

FROM POLICIES TO ADVOCACY: A 14-YEARS JOURNEY OF INDONESIAN LABOUR MIGRATION TO MALAYSIA

HISYAM, H. A.^{1*} – NOORDIN, N.² – ARSHAD, R.³

¹ *Administrative Science and Policy Studies, Universiti Teknologi MARA (UiTM), Selangor, Malaysia.*

² *Administrative Science and Policy Studies, Universiti Teknologi MARA (UiTM) Kedah Branch, Kedah, Malaysia.*

³ *Administrative Science and Policy Studies, Universiti Teknologi MARA (UiTM) Negeri Sembilan Branch, Negeri Sembilan, Malaysia.*

**Corresponding author
e-mail: ammarhisyam26[at]gmail.com*

(Received 17th June 2026; revised 10th July 2026; accepted 29th July 2026)

Abstract. The policy and governance of Indonesian labour migration to Malaysia have had major changes between 2010 and 2025. This paper investigates the developments of the Indonesian labour migration through the following sections: policy developments, challenges of migrant workers, effectiveness of policy reforms, and the role of non-governmental organisations (NGOs) and community-based organisations (CBOs). This systematic literature review (SLR) draws together evidence from studies spanning the period 2010 to 2025, from a rights-based migration governance perspective. The results show that bilateral agreements have improved governance over labour migration, and that migrant protection mechanisms have been bolstered, notably with the signing of the Memoranda of Understanding (MoUs) in 2011 and 2022. Despite this, there are several policy implementations, institutional coordination, labour exploitation and social vulnerability issues that continue to impact Indonesian migrant workers in Malaysia. The review also underscores the significant role played by NGOs and CBOs in advocacy, provision of services to migrants, and the promotion of their rights. Despite policy changes, there is still a great deal of policy implementation to policy formulation. The study suggests that better enforcement, multi-stakeholder cooperation and a rights-based approach are key to ensure more effective, inclusive, and sustainable governance of labour migration between Indonesia and Malaysia. This study is grounded in a rights-based migration governance framework, which serves as the underpinning theory guiding the analysis of policy reforms, advocacy efforts, and migrant protection mechanisms.

Keywords: *labour migration, migrant protection, migration governance, policy reform, Indonesia-Malaysia relations*

Introduction

Indonesia-Malaysia is one of the largest and longest lasting migration corridors in Southeast Asia. Indonesia's economic differences, labour market requirements, geographic proximity, and history have caused millions of workers to relocate to Malaysia in search of jobs, especially in domestic service, manufacturing, construction and plantation work (Hugo, 2011; Kaur, 2010). This migration stream has been instrumental in the economic growth of Malaysia and has also led to remittances which have contributed to the household livelihoods and development in Indonesia (Jasiyah et al., 2024). Over the last decade, the management of Indonesian labour migration to Malaysia has undergone significant changes. During the period between 2010 and 2025, both countries signed various bilateral agreements, adopted labour laws and institutional

measures to protect migrant workers and improve migration management. Notable developments include the signing of the Memoranda of Understanding (MoUs) of 2011 and 2022 that aimed to regulate the recruitment process, at least in part, enhanced protection of labour rights and better cooperation between the two countries. However, despite these strides in policy, there remain various issues of implementation, enforcement, labour exploitation, and migrant welfare that suggest that the current migration governance frameworks are inadequate and ineffective.

Labour migration between Indonesia and Malaysia represents a long history and a large-scale intra-regional migration flow in Southeast Asia. The cross-border labour migration is done for historical, political and economic reasons and the labour source country is Indonesia and destination country is Malaysia for low- and semi-skilled labour migrants (Hugo, 2011; Kaur, 2010). The Indonesian labour migrants work primarily in domestic services and construction, plantation and agricultural sector, contributing to the Malaysian economy, also to Indonesia's economy through remittances and to socio-economic development in the labour source country; therefore, providing livelihood for rural communities (Jasiyah et al., 2024; Raysharie and Saprianto, 2022). Therefore, there are economic motives for labour migration as well as labour market and development differentials. The policy to manage Indonesia to Malaysia labour migration has changed from 2010 to 2025 to enhance labour condition. For instance, Memorandum of Understanding (MoU) between Indonesia and Malaysia was signed in 2011 and 2022 to regulate the process. These have only recently been emphasised, but unfortunately, the studies indicate they're not being implemented. Despite the efforts to legislate both bilateral and home country laws to protect migrant workers, the incompetence of the Indonesian government, the coordination of government agencies, bad governance and implementation contribute to the ineffectiveness of laws (Raysharie and Saprianto, 2022; Elias, 2013). Hence, Indonesian migrant workers in Malaysia continue to face labour abuse, poor wages, long working hours and bad working and living conditions (Noor and Shaker, 2017; Djafar and Hassan, 2014). These are further compounded with structural and social challenges such as language barrier, fear of reprisals and lack of knowledge on workers' rights, and unfair work for undocumented workers (Elias, 2018).

