

Legal Protection of Gig Economy Workers: A Comparative Study in Indonesia, Malaysia, and Singapore

Sri Jaya Lesmana^{1*}, Muhammad Mpu Samudra²

^{1,2} Faculty of Law, Universitas Islam Syekh-Yusuf, Tangerang, Indonesia.

@ : sjlesmana@unis.ac.id

Corresponding Author*



Abstract

Introduction: With the rapid growth of the digital economy, gig workers, who are generally classified as independent contractors, often do not have adequate legal and social security protections compared to conventional workers.

Purposes of the Research: This study presents a comparative analysis of legal protection for gig economy workers in three Southeast Asian countries, namely Indonesia, Malaysia, and Singapore. The study focuses on the regulatory framework applicable in each country, covering aspects of labor laws as well as various other regulations or policies related to workers' rights and social protection guarantees.

Methods of the Research: Normative legal research methods are used to examine policies related to workers in the performing economy sector in Indonesia, Malaysia, and Singapore. This approach is used to compare the legal protection provided to these workers in the three countries, by referring to the provisions of the applicable laws and regulations in each country.

Results of the Research: The results show that despite differences in regulatory approaches, the three countries still face significant challenges in creating adequate social safety nets. The researcher recommends that harmonization and innovation in labor policies need to be carried out to achieve a balance between work flexibility and the protection of workers' rights. In addition, the development of more inclusive and sustainable regulations in the digital era should also be carried out.

Keywords: Gig Economy; Legal Protection; Legal Comparison.

Submitted: 2025-04-18

Revised: 2025-09-26

Accepted: 2025-09-27

Published: 2025-09-30

How To Cite: Sri Jaya Lesmana, Muhammad Mpu Samudra. "Legal Protection of Gig Economy Workers: A Comparative Study in Indonesia, Malaysia, and Singapore." *SASI* 31 no. 3 (2025): 201-218. <https://doi.org/10.47268/sasi.v31i3.3006>

Copyright © 2025 Author(s)



Creative Commons Attribution-NonCommercial 4.0 Internasional License

INTRODUCTION

Technological advance have a significant impact on globalization in the era of digitalization, especially in increasing convenience, efficiency, and productivity in the transportation and communication sectors, which ultimately provides benefits for society and the business world.¹ Therefore, adapting to technological developments is a must in the face of globalization and digitalization. Technology also plays a key role in accelerating the globalization process by presenting various innovations that affect economic growth, both in the short and long term.² In addition, globalization opens up opportunities for companies to expand into international markets, which simultaneously increases labor competition globally.

¹ Marinko Skare and Domingo Riberio Soriano, "How Globalization Is Changing Digital Technology Adoption: An International Perspective," *Journal of Innovation and Knowledge* 6, no. 4 (2021): 222-33, <https://doi.org/10.1016/j.jik.2021.04.001>.

² Soliyev I. I. and Ganiev B. B., "Key Factors Influencing Economic Development," *European Journal of Research Development and Sustainability* 2, no. 3 (2021): 12-16, <https://scholarzest.com/index.php/ejrd/article/view/306>.

With technology collaboration, the production and distribution process of products can be carried out faster, with lower costs and higher efficiency. However, technological advances can also have a mixed impact on conventional business actors, who must adapt to technological developments in order to remain competitive in the market.³ If they fail to adjust, it will be difficult to meet the needs of consumers who have become accustomed to getting services from companies that adopt the latest technology. In addition, economic growth contributes to improving people's welfare in various aspects, such as environmental, social, and economic. Therefore, changes in life patterns are needed to achieve better well-being.⁴

Advances in digital technology and changes in global work patterns have encouraged the emergence of the gig economy phenomenon, which is a work system that offers high flexibility, is based on short-term contracts, and has no permanent attachment to the company.⁵ The gig economy includes a wide range of jobs, such as freelancers, independent contractors, and part-time workers, spread across a variety of sectors, including transportation, food service, digital marketing, graphic design, information technology, as well as other creative industries. In the Southeast Asian region, the growth of the gig economy is experiencing rapid development, driven by the increasing demand for flexible labor and easy access to digital technology.⁶

The gig economy work model provides opportunities for individuals to increase their income while honing their skills independently. However, there are serious challenges in the form of lack of legal protection, income uncertainty, and limited access to social security, which need to be addressed immediately in order to create a more inclusive and sustainable work ecosystem.⁷ Flexibility, additional income opportunities, and the development of personal skills are indeed the main attractions of the gig economy, but from a legal perspective, this raises important issues related to the clarity of workers' status, the protection of fundamental rights, and the obligations of the state and digital platforms in ensuring their welfare. As reported by Antara News, the Asia Pacific region recorded rapid growth in the freelance economy, with Singapore occupying the position as the main market for freelancers in Asia as well as being included in the top 10 best markets for independent workers at the global level.

Based on data released by freelance portals in Southeast Asia, India occupies the top position with the number of users at 2,369,000, followed by the Philippines which is the next largest market with 536,000 users. Other countries in the region also showed fairly high activity, with Indonesia recording around 412,000 users, while Vietnam had around 155,000 users. Freelancers in the region are spread across a variety of industries, including graphic design, marketing, as well as internet programming.⁸ Meanwhile, data from the Central

³ Nezhil Altay and Arunachalam Narayanan, "Forecasting in Humanitarian Operations: Literature Review and Research Needs," *International Journal of Forecasting* 38, no. 3 (2022): 1234–44, <https://doi.org/10.1016/j.ijforecast.2020.08.001>.

⁴ Ian Clark et al., "A 'Place-Based' Approach to Work and Employment: The End of Reciprocity for Ordinary Working Families and 'Giggers' in a Place," *Economic and Industrial Democracy* 43, no. 2 (2022): 634–57, <https://doi.org/10.1177/0143831X20946374>.

⁵ A Shaji George, "Gig Economy 2.0: Examining How Smart Technologies Could Revolutionize On-Demand Work," *Partners Universal Innovative Research Publication (PUIRP)* 2, no. 4 (2024): 29–49, <https://doi.org/10.5281/zenodo.13334926>.

⁶ Afsana Mimi and Lisa Mani, "Gravitating the Gig Economy for Reshaping the Careers Using Technological Platform in the Digital Age in an Emerging Economy," *Journal of Information Systems and Informatics* 6, no. 4 (2024): 3129–61, <https://doi.org/10.51519/journalisi.v6i4.966>.

⁷ Tegar Islami Putra, Nurul Fibrianti, and Mohammad Raziq Fakhruallah, "Basis of Data Protection Officer Appointment: Comparative Study of Indonesia and European Union Regulation," *SASI* 31, no. 1 (2025): 1–15, <https://doi.org/10.47268/sasi.v31i1.2068>.

⁸ CEO Suite, "Meningkatnya Jumlah Tenaga Kerja Freelance," CEO Suite, 2021, <https://ceosuite.co.id/meningkatnya-jumlah-tenaga-kerja-freelance/>.

Statistics Agency shows that the number of freelance workers in Indonesia will reach 84 million people in August 2024, which covers 58% of the total labor force of 144 million people. This figure has increased significantly compared to 2023, where the number of freelancers was recorded at 46 million people or around 32% of the total labor force.⁹ Workers in the gig economy generally have flexible work systems, work for multiple clients or platforms at once, and receive payments based on projects or tasks they complete.¹⁰

While the gig economy offers flexibility and independence for its workers, there have been criticisms regarding the lack of protection and benefits received by workers in this sector. This can lead to uncertainty and instability in terms of income and benefits.¹¹ Unlike permanent workers, gig workers often do not have protection for their basic rights, such as social security, leave rights, minimum wage, and access to health services. This situation poses a risk to workers' welfare, especially since many employment law systems in Southeast Asia have not been fully adapted to accommodate protections for gig workers.¹² In some countries such as the Philippines, Indonesia, Malaysia, and Thailand, regulations regarding gig workers are developing with a different approach. Some countries have begun to pay more attention to the protection of gig workers' rights, while others still face challenges in designing effective policies.

