forced labor, and online fraud. This study employs a normative juridical approach, examining the implementation of the United Nations Convention against Transnational Organized Crime (UNTOC) and the ASEAN Plan of Action in both countries. This study is based on a qualitative literature study, utilizing secondary data from both primary and secondary legal sources. The findings indicate that Indonesia has implemented Law No. 21 of 2007 on the Eradication of Human Trafficking, while the Philippines uses the Anti-Trafficking in Persons Act of 2003 and Expanded Anti-Trafficking in Persons Act of 2012. Both nations have strengthened maritime patrols and inter-agency coordination, but the effectiveness of law enforcement still faces challenges, such as limited resources and insufficient training. Another issue is the need for enhanced cross-border cooperation. This study recommends strengthening regional collaboration, raising public awareness, and improving victim protection measures. These findings aim to contribute to better TPPO policies in Southeast Asia, especially in Indonesia and the Philippines.</p>



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Introduction

Trafficking in persons (TIP) continues to be a pressing concern for countries worldwide, including in Southeast Asia. One of the most prevalent cases of Trafficking in Persons (TIP) in Southeast Asia involves forced labor and sexual exploitation. Many victims are trafficked from rural areas to urban centers or across borders with false promises of employment, only to be trapped in exploitative conditions. Countries like Thailand, Malaysia, Phillipines and Indonesia have been identified as both source and destination countries for trafficking, particularly in industries such as fishing, domestic work, and entertainment. Criminal networks take advantage of weak law enforcement, corruption, and economic vulnerabilities to sustain their operations. Efforts to combat TIP in the region include stricter regulations, cross-border cooperation, and awareness campaigns, but challenges remain in identifying and rescuing victims due to the hidden nature of these crimes.

According to the United States Agency for International Development (USAID) in its 2021 report, TIP is the second-largest crime globally and disproportionately affects the most vulnerable groups within societies. TIP falls under the category of transnational organized crime. According to the United Nations Office on Drugs and Crime (UNODC) 2020 report, transnational organized crime involves a structured group engaging in criminal activities for financial or material gain, affecting more than one country through its execution, planning, or impact.¹

Essentially, TIP can arise from various factors, including poverty. TIP, particularly involving women and children, has expanded into a networked crime, both organized and unorganized. This crime often involves not only individuals but also state officials who abuse their authority and/or power. TIP networks operate across domestic regions and extend internationally, underscoring the

¹ UNODC. (2024). United Nations Convention against Transnational Organized Crime and the Protocols Thereto. United Nations Treaty Collection. <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>

transnational reach of such operations.²

According to the UNODC in its *Casinos, Cyber Fraud, and Trafficking in Persons for Forced Criminality in Southeast Asia Policy Report* (September 2023), transnational organized crime in Southeast Asia has undergone significant changes, with an increase in TIP for forced criminal activities, particularly in the form of online fraud. In The Philippines, profits from online fraud are estimated to reach between USD 7.5 billion and USD 12.5 billion, nearly half the GDP of that country in 2021. In Indonesia³, according to a statement from the Chief of Police, there were 982 cases of TIP in 2023, a significant increase from 145 cases in 2022. In 2023, 3,208 individuals were victims of TIP, compared to 668 individuals in 2022.⁴

According to the UNODC, TIP consists of three main elements: activities, means, and purpose. The activities in TIP involve recruiting, transporting, transferring, harboring, and receiving victims. The means include threats or use of force, coercion, deception, abuse of vulnerability, payment or benefits, and abduction. The purpose is exploitation, which encompasses various forms such as in the sex industry, entertainment, hospitality, domestic work, and forced marriage. TIP perpetrators often use physical and sexual abuse, extortion, emotional manipulation, and confiscation of official documents to control their victims. Exploitation may occur in the victim's home country, during migration, or in a foreign country.⁵ TIP trafficking routes may involve land, sea, or air routes. Sea routes is being one of the primary methods in TIP cases. TIP perpetrators often use ship to evade detection, transporting victims through ports and

² Shahrullah, R. S., & Tjhang, D. F. (2014). Tinjauan Yuridis Terhadap Penanggulangan Tindak Pidana Perdagangan Manusia di Indonesia dan Filipina. *Journal of Judicial Review*. <https://journal.uib.ac.id/index.php/jjr/article/view/143/110>

³ UNODC. (2024). United Nations Convention against Transnational Organized Crime and the Protocols Thereto. United Nations Treaty Collection. <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>

⁴ TBNews. (2023). Kapolri Catat Ada 982 Kasus TPPO di Sepanjang 2023. <https://tribatanews.jambi.polri.go.id/main/detail/6717/Kapolri-Catat-Ada-982-Kasus-TPPO-di-Sepanjang-2023>

⁵ Nation, U. (2023). UNODC is the Leading Entity within the United Nations System to Address the Criminal Elements of Human Trafficking. Unodc.Org. https://ourrescue.org/join-the-fight?gad_source=1&gbraid=0AAAAAoc8JBFjNQv0OtLEzhsj4jJrvzxml&gclid=Cj0KCQiA_9u5BhCUARIsABbMSPuK69ppydNhVakW81x41vYLr14i5wYyYzLqWiQGsyR4JqEqouUW0waAtZCEALw_wcB

concealed routes. Limitations in monitoring maritime areas and the presence of unregulated routes make sea routes a serious challenge in TIP prevention efforts.⁶ A maritime route refers to established shipping lanes used for commercial trade, navigation, and transportation of goods across seas and oceans, often regulated by international laws.⁷ In contrast, a sea route specifically refers to the physical path taken by vessels over the sea, which can vary depending on weather conditions, territorial waters, and navigational constraints.

Various countries have placed special attention on TIP, reflected in the establishment of several international conventions, such as the The Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Human Trafficking Protocol), the UN Convention Against Transnational Organized Crime and the Protocols Thereto, and the Protocol against the Smuggling of Migrants by Land, Sea and Air were all adopted in 2000, followed by the Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition in 2001. Years later, the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP) was adopted in 2015 as a regional commitment to combating human trafficking. These conventions specifically address the protection, prevention, and support for victims of trafficking, emphasizing the importance of international cooperation in tackling this issue.

Indonesia and the Philippines are two countries significantly impacted by TIP, influenced by various social and economic factors. In Indonesia, issues such as poverty, unemployment, and limited access to quality education drive many to seek employment abroad, making them vulnerable to trafficking networks that exploit migrant workers. Similarly, in the Philippines, many citizens—especially women and children—pursue work opportunities overseas but find themselves trapped in exploitation, particularly in the sex industry or in high-risk jobs.⁸

Indonesia is also one of the countries paying particular attention

⁶ UNODC (2011), Transnational Organized Crime in The Fishing Industry, https://www.unodc.org/documents/human-trafficking/Issue_Paper_-_TOC_in_the_Fishing_Industry.pdf

⁷ Yan, Z., Xiao, Y., Cheng, L., He, R., Ruan, X., Zhou, X., ... & Bin, R. (2020). Exploring AIS data for Intelligent Maritime Routes Extraction. *Applied Ocean Research*, 101, 102271.