Indonesian migrant workers in Malaysia continue to be discriminated and marginalised. The negative stigma, xenophobia and social-cultural anti-social attitude hinder migrant workers' access to health care, education and housing (Domingo and Wahab, 2024). Politically and in the media, they are made scapegoats as a threat to the economy or slow down economic growth, resulting in social marginalisation and delaying social integration process (Elias, 2018). It became an opportunity to violate migrant workers' right. COVID-19 has exposed these problems and social-economic inequalities. Travel bans, perceived or actual loss or reduction of income and prioritising health security and safety, have had a disproportionate negative impact on migrant populations, many of whom also had no health or social security (Domingo and Wahab, 2024; Pandi, 2023). COVID-19 highlights the need for public policy reform to achieve a productive and inclusive labour market for addressing workplace issues, social welfare and health. Civil society organisations (non-governmental organisations or NGOs and community-based organisations or CBOs) are vital in managing labour market. NGOs such as Migrant Care and Solidaritas Perempuan also play a role in human rights mobilisation for migrant workers by awareness raising on labour laws and regulations, and social and legal services (legal advice, health, counselling and crisis

management, for example) (Palmer, 2018). They are also engaged in policy advocacy through strategy making and collaboration with international agencies such as International Labour Organization and ASEAN (Papademetriou et al., 2016; Fukunaga, 2015). In contrast, grassroots informal social networks and social migrant organisation offer social support in tackling issues related to employment and non-employment, and social and legal integration (Gerard, 2018).

The rise of social organisations is part of the multi-stakeholder approach to labour migration policy and governance-in which governments and "non-government" stakeholders collaborate with each other in a range of activities to overcome issues of labour migration. But these social organisations are also subjugated by the factors of cost, politics and resources that affect their project realisation (Domingo and Wahab, 2024; Elias, 2018). There is also extensive study of Indonesia's migration labour to Malaysia but mostly with a focus on government and policy reform, difficulties faced by members of the migrant community and efforts to advocate for their rights. To do so, these need to be analysed in each period and integrated. Therefore, this study seeks to address this gap through a systematic literature review approach to looking at the dynamic of Indonesia's labour migration to Malaysia from 2010-2025 period. Four aspects are discussed: immigration policy development, issues and problems for the members of the migrant community, immigration policy reform and responses from NGOs and other non-government organisations to uphold the rights of members of the migrant community. Based on a synthesised and integrated analysis of these dimensions, this research supports the development of policies that are more effective, inclusive and sustainable.

Materials and Methods

The Systematic Literature Review (SLR) method was used in this study to analyse the development of the Indonesian labour migration to Malaysia in the period 2010-2025. The SLR method was chosen because it allows for a systematic, transparent, complete and reproducible evidence-based synthesis of the available evidence on migration policies, migration worker challenges, policy change impacts and advocacy efforts. The review was conducted following Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA 2020) guidelines (Page et al., 2021) to improve the methodological rigour, transparency and reporting quality of the review process. In addition, Open Access repositories were excluded to maintain consistency with peer-reviewed and indexed sources, in line with the journal's requirements.

Identification

Three databases were chosen for this review: Web of Science (WoS), Scopus and Social Science Research Network (SSRN). These databases were selected as a representative set that together offer a comprehensive range of references to migration research, public policy, labour relations, human rights and general social science research. Web of Science and Scopus are internationally recognised databases of indexing high-quality peer-reviewed publications and SSRN offers access to new policy discussions, working papers and recent debates on labour migration governance. There was an extensive coverage of both academic and policy-oriented literature related to Indonesian labour migration in Malaysia thanks to the availability of these databases. We developed a searching strategy using filters such as Boolean operators and key

terms. Our search terms included variations of labour migration, immigration policies, labour problems, policy changes and advocacy. Wild card operators and synonyms were used to increase coverage, such as:

“Indonesian labour migration” OR “Indonesia migrant worker”
 “Malaysia labour policy” OR “immigration policy”
 “Migrant worker challenges” OR “labour exploitation”
 “Policy reform” OR “labour protection”
 “NGO” OR “community-based organization”

These search terms were adapted to the syntax requirements of each database to ensure consistency and coverage across platforms (*Table 1*).

Table 1. Search string applied to the databases.

Database	Search string
Web of Science (WoS)	TS = (("Indonesian labour migration" OR "Indonesia* migrant worker*") AND ("Malaysia*" OR "Malaysia labour market") AND ("immigration policy*" OR "labour policy*") AND ("migrant worker challenge*" OR "labour exploitation") AND ("policy reform*" OR "labour protection") AND ("NGO*" OR "community-based organization*"))
Scopus	TITLE-ABS-KEY (("Indonesian labour migration" OR "Indonesia* migrant worker*") AND ("Malaysia*" AND ("immigration policy*" OR "labour policy*") AND ("migrant worker challenge*" OR "labour exploitation") AND ("policy reform*" OR "labour protection") AND ("NGO*" OR "community-based organization*"))
SSRN	("Indonesian labour migration" OR "Indonesia migrant workers") AND ("Malaysia") AND ("immigration policy" OR "labour policy") AND ("migrant worker challenges" OR "labour exploitation") AND ("policy reforms" OR "labour protection") AND ("NGOs" OR "community-based organizations")

Screening, eligibility and inclusion

After the identification phase, the study team brought together all found records and reviewed them. Articles found to be duplicates across databases were excluded for accuracy. At this point, 20 duplicate records were removed. Next, the titles, abstracts and keywords of the remaining articles were reviewed for relevance to the research question. The exclusion criteria were limited to the following four key areas: (1) changing immigration policies, (2) issues facing migrant workers, (3) impact of policy reforms, and (4) influence of NGOs and community groups. Any article which did not focus on these topics was excluded. This removed 80 articles from further consideration, resulting in 30 being considered (*Table 2*).