In Indonesia, the government has tried to provide protection for gig economy workers who provide delivery services through the "Regulation of the Minister of Transportation Number 17 of 2019" amending the "Regulation of the Minister of Transportation Number 118 of 2018 concerning the Implementation of Special Rental Transportation" and "Government Regulation Number 30 of 2021 concerning the Implementation of the Traffic and Road Transportation Sector". However, there is still no regulation that specifically regulates goods delivery services using gig worker services. Therefore, legal protection for gig workers has not been accommodated and the government needs to determine policies to provide legal protection for gig economy workers.¹³ Therefore, the researcher believes that it is important to conduct a comparative analysis related to legal protection for gig workers in Southeast Asia, in order to understand the legal approaches that have been implemented, identify shortcomings, and formulate recommendations for improving the welfare and legal security for gig workers in this region.

Previous research on gig economy workers has been carried out, including in the following research. First, research by Qolbi Hanif Fadhlulloh, Aidul Fitriadi Azhari, and Rizka in a study entitled "Comparison of the Legal Status of Gig Economy Workers in Indonesia, the Netherlands, and the United Kingdom".¹⁴ Next, research conducted by

⁹ Anisa Zulfani, "GIG Economy: Untung Atau Rugi?," KIME FEB UNNES, 2024, <https://sites.unnes.ac.id/kimefe/2024/07/gig-economy-untung-atau-rugi/#:~:text=Mengacu pada data yang diperoleh,juta jiwa pada Februari 2023.>

¹⁰ Al James, "The Gig Economy: A Critical Introduction," *Taylor & Francis Journals* 97, no. 1 (2021): 113-14, <https://doi.org/10.1080/00130095.2020.1831908>.

¹¹ Hannah Johnston and Chris Land-Kazlauskas, "Organizing On-Demand Representation, Voice, and Collective Bargaining in the Gig Economy," ILO Working Papers, 2018.

¹² David Tan, "A Brave New Frontier in the Dichotomous Indonesian Labor Law: Gig Economy, Platform Paradox and Workers Without Employers," *Mimbar Hukum* 33, no. 1 (2021): 1-38, <https://doi.org/10.22146/mh.v33i1.1956>; I Gde Sandy Satria, "Perlindungan Hak Pekerja Gig Economy Melalui Perspektif Hukum Ketenagakerjaan," *Nomos: Jurnal Penelitian Ilmu Hukum Jurnal Penelitian Ilmu Hukum* 5, no. 1 (2025): 127-34, <https://doi.org/10.56393/nomos.v5i1.2723>.

¹³ Sumaiya Abdul Rasheed, Uzma Sati, and Farheen Bano, "Gig Economy Work and Workers Life Balance Issues A Phenomenological Approach," *POMS: Periodicals of Management Studies* 2, no. 2 (2022): 82-98, <https://pmanagementstudies.com/poms/index.php/poms/article/view/20>.

¹⁴ Qolbi Hanif Fadhlulloh, Aidul Fitriadi Azhari, and Rizka, "Perbandingan Kedudukan Hukum Pekerja Gig Economy Di Indonesia, Belanda, Dan Inggris; Comparison of the Legal Position of Gig Economy Workers in Indonesia, the Netherlands, and the UK," *Fundamental: Jurnal Ilmiah Hukum* 12, no. 3 (2023): 307-22, <https://doi.org/10.34304/jf.v12i2.165>.

Akhdan Adityo Latri, Rajwa Khaicirinu Riyanto, Muhammad Bintang Firdaus, and Muhammad Gaung Syah Arjuna with the title "Workers' Rights in the Gig Economy Era: Legal Protection for Freelance and Contract Workers".¹⁵ Then there is research from Rengga Kusuma Putra, Adi Suryo Ramadhan, Greget Widhiati, Tri Imalia, and Kapsah in a study entitled "Legal Protection for Gig Economy Workers: A Civil Law Perspective in Indonesia".¹⁶

The difference between the researcher's research and the previous study is that the researcher's research has a regional coverage in Southeast Asia and focuses on the comparison of legal policies in Indonesia, Malaysia, and Singapore using a comparative study method. This study not only analyzes the regulations that apply in each country, but also identifies the advantages and disadvantages of the legal approach applied. Thus, this study is expected to provide broader insight into the pattern of legal protection for gig economy workers in this region and develop more comprehensive recommendations for policymakers in improving the welfare and legal protection of gig workers, especially in the three countries. So that the results and recommendations will be different from previous research.

METHODS OF THE RESEARCH

The normative legal research method is used in this study to analyze policies related to gig economy workers in Southeast Asia, especially in Indonesia, Malaysia, and Singapore. This method is applied to compare legal protection for gig economy workers in the three countries by referring to the applicable laws and regulations, such as the Labor Law and other related regulations. Data collection is carried out through literature studies by reading, collecting, and classifying materials relevant to the research topic. Data analysis was carried out in a comparative descriptive manner to identify similarities, differences, and trends in legal protection policies in force in the three countries. The results of the analysis are then presented descriptively in the form of scientific articles to provide recommendations for improving legal policies that are more effective in protecting gig economy workers.

RESULTS AND DISCUSSION

The transformation of the world of work is experiencing rapid development along with the advancement of the internet. Today, job opportunities are much wider than they were a few decades ago.¹⁷ Previously, the recruitment process was carried out offline, making it difficult for prospective workers from outside the region to access the desired company. In addition, companies have to incur large costs in the time-consuming hiring process. However, with the advent of internet technology, short-term contract-based jobs have become more accessible through various freelancer platforms that provide job vacancy information.

Based on BPS as of August 2024, as many as 58% of the workforce in Indonesia is included in the category of informal workers. Of the total of more than 144 million people who work,

¹⁵ Akhdan Adityo Latri et al., "Hak Pekerja Di Era Gig Economy: Perlindungan Hukum Bagi Pekerja Lepas Dan Kontrak," *Media Hukum Indonesia (MHI)* 2, no. 2 (2024): 375–83, <https://doi.org/10.5281/zenodo.11770886>.

¹⁶ Rengga Kusuma Putra et al., "Perlindungan Hukum Bagi Pekerja Gig Economy: Perspektif Hukum Perdata Di Indonesia," *PERKARA: Jurnal Ilmu Hukum Dan Politik* 2, no. 4 (2024): 553–64, <https://doi.org/10.51903/perkara.v2i4.2227>.

¹⁷ Suli Murwani, "Gig Economy, Antara Solusi Resesi Dan Potret Pekerja Masa Depan," *Tirto.id*, 2023, <https://tirto.id/gig-economy-antara-solusi-resesi-dan-potret-pekerja-masa-depan-gFAB>.

around 84 million people are informal workers, which includes individuals who are self-employed (such as MSMEs), working with the help of irregular workers, freelancers, and family workers who do not receive wages.¹⁸ Based on this data, informal workers still dominate the distribution of labor compared to formal workers. The number of formal workers reaches 42% or around 61 million people.¹⁹

A significant surge in contract-based jobs through digital platforms in large numbers is known as the gig economy. According to Wilson, the gig economy refers to a type of work with short-term contracts, which was previously better known as freelance work. In this system, workers receive wages based on the number of jobs completed digitally, and their income is not fixed.²⁰ The gig economy itself is still difficult to define, measure, or interpret. There are various points of view regarding the gig economy. Some see it as part of a shift in the employment structure that is increasingly unstable and tends to be exploitative, as this work has no clear time limits. However, on the other hand, there is also a view that sees the gig economy as a new form of work that offers more flexibility than traditional contract-based jobs.²¹

In the industrial revolution 4.0, one of the impact that emerged in career development was the birth of the gig economy phenomenon, also known as the sharing economy. This phenomenon has also given birth to gig workers, which can be interpreted as freelancers or freelancers. The presence of gig workers is a significant change, because it offers a new work model that is more flexible compared to the traditional employment system which tends to be permanent and rigid. In Indonesia, the gig economy is not only limited to the online transportation sector, but also includes thousands of freelancers registered on various job search platforms, such as Fastwork, Fiverr, Freelancer.com, Upwork.com, Sribu and so on. This shows that project-based and flexible work systems are increasingly developing and becoming part of the employment landscape in the digital era.