⁸ Shahrullah, (2014), *Loc.Cit.*

to TIP, given the increasing number of cases each year. TIP in Indonesia is governed by Law No. 21 of 2007 on the Eradication of Trafficking in Persons (hereinafter referred to as the TIP Law). Indonesia has also enacted various regulations aimed at preventing and addressing TIP, such as Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers and Presidential Regulation No. 19 of 2023 on the National Action Plan for the Prevention and Handling of Trafficking in Persons for 2020–2024. However, according to the 2023 *Trafficking in Persons Report* published by the U.S. Embassy and Consulates in Indonesia, Indonesia was placed in Tier 2, indicating that while the Indonesian government has not yet fully met the minimum standards for TIP eradication, it has made significant efforts toward achieving them in 2023.

In contrast, the Philippines, according to the 2023 *Trafficking in Persons Report*, was placed in Tier 1, indicating that the Philippine government has fully met the minimum standards in its efforts to combat TIP. TIP in the Philippines is regulated by Republic Act No. 9208 (Anti-Trafficking in Persons Act of 2003) and Republic Act No. 10364 (Expanded Anti-Trafficking in Persons Act of 2012). The National Bureau of Investigation (NBI) and the Philippine National Police (PNP) investigated 277 cases of trafficking in persons, compared to 168 investigations in 2021. The Philippine government reported the identification of 1,277 victims, 740 of whom were victims of sex trafficking (comprising 490 women, 37 men, 148 girls, and 65 boys), and 537 were victims of labor trafficking (comprising 119 men and 418 women). This figure represents a decrease compared to the 1,802 victims identified the previous year.⁹

TIP in Southeast Asia involves various methods exploiting victims in sector like agriculture, mining, gambling, and forced or sexual labor. In Indonesia, TIP often involves labor exploitation in domestic work, factories, construction, and plantations (US *Department of State Trafficking in Person Report of Indonesia*). In the Philippines, victims are forced into labor in agriculture, construction, fishing, and maritime sectors, as well as sex trafficking in tourist areas. Children are exploited in street activities and online sexual abuse, often by family members, making the Philippines a major source of

⁹ Lee-Brago, P. (2023). Philippines retains tier 1 ranking vs human trafficking. Philstar.Com.
<https://www.philstar.com/nation/2023/06/19/2274859/philippines-retains-tier-1-ranking-vs-human-trafficking/amp/>

online child exploitation globally (*US Department of State Trafficking In Person Report of Philippines*). In other Southeast Asian countries, such as Cambodia and Myanmar, report TIP victims being coerced into illegal gambling, online scams, and forced fishing labor under harsh conditions.¹⁰

The International Organization for Migration (IOM) describes the modus operandi of TIP in Southeast Asia involves systematic recruitment, transportation, and exploitation. Victims are often recruited through online job offers or direct recruitment, typically at no cost to them. Traffickers arrange and fund transportation, assist with travel documents like tourist visas, and transfer victims through a network of traffickers before reaching employers. Deception is commonly used, with victims promised good working conditions and high wages, only to face poor conditions upon arrival. Some victims are abducted or coerced through threats, document confiscation, or torture. TIP purposes in Southeast Asia include forced labor, sexual exploitation, involvement in criminal activities like online scams, and organ trafficking.¹¹

Many previous studies have examined the enforcement of TIP laws. Heni Susanti, Syafrinaldi, and Wira Atma Hajri conducted a comparative legal study on TIP between Indonesia and Malaysia. They found that Indonesia's TIP Law has stricter provisions regarding the prosecution of witnesses compared to Malaysia's Anti-Trafficking in Persons Act (ATPA) Act 670. However, there are no national regulations regarding the extension of jurisdiction, and there is a lack of a specialized council for coordinating and overseeing the national action plan for the prevention and eradication of human trafficking, as well as for the protection of victims.¹²

Dewi Asri Puanandini, in her research, found that the

¹⁰ Hinz, E. (2023). Asia Tenggara: Bagaimana Perangi Krisis Perdagangan Manusia? Dw.Com. <https://amp.dw.com/id/asia-tenggara-bagaimana-perangi-krisis-perdagangan-manusia/a-65437224>

¹¹ Archambault, C. (2024). Iom's Regional Situation Report on Trafficking in Persons Into Forced Criminality in Online Scamming Centres in Southeast Asia. Iom's Situation Report. https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update_december-2023.pdf

¹² Susanti, H., Syafrinaldi, & Hajri, W. A. (2022). Perbandingan Aturan Hukum Tentang Tindak Pidana Perdagangan Orang di Indonesia dan Malaysia. In Fakultas Hukum. Universitas Islam Riau. <https://ejournal.uniks.ac.id/index.php/KODIFIKASI/article/view/1843>

enforcement of laws against human trafficking involving Indonesian migrant workers often involves the participation of organized actors from various institutions, such as civil registration, labor, health, immigration, and airports. Recruitment agencies (P3MI) exploit immigration officers to facilitate the departure of prospective migrant workers in exchange for bribes. The Indonesian Migrant Worker Protection Agency (BP2MI) enforces the law through actions such as service delays, revocation of company licenses, written warnings, and cancellation of departures. Long-term efforts include strict supervision of Indonesian labor supply companies.¹³

Ananda Chrisna D. Panjaitan, in her research, found that the Palermo Protocol is fully binding under Indonesian legislation, particularly in terms of the definition of trafficking, which has undergone changes. This could lead to misinterpretation and a lack of harmony with Indonesia's TIP Law. Such discrepancies may hinder the enforcement of laws against human trafficking and result in Indonesia being perceived as less effective in addressing cases involving both perpetrators and victims of this crime.¹⁴

Based on the background outlined above, this study, titled *Southeast Asia Against Human Trafficking by the Sea: Comparison between Indonesia and the Philippines*, aims to analyze and compare the implementation of international and regional legal frameworks in preventing TIP via maritime routes. This research focuses on two key aspects: first, examining how Indonesia and the Philippines enforce the UNTOC (Human Trafficking Protocol) in their efforts to combat human trafficking through maritime routes to Southeast Asian countries; and second, evaluating the extent to which both countries implement the ASEAN Plan of Action in addressing TIP within the region. By investigating these issues, this study seeks to identify strengths, challenges, and areas for improvement in the legal enforcement of TIP prevention in both countries.

¹³ Puanandini, D. A. (2020). Penegakan Hukum Tindak Pidana Perdagangan Orang Pekerja Migran Indonesia. *ADLIYA: Jurnal Hukum dan Kemanusiaan*, 14(2). <https://doi.org/10.15575/adliya.v14i2.9938>

¹⁴ D. Panjaitan, A. C. (2022). Harmonisasi Undang-Undang Nomor 21 Tahun 2007 Tentang Pemberantasan Tindak Pidana Perdagangan Orang Dengan Protokol Palermo dalam Perlindungan Perdagangan Orang di Indonesia. *Jurnal Yustitia*, 16(1), 1–13. <https://www.ojs.unr.ac.id/index.php/yustitia/article/view/895>

Method

This study uses a normative legal research method, combining statutory and comparative approaches, with data collected through literature review and analyzed qualitatively. The primary objective of this study is to conduct a legal comparison between Indonesia and the Philippines in terms of TIP law enforcement, one of the key characteristics of this method.¹⁵ The data sources for this study are secondary data, which include primary legal materials such as: the UN Convention Against Transnational Organized Crime and the Protocols Thereto; the ASEAN Convention Against Trafficking in Persons, Especially Women and Children; the ASEAN Plan of Action; Law No. 21 of 2007 on the Eradication of Human Trafficking Crimes; Republic Act No. 9208 (Anti-Trafficking in Persons Act of 2003); and Republic Act No. 10364 (Expanded Anti-Trafficking in Persons Act of 2012). The secondary legal materials used include scholarly journals and official websites of UNODC, ASEAN, IOM, and other relevant organizations.