Table 2. Inclusion and exclusion criteria.

Inclusion criteria	Exclusion criteria
Studies conducted between the years 2010 to 2025	Studies conducted before the year 2010
Articles from peer-reviewed journals	Conference proceedings, review articles, book chapters
Text written in English	Text written in languages other than English
Related to Indonesian labour migration and policy	Not related to the specified topic

During the eligibility phase, a detailed review of the full texts of the remaining articles was conducted to ensure they met the inclusion criteria. This review involved assessing the methodological quality of the studies, the relevance of their findings to the research questions, and the rigor of their data analysis. Out of the 60 articles, 35 were excluded due to insufficient methodological quality or lack of relevance, leaving 25 articles for inclusion in the systematic review. The final step involved the inclusion of the selected studies for detailed analysis. These studies were categorized based on their

focus on the evolution of immigration policies, challenges faced by Indonesian labourers, effectiveness of policy reforms, and the roles of NGOs. This categorization facilitated the thematic analysis and synthesis of the findings in a coherent manner. A PRISMA flow diagram was created to provide a visual representation of the study selection procedures and to support transparency and repeatability of the review process. The diagram presents the number of records identified, screened, assessed for eligibility, and included in the final analysis. 130 records to the initial search were identified from the databases Web of Science (WoS), Scopus and SSRN. Following the elimination of 20 duplicate articles, 110 studies were screened. After screening by title, abstract and keywords, 80 articles were excluded for being irrelevant, leaving 30 articles for full-text screening. After this, 5 articles were dismissed in the eligibility stage for reasons of poor methodology or lack of relevance to the topic. A total of 25 studies were reviewed. The study selection process is shown in *Figure 1*.

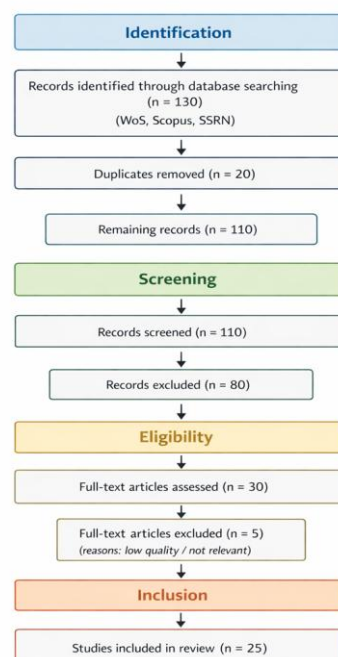


Figure 1. PRISMA flow diagram of the study selection process.

Results and Discussion

Evolution of immigration policies

The study of immigration policies is central to this review as it influences the governance of labour migration, migrant worker protection, recruitment processes and cooperation between Indonesia and Malaysia. This review looks at major policy changes from 2010 to 2025, and their impact on labour migration management and protection for migrant workers, as well as continuing implementation challenges that hinder the impact of policy. Immigration policies governing Indonesian labour migration to Malaysia from 2010 to 2025 is a dynamic and ever-evolving process shaped by economic, political and growing concerns for workers' rights. This era marks

a shift from policy on controlled migration to standardised and regulated policies, as well as rights-based migration policies. Yet while policies have improved, there are also evident differences in their effectiveness, manifesting a disconnection between policies in action and policies on paper. In the early stage of this era, immigration policies in Malaysia were heavily affected by the desire to control labour migration and irregularities to meet the need for low-skilled workers in the construction, agricultural and domestic service sector (International Labour Organization, 2015; Kaur, 2010). At this time, policies were predominantly focused on economic efficiency with a goal to maintain a regular supply of labour and meet national development needs, and on migration management. For example, the 2011 Memorandum of Understanding (MoU) signed between Indonesia and Malaysia was a turning point for controlling the recruitment of labour, improving working conditions and protecting the rights of Indonesian maids in Malaysia (Domingo and Wahab, 2024). This MoU attempted to address concerns relating to the problematic issues of wage discrimination, and unfair working and legal conditions. But despite these deals, it was ineffective due to the lack of enforcement, monitoring and co-ordination processes, and vulnerability for migrant workers (Elias, 2013).