A. Regulation of Occupational Safety and Legal Protection of Gig Economy Workers in Southeast Asian Countries

Each country has a different approach to regulating gig economy workers, depending on the legal system, employment policies, and the level of development of the digital economy in each country. Some countries have begun to adapt their regulations to provide social protection for gig workers, while others still rely on partnership systems that make the legal status of gig workers less clear. Therefore, it is important to conduct a comparative analysis to understand how each country designs policies that can ensure the welfare and safety of gig economy workers in the region. The following is an overview of labor regulations and legal protections for gig workers in Indonesia, Malaysia, and Singapore.

Indonesia

In “Law Number 13 of 2003 jo. Law Number 11 of 2020” (Manpower Law) states that worker protection includes, among others, protections related to the right to negotiate with

¹⁸ Direktorat Statistik Kependudukan dan Ketenagakerjaan, “Keadaan Pekerja Di Indonesia Agustus 2021,” 2024.

¹⁹ Qonita Azzahra, “Pekerja Informal Indonesia Per Agustus 2024 Capai 83,8 Juta Jiwa,” *Tirto.Id*, November 5, 2024, <https://tirto.id/pekerja-informal-indonesia-per-agustus-2024-capai-838-juta-jiwa-g5rb>.

²⁰ Farah Diba Almayanda Alauddin et al., “The Influence of Digital Platforms on Gig Workers: A Systematic Literature Review,” *Heliyon* 11, no. 1 (2025): 1–14, <https://doi.org/10.1016/j.heliyon.2024.e41491>; Treviliana Eka Putri, Paska Darmawan, and Richard Heeks, “What Is Fair? The Experience of Indonesian Gig Workers,” *Digital Geography and Society* 5, no. 12 (2023): 1–5, <https://doi.org/10.1016/j.diggeo.2023.100072>.

²¹ Gongyan Yang, Shujie Yao, and Xinran Dong, “Digital Economy and Wage Gap between High- and Low-Skilled Workers,” *Digital Economy and Sustainable Development* 1, no. 1 (2023): 1–14, <https://doi.org/10.1007/s44265-023-00009-y>.

employers, occupational safety, health, special protection (women, children, for people with disabilities), to protect employee salaries and benefits, and social security.²² The gig economy is very much related to partnerships. Regarding employment relations according to the labor law, although it is recognized that there is an employment relationship, it should be noted that the relationship between the worker and the employer is not necessarily an employment relationship. In this view, it lies in each of the roles of employment, namely employers, workers, the government, and the Industrial Relations Court.

Both the business world and the community in Indonesia have experienced various benefits from the development of the gig economy, especially in terms of work flexibility and wider economic opportunities.²³ However, behind this growth, there are significant challenges related to legal protection and the status of gig workers. In Indonesia's labor system, gig workers are seen as independent contractors or partners, not as permanent employees. This causes them not to get the same employment rights as formal workers, such as social security, leave rights, and protection against termination of employment. In addition, regulations that have not fully accommodated flexible working patterns in the gig economy are obstacles in providing adequate protection for workers in this sector.

Labor law enforcement in Indonesia still faces various obstacles, especially because existing labor standards are not fully relevant to the nature of gig economy work. Lack of clarity in defining employment relationships, the role of gig workers, and regulations regarding the workplace further complicates the situation. Therefore, more adaptive policy updates are needed so that the employment system can provide better protection for gig workers without hindering the flexibility that is the main advantage of this sector. Negotiations with stakeholders are a crucial aspect in ensuring the welfare of gig workers, given their status as independent contractors who do not have the right to various labor protections.

Unlike permanent workers who are not recognized as formal workers, gig workers are not eligible for social benefits, minimum wages, and the right to form or join a union. This status often causes problems related to legal protection and the fulfillment of the rights of gig workers. One of the main challenges faced is their weak bargaining position in setting rates and fair working conditions. In addition, unlike permanent workers, gig workers also do not receive labor protection guarantees, such as workplace health or safety benefits, social security, leave rights, wage standards, or other labor protections.²⁴ This creates greater uncertainty in terms of welfare and job stability for gig workers.

Until now, Indonesia has not had laws and regulations that specifically regulate protection for gig economy workers. As partners, gig workers should have equal rights with other workers in general, including the right to a decent wage, social security, and the opportunity to work in a safe and healthy environment. Although there are no specific regulations, gig workers in Indonesia can still get protection through several regulations that have been in effect, including: a) The Labor Law, which regulates the relationship

²² Richard Jatimulya Alam Wibowo, "Urgensi Pembaharuan Hukum Ketenagakerjaan Indonesia Untuk Mengakomodasi Perlindungan Hubungan Kemitraan," *Jurnal Ketenagakerjaan* 18, no. 2 (2023): 109–23, <https://doi.org/10.47198/jnaker.v18i2.211>.

²³ Ode Kamarudin, "Ekonomi Gig: Peluang Dan Tantangan Di Era Kerja Digital," *Currency: Jurnal Keuangan Dan Perbankan Syariah* 03, no. 1 (2024): 362–73, <https://doi.org/10.32806/ccy.v3i1.321>.

²⁴ Alex de Ruyter, Martyn Brown, and John Burgess, "Gig Work and the Fourth Industrial Revolution: Conceptual and Regulatory Challenges," *Journal of International Affairs* 72, no. 1 (2019): 37–50; Devanto Shasta Pratomo et al., "Gig Workers In The Digital Era In Indonesia: Development, Vulnerability and Welfare," in *Proceedings of the 2023 Brawijaya International Conference (BIC 2023)*, *Advances in Economics, Business and Management Research* (Atlantis Press, 2024), 47–60, https://doi.org/10.2991/978-94-6463-525-6_6.

between employers and workers, can provide protection for gig economy workers. Even though they are categorized as partners, gig workers still have certain rights as a workforce, such as the right to work in a safe and healthy environment; b) "Law Number 8 of 1999 concerning Consumer Protection" (Consumer Protection Law), which guarantees customers' rights to safe and quality goods and services. While this regulation focuses more on consumer protection, it also indirectly encourages gig workers to provide safe and quality services, which in turn can strengthen their position. The Consumer Protection Law has relevance for gig workers because it encourages them to always maintain safe, professional, and quality service standards. This at the same time increases public trust in the services provided, thereby strengthening the reputation and bargaining power of workers in the digital work ecosystem. However, this law also creates a dual responsibility for workers, namely ensuring that the services they provide do not cause harm to consumers; c) In addition, there are a number of other regulations that also provide protection for gig economy workers in Indonesia. One of them is the "Decree of the Minister of Transportation Number KP 667 of 2022 concerning Guidelines for the Calculation of the Cost of Using Motorcycles Used for the Benefit of the Community (Decision of the Minister of Transportation KP 667/2022)" which regulates guidelines for calculating the cost of using application-based motorcycle services for the benefit of the community. This regulation aims to ensure clarity regarding the fare structure, so that it can provide income certainty for gig workers in the online transportation sector.²⁵

It can be said that the current regulations have not been able to provide adequate legal protection for gig workers, so their position is still lagging behind conventional workers. The Employment Law only recognizes formal employment relationships based on employment agreements, wages, and work orders. As a result, gig workers are categorized as independent contractors because they do not have a direct working relationship with digital platforms, so they are not covered by the definition of "worker" under the law. This condition prevents them from obtaining basic rights, such as employment social security, severance pay, regulation of working hours, leave rights, and protection from termination of employment.

Meanwhile, the Consumer Protection Law focuses more on consumer rights from harmful business practices, not on the position or protection of gig workers. In this framework, gig workers are only seen as part of the service chain, whereas platforms are more placed as service providers for consumers. Thus, this regulation does not regulate the rights of gig workers, such as the openness of algorithms, the assessment system, or fairness in wage distribution. The Ministry of Transportation KP 667/2022 provides rules related to the mechanism of online motorcycle taxi fares, both upper and lower limits, which aims to protect drivers from harmful tariff practices. However, this protection is still limited to the economic aspect in the form of tariff certainty, without touching more comprehensive protections such as social security, employment rights, and the legal status of gig workers themselves.

