

Protection of the Constitutional Rights of Workers Dismissed for Urgent Reasons According to Government Regulation Number 35 of 2021

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Abstract

This research delves into the alignment of regulations governing the Termination of Employment (PHK) due to grave misconduct, as outlined in Government Regulation No. 35 of 2021, with the principles safeguarding workers' constitutional rights enshrined in the 1945 Constitution (UUD 1945). Employer-initiated unilateral dismissals based on allegations of urgent violations, as specified in Article 52 paragraph (2) of PP 35/2021, pose a significant risk of contravening the tenets of due process and the right to legal safeguards guaranteed under Article 27 paragraph (2) and Article 28D paragraph (1) of the UUD 1945. This inquiry also draws on Constitutional Court Decision No. 012/PUU-I/2003, which underscored the necessity of judicial proceedings in termination cases linked to severe breaches, and Decision No. 91/PUU-XVIII/2020, which highlighted procedural deficiencies within the Job Creation Law. Employing a normative legal research methodology with an analytical lens, this study emphasizes legislative analysis and case law examination. Originality of this study lies in its finding that the application of unilateral termination of employment (PHK) without a court process can lead to injustice and harm workers who may lose their jobs without the opportunity to defend themselves. This research concludes that the provisions on urgent layoffs in PP 35/2021 should be reviewed to align with constitutional principles that offer fairer protection for workers. It is recommended that new employment regulations be created with a focus on balancing the protection of workers' rights with the interests of employers.

Keywords: *Termination of Employment, Protection Right Constitutional, Due Process of Law.*



A. INTRODUCTION

Since the promulgation of the 1945 Constitution, the safeguarding of workers' rights has been positioned as a cornerstone of state responsibility. This commitment is articulated in Article 27(2) of the Constitution, which serves as the nation's foundational legal framework, declaring that "every citizen is entitled to employment and a livelihood befitting human dignity". Consequently, ensuring the constitutional rights of workers constitutes a vital pillar in the pursuit of social justice. In this context, the government, as the principal executor of the constitutional mandate, bears the responsibility to fulfill these fundamental rights, enabling Indonesian citizens to access equitable opportunities. This obligation aligns with the overarching aspirations of the Indonesian people, as enshrined in the preamble to the 1945 Constitution: "to advance the general welfare" (Iftitah et al., 2023).

The protection of workers' constitutional rights is one of the issues that has become the focus of attention in the formulation of labour regulations in Indonesia.

The right to work and a decent livelihood has been guaranteed by the 1945 Constitution of the Republic of Indonesia (UUD 1945) through Article 27 paragraph (2). In this case, all forms of regulations governing termination of employment (PHK) must pay attention to constitutional principles that ensuring the rights of workers continues to be a significant concern, with notable scrutiny on Government Regulation No. 35 of 2021, which addresses provisions related to temporary employment contracts, outsourcing practices, work schedules, rest periods, and employment termination (Millinum, 2022).

One of the rules that has caused controversy in Government Regulation No. 35/2021 is Article 52 paragraph (2), which allows employers to lay off workers unilaterally on the grounds of urgent violations. These urgent violations are actions that are considered detrimental to the company, including acts like deception, misappropriation, or theft of the Company's assets or funds, drunkenness, using narcotics, attacking, persecuting, threatening and intimidating co-workers and others, which in Labour Law No. 13 of 2003 are qualified as serious misconduct. The problem is that the dismissal procedure is carried out without going through a legal process or a proper industrial dispute resolution mechanism, thus potentially violating workers' fundamental constitutional entitlements, specifically the right to legal safeguards and the assurance of an equitable judicial process (Rachman, 2022).

The complexity of this legal issue has deepened following the Constitutional Court's Decision No. 91/PUU-XVIII/2020, which deemed the enactment of the Job Creation Law inconsistent with the 1945 Constitution and rendered it non-binding unless rectified within two years. To address this, the government introduced a Government Regulation in Lieu of Law (Perppu) on Job Creation, later formalized as Law No. 6 of 2023. Despite this development, Government Regulation No. 35/2021, which serves as an implementing rule for the Job Creation Law, remains active, thereby allowing the continued application of contentious provisions on urgent layoffs in labor practices.

From the standpoint of constitutional law, the rules on unilateral termination due to alleged urgent violations under Government Regulation No. 35/2021 raise concerns about violating the constitutional guarantee of due process. These provisions undermine the presumption of innocence, a fundamental principle ensuring that individuals are not judged guilty without a definitive verdict from a court with final legal authority. This principle is clearly outlined in Article 28D paragraph (1) of the 1945 Constitution, which guarantees every individual the right to legal recognition, protection, and fair treatment under the law (Paisal, 2020).