In the ongoing complex of migration processes, the mid-2010s brought a focus on institutionalise and policy-oriented labour migration governance. In Malaysia and Indonesia, measures were taken to strengthen domestic legal and policy frameworks in line with international labour and human rights standards. For instance, in Malaysia, the introduction and revision of laws and regulations such as the Prevention and Suppression of Trafficking in Persons and Smuggling of Migrants Act have been aimed at preventing forced-labour and other forms of human trafficking (International Labour Organization, 2017). These measures reflect a broader goal for labour migration policy governance, not just in terms of economic development, but increasingly also with regards to protection and accountability. In Indonesia, planning for safe, orderly and regular migration was initiated under the National Medium-Term Development Plan (2020-2024 (Shahiri and Du, 2025). This reflects the awareness of the need for collaboration and co responsibility for reciprocal labour migration. The new 2022 MoU between Indonesia and Malaysia is another landmark event in the history of migration governance, as it demonstrates a shift towards more integrated and shared management of labour. The 2022 MoU includes more sophisticated measures to improve transparency in recruitment, labour dispute resolution and labour rights protection, including access to law and better labour conditions (Jasiyah et al., 2024). This agreement also underscored the importance of digital platforms in the recruitment and monitoring of workers, suggesting a digitalisation and modernisation in governance processes. The new MoU also highlights the need for cooperation between source and destination countries to deal with challenges related to labour migration, reflecting the reality that effective management of labour migration can only be achieved through collaboration at bilateral level.

But the literature shows there is a disconnect between policy and practice. Institutional factors such as bureaucratic myopia, lack of coordination and lack of enforcement capacity continue to plague policies and governance (Raysharie and Saprianto, 2022). Policies remain little more than "paper laws" and are not reflected in the reality faced by migrant workers. This suggests that while policy reform is needed it needs to be complemented with strong enforcement and institutional frameworks. Furthermore, the continued use of informal recruitment methods and unregulated labour

relations pose additional challenges to enforcement. But as well as government action, non-government actors, such as non-governmental organisations (NGOs), are also engaged in immigration policy debates and initiatives to improve protections. They are engaged in tracking policy formulation and implementation, increasing awareness of labour rights violations, and spreading the message and campaigns to bring about policy reform (Palmer, 2018). This is part of the trend towards multi-stakeholder governance in labour migration, where state and non-state actors have an influence on policy processes. This raises the question of multilateral solutions to help resolve multilateral problems. Finally, the policy debate has increasingly focused on the technological and moral aspects of labour migration. Electronic mediation for recruitment, data control and other transparency measures has been suggested to reduce labour migration exploitation and improve transparency (Arifianto, 2023). Similarly, there is a renewed call for a rights-based approach to promote the dignity, safety and protection of workers. This indicates a change in migration policy from an economic, to a more humanistic approach.

Finally, migration policy progress from 2010 to 2025 between Indonesia and Malaysia reveal significant improvements in formalising labour migration arrangements and reforms in policy settings and regulations. However, problems of implementation, capacity and enforcement show inconsistent policy effectiveness. In this regard we must continue to undertake policy reform, supported by improved coordination, monitoring and political will. In the absence of these efforts, there is likely to be a disconnect between policies designed for migrants and migratory experiences - ineffective migration governance. Migration volume trends during the review period reflect the impact of policy and external shocks, as suggested in the literature. For example, studies note that the 2011 MoU coincided with heightened recruitment in plantation and construction sectors (Domingo and Wahab, 2024), while COVID-19 restrictions in 2020–2021 sharply curtailed mobility and employment opportunities for migrants (Domingo and Wahab, 2024; Pandi, 2023). Following the 2022 MoU, recruitment resumed under more formalised arrangements, though enforcement gaps and economic uncertainties continued to affect flows (Jasiyah et al., 2024).

Challenges faced by Indonesian migrant workers

Indonesians face a range of challenges while overseas. There are various challenges faced by IDWs overseas. Indonesians' experiences in Malaysia as migrant workers between 2010 and 2025 are complex, multidimensional, and entrenched in the economic, legal, social and institutional context. Although the literature shows that there are ample policy changes and bilateral agreements to improve the protection of migrant workers, literature consistently points to various forms of vulnerability Indonesian migrant workers face in the process of migration. These are not individual challenges but rather interrelated, as they relate to broader governance problems in both labour migration systems in Indonesia and Malaysia (Domingo and Wahab, 2024; Elias, 2018). Migration remains an indispensable means for economic opportunities for workers and families, but structural gaps in recruitment, protection, and enforcement remain a threat to migrant workers' exploitation and marginalisation. Economic exploitation is one of the most common issues that are reported. The most common jobs of Indonesian migrant workers are in labour-intensive industries like construction, plantations, manufacturing and domestic service sectors where the protection of labour is weak or not well implemented. The problems mentioned in the study are payment of salaries,

absence of salary, overtime, illegal deductions, substitution of contracts, and poor housing conditions (Pandi, 2023). Despite the efforts of bilateral agreements and labour regulations in improving employment standards, implementation gaps persist and are an impediment to its effectiveness. Recent research also shows that recruitment costs continue to be a real problem for a lot of migrants, and that many migrants end up paying a lot of debt before migrating. This debt enticement can make it more difficult for workers to report abusive employers or quit bad working conditions, as they fear losing out on income and may need to pay the debts back (Kurniati, 2025; Parashtheo et al., 2025). As a result, many migrant workers are unable to escape from unequal employment relationships that are marked by economic insecurity and an imbalance in the ability to negotiate.