This research represents a new approach in comparing the prevention of TIP via maritime routes between Indonesia and the Philippines. Using the Legal Comparison Theory by Soerjono Soekanto, where comparison is understood as an activity aimed at identifying similarities and/or differences between two or more specific phenomenal.¹⁶ The objective of this study is to gain an understanding of the different approaches to TIP prevention in both countries and identify steps that can be taken to improve TIP law enforcement in Indonesia. Given that Indonesia is in Tier 2, indicating that it has not yet met the minimum standards for TIP eradication, while the Philippines has met those standards and is placed in Tier 1, this comparison is considered crucial for enhancing TIP law enforcement efforts in Indonesia.

This study aims to understand the legal frameworks for TIP law enforcement in Indonesia and the Philippines and contribute to improving TIP law enforcement in both countries to prevent TIP. The scope of this study is limited to a comparison of the existing legal frameworks, without including case studies or practical experiences that may be important for understanding actual implementation.

¹⁵ Disemadi, H. S., Hukum, F., & Batam, U. I. (2022). Lenses of Legal Research: A Descriptive Essay on Legal Research Methodologies. 24(December), 289–304. <https://journal.uib.ac.id/index.php/jjr/article/download/7280/2878/12152>

¹⁶ D. Panjaitan, A. C. (2022). *Loc.Cit.*

This research focuses on the legal frameworks governing human trafficking prevention through maritime routes in Indonesia and the Philippines. Given their strategic geographic positions and extensive coastlines, both countries face significant challenges in combating TIP via sea routes. Indonesia, as an archipelagic nation, struggles with border control and law enforcement in remote maritime areas, while the Philippines, despite its Tier 1 status in TIP eradication, continues to face issues related to migrant smuggling and forced labor at sea. By examining the differences in their legal approaches and enforcement mechanisms, this study seeks to provide insights into the strengths and weaknesses of each system, offering recommendations to enhance TIP prevention efforts in Indonesia.

Result and Discussion

1. Implementation of the UNTOC (Human Trafficking Protocol in Indonesia and the Philippines in Preventing TIP via Maritime Routes to Southeast Asian Countries

The patterns and routes of TIP in the Philippines and Indonesia are heavily influenced by the geographical conditions and socio-economic situations of the two countries. Indonesia has a trafficking route that heavily utilizes maritime pathways. TIP cases in Indonesia are prevalent in major provinces such as Sumatra, Kalimantan, Java, Bali, Papua, and West Nusa Tenggara.¹⁷

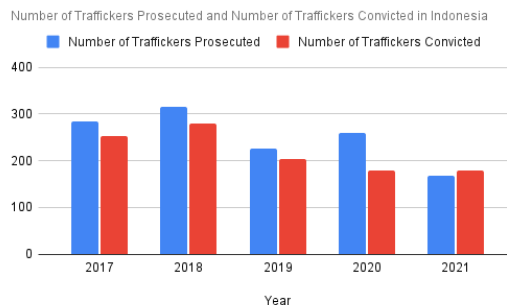
Human trafficking is a serious global issue, with the International Labor Organization (ILO) estimating around 12 million victims worldwide, including both children and adults, with 56% being women exploited as sex slaves. According to the International Organization for Migration (IOM), Indonesia struggles to meet international standards in handling human trafficking, serving as a source, transit, and destination country. The five provinces with the highest number of victims are East Java, West Java, Central Java, West Nusa Tenggara (NTB), and East Nusa Tenggara (NTT). In 2018, IOM recorded 329 child trafficking victims, while the Indonesian National

¹⁷ Maulid Dina, S. R., & Kusumaningrum, D. N. (2023). Kebijakan luar negeri Indonesia dalam menangani kasus perdagangan manusia di kawasan Asia Tenggara. *JISPAR, Jurnal Ilmu Sosial, Politik dan Pemerintahan*, **12**(1). ISSN 2089-6123; e-ISSN 2684-9119. <https://e-journal.upr.ac.id/index.php/JISPAR/article/download/7985/4366/19122>

Police reported an expansion of trafficking networks from 14 to 18 provinces, spanning Sumatra, Java, Bali, Kalimantan, Sulawesi, West Nusa Tenggara, and Papua.¹⁸

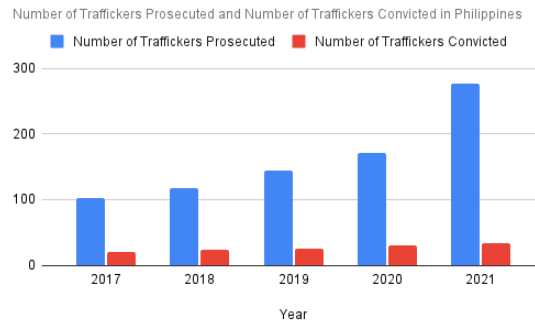
Data from Indonesia's Ministry of Women's Empowerment and Child Protection (KPPPA) and the International Organization for Migration (IOM) indicate that Sumatra, Kalimantan, and Sulawesi are major hotspots for human trafficking due to their strategic coastal locations and economic disparities. In Sumatra, provinces such as North Sumatra and Riau serve as key transit points for victims trafficked to Malaysia and Singapore, primarily for forced labor and sexual exploitation. In Kalimantan, border areas like West Kalimantan and North Kalimantan are known for cases of trafficking linked to illegal logging, palm oil plantations, and undocumented migration to Malaysia. Meanwhile, Sulawesi, particularly South Sulawesi, functions as both a source and transit area, with victims often trafficked to the Philippines or subjected to forced labor in fishing industries. The widespread use of maritime routes, weak border control, and economic vulnerabilities in these regions contribute to the persistence of trafficking cases. Traffickers often send victims to Malaysia, the Middle East, and the Asia-Pacific region via sea routes, which geographically provide a relatively easy and quick means of transporting victims. These areas are frequently under-monitored, allowing traffickers to exploit these routes to move victims to neighboring countries or to regions far from the scrutiny of authorities.¹⁹

Graphic 1. Comparison of Traffickers Prosecuted and Convicted in Indonesia and the Philippines



¹⁸ *Ibid.*

¹⁹ International Organization for Migration (IOM). (2021). No Title. https://emergencymanual.iom.int/sites/g/files/tmzbd11956/files/2022gar_2021_i_4_oct_final_optimized.pdf



Source: US Department of State Trafficking In Person Report of Indonesia and Philippines

The chart above illustrates the differences in handling TIP cases between Indonesia and the Philippines from 2017 to 2021. Indonesia consistently had a higher number of traffickers prosecuted and convicted each year compared to the Philippines. In 2017, Indonesia prosecuted 284 traffickers and convicted 253, while the Philippines only prosecuted 103 and convicted 21. Although there was a decline in 2021, Indonesia still recorded 167 prosecutions and 178 convictions. On the other hand, the Philippines saw an increase in prosecutions, rising from 103 in 2017 to 277 in 2021, but the number of convictions remained low, at 34.