In its Decision No. 012/PUU-I/2003, the Constitutional Court emphasized that terminations based on allegations of gross misconduct must undergo a judicial process. The court reasoned that dismissals linked to criminal acts, including those classified as urgent violations, require a prior determination of the worker's guilt or innocence through a criminal court proceeding. In this context, the provisions in Government Regulation No. 35/2021 that allow unilateral dismissal without a court

process contradict the Constitutional Court's decision and violate workers' constitutional rights (Azhar, 2021).

The previous Labour Law, Law No. 13 Year 2003, has provided the basis for a process of industrial relations dispute resolution involving bipartite mechanisms, mediation, and industrial relations courts. These procedures are designed to ensure that any disputes between workers and employers, including in the case of layoffs, are resolved fairly and through clear legal mechanisms, however the provisions in PP 35/2021 that allow unilateral layoffs without due process, essentially ignores the dispute resolution mechanisms that have been regulated in the Labour Law and this is very detrimental to employees dismissed on urgent grounds may face significant legal uncertainty, a situation that starkly contradicts the principles of presumption of innocence and the right to equal legal protection (Arsalan & Putri, 2020).

Another issue that arises is the matter of compensation for employees dismissed for urgent reasons. Under PP 35/2021, compensation is limited to the employee's unused leave balance, return travel expenses, and severance pay, with the amounts being determined by the employer. In contrast to layoffs due to gross misconduct regulated in the Labour Law, this law provides rights to severance pay, long service awards, and compensation pay. This difference shows an injustice in the treatment of workers terminated for urgent reasons, who should receive the same rights as workers terminated for gross misconduct (Fernando, 2022).

Referring to the issues outlined in the background above, the author identifies the following questions: 1. In what way does the regulation on layoffs for urgent violations in PP 35 of 2021 align with the principles of safeguarding workers' constitutional rights as set forth in the 1945 Constitution? 2. Does the practice of unilateral termination, as outlined in Article 52 paragraph (2) of PP 35 of 2021, which bypasses the judicial process, conform to the principle of due process of law and the right to justice as guaranteed by the 1945 Constitution?

B. METHOD

This study employs a normative legal research method, which focuses on examining laws, regulations, legal doctrines, and court rulings to analyze and understand the legal issues presented. In this context, normative legal research is carried out by exploring legal norms from various written legal sources, including applicable laws, regulations, and pertinent court decisions, to comprehend the protection of the constitutional rights of workers dismissed for urgent reasons.

The research adopts a legislative, analytical, and conceptual approach, along with a case study. The legislative approach involves reviewing laws and regulations relevant to the protection of workers' rights, particularly those concerning termination of employment (PHK) for urgent reasons. The analysis will concentrate on Government Regulation No. 35 of 2021 (PP 35/2021), which implements Law No. 11 of 2020 on Job Creation, as well as Law No. 13 of 2003 on Labour. Additionally, the provisions of the 1945 Constitution, particularly Articles 27 paragraph (2) and

28D paragraph (1), will be examined for their relevance to the protection of workers' constitutional rights.

For primary legal materials, the researcher applies a case approach, focusing on Constitutional Court decisions related to layoffs, especially those based on urgent reasons. Notable decisions include Constitutional Court Decision No. 012/PUU-I/2003 regarding dismissals for gross misconduct, and Constitutional Court Decision No. 91/PUU-XVIII/2020 regarding the Job Creation Law. Analyzing these decisions is crucial to understanding how the courts interpret and apply principles of worker rights protection. Additionally, secondary legal materials such as legal literature, books, academic journal articles, and writings by legal experts on worker rights protection, layoffs, and labor law are also used to support the research.

C. RESULTS AND DISCUSSION

The Job Creation Law was designed to support the objectives of the Indonesian government by promoting a prosperous, just, and thriving society, rooted in the values of Pancasila and the 1945 Constitution. To realize this, the state must take proactive steps to guarantee citizens' rights to secure and dignified employment. This highlights that a key goal of the Job Creation Law is to establish a just and prosperous society, in harmony with the social justice principles enshrined in Pancasila and the 1945 Constitution. If implemented correctly, this ideally means that labour policies including termination of employment (PHK) should protect workers' rights in a fair and balanced manner, without putting them in a vulnerable or unfair position.