Another significant issue for Indonesian migrant workers in Malaysia is their legal vulnerability. Although there are legal mechanisms in place to protect the rights of workers, there are a number of structural and procedural barriers that limit access to justice. Language barriers, lack of legal knowledge, lack of knowledge about labour laws and employers' fear of retaliation, are common challenges that migrant workers experience in navigating legal systems (Elias, 2013). There is a lack of awareness in many workers about the importance of reporting cases of abuse, exploitation, and violation of contracts, due to the risk of losing their jobs, being deported, or being blacklisted for future migration opportunities. In recent times socio-legal research has been conducted and it has been noted that workers' lack of knowledge of the law still prevents them from obtaining formal protection and effectively exercising their rights. In addition, the process for workers to initiate a legal case is often lengthy and the complaint procedures complex and difficult, which deters workers from pursuing redress, especially those who are irregularly present in the country. In addition, the situation of undocumented or irregular migration adds to the legal and economic vulnerabilities. Although formalisation of labour migration in the form of bilateral agreements and recruitment procedures has been attempted, a large number of Indonesian migrant workers still enter or stay in Malaysia in an unofficial manner. The labour market, recruitment inefficiencies, and deficiencies in border management systems are cited as reasons why irregular migration continues to be a governance problem by Ahmad and Khairi (2024). Undocumented workers frequently lack legal protection, health care, social assistance, and options for dispute resolution. They are at higher risk of exploitation in the workplace, labour trafficking, arbitrary detention, and workplace abuse, due to their lack of documentation. Despite the presence of such regularisation and amnesty programmes, the effect of such initiatives has been limited due to the challenges in implementation and access, leaving vulnerable undocumented workers still in the labour market in Malaysia.

In addition to economic and legal issues, Indonesian migrant workers also face social discrimination and exclusion. Migrant workers are often targeted for negative stereotypes, xenophobic attitudes and social marginalisation within host communities, as found by research (Domingo and Wahab, 2024; Noor and Shaker, 2017). These perceptions can impact the access to healthcare, education, housing and other social participation. Frequently media images and political narratives portray migrant workers as a burden, a competitor, a security risk, and thus unequal treatment and exclusionary practices are reinforced (Elias, 2018). This means that many migrant workers are unable to be integrated into their communities and are socially isolated. Fewer social contacts and social networks can also have a negative impact on psychological health and limit

access to informal help and support during difficult times. Gerard (2018) also states that social exclusion may hinder migrant workers' ability to gain access to information, resources and support networks needed for successful integration into host societies. Issues related to health and welfare have also become significant issues in the literature on labour migration. Access to affordable health care services can be difficult for migrant workers because they may not be able to afford the services, may have trouble navigating administrative procedures, may be restricted by their employer, and may have concerns about their immigration status. These problems were accentuated by the COVID-19 pandemic and the inequalities that previously existed in the lives of migrants became more apparent. Restrictions on mobility, closure of borders, loss of employment, wage cuts, and public health measures negatively impacted migrant workers in various industries (Domingo and Wahab, 2024; Pandi, 2023). During the crisis, many workers were not sufficiently covered by healthcare and social protection benefits, nor were they supported by emergency mechanisms. In addition, the poor living conditions and lack of health service provision raised health risks for migrants. The pandemic thus brought to a sharp focus the need for migratory labourers, during a crisis, to be protected more inclusively in both the labour and social protection policies.

Recent research has also highlighted the various governance and institutional issues that remain to impact migrants' rights to protection. There have been several policy changes in Indonesia and Malaysia to improve the governance of migration, however, implementation is uneven at sectoral and institutional level. Persistent weaknesses in the institutional coordination, enforcement capacity, recruitment monitoring, and labour inspection mechanisms are cited by Kurniati (2025) and Harahap et al. (2024). The governance gaps lead to inconsistencies in policy implementation and limit the effectiveness of policy protection mechanisms. In many situations, non-governmental organisations (NGOs), community-based organisations (CBOs) and informal support networks are the only sources provided for legal assistance, welfare support and advocacy services for migrant workers. This indicates that although formal regulatory frameworks have been increased, there are still some gaps between policy goals and implementation. In general, the problems encountered by Indonesian workers in Malaysia from 2010 to 2025 is an embodiment of deep structural inequalities that exist in labour migration systems. Despite a series of reforms, the experiences of migrant workers remain affected by economic exploitation, legal insecurity, irregular migrations, social discrimination, health vulnerabilities, and institutional weaknesses. While there have been significant changes in policy over the past five years, the literature indicates that more can be done to improve the protection of migrant workers than simply develop policy. To strengthen labour migration governance that is more equitable and sustainable between Indonesia and Malaysia, the enforcement mechanisms, institutional coordination, legal protection systems, social policies, and bilateral cooperation and relationship need to be improved.