TIP victims in Indonesia are exploited for various purposes. Many Indonesian migrant workers are exploited in Asia, the Middle East, and aboard fishing vessels in the Indian and Pacific Oceans, with many working in domestic labor, factories, construction, and plantations. Child exploitation in Indonesia also extends to the fisheries and plantation sectors, including forced child labor in agricultural fields such as tobacco. Additionally, forced child marriages, child sex trafficking, and exploitative practices along border routes in tourist areas and economic hubs like Batam and Jakarta represent significant issues that the government must address.²⁰

In the Philippines, one of the main trafficking routes originates from the Mindanao region. Traffickers often use back routes in Mindanao to smuggle victims into Malaysia and other parts of Asia via sea routes. There have also been reports of Filipino nationals suddenly found abroad with incomplete documents, indicating the involvement

²⁰ UNODC. (2024). United Nations Convention against Transnational Organized Crime and the Protocols Thereto. United Nations Treaty Collection. <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>

of corrupt networks, including at Ninoy Aquino International Airport.²¹ Sea routes are chosen because they are more efficient, and the geographical condition of the Philippines as an archipelagic country makes it easier for traffickers to move victims without being detected by authorities.²²

TIP victims in the Philippines are typically women and children from vulnerable rural, urban, or disaster-affected areas. Traffickers lure them into sex trafficking, forced domestic labor, forced begging, and other forms of labor exploitation in tourist and urban areas. Men are exploited in forced labor within sectors such as agriculture, construction, fishing, and maritime industries. Traffickers sometimes use debt bondage, where victims are forced to pay off high debts to gain their freedom. Children involved in street activities, such as begging or small-scale vending, are prime targets for exploitation in hard-to-reach areas beyond the authorities' control. The Philippines is also known as one of the largest sources of Online Sexual Exploitation of Children (OSEC) globally, with many children exploited by family members for live-streamed abuse.

Given the high incidence of TIP globally, the UNTOC, also known as the Palermo Convention, was adopted in 2000 through the initiative of the UN. One of the key protocols accompanying this convention is the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children (Human Trafficking Protocol). This protocol aims to protect individuals from TIP, establishing measures for prevention, law enforcement, and victim protection.²³

UNTOC provides a crucial international standard in combating TIP, encouraging member states to enhance international cooperation and strengthen their laws against transnational organized crime.²⁴ Through Human Trafficking Protocol, UNTOC offers a consistent

²¹ Fajardo, H. F. (2023). Trafficking and Modern Slavery in the Philippines. <https://blog.g20interfaith.org/2023/11/10/trafficking-and-modern-slavery-in-the-philippines/>

²² Archambault, C. (2024). *Loc.Cit.*

²³ Wulandari, A., Solhea, D. M., & R, W. (2023). Analisis Dampak Globalisasi terhadap Perdagangan Internasional. J-MAS (Jurnal Manajemen Dan Sains). J-MAS (Jurnal Manajemen Dan Sains), 8(1), 1160–1165. <https://jmas.unbari.ac.id/index.php/jmas/article/view/1202>

²⁴ Athiansyah, F. Z., & Syam, M. H. (2022). Yurisdiksi Indonesia terhadap Pelaku Kejahatan Anak Buah Kapal Long Xing 629 di Laut Lepas berdasarkan Hukum Internasional. Jurnal Riset Ilmu Hukum, 1(2), 124–131. <https://journals.unisba.ac.id/index.php/JRIH/article/view/530>

definition of TIP, facilitating law alignment and a uniform approach to address the issue. It also promotes preventive strategies, public awareness, and victim protection involving governments, civil society, and the private sector. UNTOC encourages information sharing and training to help countries address TIP more effectively, especially in cases with international networks Overall,²⁵ UNTOC and its protocols provide a strong foundation for countries to collaborate globally in combating TIP, protecting vulnerable individuals, and contributing to global security and stability.

Indonesia, as a member of the UN, ratified UNTOC in 2009 by enacting Law No. 5 of 2009 on the Ratification of the United Nations Convention Against Transnational Organized Crime. This law references the UNTOC and specifically relates to the Indonesian Law on TIP Law. The TIP Law regulates all forms of TIP, both domestically and transnationally, and provides protections for witnesses and victims, including rights to restitution, medical, and social rehabilitation.

The law establishes a legal enforcement mechanism involving various institutions, such as the police, prosecutors, and child protection agencies, to address TIP cases. It also emphasizes the importance of training law enforcement officers to enhance their capacity to deal with these crimes. Additionally, the law ensures that victims' rights, including access to protection, rehabilitation, and legal assistance, are provided to facilitate their recovery and reintegration into society, with the government responsible for offering adequate support.²⁶

Indonesia also enacted Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers to protect migrant workers, who are frequently victims of trafficking, by regulating recruitment, employer responsibilities, and safeguarding workers' rights. This law ensures fair treatment and offers oversight, complaint resolution, and legal assistance. Strengthening protection for migrant workers is crucial

²⁵ Syahrin, A. A., & Aslami, N. (2022). Peran Hukum Pada Transaksi Bisnis Internasional di Era Perdagangan Bebas. *Journal If Social Research*, 1(3), 156–162. <https://ijsr.internationaljournallabs.com/index.php/ijsr/article/view/41/57>

²⁶ Putri, R. T., Bakker, F. F., & Chairunnisa, D. (2022). Problems of Human Trafficking as Transnational Crimes in the Perspective of Immigration and International Law. *Journal of Law and Border Protection*, 4(1), 79–88. https://www.researchgate.net/publication/364424214_The_Problems_Of_Human_Trafficking_As_Transnational_Crimes_In_The_Perspective_Of_Immigration_And_International_Law

given the high incidence of exploitation in destination countries such as Malaysia, the Middle East, and other parts of Asia. In addition, Indonesia has implemented several derivative regulations stemming from various government regulations and related ministry decrees. One important regulation is the Minister of Manpower Regulation (Permenaker) No. 18 of 2018 on Social Security for Indonesian Workers Abroad, which provides social security-including health, accident, and death benefits-for Indonesian workers abroad. The aim of this social security program is to provide a sense of security for migrant workers who often work in high-risk environments, far from the direct protection of their families or the Indonesian government.

To combat TIP via maritime routes, Indonesia has increased patrols and operations with the Indonesian Maritime Security Agency (Bakamla) using satellite monitoring and drones to detect illegal activities in real-time. Training maritime security personnel is essential to enable them to recognize the signs of TIP and handle cases more effectively.²⁷ In addition, strengthening coordination among agencies, including the Police, Bakamla, and the Ministry of Social Affairs, aims to create synergy in handling TIP cases, facilitating the detection and management of cases involving transnational networks. This collaboration ensures a more integrated approach to combating human trafficking, allowing for more efficient response efforts and better protection for victims.

In Indonesia, the National Agency for the Prevention of TIP (BNPTPO) is the main body overseeing TIP efforts, coordinated by the Ministry of Women's Empowerment and Child Protection, and collaborating with the Ministry of Manpower to protect migrant workers. The Ministry of Women's Empowerment and Child Protection supports prevention programs and protection for women and children, while the Ministry of Manpower oversees recruitment companies and sets protection standards for workers. For law enforcement, the Criminal Investigation Division (CID) of the Indonesian National Police handles transnational TIP cases, with support from the Indonesian Migrant Worker Protection Agency (BP2MI), which protects migrant workers from exploitation and assists

²⁷ Salsa, S. N. (2021). *Mutual Legal Assistance Dalam Penyidikan Tindak Pidana Perdagangan Manusia Melalui Media Sosial Sebagai Kejahatan Terorganisasi Transnasional* Mutual Legal Assistance in the Investigation of the Criminal Action of Human Trade Through Social Media as a Tran. *Jurnal Yuridis*, 8(1). <https://conference.upnvj.ac.id/index.php/ncols/article/view/1539>

in reporting and investigating TIP cases.²⁸

Indonesia's TIP prevention efforts include enhancing investigations and prosecutions, particularly through amended laws allowing child sex trafficking cases to process without proving coercion. SOPs for victim identification help law enforcement protect victims, including men, who are often overlooked. BP2MI and the Ministry of Manpower monitor labor recruitment agencies and offer regular anti-trafficking training to judicial and social personnel. The government has improved anti-trafficking task force coordination, established a data system to analyse trends, and raised awareness at the local level, implementing protocols for cross-provincial TIP cases.