In fact, social security is a fundamental right guaranteed by the constitution. "Article 28H paragraph (3) and Article 34 paragraph (2) of the 1945 Constitution (1945 Constitution)" affirm the state's responsibility in ensuring welfare and social protection for all citizens. The

²⁵ Fadhlulloh, Azhari, and Rizka, "Perbandingan Kedudukan Hukum Pekerja Gig Economy Di Indonesia, Belanda, Dan Inggris; Comparison of the Legal Position of Gig Economy Workers in Indonesia, the Netherlands, and the UK."

lack of legal protection for gig workers has implications for economic uncertainty, especially related to health insurance, employment protection, and the work risks they face. Therefore, more comprehensive policy reforms are needed so that gig workers have equal rights and protections with other workers, without eliminating the flexibility that is the main hallmark of this work model.

Malaysia

Gig economy refers to work done through digital platforms. This concept has various other terms, such as sharing economy, collaborative economy, digital economy, crowd economy, and peer economy.²⁶ In general, the gig economy is described as a platform-based work system that connects workers with platform owners for mutual benefit.²⁷ Gig workers are categorized as part of the informal sector because they work freelance without a fixed work tie. These informal jobs include odd jobs that are generally facilitated through digital workforce platforms. The main characteristic of this kind of work is the flexibility with temporary and short-term work arrangements between the individual and the organization. In general, there are two main categories in digital workforce platforms, namely online web-based platforms and location-based platforms.²⁸

Contrary to popular belief, the informal employment rate in Malaysia has actually decreased over time. However, the number of freelancers, especially location-based ones, has increased. An analysis of data from the Household Income Survey (HIS) shows that the informal employment rate in Malaysia declined between 2009 and 2022. On the other hand, data from the Malaysia Digital Economy Corporation (MDEC) revealed that between 2016 and 2021, there was an increase in the number of digital workforce platforms registered with MDEC, along with an increase in the number of active freelancers. This growth mainly occurs in location-based jobs, which are types of jobs that are supported by digital technology, such as applications, but still require a physical presence, such as online transportation services, freight delivery, and household services.²⁹

Freelancers or workers in the gig economy are individuals who do not have a standard employment relationship, which is usually characterized by a full-time, long-term job with a single employer. This conventional work model is the basis for various social protection policies, including social insurance related to pensions, disability, and unemployment.³⁰ Gig workers are categorized as non-standard workers, which includes part-time workers, freelancers, independent contractors, as well as project-based workers.³¹ However, gig

²⁶ Mokter Hossain et al., "Emerging Technologies in Sharing Economy: A Review and Research Agenda," *Technological Forecasting and Social Change* 218, no. May (2025): 1–18, <https://doi.org/10.1016/j.techfore.2025.124218>; Henriko Tobing, "The Gig Economy Dilemma: Exploring Alternatives to Create Decent Work for Online Motorcycle Taxi Drivers in Indonesia," *Jurnal Ketenagakerjaan* 19, no. 2 (2024): 168–83, <https://doi.org/10.47198/jnaker.v19i2.340>.

²⁷ Zhi Ming Tan et al., "The Ethical Debate about the Gig Economy: A Review and Critical Analysis," *Technology in Society* 65, no. 2 (2021): 1–28, <https://doi.org/10.1016/j.techsoc.2021.101594>.

²⁸ ILO, *World Employment and Social Outlook: The Role of Digital Labour Platforms in Transforming the World of Work* (Geneva: International Labour Office, 2021), https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@dgreports/@dcomm/@publ/documents/publication/wcms_771749.pdf.

²⁹ Yashodhan Ghorpade et al., "Informal Employment in Malaysia: Trends, Challenges and Opportunities for Reform," *World Bank* (Washington DC, 2024), <https://doi.org/10.1596/dspace/60475>.

³⁰ World Bank, "World Development Report: The Changing Nature of Work," *World Bank* (Washington DC, 2019), <https://doi.org/10.1596/978-1-4648-1328-3>.

³¹ Si Qiao, Guan Huang, and Anthony Gar On Yeh, "Who Are the Gig Workers? Evidence from Mapping the Residential Locations of Ride-Hailing Drivers by a Big Data Approach," *Cities* 132, no. 2 (2023): 1–29, <https://doi.org/10.1016/j.cities.2022.104112>; Bronson Mutanda and Bomi Cyril Nomlala, "Examining Social Insurance Perceptions and Attitudes among Zimbabwean Informal Sector Workers: A Study on Providing Social Protection to the Disenfranchised," *TIJAB (The International Journal of Applied Business)* 8, no. 2 (2024): 149–63, <https://doi.org/10.20473/tijab.v8.i2.2024.55254>; Haoxiang Zhang, "Evolution and Innovation of Social Insurance Policies for New Forms

workers are not included in the definition of “worker” as stipulated in the Employment Act 1955,³² and until now there is no legal provision that specifically regulates the status of freelancers in the Employment Law. As a result, they still face various challenges related to legal protection and social welfare.³³

In general, gig workers are classified as independent contractors, so they do not get the same rights as permanent workers under existing labor.³⁴ However, the Malaysian government has begun to take steps to provide more protection for workers in the sector. Some of the relevant policies include: a) The Employment Amendment Act 2022 (EAA 2022) Section 101c, which came into effect on September 1, 2022, states that the employee's status does not always have to be based on a written employment contract. Provided that a person performs work under the control or direction of another party, his working hours are determined by another person, there is a provision of tools, materials, or equipment for work, the tasks performed are an integral part of the other party's business, his work is solely for the benefit of that party, or if he receives periodic payments as his main source of income. This provision implies that the employment status of freelancers is placed as an employee as stipulated in the Employment Act 1955 (EA 1955);³⁵ b) The Social Security Organisation (SOC SO) Self-Employment Social Security Scheme (SESSS), allows gig workers, such as e-hailing and food delivery drivers, to obtain protection against occupational accidents, including occupational diseases and accidents during work-related activities, temporary disability allowance and permanent disability allowance; c) The Employees Provident Fund (EPF) i-Saraan, is a voluntary retirement savings program designed specifically for gig workers. The program allows workers to set aside a portion of their income independently, so that they can build a retirement fund as financial security in the future. By its voluntary nature, the i-Saraan EPF provides flexibility for gig workers who do not get automatic contributions through the conventional social security system, while supporting their financial stability in the long term.

If we look closely, although gig workers are not explicitly recognized in EA 1955, their existence has been indirectly recognized through EAA 2022. In Malaysian employment law, employment status has an important role in determining legal rights, protections, and obligations that must be fulfilled. If an employment relationship is classified as an employment contract, then the employer has the authority to regulate its workers and be responsible for them during working hours.³⁶ On the other hand, employment contracts in general law focus on the relationship between employers and employees to distinguish the status of employees from independent workers. The employment contract itself is a legal

of Employment,” *International Journal of Social Sciences and Public Administration* 2, no. 3 (2024): 212-18, <https://doi.org/10.62051/ijsspa.v2n3.29>.

³² Nurhidayah Abdullah, Elya Nabila Abdul Bahri, and Nur Farzana Md Yusof, “Gig Economy Workers: Challenges from Pandemic to Endemic,” in *Post-Pandemic Economic And Social Development Recovery, Challenges and Policy, in Malaysia*, ed. Muzalwana Abdul Talib, Ahmad Farid Osman, and Elya Nabila Abdul Bahri (London: Routledge, 2025), 88-107.

³³ Aldijana Bunjak, Matej Černe, and Aleš Popović, “Absorbed in Technology but Digitally Overloaded: Interplay Effects on Gig Workers’ Burnout and Creativity,” *Information and Management* 58, no. 3 (2021): 1-12, <https://doi.org/10.1016/j.im.2021.103533>.