Effectiveness of policy reforms

Between 2010 and 2025, policy changes have been taken, and the impact of these changes is still an important topic to discuss in terms of the governance of labour migration between Indonesia and Malaysia. Both countries adopted several bilateral agreements, legal changes and administrative measures to increase the protection of migrant workers, strengthen the control of migration and improve the governance of migrant workers during this period. The literature indicates that these reforms show a

positive trend in addressing the protection of migrant workers and the regulation of migration, but their implementation is not yet optimal, as evidenced by institutional weaknesses and legal enforcement issues (Kurniati, 2025; Domingo and Wahab, 2024). Thus, it would be misleading to consider a policy reform successful simply because it has a legal framework; it also needs to consider the impact of the policy on the actual life of migrant workers. A notable policy change in the reviewed period was the enhancement of bilateral cooperation seen in the Memoranda of Understanding (MoUs) established in 2011 and 2022 between Indonesia and Malaysia. These agreements aimed to narrow the governance gap in recruitment, address employment conditions, provide better protection of wages, and increase legal protection for Indonesian migrant workers in Malaysia (Domingo and Wahab, 2024; Jasiyah et al., 2024). The 2011 MoU was an important milestone to tackle older concerns on protection of domestic workers such as salary payments, rest days and recruitment processes. In 2022, the MoU furthered calls for increased transparency, better labour monitoring systems, and increased accountability for employers and recruitment agencies. These are an incremental shift in the migration management focus from labour supply to a rights-based governance of labour migration.

There were also policy changes, which helped improve institutions to regulate labour migration. Indonesia and Malaysia implemented measures to enhance the governance of migration and coordination between relevant agencies and to harmonise their national labour policies with international standards. In Malaysia, the legislative measures and the regulatory measures aimed to combat the issue of labour exploitation, trafficking in persons and forced labour practices by strengthening the legislative framework and improving the enforcement thereof (International Labour Organization, 2017). Likewise, Indonesia took steps to strengthen its migration governance framework with policies encouraging safe regular and orderly migration and bolstering the monitoring of recruitment agencies and pre-departure processes (Shahiri and Du, 2025). Such efforts reflect greater awareness that governance of labour migration needs to be coordinated within a multi-institutional and multi-policy framework. There are also some positive changes brought about by technological and administrative changes made in the period under review, as mentioned in a few studies. The process of digitalization in the recruitment and migration management systems has facilitated transparency, documentation and information sharing between both countries (Arifianto, 2023). The availability of electronic recruitment websites and digital monitoring have eliminated some potential avenues for recruitment irregularities and provided more surveillance over recruitment processes for migrant workers. Better bilateral communication channels have also facilitated improved information sharing on migrant worker management, labour disputes and protection issues. The reforms together reflect a process of modernisation of the migration governance system and streamlining of administration on both sides.

Despite this good news, literature has repeatedly pointed out that implementation and enforcement are the main constraints to policy effectiveness. Regulatory mechanisms have been more detailed, but institutional capacity to ensure compliance and implement labour standards has been limited (Kurniati, 2025; Harahap et al., 2024). Government agencies are still not coordinated well, labour inspection resources are still limited, and there is still a lack of efficiency in government processes, while monitoring is also inconsistent resulting in poor outcome of the policy. Although there is formal legislation in place to protect workers, many migrant workers still face labour exploitation, contract

violations and poor working conditions (Elias, 2013). The lack of policy implementation as a result of the gap between the formulation and implementation of policies is one of the biggest obstacles to Indonesia–Malaysia labour migration governance. Another policy reform area that has not been completely successful is recruitment governance. Both countries have introduced tougher regulations to control recruitment agencies and the exploitation of workers, but informal recruitment is still prevalent in addition to the formal channels. Many migrant workers continue to rely on intermediaries for jobs, paying high fees and/or receiving false information about working conditions (Parashtheo et al., 2025). These practices make workers more vulnerable to debt slavery and exploitation, and weaken the protection already provided by regulation. The existence of irregular migration also indicates that formal recruitment has not yet been able to meet the needs of the labour market and/or the migration experience of migrants and employers. Other political and economic factors also shape the success of policy reform. Labour migration is still tightly related with economic development goals, the labour market needs and bilateral diplomatic relations between Indonesia and Malaysia. Consequently, there is always a conflict between economic considerations and the protection of migrant workers in migration policies (Elias, 2018). Governments have shown a growing interest in enhancing labour standards, but sometimes these efforts are hampered by limited resources and implementation difficulties, as well as varying policy agendas. The economic and rights-based aspects of migration governance are still in tension throughout the review period.