The implementation of the UNTOC in Indonesia and the Philippines is of paramount importance, especially in preventing TIP through maritime routes involving transnational networks. Both countries are in Southeast Asia, a region known as one of the major routes for TIP, including the exploitation of women and children. With their strategic geographical positions and borders with many countries, Indonesia and the Philippines often serve as transit points for human traffickers. Therefore, the application of UNTOC is crucial in addressing the urgency of combating TIP through these maritime pathways.²⁹

The sea route remains a conventional choice for human traffickers. According to the UNODC Report, the TIP route in Indonesia is primarily dominated by individuals trafficked to Malaysia or other Southeast Asian countries, passing through the Malacca Strait from the Malay Peninsula. In the case of the Philippines, TIP routes typically originate from Mindanao, especially from Zamboanga City, moving towards Jolo, Sulu, and Tawi-Tawi, and also extending to neighboring countries.³⁰

The Philippines, as an United Nations member state, has ratified the UNTOC and enacted the Anti-Trafficking in Persons Act of 2003 and the Expanded Anti-Trafficking in Persons Act of 2012 to

²⁸ UNODC. (2024). United Nations Convention against Transnational Organized Crime and the Protocols Thereto. United Nations Treaty Collection. <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>

²⁹ Prastiwi, I. A., & Hardiyanti, R. T. (2020). Perdagangan Orang Dalam (Insider Trading) Dalam Transaksi Saham Di PT. Perusahaan Gas Negara Tbk. Widya Yuridika: Jurnal Hukum, 3(1). <https://doi.org/10.31328/wy.v3i1.1210>

³⁰ UNODC. (2024). United Nations Convention against Transnational Organized Crime and the Protocols Thereto. United Nations Treaty Collection. <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>

combat human trafficking. The Anti-Trafficking in Persons Act of 2003 in the Philippines establishes mechanisms for law enforcement and victim protection, involving agencies such as the Department of Social Welfare and Development, the Philippine National Police, and the Department of Justice. It mandates special training for law enforcement, ensure victims' access to protection, rehabilitation, legal assistance, and temporary shelters, and promotes prevention through public awareness campaigns. By implementing this law, the Philippines demonstrates its commitment to fighting TIP and fulfilling its UNTOC obligations.

The Philippines also enacted the Expanded Anti-Trafficking in Persons Act of 2012, broadening the definition of trafficking to include more forms of exploitation and increasing penalties for offenders. The law also assigns specific roles to various government agencies in the identification, protection, and rehabilitation of victims, with particular provisions for the protection of children. The Expanded Anti-Trafficking in Persons Act of 2012 also includes implementation guidelines detailing procedures for TIP victims, with special provisions for children and other survivors. Additionally, child protection laws offer further guarantees of protection for children vulnerable to TIP. These regulations ensure that victims have access to medical assistance, legal protection, and appropriate counselling services.³¹

The Philippines has implemented various measures to prevent TIP through maritime routes, including joint operations between the Philippine Navy and other law enforcement agencies to enhance surveillance and prevent TIP activities in known routes. Port monitoring is strengthened with strict inspection procedures at major ports, where port authorities and law enforcement collaborate to verify documents and interview suspected passengers. Additionally, public awareness campaigns educate the public on TIP signs, risks, and protection methods, aiming to encourage reporting of suspicious cases and support for victims.³²

³¹ Gazette, O. (2013). Republic Act No. 10364. Officialgazette.Gov.Ph. <https://gcg.gov.ph/files/cr0Ubd0ctqG0XYEtcVGz.pdf>

³² Aryani, F. r, & Ilmih, A. A. (2024). Kejahatan Perdagangan Orang Dalam Perspektif Kejahatan Lintas Negara. Aladalah: Jurnal Politik, Sosial, Hukum Dan Humaniora, 2(4), 160–167. <https://ejurnalqarnain.stisnq.ac.id/index.php/ALADALAH/article/download/967/1056/3789>

The Philippines has the Inter-Agency Council Against Trafficking (IACAT) under the Department of Justice as the main body overseeing and coordinating trafficking efforts. IACAT liaises with government agencies to prevent trafficking, prosecute offenders, and rehabilitate victims. It collaborates with the Department of Social Welfare and Development (DSWD) to provide victim support, including shelter, medical, psychological, and reintegration services. In law enforcement, the National Bureau of Investigation (NBI) and the Philippine National Police (PNP), through the Women and Children Protection Centre (WCPC), play a crucial role in investigating and arresting offenders. Specialized units, such as the Anti-Human Trafficking Division (AHTRAD), address online sexual exploitation of children (OSEC) and child trafficking, with IACAT facilitating inter-agency coordination of operations.

Efforts to prevent TIP in the Philippines focus on investigating and prosecuting offenders, including labor traffickers, illegal recruitment syndicates, and complicit officials. The government has strengthened victim identification and assistance, training law enforcement to recognize trafficking indicators and improving reintegration services for returnees, especially from conflict zones. It encourages survivor involvement in policy formation, offers restitution mechanisms, and allocates resources to anti-trafficking task forces. Additionally, an inter-agency coordination system optimizes victim protection and tracks potential traffickers. These efforts helped the Philippines move from Tier 3 to Tier 1 in 2016.

This should serve as an example for Indonesia to optimize inter-agency cooperation in combating TIP. By fostering partnerships between the government, law enforcement, and non-governmental organizations, Indonesia can enhance its effectiveness in detecting and addressing TIP cases. Raising public awareness is also crucial to empower individuals to be more vigilant about the risks of TIP. The implementation of these strategies is expected to create a safer environment and support the recovery of victims.