In implementation, layoffs for urgent reasons are often carried out by employers for operational or disciplinary reasons. However, in order to achieve fairness, such layoffs must be equipped with protection mechanisms that ensure workers are treated fairly and humanely. This means that workers are entitled to fair compensation, the opportunity to defend themselves, and legal assistance if needed. The principles in the Job Creation Law must be implemented with due regard to workers' human rights, especially when dealing with decisions that have a direct impact on their livelihoods. If urgent reasons are used as the basis for dismissal, this should not be done arbitrarily or only in favour of the employer. The state is expected to ensure that the regulation remains consistent with the fair protection of workers' rights (Laoly, 20203).

Termination of Employment (PHK) is a scourge for workers/labourers because it concerns the life and livelihood of workers and their families, this is because the existence of PHK means that workers lose their jobs and income. This is especially true if the layoff happens to low-level workers, who are generally very unprepared both economically and mentally. As a result, layoffs become the beginning of suffering for workers and their families (Judge, 2022).

According to the author, for workers, dismissal is a very difficult situation, especially when the dismissal is for urgent reasons or because of serious offences. In this situation, after the dismissal, the worker may find it difficult to get a job

opportunity, because of the crime he is accused of, which will damage the good name of the worker, and this will result in other companies not being willing to employ the worker. Therefore, dismissal should be carried out with full consideration of the fate and rights of the dismissed worker.

Government Regulation No. 35/2021 (PP 35/2021), particularly Article 52 paragraph (2), authorises employers to unilaterally terminate workers on the grounds of 'urgent misconduct,' which generally includes criminal acts or gross misconduct deemed detrimental to the company. While the purpose of this regulation is to protect the interests of employers, its implementation raises serious questions regarding the constitutional principles that guarantee the protection of workers' rights under the 1945 Constitution.

Conformity of Urgent Offence Layoffs with the Principle of Constitutional Rights in the 1945 Constitution

Article 27 paragraph (2) of the 1945 Constitution underscores that every citizen is entitled to a decent job and livelihood, while Article 28D paragraph (1) guarantees the right to fair recognition, protection, and legal certainty for all individuals. In the context of unilateral dismissals as outlined in Government Regulation No. 35 of 2021, these constitutional provisions are essential in ensuring that workers' rights are respected and upheld, the mechanism appears to contradict the principle of due process of law. This principle is an important pillar of procedural justice, which ensures that any action against individual rights including the right to work must be carried out through a fair and transparent legal process (Natural & Wise, 2020).

In addition, dismissals carried out without going through an adequate dispute resolution mechanism or court are considered to violate the principle of justice as stipulated in the 1945 Constitution. Workers accused of gross misconduct, as stipulated in Article 52 paragraph (2), are not given the opportunity to defend themselves before being dismissed, which violates the principle of presumption of innocence. According to Article 28D paragraph (1), every individual has the right to fair legal protection, meaning that this includes the right to be given the opportunity to provide a defence in the dismissal process.

The Constitutional Court in its decision No. 012/PUU-I/2003 emphasised the importance of court procedures in cases of dismissal related to gross misconduct. The Court emphasised that termination for gross misconduct must be handled through a criminal court process first to legally prove the worker's guilt. Dismissal without a clear legal process is contrary to the principle of justice set out by the Court, meaning that employers who dismiss workers unilaterally without a judicial process, this is clearly contrary to the principle emphasised by the Constitutional Court Decision (Nasution, 2023).

The Court affirmed that termination decisions, especially those related to allegations of criminal acts or serious misconduct, must go through legitimate verification in court, not just the unilateral decision of the employer. Giving

employers too much power to unilaterally terminate employment, this potentially violates workers' rights to fair legal protection.

In its Decision No. 91/PUU-XVIII/2020, the Constitutional Court raised concerns about the Job Creation Law, which underpins GR 35/2021, pointing out procedural inconsistencies in its formulation. The Court noted that several provisions, including those related to layoffs, need to be amended to ensure they comply with the 1945 Constitution. Although the Court did not annul the law, this ruling emphasizes the need for clearer regulations regarding unilateral terminations, ensuring they align with constitutional justice principles (Tantri, 2022).

The practice of unilateral termination without judicial proceedings, as outlined in PP 35/2021, contradicts the protection of workers' constitutional rights as envisioned by the Constitutional Court in Decision No. 91/PUU-XVIII/2020. This indicates the need for further revisions to harmonise the provisions on termination of employment with the guarantee of protection of workers' rights mandated by the constitution (Vinita et al., 2023).