³⁴ Mohsin Ali et al., “Are Gig Workers Protected? A Possible Solution,” *International Journal of Economics and Finance Studies* 15, no. 3 (2023): 282-302, <https://doi.org/10.34109/ijefs.202315313>; Luyando Martha Katiyatiya and Nombulelelo Lubisi, “The Current Social Protection Discourse, Gig Economy within the Advent of COVID-19: Some Emerging Legal Arguments,” *Labor History* 66, no. 1 (2025): 64-76, <https://doi.org/10.1080/0023656X.2024.2340610>.

³⁵ Nurhidayah Abdullah et al., “Critical Insights into Gig Economy: A Peninsular Malaysia Case Study,” *Jambe Law Journal* 7, no. 2 (2024): 395-427, <https://doi.org/10.22437/jlj.7.2.395-427>.

³⁶ Rafizah Abu Hassan et al., “Amendments to the Employment Act 1955: An Analysis of the Key Changes with Reference to International Labour Standards – A Positive Improvement for Malaysia’s Employment Regime?,” *International Journal of Academic Research in Business and Social Sciences* 13, no. 1 (2023): 154-66, <https://doi.org/10.6007/ijarbs/v13-i1/15568>.

document that is the basis for determining employment status. A legal employment relationship between an employer and an employee, according to common law, is determined based on the terms and conditions that have been agreed upon by both parties.³⁷

Furthermore, service contracts have been described in a variety of ways, but they generally have similarities as voluntary agreements between individuals, whereby an employee accepts employment opportunities and is under the control of the employer in terms of remuneration. On the other hand, a service contract is more like an agency relationship, where individuals who work under this contract are not considered employees.³⁸ Under EA 1955, freelancers are categorized as individuals who work independently or as independent contractors. In contrast to employment contracts, freelancers are hired under employment agreements that require them to complete certain tasks. They receive instructions on what to do, but not on how to carry it out, so they still have freedom from the direct control of the employer.³⁹

The difference in interpreting the legal status of “employee” or “worker” according to EA 1955 and EAA 2022 causes ambiguity in many related aspects. This has an impact on the legal protections provided, workers' rights, and employers' obligations to gig workers. This confusion also affects the implementation of labor policies, including access to social security, wage protection, and the right to decent working conditions. In addition, this legal uncertainty can make it difficult for gig workers to fight for their rights, given that their status is not explicitly recognized in existing regulations.

In the context of the gig economy, establishing the status of workers as freelancers without conducting an in-depth analysis is an unfair and irrational approach. Gig workers should not automatically be classified as independent contractors just because they have flexible hours or are considered to have their own business. Such an approach risks absolving platform companies of their responsibility for the welfare of gig workers, which in fact contributes greatly to the business continuity of the platform. In this case, clearer and more inclusive regulations are important to determine the actual working relationship between gig workers and platforms, as well as ensure that their rights and social protections are met proportionately.⁴⁰ In addition, several government initiatives such as SESSS and EPF i-Saraan are considered less effective because they are voluntary. This means that freelancers have the freedom not to participate in the scheme, so social protection for them is not guaranteed in its entirety.⁴¹ Furthermore, the gig economy encompasses a wide range of sectors with different characteristics, which leads to difficulties in the implementation of uniform regulations. This disparity also has an impact on the fragmentation of authority among government agencies responsible for enforcing the law for gig workers, thus creating challenges in the supervision and implementation of protection policies for them. Researchers argue that a more comprehensive and systematic approach is needed to ensure that gig workers get adequate legal protection as well as social security.

³⁷ Nguyen Le Thu, “Legal Considerations for Determination of Employment Relation and Employment Contract,” *VNU Journal of Science: Legal Studies* 37, no. 2 (2021): 42–48, <https://doi.org/10.25073/2588-1167/vnuls.4346>.

³⁸ Abdullah et al., “Critical Insights into Gig Economy: A Peninsular Malaysia Case Study.”

³⁹ Nurfarahin Harun, Noraliza Mohamad Ali, and Nur Layali Mohd Ali Khan, “An Experimental Measure of Malaysia’s Gig Workers Using Labour Force Survey,” *Statistical Journal of the IAOS* 36, no. 4 (2020): 969–77, <https://doi.org/10.3233/SJI-200749>.

⁴⁰ Maudy Stevania and Siti Hajati Hoesin, “Analisis Kepastian Hukum Jaminan Sosial Ketenagakerjaan Bagi Gig Worker Pada Era Gig Economy di Indonesia,” *Jurnal Ilmiah Penegakan Hukum* 11, no. 2 (2024): 268–77, <https://doi.org/10.31289/jiph.v11i2.11968>.

⁴¹ Khairunnisa Abd Samad et al., “Is the Well-Being of Gig Workers in Malaysia Better? The Reality of Pain and Gain,” *International Review of Applied Economics* 37, no. 1 (2023): 1–14, <https://doi.org/10.1080/02692171.2023.2240243>.

Singapore

In the past decade, the gig economy in Singapore has experienced rapid growth along with technological advancements. Platforms such as Grab and Deliveroo have opened up opportunities for individuals who want flexibility in their work. By 2023, the number of platform-based workers in Singapore is expected to reach more than 70,500 people, or about three percent of the total workforce. Of this figure, as many as 33,600 people work as ride-hailing drivers, 22,200 are taxi drivers, and another 14,700 work in the delivery sector.⁴² Despite offering flexibility, gig workers in Singapore still face challenges, such as a lack of equal legal protections for formal workers, income uncertainty, and limited access to social security and health benefits. The Singapore government has taken steps to address this problem by introducing more inclusive regulations to improve the welfare of gig workers without sacrificing the work flexibility that is the main attraction of the sector.

One of the concrete actions taken in 2023 is that the Ministry of Manpower (MOM) of Singapore announced the establishment of the Workers' Occupational Injury Compensation (PWIN) Implementation Network Platform. This initiative aims to design policies and operational mechanisms to implement a comprehensive occupational injury compensation system for platform workers. PWIN involves collaboration between various stakeholders, including platform companies, insurance providers, as well as tripartite partners to ensure better protection for gig workers. A total of thirteen platform companies have been registered as participants in this program, which covers various sectors, namely: (i) Ride-Hailing: Grab, Gojek, Tada, and Ryde; (ii) Taxi Operator: ComfortDelGro, which also manages the Zig ride-hailing app; (iii) Food Delivery Services: Deliveroo and Foodpanda; and (iv) E-Commerce and Package Delivery: Amazon, GoGoX, Lalamove, Pickupp, uParcel, and Teleport, which are logistics units of AirAsia.⁴³

Although PWIN has been formed to compensate platform workers who suffer from work accidents, the status of gig workers as independent contractors remains a challenge in terms of social protection. They are not eligible to receive contributions from the Central Provident Fund (CPF), which is a mandatory savings system in Singapore for retirement, housing and healthcare purposes. As a result, many gig workers do not have enough savings to buy a home or prepare for a retirement fund, which could have an impact on their future well-being.⁴⁴ In addition, the absence of long-term protections such as health insurance and retirement benefits further exacerbates the financial uncertainty they face. To accommodate this problem, the government introduced the Platform Workers Law in 2024, which aims to increase protections for gig workers without neglecting economic sustainability in the platform-based work sector.

Singapore is indeed one of the countries in Southeast Asia that is quite advanced in accommodating gig economy workers with its various proactive policies. Even though the Employment Act does not explicitly cover gig workers, there are initiatives to provide more protection for digital platform workers. Then there is also the Work Injury Compensation Act (WICA) policy which allows certain gig workers to get compensation in case of work

⁴² Kok Yufeng, "What You Need to Know about the New Platform Workers Bill," *The Straits Times*, September 10, 2024, <https://www.straitstimes.com/singapore/politics/what-you-need-to-know-about-the-new-platform-workers-bill>.

⁴³ Ministry of Manpower, "Formation of Platform Workers Work Injury Compensation Implementation Network," Ministry of Manpower, 2023, <https://www.mom.gov.sg/newsroom/press-releases/2023/0203-formation-of-pwin>.