2. Comparison of Human Trafficking Protocol Implementation in Indonesia and the Philippines

In implementing the UNTOC, Indonesia faces challenges such as limited resources, inadequate training for law enforcement, and corruption. Many law enforcement agencies lack sufficient funding

and infrastructure, while personnel often lack the necessary expertise to effectively TIP cases³³. Meanwhile, the Philippines excels in inter-agency coordination between law enforcement and non-governmental organizations, but faces bureaucratic obstacles that hinder policy implementation, as well as a lack of technical support to enhance law enforcement capacity³⁴. Weak law enforcement and the high number of unreported TIP cases are also significant issues. Limited resources, insufficient training, corruption, and complex bureaucracy hinder the implementation of the UNTOC in both countries, undermining public trust and obstructing trafficking prevention efforts.³⁵

To improve the implementation of the UNTOC in Indonesia, it is recommended that the government conduct comprehensive training for law enforcement officers, enhance inter-agency coordination through collaborative forums, and invest in modern surveillance technology to detect suspicious activities in maritime areas. Additionally, administrative processes should be streamlined to expedite decision-making, while public awareness campaigns should be launched to reach various segments of society about the risks of human trafficking. Below is a table comparing the implementation of the Human Trafficking Protocol in Indonesia and the Philippines:

Table 1. Comparison of Human Trafficking Protocol Implementation in Indonesia and the Philippines³⁶

Aspect	Philippines	Indonesia
Key Regulations	<i>Anti-Trafficking in Persons Act of 2003 and Expanded Anti-Trafficking in Persons</i>	Law No. 21 of 2007 on the Eradication of Human Trafficking, Law

³³ Sumolang, A. Z. Z. (2022). Penanganan Terhadap Korban Perdagangan Orang Dan Penyelundupan Manusia Menurut Undang-Undang Nomor 6 Tahun 2011 Tentang Keimigrasian. *Lex Et Societatis*, 8(2), 16–24. <https://doi.org/10.35796/les.v8i2.28486>

³⁴ Toule, E. R. M. (2020). Kebijakan Kriminal Terhadap Pencegahan Tindak Pidana Perdagangan Orang. *Mizan: Jurnal Ilmu Hukum*, 9(1), 274–282. <https://ejournal.uniska-kediri.ac.id/index.php/Mizan/article/view/1049>

³⁵ Santoso, Perdana, F. W., Irwan, Setiawan, B., & Purboyo. (2022). Penguatan Fungsi Keimigrasian dalam Rangka Pencegahan Tindak Pidana Perdagangan Orang (TPPO) dalam Pengiriman Buruh Migran Non Prosedural di Wilayah Perbatasan. *Jurnal Indonesia Sosial Teknologi*, 3(2), 333–341. <https://jst.publikasiindonesia.id/index.php/jst/article/view/375>

³⁶ ASEAN. (2015). *ASEAN Plan Of Action Against Trafficking In Persons, Especially Women And Children*. <https://asean.org/Wp-Content/Uploads/2021/01/ASEAN-Convention-Against-Trafficking-In-Persons-Especially-Women-And-Children-Plan.Pdf>

	<i>Act of 2012</i>	No. 18 of 2017 on the Protection of Indonesian Migrant Workers
Implementing Regulations	Implementing Regulations of the Anti-Trafficking in Persons Act of 2003, including guidelines for victim protection and child protection laws.	Minister of Manpower Regulation (Permenaker) No. 18 of 2018 on Social Security for Indonesian Workers Abroad.
Eliminated Regulations of the UNTOC	The Philippines implements the UNTOC in full without any eliminations.	Indonesia implements the UNTOC in full without any eliminations
TIP Routes	Most of the trafficking routes from Mindanao extend to countries in Asia and the Middle East via maritime routes.	From Indonesia (Sumatra, Kalimantan, Java, Bali, Papua, and West Nusa Tenggara) to Malaysia, the Middle East, and the Asia-Pacific region via maritime routes.
TIP Objective	As reported in the last five years, human trafficking in the Philippines involves the exploitation of women and children from rural areas, impoverished urban areas, and regions affected by conflict and disasters. Forms of exploitation include sex trafficking, forced labor in domestic work, forced begging, and other forms of labor exploitation in tourist areas. Exploited Filipino migrant workers have been found in the Middle East, Europe, and Asia, working in	As reported in the last five years, trafficking victims in Indonesia involve both domestic and foreign exploitation, as well as the exploitation of Indonesian victims abroad. All 34 provinces in Indonesia are sources and destinations for human trafficking, with forced labor exploitation in Asia, the Middle East, Malaysia, and fishing vessels in the Indian and Pacific Oceans. Additionally, child exploitation occurs in the plantation, fishing, and forced labor sectors,

	industries such as fishing, construction, manufacturing, hospitality, as well as through OSEC (Online Sexual Exploitation of Children).	including child labor in tobacco farming, as well as exploitation through child marriage and sex trafficking, particularly in tourism areas and border regions.
Oversight Institutions	IACAT, under the DOJ; DSWD	National Agency for the Prevention of Human Trafficking (BNPTPO), Ministry of Women's Empowerment and Child Protection, Ministry of Manpower
Law Enforcement Agency	NBI, PNP, IACAT, WCPC, AHTRAD	CID INP, BP2MI
Prevention Efforts	Investigate and prosecute traffickers, including labor traffickers and involved officials; enhance victim identification; improve reintegration service capacity for survivors and support survivor-specific programs; involve survivors in policy-making; ensure victim restitution; allocate resources for task forces and law enforcement units; implement a coordinated interagency response; establish a database for illegal recruiters.	Enhance efforts to investigate and prosecute human traffickers, including involved officials; amend laws to remove the requirement of force or coercion in child sex trafficking cases; allow shelter residents freedom of movement; disseminate victim identification SOPs; increase victim services, including for male victims; monitor recruitment agencies; provide anti-trafficking training; boost resources and coordination for task forces; develop a data collection system, raise awareness, and establish national protocols for inter-provincial cases.

Source: Author's own analysis

The Philippines and Indonesia have distinct approaches to combat human trafficking, with each country implementing specific legal frameworks and regulations. The Philippines enforces the *Anti-Trafficking in Persons Act of 2003* and its expansion in 2012, while Indonesia has *Law No. 21 of 2007 on the Eradication of Human Trafficking* and *Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers*. In terms of implementation, the Philippines has specific regulations for victim protection and child protection, while Indonesia enforces the *Minister of Manpower Regulation No. 18 of 2018* for migrant worker security. Both countries fully adopt the UNTOC without any eliminations. The trafficking routes in the Philippines mainly originate from Mindanao, extending to Asian and Middle Eastern countries via maritime channels, while in Indonesia, trafficking flows from Sumatra, Kalimantan, and Sulawesi toward Malaysia, the Middle East, and the Asia-Pacific region. The primary objective of human trafficking in both countries involves various forms of exploitation, including forced labor, sex trafficking, and child exploitation. In the Philippines, trafficking victims are often exploited in domestic work, the hospitality industry, and even through *Online Sexual Exploitation of Children* (OSEC), while in Indonesia, victims face forced labor in plantations, fishing, and tobacco farming, along with cases of child marriage and sex trafficking in tourism areas and border regions.

Regarding institutional oversight, the Philippines relies on the *Inter-Agency Council Against Trafficking* (IACAT) under the Department of Justice (DOJ) and the *Department of Social Welfare and Development* (DSWD), whereas Indonesia assigns responsibilities to the *National Agency for the Prevention of Human Trafficking* (BNPTPO), the *Ministry of Women's Empowerment and Child Protection*, and the *Ministry of Manpower*. Law enforcement in the Philippines involves agencies such as the *National Bureau of Investigation* (NBI), the *Philippine National Police* (PNP), and the *Women and Children Protection Center* (WCPC), while Indonesia operates through the *Criminal Investigation Division of the Indonesian National Police* (CID INP) and BP2MI. Both nations prioritize prevention efforts by strengthening investigations, prosecuting traffickers—including complicit officials—enhancing victim services, and implementing coordinated interagency responses. The Philippines focuses on survivor reintegration, policy involvement, and restitution, while Indonesia works on refining victim identification, monitoring recruitment agencies, expanding anti-trafficking training, and developing data collection systems. These

initiatives reflect each country's commitment to eradicating human trafficking and improving law enforcement efforts.