Moreover, NGOs and community-based organisations (CBOs) have been found to play a key role in the implementation of policies and in protection for migrants in the literature. There are a number of organisations that have been active and engaged in advocacy, awareness raising, legal assistance and service provision to migrant workers, including Migrant Care, Tenaganita and Solidaritas Perempuan (Palmer, 2018). NGOs often serve as intermediaries between the migrant workers and the government institutions to address protection gaps and to track the implementation of government policies. Their ongoing participation highlights the significance of multi-stakeholder governance mechanisms in enhancing migration management and policy responsiveness towards the needs of migrant workers. In general, the success or failure of policy measures implemented from 2010 to 2025 is mixed. Significant progress has been made in strengthening bilateral cooperation, formalising recruitment systems, improving legal protections and strengthening migration governance frameworks, although implementation challenges have not yet been addressed. However, the implementation of many reforms is still weak, institutional structures are disjointed, recruitment standards fail to prevent labour vulnerabilities, and these continue to be an issue. The results indicate a need for further policy work on the following areas: improved institutional accountability, more robust enforcement mechanisms, more transparency in the recruitment process, and improved multi-stakeholder collaboration between governments, employers, civil society organisations and migrant communities. This is necessary to guarantee the policy changes are translated into a tangible change of protection, welfare and rights for Indonesian migrant workers in Malaysia. Recent bibliometric evidence underscores that poverty alleviation strategies must integrate microfinance and social entrepreneurship rather than rely solely on innovation-centric models (Jaafar and Abdullah, 2026). This resonates with the necessity-driven strategies observed among Indonesian domestic workers, highlighting the need for empowerment-based approaches.

Conclusion

This systematic literature review explored the development of labour migration from Indonesia to Malaysia from 2010 to 2025 in four aspects; immigration policymaking; problems faced by labour migrants; outcomes of policy reforms; and the involvement of non-governmental organisations (NGOs) and community-based organisations (CBOs). To gain a comprehensive picture of labour migration governance in the migration corridor between Indonesia and Malaysia, the PRISMA approach was used to select and synthesize relevant studies, resulting in 25 studies. The results proved that the labour migration between Indonesia and Malaysia is still one of the most important migrations in Southeast Asian region. During the review period, both countries made several bilateral agreements and policy changes to benefit labour migration governance and protection of migrant workers. The 2011 and 2022 Memoranda of Understanding (MoUs) were significant steps in the regulation of recruitment activities, in improving employment conditions and in strengthening cooperation between both governments. The developments are an incremental move towards a more rights-based and structured approach to migration governance. Despite these policy developments, the review concluded that implementation issues persist in impeding the effectiveness of many reforms. Key challenges in labour migration governance continue to be weak enforcement mechanisms, institutional fragmentation, recruitment irregularities and the lack of monitoring. Consequently, the situation of Indonesian migrant workers remains vulnerable in many aspects such as labour exploitation, wage-related conflicts, lack of legal security, social discrimination, and limited access to protection mechanisms. The results indicate that policy reforms are not enough unless they can be effectively implemented, institutionalized accountability, and bilateral cooperation will be maintained.

The importance of the role of NGOs and CBOs in filling gaps in formal protection systems is also pointed out. Migrant Care and other organisations like Solidaritas Perempuan and Tenaganita are important in providing advocacy, awareness raising, legal assistance and provision of services to migrant workers. Their participation is a testament to the need for multi-stakeholder approaches in migration governance and protection. Often these organisations play a key role in supporting migrant workers who may have challenges accessing formal institutional assistance. Theories from a theoretical perspective support a rights-based approach to migration governance which asserts the rights of the migrants to be protected throughout migration. There is still an economic dimension to policy making on migration, but a growing volume of literature is attentive to the need to consider social justice, human rights and the welfare of workers as well as the needs of the labour market. This view underscores the importance of migration policies that focus on dignity, protection and fair treatment, as well as economic goals. It was noted that there were several limitations in the literature. First, much of the research deals with specific aspects of labour migration, such as the development of labour migration policy, labour migration exploitation, or the welfare of the migrants, for example, with little integration between these aspects. Second, there is not that much empirical research that looks at the long-term effects of policy reforms. Third, limited research studies have examined migrant workers' experiences in various industries and across migration status, including undocumented workers. These restrictions highlight the need for more in-depth and comparative studies of labour migration governance.

There is a need to explore long-term effectiveness of the recent policy reform, including the 2022 MoU and new digital governance initiatives. Research should further examine the experiences of migrant workers in various sectors; evaluate the impact of protection measures; and examine the role of civil society organisations in migration governance. Lessons learned from comparative studies of other ASEAN labour migration corridors may also be useful for understanding best practices on how to protect migrants and manage migration in the region. Finally, it can be concluded that there was a great improvement in the governance of labour migration between Indonesia and Malaysia during the years 2010 to 2025. There are significant hurdles, however, in taking policy pledges to meaningful improvements for migrant workers. Greater effectiveness, inclusiveness, and sustainability of labour migration governance into the future will require strengthening enforcement mechanisms, improving institutional coordination, increasing transparency regarding recruitment, and fostering increased government collaboration with NGOs and communities of migrants.

Acknowledgement

This research is self-funded.

Conflict of interest

The authors confirm that there is no conflict of interest involve with any parties in this research study.