⁴⁴ Central Provident Fund, "Saving as a Platform Worker with CPF Contributions," Central Provident Fund Board, 2024, <https://www.cpf.gov.sg/member/growing-your-savings/cpf-contributions/saving-as-a-platform-worker>.

accidents. In addition, the government has also launched the Contributory Medisave Scheme (CMS), which requires digital platforms to contribute to the health fund of gig workers.

As a further step, Singapore has also established the Tripartite Workgroup on Platform Workers, which aims to review and develop policies that can improve protection for digital platform workers, especially in terms of social benefits, employment protection, and fairness in employment relations.⁴⁵ This initiative reflects the country's commitment to develop a gig economy ecosystem that is not only innovative but also sustainable and fair for workers. Through collaboration between the government, workers' representatives, and platform companies, it is hoped that the policies designed will be able to overcome uncertainty and improve the welfare of workers, while ensuring that the growth of the digital economy continues to run in harmony and in line with the principles of social justice.

The most significant gap in legal protection in the three countries shows significant variations. In Indonesia, the biggest gap lies in the legal status of gig workers that are not recognized within the framework of the Labor Law. They are positioned only as partners or independent contractors so that they do not have access to basic employment rights, such as social security, protection of working hours, leave rights, and protection from termination of employment. Existing regulations, such as the Ministry of Transportation related to online motorcycle taxi fares, only focus on economic aspects in the form of tariff certainty, without providing social protection or more comprehensive legal guarantees.

In contrast, Malaysia has implemented social protection schemes such as SESSS and EPF i-Saraan. However, its voluntary nature makes the protection only applicable to workers who register and pay contributions independently, so its coverage is limited and not comprehensive, especially for workers with low or unstable incomes. Meanwhile, Singapore has shown a more proactive approach through policies such as WICA, CMS, as well as the recommendations of the Tripartite Workgroup on Platform Workers that provide a clearer foundation for protection for platform workers. However, gaps remain in terms of balancing work flexibility with long-term social protection, for example related to pension security, unemployment protection, and the sustainability of gig workers' income.

B. Ideal Legal Protection Model for Gig Economy Workers

The legal protection model implemented in various Southeast Asian countries has a significant impact on the welfare and safety of gig economy workers. Researchers argue that the ideal legal protection model for gig economy workers should take into account the flexibility that is the main characteristic of this job, but also provide adequate protection for workers' welfare, safety, and basic rights.⁴⁶ Here are the elements that should be present in an ideal legal protection model for gig economy workers: 1) Classification and Recognition of Worker Status Must Be Clear: To provide effective protection, it is important that there is clarity regarding the status of gig workers. An ideal legal model should recognize gig workers as part of the workforce who are entitled to basic protections, even if they are independent contractors. The state could classify gig workers as a new category in labor laws, which give them basic rights without eliminating the flexibility that characterizes gig

⁴⁵ Tripartite Workgroup, "Enhancing Representation for Platform Workers," 2023, <https://www.mom.gov.sg/-/media/mom/documents/employment-practices/platform-workers/twg-on-representation-for-platform-workers-report.pdf>.

⁴⁶ Mulyadi, Sutarman Yodo, and Sulbana, "Legal Protection for Female Workers in Indonesia (Study on the Rights of Female Workers in Tolitoli)," *Fiat Justisia: Jurnal Ilmu Hukum* 18, no. 4 (2024): 407–24, <https://doi.org/10.25041/fiatjustisia.v18no4.3598>.

work; 2) Flexibility in Work: While it provides adequate legal protection, it must also maintain the flexibility that is the main attraction of gig work. Gig workers should be able to choose the time and type of work they want to do without any obligation to follow fixed working hours; 3) Social Security and Health: Gig workers must have access to adequate social security, including protection against work accidents, health insurance, and retirement benefits. The state could require platforms to contribute to social security funds, or offer affordable self-contribution systems for gig workers, such as pension savings or platform-based health insurance systems. This will reduce income uncertainty and help gig workers plan for the future; 4) Minimum Wage and Protection Against Termination of Employment. While gig workers are typically paid based on projects or tasks, it's important to ensure that they are not exploited. Gig workers must be guaranteed the right to a reasonable minimum wage based on working hours or applicable standards. In addition, protections against unfair termination need to be put in place, including a mechanism to file an objection if a worker feels that his or her contract has been arbitrarily terminated by the platform; 5) Legal Protection and Organizational Skills: Gig workers must have the right to form a union or organization to fight for their interests. In some countries, gig workers are not given the right to organize collectively, which can limit their bargaining power in setting rates or working conditions. Providing space for gig workers to organize will strengthen their bargaining position in negotiations with the platform; 6) Compensation and Protection Against Work Accidents. An ideal legal protection model should ensure that gig workers, such as drivers or couriers, get proper compensation in the event of a work accident. The state and platform companies should collaborate to create compensation mechanisms that are fair and accessible to gig workers, including access to work accident insurance or health compensation; 7) Supervision and Law Enforcement: To ensure that this protection runs properly, there must be an effective surveillance system. The government must provide institutions or mechanisms to monitor and enforce employment policies⁴⁷ for gig workers. In addition, gig workers should have easy access to file complaints regarding violations of their rights or injustices that occur in their work.

The ideal legal protection model for gig workers should combine aspects of flexibility and freedom of work with the provision of adequate social safety nets. This is so that workers are not trapped in economic and social uncertainties that can hinder the sustainability of their careers. With a firm and clear policy regarding the rights of gig workers, they will feel safer and more valued, so that they are able to contribute optimally. On the other hand, the existence of comprehensive regulations will allow the platform to continue to operate efficiently and achieve long-term success, while maintaining a balance between innovation and workforce protection. This step not only benefits workers, but also supports the inclusive and sustainable growth of the digital economy.

CONCLUSION

In general, in all three countries, gig workers are still treated as independent contractors, making it difficult for them to obtain equal protection from formal workers, especially with regard to social security and labor rights. While Indonesia, Malaysia, and Singapore have taken certain steps to respond to these challenges, the protection gap remains real and urgent to address. An ideal legal protection model for gig workers should at least provide

⁴⁷ Helmi, Hafrida, and Retno Kusniati, "Health Workers' Legal Protection Policy to the Coronavirus Disease 19 (Covid-19) Containment Measures," *Fiat Justisia: Jurnal Ilmu Hukum* 15, no. 1 (2021): 51-74, <https://doi.org/10.25041/fiatjustisia.v15no1.2101>.

certainty regarding the status and classification of workers, maintain work flexibility, ensure access to social security and health, guarantee minimum wages and protection from termination of employment, recognize the right to organize, provide compensation and protection for work accidents, and be supported by effective supervision and enforcement mechanisms. By combining the work flexibility that is the hallmark of the gig economy with an adequate social safety net, a fairer balance can be created. Practically, for policymakers, regulations are needed that are more responsive to the development of the gig economy, including policies on the integration of gig workers into the social security system, clarity and openness of digital contracts, and protection against the risk of work accidents. Meanwhile, for digital platforms, there needs to be a greater commitment to ensuring the welfare of partners, for example through shared contributions to social security, the implementation of fair labor standards, and transparent protection mechanisms.