3. Implementation of the ASEAN Plan of Action Against Trafficking in Persons, Especially Women and Children, by Indonesia and the Philippines to Prevent TIP Across Maritime Routes

ASEAN in 2020 *Plan of Action in Combating Transnational Crime* (ASEAN Plan of Action) aims to combat TIP, especially targeting women and children, in Southeast Asia.³⁷ Acknowledging the role of some ASEAN countries as destination countries, the plan emphasizes international cooperation and a regional approach to prevent, suppress, and punish trafficking, including sexual exploitation, forced labour, and organ trafficking.³⁸ As a continuation of the ACTIP and UNTOC, it aligns with domestic laws and international obligations of ASEAN Member States. The plan focuses on four key areas: prevention, victim protection, law enforcement, and regional/international cooperation.

ASEAN commits to victim support through medical, psychological, and legal assistance, as well as socio-economic reintegration. Law enforcement is strengthened via training, technology, and cross-border cooperation. The plan seeks to harmonise legal systems with international standards and prioritise coordination among member states and global partners like Interpol and the UN for information exchange and rapid responses to transnational threats.³⁹

As part of ASEAN, Indonesia has taken significant steps in adopting the ASEAN Plan of Action through the implementation of comprehensive policies and regulations. One key measure is the enactment of the TIP Law, which provides a strong legal foundation to combat traffickers and protect victims, with clear definitions and severe penalties for offenders. The government has also ratified Presidential Regulation No. 19 of 2023 on the National Action Plan

³⁷ ASEAN. (2015). *ASEAN Plan Of Action Against Trafficking In Persons, Especially Women And Children*. <https://asean.org/Wp-Content/Uploads/2021/01/ASEAN-Convention-Against-Trafficking-In-Persons-Especially-Women-And-Children-Plan.Pdf>

³⁸ *Ibid.*

³⁹ *Ibid.*

for the Prevention and Handling of Human Trafficking Crimes for 2020-2024, aimed at coordinating efforts at the national and regional levels, encompassing prevention, protection, and law enforcement strategies. Cross-ministerial coordination, including the Ministry of Social Affairs, Ministry of Law and Human Rights, and Ministry of Women's Empowerment and Child Protection, is optimized through regular forums addressing TIP issues⁴⁰.

At the regional level, provincial and district governments are required to develop local action plans aligned with the national action plan, tailoring programs to the specific needs of their respective regions. Concrete programs implemented include training for law enforcement officers to enhance their capacity in handling TIP cases, maritime patrols by the Indonesian Navy and Police to prevent TIP through sea routes, public awareness campaigns to increase community understanding of TIP risks, and rehabilitation programs for victims involving psychological and social support⁴¹.

On the other hand, the Philippines has taken significant steps in adopting the ASEAN Plan of Action through the implementation of the Anti-Trafficking in Persons Act of 2003 and the Expanded Anti-Trafficking in Persons Act of 2012, which provide a comprehensive legal framework for the prevention, detection, and handling of TIP. The Philippine government has also developed a National Action Plan aligned with the ASEAN action plan, aiming to enhance the capacity of law enforcement officials through training and cooperation with international agencies and non-governmental organizations. Inter-agency coordination, particularly with the Department of Social Welfare and Development, is crucial for the implementation of this plan, with regular coordination forums held to discuss related issues.

In addressing the challenge of TIP via sea routes, the Philippines has enhanced maritime border surveillance by conducting regular patrols and collaborating with the Philippine Navy and port authorities. Public awareness campaigns have been launched to educate the public about the risks of human trafficking and how to protect themselves. Additionally, victim protection programs remain a

⁴⁰ Susanti, H., Syahfrinaldi, & Hajri, W. A. (2022). *Loc.Cit.*

⁴¹ Iskandar, & Nursiti. (2022). Peran Organisasi Internasional dan Regional dalam Penyelesaian Pelanggaran Hak Asasi Manusia Perdagangan Orang di Indonesia. *Jurnal HAM*, 123, 385–404.
<https://ejournal.balitbangham.go.id/index.php/ham/article/view/2030>

key focus, providing health, psychological, and rehabilitation support to assist in their reintegration into society.⁴²

Both countries have made progress in implementing the ASEAN Plan of Action, with more TIP cases reported. However, challenges remain, including low public awareness, social stigma, inter-agency coordination issues, and limited resources. Despite budget constraints and a shortage of trained personnel, improved government and NGO cooperation is expected to enhance program effectiveness. Continued efforts and collaboration are essential for better results in combating human trafficking.⁴³

In May 2023, Philippine authorities raided a complex in Mabalacat, Pampanga, which was a hub for online fraud operations. Over 1,000 workers were found, including 154 Indonesian nationals suspected of being TIP victims. This case highlights the challenges of transnational TIP and the need for ASEAN cooperation in addressing it, as cross-border trafficking is complicated by the complex and well-organized nature of trafficking networks. TIP syndicates often operate with the support of international, closed, and well-structured networks, making law enforcement efforts difficult when limited to national jurisdictions.

Indonesia and the Philippines demonstrate commitment through regional collaboration under the ASEAN Plan of Action, including data exchange on TIP cases, trafficker methods, and victim profiles. This enables both countries to more effectively identify and combat trafficking networks. Key initiatives include joint maritime patrols involving law enforcement from both countries to address illegal activities. Coordination forums are also held to discuss challenges and updates in tackling TIP, including training for law enforcement officers.⁴⁴

⁴² Sari, A. G., Murity, H., & Sulisty, H. (2021). Tindak Pidana Perdagangan Manusia Ditinjau Dari Hukum Nasional Dan Hukum Internasional. *Jurnal Transparansi Hukum*, 4(1). <https://ojs.unik-kediri.ac.id/index.php/transparansihukum/article/view/5362>

⁴³ Sitania, L. V, & Suponyono, E. (2020). Akomodasi Pemberantasan Tindak Pidana Perdagangan Orang Dalam Aspek Hukum Internasional Dan Nasional. *Jurnal Pembangunan Hukum Indonesia*, 2(1), 38–54. <https://doi.org/10.14710/jphi.v2i1.38-54>

⁴⁴ Khairi, N. F. (2021). Asean's Effort on Dealing With Human Trafficking Problems In Southeast Asia. *Jurnal INterior*, 20(2), 84–93. <https://journal.umpr.ac.id/index.php/anterior/article/view/1795>

In May 2023, the Indonesian Embassy in Manila repatriated 53 Indonesians suspected of being TIP victims in one of the largest rescue operations in the Philippines. Prompted by reports of Indonesians being forced to work under inhumane conditions by a trafficking syndicate. The embassy collaborated with Philippine law enforcement to secure the location and rescue the victims, who received emergency protection before returning to Indonesia. Upon their return, the victims were provided with medical, psychological, and legal support for recovery and reintegration. This operation highlights the effectiveness of Indonesia-Philippines bilateral cooperation in combating TIP.⁴⁵

This collaboration is expected to serve as a model for other ASEAN countries. ASEAN-wide cooperation includes meetings, cross-border training, and intelligence sharing to improve law enforcement capacity.⁴⁶ These efforts have led to increased effectiveness in handling TIP cases, greater public awareness, and more active participation in reporting suspicious activities (Rizky, 2020). Despite challenges such as varying commitments and capacities among countries, this collective effort is essential for creating a safer environment and providing better protection for TIP victims.