REFERENCES

- [1] Ahmad, R., Khairi, A. (2024): Human security and governance: Indonesian illegal migrant workers in Malaysia. – *SINERGI: Journal of Strategic Studies & International Affairs* 4(2): 38-49.
- [2] Arifianto, A.R. (2023): The securitization of transnational labour migration: The case of Malaysia and Indonesia. – *Asian Politics & Policy* 1(4): 613-630.
- [3] Djafar, F., Hassan, M.K.H. (2014): Home bias and network effect of Indonesian migrant workers on Malaysia's external trade. – *Journal of Applied Economics and Business* 2(2): 5-16.
- [4] Domingo, P., Wahab, A. (2024): Labour migration and trafficking in persons: A political economy analysis. An analysis of Malaysia. – Overseas Development Institute, London 50p.
- [5] Elias, J. (2013): Foreign policy and the domestic worker: The Malaysia-Indonesia domestic worker dispute. – *International Feminist Journal of Politics* 15(3): 293-313.
- [6] Elias, J. (2018): Migration, Gender, and Politics in Southeast Asia. – Routledge, London 160p.
- [7] Fukunaga, Y. (2015): Assessing the progress of ASEAN MRAs on professional services. – ERIA Discussion Paper Series 24p.
- [8] Gerard, K. (2018): ASEAN as a “rules-based” community: Business as usual. – *Asian Studies Review* 42(2): 873-889.
- [9] Harahap, A.M., Rahman, N.A., Ismail, M.F. (2024): Challenges and problems in labour law from Indonesia and Malaysia perspectives. – *Malaysian Journal of Syariah and Law* 12(1): 55-72.

- [10] Hugo, G. (2011): Migration and development in Indonesia. – *Asian and Pacific Migration Journal* 20(3-4): 351-370.
- [11] International Labour Organization (2017): *Labour Migration in Asia-Pacific: Challenges and Opportunities*. – International Labour Organization 40p.
- [12] International Labour Organization (2015): *Review of the Malaysian Anti-Trafficking in Persons and Anti-Smuggling of Migrants Act*. – International Labour Organization 40p.
- [13] Jaafar, N.T., Abdullah, N. (2026): Poverty and entrepreneurship research: A bibliometric analysis of Scopus-indexed journal articles (1974-2024). – *Journal of Business and Social Development* 14(1): 176-202.
- [14] Jasiyah, R., Raliby, O., Hierdawati, T., Pamungkas, B.D., Ningtyas, S. (2024): Indonesia's economic growth projections 2023-2025: Empirical data analysis. – *Jurnal Ekonomi* 13(1): 345-354.
- [15] Kaur, A. (2010): Labour migration in Southeast Asia: Migration policies, labour exploitation, and regulation. – *Journal of the Asia Pacific Economy* 15(1): 6-19.
- [16] Kurniati, Y. (2025): Comparative labor law studies in Indonesia and Malaysia: Legal protection and migrant worker governance. – *Laws* 14(6): 20p.
- [17] Noor, N.M., Shaker, M.N. (2017): Perceived workplace discrimination, coping and psychological distress among unskilled Indonesian migrant workers in Malaysia. – *International Journal of Intercultural Relations* 57: 19-29.
- [18] Page, M.J., McKenzie, J.E., Bossuyt, P.M., Boutron, I., Hoffmann, T.C., Mulrow, C.D., Shamseer, L., Tetzlaff, J.M., Akl, E.A., Brennan, S.E., Chou, R., Glanville, J., Grimshaw, J.M., Hróbjartsson, A., Lalu, M.M., Li, T., Loder, E.W., Mayo-Wilson, E., McDonald, S., McGuinness, L.A., Stewart, L.A., Thomas, J., Tricco, A.C., Welch, V.A., Whiting, P., Moher, D. (2021): The PRISMA 2020 statement: An updated guideline for reporting systematic reviews. – *BMJ* 372: 9p.
- [19] Palmer, W. (2018): Back pay for trafficked migrant workers: An Indonesian case study. – *International Migration* 56(2): 56-67.
- [20] Pandi, A.R. (2023): Indonesian domestic workers in Malaysia during the COVID-19 pandemic. – *Asian Journal of Labour Studies* 5(1): 102-118.
- [21] Papademetriou, D.G., Sugiyarto, G., Mendoza, D.R., Salant, B. (2016): *Achieving Skill Mobility in the ASEAN Economic Community: Challenges, Opportunities, and Policy Implications*. – Asian Development Bank 80p.
- [22] Parashteo, B., Sakti, S.W.K., Suntoro, A., Wulan, T.R. (2025): Indonesian migrant workers in Malaysia and their social environment: Analysis from a socio-legal perspective. – *Policy, Law, Notary and Regulatory Issues* 4(2): 101-118.
- [23] Raysharie, P.I., Saprianto, R. (2022): Analysis of poverty reduction in East Barito Regency. – *Journal of Economic Education* 11(2): 437-450.
- [24] Shahiri, H., Du, Y. (2025): Palm oil plantation workers in Malaysia and Indonesia: Issues and challenges. – In: *The Palm Oil Export Market* 13p.