REFERENCES

- Abdul Rasheed, Sumaiya, Uzma Sati, and Farheen Bano. "Gig Economy Work and Workers Life Balance Issues A Phenomenological Approach." *POMS: Periodicals of Management Studies* 2, no. 2 (2022): 82–98. <https://pmanagementstudies.com/poms/index.php/poms/article/view/20>.
- Abdullah, Nurhidayah, Elya Nabila Abdul Bahri, and Nur Farzana Md Yusof. "Gig Economy Workers: Challenges from Pandemic to Endemic." In *Post-Pandemic Economic And Social Development Recovery, Challenges and Policy, in Malaysia*, edited by Muzalwana Abdul Talib, Ahmad Farid Osman, and Elya Nabila Abdul Bahri, 88–107. London: Routledge, 2025.
- Abdullah, Nurhidayah, Maria Mohd Ismail, Muhammad Syariqul Huzni Murad, Kamaruzaman Jusoff, Faizal Kurniawan, and Mohammed Salah. "Critical Insights into Gig Economy: A Peninsular Malaysia Case Study." *Jambe Law Journal* 7, no. 2 (2024): 395–427. <https://doi.org/10.22437/jlj.7.2.395-427>.
- Abu Hassan, Rafizah, Hartini Saripan, Nurus Sakinatul Fikriah Mohd Shith Putera, Sarah Munirah Abdullah, and Ani Munirah Mohamad. "Amendments to the Employment Act 1955: An Analysis of the Key Changes with Reference to International Labour Standards – A Positive Improvement for Malaysia's Employment Regime?" *International Journal of Academic Research in Business and Social Sciences* 13, no. 1 (2023): 154–66. <https://doi.org/10.6007/ijarbss/v13-i1/15568>.
- Alauddin, Farah Diba Almayanda, Aini Aman, Mohd Fahmi Ghazali, and Sity Daud. "The Influence of Digital Platforms on Gig Workers: A Systematic Literature Review." *Heliyon* 11, no. 1 (2025): 1–14. <https://doi.org/10.1016/j.heliyon.2024.e41491>.
- Ali, Mohsin, Hafezali Iqbal Hussain, Qasim Ali Nisar, Yen Wen Chang, Baharom Abdul Hamid, and Ziyaad Mahomed. "Are Gig Workers Protected? A Possible Solution." *International Journal of Economics and Finance Studies* 15, no. 3 (2023): 282–302. <https://doi.org/10.34109/ijefs.202315313>.
- Altay, Nezih, and Arunachalam Narayanan. "Forecasting in Humanitarian Operations: Literature Review and Research Needs." *International Journal of Forecasting* 38, no. 3 (2022): 1234–44. <https://doi.org/10.1016/j.ijforecast.2020.08.001>.
- Azzahra, Qonita. "Pekerja Informal Indonesia Per Agustus 2024 Capai 83,8 Juta Jiwa."

Tirto.Id, November 5, 2024. <https://tirto.id/pekerja-informal-indonesia-per-agustus-2024-capai-838-juta-jiwa-g5rb>.

- Bunjak, Aldijana, Matej Černe, and Aleš Popovič. "Absorbed in Technology but Digitally Overloaded: Interplay Effects on Gig Workers' Burnout and Creativity." *Information and Management* 58, no. 3 (2021): 1–12. <https://doi.org/10.1016/j.im.2021.103533>.
- Central Provident Fund. "Saving as a Platform Worker with CPF Contributions." Central Provident Fund Board, 2024. <https://www.cpf.gov.sg/member/growing-your-savings/cpf-contributions/saving-as-a-platform-worker>.
- CEO Suite. "Meningkatnya Jumlah Tenaga Kerja Freelance." CEOSuite, 2021. <https://ceosuite.co.id/meningkatnya-jumlah-tenaga-kerja-freelance/>.
- Clark, Ian, Chris Lawton, Clifford Stevenson, Tom Vickers, and David Dahill. "A 'Place-Based' Approach to Work and Employment: The End of Reciprocity for Ordinary Working Families and 'Giggers' in a Place." *Economic and Industrial Democracy* 43, no. 2 (2022): 634–57. <https://doi.org/10.1177/0143831X20946374>.
- David Tan. "A Brave New Frontier in the Dichotomous Indonesian Labor Law: Gig Economy, Platform Paradox and Workers Without Employers." *Mimbar Hukum* 33, no. 1 (2021): 1–38. <https://doi.org/10.22146/mh.v33i1.1956>.
- Direktorat Statistik Kependudukan dan Ketenagakerjaan. "Keadaan Pekerja di Indonesia Agustus 2021," 2024.
- Fadhlulloh, Qolbi Hanif, Aidul Fitriciada Azhari, and Rizka. "Perbandingan Kedudukan Hukum Pekerja Gig Economy di Indonesia, Belanda, dan Inggris; Comparison of the Legal Position of Gig Economy Workers in Indonesia, the Netherlands, and the UK." *Fundamental: Jurnal Ilmiah Hukum* 12, no. 3 (2023): 307–22. <https://doi.org/10.34304/jf.v12i2.165>.
- George, A Shaji. "Gig Economy 2.0: Examining How Smart Technologies Could Revolutionize On-Demand Work." *Partners Universal Innovative Research Publication (PUIRP)* 2, no. 4 (2024): 29–49. <https://doi.org/10.5281/zenodo.13334926>.
- Ghorpade, Yashodhan, Amanina Abdur Rahman, Alyssa Farha Jasmin, Natalie Fang Ling Cheng, and Soonhwa Yi. "Informal Employment in Malaysia: Trends, Challenges and Opportunities for Reform." *World Bank*. Washington DC, 2024. <https://doi.org/10.1596/dspace/60475>.
- Harun, Nurfarahin, Noraliza Mohamad Ali, and Nur Layali Mohd Ali Khan. "An Experimental Measure of Malaysia's Gig Workers Using Labour Force Survey." *Statistical Journal of the IAOS* 36, no. 4 (2020): 969–77. <https://doi.org/10.3233/SJI-200749>.
- Helmi, Hafrida, and Retno Kusniati. "Health Workers' Legal Protection Policy to the Coronavirus Disease 19 (Covid-19) Containment Measures." *Fiat Justisia: Jurnal Ilmu Hukum* 15, no. 1 (2021): 51–74. <https://doi.org/10.25041/fiatjustisia.v15no1.2101>.
- Hossain, Mokter, Farhan Ahmad, Majid Aleem, Anu Bask, and Mervi Rajahonka. "Emerging Technologies in Sharing Economy: A Review and Research Agenda." *Technological Forecasting and Social Change* 218, no. May (2025): 1–18. <https://doi.org/10.1016/j.techfore.2025.124218>.

- I., Soliyev I., and Ganiev B. B. "Key Factors Influencing Economic Development." *European Journal of Research Development and Sustainability* 2, no. 3 (2021): 12–16. <https://scholarzest.com/index.php/ejrd/article/view/306>.
- ILO. *World Employment and Social Outlook: The Role of Digital Labour Platforms in Transforming the World of Work*. Geneva: International Labour Office, 2021. https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@dgreports/@dcomm/@publ/documents/publication/wcms_771749.pdf.
- James, Al. "The Gig Economy: A Critical Introduction." *Taylor & Francis Journals* 97, no. 1 (2021): 113–14. <https://doi.org/10.1080/00130095.2020.1831908>.
- Johnston, Hannah, and Chris Land-Kazlauskas. "Organizing On-Demand Representation, Voice, and Collective Bargaining in the Gig Economy." ILO Working Papers, 2018.
- Kamarudin, Ode. "Ekonomi Gig: Peluang Dan Tantangan Di Era Kerja Digital." *Currency: Jurnal Keuangan Dan Perbankan Syariah* 03, no. 1 (2024): 362–73. <https://doi.org/10.32806/ccy.v3i1.321>.
- Katiyatiya, Luyando Martha, and Nombulelelo Lubisi. "The Current Social Protection Discourse, Gig Economy within the Advent of COVID-19: Some Emerging Legal Arguments." *Labor History* 66, no. 1 (2025): 64–76. <https://doi.org/10.1080/0023656X.2024.2340610>.
- Latri, Akhdan Adityo, Rajwa Khaicirinu Riyanto, Muhammad Bintang Firdaus, and Gaung Syah Arjuna. "Hak Pekerja di Era Gig Economy: Perlindungan Hukum Bagi Pekerja Lepas Dan Kontrak." *Media Hukum Indonesia (MHI)* 2, no. 2 (2024): 375–83. <https://doi.org/10.5281/zenodo.11770886>.
- Mimi, Afsana, and Lisa Mani. "Gravitating the Gig Economy for Reshaping the Careers Using Technological Platform in the Digital Age in an Emerging Economy." *Journal of Information Systems and Informatics* 6, no. 4 (2024): 3129–61. <https://doi.org/10.51519/journalisi.v6i4.966>.
- Ministry of Manpower. "Formation of Platform Workers Work Injury Compensation Implementation Network." Ministry of Manpower, 2023. <https://www.mom.gov.sg/newsroom/press-releases/2023/0203-formation-of-pwin>.
- Mulyadi, Sutarman Yodo, and Sulbana. "Legal Protection for Female Workers in Indonesia (Study on the Rights of Female Workers in Tolitoli)." *Fiat Justisia: Jurnal Ilmu Hukum* 18, no. 4 (2024): 407–24. <https://doi.org/10.25041/fiatjustisia.v18no4.3598>.
- Murwani, Suli. "Gig Economy, Antara Solusi Resesi Dan Potret Pekerja Masa Depan." *Tirto.Id*, 2023. <https://tirto.id/gig-economy-antara-solusi-resesi-dan-potret-pekerja-masa-depan-gFAB>.
- Mutanda, Bronson, and Bomi Cyril Nomlala. "Examining Social Insurance Perceptions and Attitudes among Zimbabwean Informal Sector Workers: A Study on Providing Social Protection to the Disenfranchised." *TIJAB (The International Journal of Applied Business)* 8, no. 2 (2024): 149–63. <https://doi.org/10.20473/tijab.v8.i2.2024.55254>.
- Pratomo, Devanto Shasta, Putu Mahardika Adi Saputra, Dien Amalina Nur Asrofi, Christiayu Natalia, and Salma Labita Zenritami. "Gig Workers In The Digital Era In