The implementation of the ASEAN Plan of Action faces various challenges in Indonesia and the Philippines. In Indonesia, obstacles include a lack of trained human resources, insufficient funding for prevention programs, poor inter-agency coordination, and low public awareness about human trafficking (Anggraini et al., 2024). The legal system struggles with slow processing of TIP cases, which discourages victims from reporting and leads to many cases going unaddressed (Farida, 2020). Similarly, the Philippines faces similar issues, with complex bureaucracy slowing decision-making and limiting the effectiveness of responses to TIP cases.⁴⁷ The lack of support from

⁴⁵ Antara. (2023). *53 WNI Korban Perdagangan Manusia Dipulangkan, Penyelamatan Terbesar di Filipina—Dunia*. Satu.Tempo.Co. <https://www.tempo.co/internasional/53-wni-korban-perdagangan-manusia-dipulangkan-penyelamatan-terbesar-di-filipina-183432>

⁴⁶ Sitinjak, C. M., Kurniawan, S. M. D., & Paramahita, S. (2022). Upaya Asean Menangani Perdagangan Manusia Di Asia Tenggara. *Jurnal Penga Wangi*, 2(2). <https://doi.org/10.31315/jpw.v2i2.7183>

⁴⁷ Kurnia, R. I., SianioarKalalo, F. P., & Lengkong, N. L. (2021). Perlindungan Terhadap Orang Asing Dikaitkan Dengan Peraturan Izin Tinggal Di Indonesia. *Lex Administratum*, 9(4), 16026. <https://ejournal.unsrat.ac.id/index.php/administratum/article/view/33311>

NGOs and civil society, limiting victim protection resources. Operational challenges, such as a shortage of law enforcement officers and difficult geography, further hinder effective implementation. Increased public awareness and more coordinated efforts, including streamlined processes and enhanced law enforcement capacity, are needed to improve TIP responses in the Philippines.⁴⁸

Indonesia and the Philippines have different approaches in implementing the ASEAN Plan of Action. Indonesia focuses on strengthening national regulations and policies, such as the TIP Law, which address traffickers and protect victims. It also ratified international protocols and implemented law enforcement training programs.⁴⁹ In contrast, the Philippines emphasizes cross-border cooperation and international collaboration through the Anti-Trafficking in Persons Act of 2003 and the Expanded Anti-Trafficking in Persons Act of 2012. The Philippines actively participates in international forums and fosters relationships with neighboring countries to share information and best practices⁵⁰.

Table 2. Strength and Weakness TIP Indonesia and Philippines

Aspect	Strengths (Philippines)	Weaknesses (Philippines)	Strengths (Indonesia)	Weaknesses (Indonesia)
Legal Framework	Comprehensive anti-trafficking laws with clear victim protection measures	Limited enforcement due to corruption and lack of resources	Strong legal framework with specific laws protecting migrant workers	Gaps in legal implementation and inconsistencies in enforcement

⁴⁸ Saputra, T., Manalu, H., & Sayudi, A. (2022). Penyalahgunaan Kondisi Rentan Seseorang Dalam Praktik Perdagangan Orang (Human Trafficking). *Jurnal Hukum Pelita*, 3(1), 102–110. <https://doi.org/10.37366/jh.v3i1.1052>

⁴⁹ Yusitarani, S., & Sa'adah, N. (2 C.E.). Analisis Yuridis Perlindungan Hukum Tenaga Migran Korban Perdagangan Manusia oleh Pemerintah Indonesia. *Jurnal Pembangunan Hukum Indonesia*, 1(24–37). <https://doi.org/10.14710/jphi.v2i1.24-37>

⁵⁰ Purwanegara, D. S. (2020). Penyidikan Tindak Pidana Perdagangan Orang melalui media sosial Investigation of human trafficking through social media. *Jurnal Sosiologi Dialektika*, 15(2), 118–127. <https://journal.unair.ac.id/DIALEKTIKA/article/view/19531>

Implementat ion of UNTOC	Fully implements UNTOC with strong international cooperation	Challenges in inter- agency coordination and resource allocation	Fully implement s UNTOC and integrates TIP prevention in labor laws	Bureaucratic inefficiencies slow down implementat ion efforts
TIP Prevention & Public Awareness	Effective public awareness campaigns, survivor involvement in policymakin g	Insufficient outreach to remote and rural areas	Growing public awareness campaigns and engageme nt with civil society	Public participation is still relatively low in rural areas
Law Enforcement & Victim Protection	Dedicated law enforcement units and victim support programs	Limited funding for victim reintegration programs	Coordinat ed law enforceme nt efforts through BNPTPO and other agencies	Lack of specialized victim services, especially for male victims
Cross-Border Cooperation	Strong collaboratio n with international organizations and ASEAN partners	Some border areas remain vulnerable due to weak monitoring	Cooperati ve agreement s with Malaysia and other neighbors for border security	Cross-border coordination is not as extensive as in the Philippines
Data Collection & Reporting	Well- established database for illegal recruiters and trafficking cases	Data collection is still fragmented across agencies	Increasing efforts in data collection and digital monitorin g of TIP cases	Lack of centralized TIP database affects policy- making

Funding & Resources	Government allocates funds for anti-trafficking programs and victim support	Limited resources hinder full-scale implementation	Government support for TIP prevention and victim rehabilitation	Budget constraints lead to gaps in law enforcement efforts
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Source: Author’s own analysis

As mentioned before in the table, both countries have strengths and weaknesses in addressing TIP. Indonesia can learn from the Philippines in fostering international collaboration, public participation, and public awareness campaigns. The Philippines could benefit from adopting a more structured approach like Indonesia. To enhance ASEAN Plan of Action implementation, recommendations include improving inter-agency cooperation, increasing funding for prevention and TIP handling, expanding public awareness through social media and community leaders, strengthening cross-border cooperation through agreements and joint patrols, improving reporting systems, and enhancing law enforcement training. With these measures, both countries can strengthen their efforts to combat human trafficking more effectively.

Conclusion

This study finds that Indonesia and the Philippines have both adopted domestic regulations aligned with international standards, such as UNTOC and the ASEAN Plan of Action, to combat TIP via maritime routes. Indonesia enforces Law No. 21 of 2007, while the Philippines applies the Anti-Trafficking in Persons Acts of 2003 and 2012. Despite strengthened maritime patrols and inter-agency coordination, law enforcement remains challenged by limited resources, insufficient training, and complex cross-border coordination. Victim protection and rehabilitation also remain inadequate, with uneven access to essential services.

To address these challenges, Indonesia and the Philippines should strengthen regional cooperation through intelligence sharing, joint patrols, and enhanced law enforcement training. Public awareness campaigns must be intensified to encourage community involvement in identifying and reporting TIP cases. Victim protection should be improved by expanding access to rehabilitation and legal

aid. Effective implementation of international standards will help reduce TIP, enhance regional security, and protect human rights, requiring active participation from governments, law enforcement, NGOs, and the public.

To improve anti-trafficking efforts, Indonesia and the Philippines should enhance bilateral and regional cooperation through joint maritime patrols, intelligence-sharing, and capacity-building programs for law enforcement officers. Public awareness campaigns should be intensified to increase community involvement in identifying and reporting TIP cases. Additionally, stronger victim protection policies should be implemented to ensure access to rehabilitation services, legal aid, and sustainable reintegration programs. Strengthening international collaboration and reinforcing national policies will significantly contribute to reducing human trafficking via maritime routes in Southeast Asia.

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