- Indonesia: Development, Vulnerability and Welfare." In *Proceedings of the 2023 Brawijaya International Conference (BIC 2023), Advances in Economics, Business and Management Research*, 47–60. Atlantis Press, 2024. https://doi.org/10.2991/978-94-6463-525-6_6.
- Putra, Rengga Kusuma, Adi Suryo Ramadhan, Greget Widhiati, Tri Imalia, and Kapsah. "Perlindungan Hukum Bagi Pekerja Gig Economy: Perspektif Hukum Perdata Di Indonesia." *PERKARA: Jurnal Ilmu Hukum Dan Politik* 2, no. 4 (2024): 553–64. <https://doi.org/10.51903/perkara.v2i4.2227>.
- Putra, Tegar Islami, Nurul Fibrianti, and Mohammad Raziq Fakhrrullah. "Basis of Data Protection Officer Appointment: Comparative Study of Indonesia and European Union Regulation." *SASI* 31, no. 1 (2025): 1–15. <https://doi.org/10.47268/sasi.v31i1.2068>.
- Putri, Treviliana Eka, Paska Darmawan, and Richard Heeks. "What Is Fair? The Experience of Indonesian Gig Workers." *Digital Geography and Society* 5, no. 12 (2023): 1–5. <https://doi.org/10.1016/j.diggeo.2023.100072>.
- Qiao, Si, Guan Huang, and Anthony Gar On Yeh. "Who Are the Gig Workers? Evidence from Mapping the Residential Locations of Ride-Hailing Drivers by a Big Data Approach." *Cities* 132, no. 2 (2023): 1–29. <https://doi.org/10.1016/j.cities.2022.104112>.
- Ruyter, Alex de, Martyn Brown, and John Burgess. "Gig Work and the Fourth Industrial Revolution: Conceptual and Regulatory Challenges." *Journal of International Affairs* 72, no. 1 (2019): 37–50.
- Samad, Khairunnisa Abd, Shafinar Ismail, Nur Hayati Abd Rahman, and Najihah Hanisah Marmaya. "Is the Well-Being of Gig Workers in Malaysia Better? The Reality of Pain and Gain." *International Review of Applied Economics* 37, no. 1 (2023): 1–14. <https://doi.org/10.1080/02692171.2023.2240243>.
- Satria, I Gde Sandy. "Perlindungan Hak Pekerja Gig Economy Melalui Perspektif Hukum Ketenagakerjaan." *Nomos: Jurnal Penelitian Ilmu Hukum Jurnal Penelitian Ilmu Hukum* 5, no. 1 (2025): 127–34. <https://doi.org/10.56393/nomos.v5i1.2723>.
- Skare, Marinko, and Domingo Riberio Soriano. "How Globalization Is Changing Digital Technology Adoption: An International Perspective." *Journal of Innovation and Knowledge* 6, no. 4 (2021): 222–33. <https://doi.org/10.1016/j.jik.2021.04.001>.
- Stevania, Maudy, and Siti Hajati Hoesin. "Analisis Kepastian Hukum Jaminan Sosial Ketenagakerjaan Bagi Gig Worker Pada Era Gig Economy Di Indonesia." *Jurnal Ilmiah Penegakan Hukum* 11, no. 2 (2024): 268–77. <https://doi.org/10.31289/jiph.v11i2.11968>.
- Tan, Zhi Ming, Nikita Aggarwal, Josh Cows, Jessica Morley, Mariarosaria Taddeo, and Luciano Floridi. "The Ethical Debate about the Gig Economy: A Review and Critical Analysis." *Technology in Society* 65, no. 2 (2021): 1–28. <https://doi.org/10.1016/j.techsoc.2021.101594>.
- Thu, Nguyen Le. "Legal Considerations for Determination of Employment Relation and Employment Contract." *VNU Journal of Science: Legal Studies* 37, no. 2 (2021): 42–48. <https://doi.org/10.25073/2588-1167/vnuls.4346>.
- Tobing, Henriko. "The Gig Economy Dilemma: Exploring Alternatives to Create Decent

- Work for Online Motorcycle Taxi Drivers in Indonesia." *Jurnal Ketenagakerjaan* 19, no. 2 (2024): 168–83. <https://doi.org/10.47198/jnaker.v19i2.340>.
- Tripartite Workgroup. "Enhancing Representation for Platform Workers," 2023. <https://www.mom.gov.sg/-/media/mom/documents/employment-practices/platform-workers/twg-on-representation-for-platform-workers-report.pdf>.
- Wibowo, Richard Jatimulya Alam. "Urgensi Pembaharuan Hukum Ketenagakerjaan Indonesia Untuk Mengakomodasi Perlindungan Hubungan Kemitraan." *Jurnal Ketenagakerjaan* 18, no. 2 (2023): 109–23. <https://doi.org/10.47198/jnaker.v18i2.211>.
- World Bank. "World Development Report: The Changing Nature of Work." *World Bank*. Washington DC, 2019. <https://doi.org/10.1596/978-1-4648-1328-3>.
- Yang, Gongyan, Shujie Yao, and Xinran Dong. "Digital Economy and Wage Gap between High- and Low-Skilled Workers." *Digital Economy and Sustainable Development* 1, no. 1 (2023): 1–14. <https://doi.org/10.1007/s44265-023-00009-y>.
- Yufeng, Kok. "What You Need to Know about the New Platform Workers Bill." *The Straits Times*, September 10, 2024. <https://www.straitstimes.com/singapore/politics/what-you-need-to-know-about-the-new-platform-workers-bill>.
- Zhang, Haoxiang. "Evolution and Innovation of Social Insurance Policies for New Forms of Employment." *International Journal of Social Sciences and Public Administration* 2, no. 3 (2024): 212–18. <https://doi.org/10.62051/ijsspa.v2n3.29>.
- Zulfani, Anisa. "GIG Economy: Untung Atau Rugi?" KIME FEB UNNES, 2024. <https://sites.unnes.ac.id/kimefe/2024/07/gig-economy-untung-atau-rugi/#:~:text=Mengacu pada data yang diperoleh,juta jiwa pada Februari 2023>.

Conflict of Interest Statement: The author(s) declares that research was conducted in the absence of any commercial or financial relationship that could be construed as a potential conflict of interest.

Copyright: © AUTHOR. This work is licensed under a Creative Commons Attribution-NonCommercial 4.0 International License. (CC-BY NC), which permits unrestricted use, distribution, and reproduction in any medium, provided the original author and source are credited.

SASI is an open access and peer-reviewed journal published by Faculty of Law Universitas Pattimura, Ambon, Indonesia.