The Constitutional Court (MK) ruling on 31 October 2024 in case No. 168/PUU- XXI/2023 changed a number of articles in Law No. 6 of 2023 on Job Creation, which has an impact on aspects of employment. The Constitutional Court partially granted the petition filed by trade unions and labourers. Additionally, the Constitutional Court's ruling touches on layoffs but does not address those related to urgent reasons. As a result, the provisions for dismissals due to urgent violations remain intact, as outlined in Government Regulation No. 35 of 2021, specifically in Article 52 paragraph (2).

The Concept of Due Process of Law

The doctrine of due process of law ensures equitable treatment for every individual within legal proceedings. In the Indonesian context, this principle is safeguarded by Article 28D paragraph (1) of the 1945 Constitution, which asserts that every person is entitled to acknowledgment, protection, and the assurance of just legal measures, along with parity before the law. In the context of labour relations, this principle must be applied to protect workers from arbitrary termination of employment (PHK). This principle also ensures that any decision that impacts workers' rights, such as layoffs, must go through a legal process that is transparent, fair, and provides an opportunity for workers to defend themselves (Sari, 2024).

According to Jimly Asshiddiqie, due process of law is a fundamental component of the democratic rule of law. In his book, he elaborates that this principle goes beyond the mere existence of formal legal procedures; it also guarantees that the law is applied impartially and without bias. For him, due process of law encompasses the essence of justice, which must be safeguarded in all legal proceedings, including court trials and government actions that impact citizens' rights. It also involves the right to be heard, the right to a defense, and the right to a transparent legal process (Qamar, 2022).

In his book *A Theory of Justice*, Rawls emphasises the principle of justice as fairness. 'Due process of law' according to Rawls means that every individual is entitled to fair and transparent legal procedures in a legal system, where equality and fundamental rights are recognised. The above view shows that everyone is entitled to a fair, transparent and non-discriminatory legal process (Gunawan, 2022).

In light of the two perspectives presented above, the implementation of Article 52 paragraph (2) of PP 35/2021 does not entirely align with the principle of due process of law and the right to justice as stipulated in the 1945 Constitution. The process of unilateral dismissal without trial overrides the principles of substantive justice, transparency, and the right of workers to be heard, thus contradicting the constitutional guarantee of fair treatment.

Article 52 paragraph (2) of PP 35 of 2021 authorises employers to conduct unilateral termination in the event of urgent violations. These violations include acts that are considered gross misconduct such as fraud or theft. However, this provision ignores the need for due process before employers make layoff decisions, thus opening up space for unilateral actions that can cause injustice to workers (Muslihin et al., 2021).

Termination for urgent reasons as stipulated in Article 52 paragraph (2) of PP 35/2021 is contrary to the 1945 Constitution Article 27 paragraph (1) which states 'all citizens are equal before the law and government and shall uphold the law and government with no exception. Layoffs for urgent reasons are clearly legally discriminatory, where layoffs for urgent reasons are a criminal offence qualification, but the PP allows layoffs without a fair trial process and this clearly contradicts the principle of due process of law guaranteed by the 1945 Constitution (Nugroho, 2022).

Workers are not given the right to defend themselves before being terminated, which violates the principle of presumption of innocence and procedural justice. This also contradicts Constitutional Court Decision No. 012/PUU-I/2003, which emphasises that dismissal on the grounds of gross misconduct must be based on a court decision to ensure that the violation actually occurred. The Constitutional Court in this decision clearly states that allegations of gross misconduct must be processed through legal channels, not just a unilateral decision by the employer (Alifya, 2019).

The dismissal of employees without adhering to judicial or industrial dispute resolution procedures, as mandated by Law No. 13 of 2003 on Manpower, poses a risk to the constitutional rights of workers. This practice undermines the principle of legal certainty, which is enshrined in Article 28D of the 1945 Constitution (Khair, 2021).

The Constitutional Court Decision No. 91/PUU-XVIII/2020 concerning the Job Creation Law has a profound effect on the enforcement of layoff provisions. The Court confirmed that the Job Creation Law, along with its implementing regulations, including PP 35/2021, need to be adjusted so as not to sacrifice workers' rights guaranteed by the 1945 Constitution. In its decision, the Court also criticised the

drafting process of the Job Creation Law which did not involve adequate participation from stakeholders, including workers (Tantri, 2022).

This decision reinforces the argument that unilateral termination regulated in GR 35/2021 must be revised must align with the principle of due process of law and the principle of justice as emphasized by the Constitutional Court. This revision should carefully balance the interests of employers with the constitutional rights of workers, which requires a fair legal process before termination can be carried out.

The implementation of unilateral dismissal based on the provisions of Article 52 paragraph (2) of Government Regulation No. 35/2021 not only causes violations of workers' rights, but also has social impacts. The legal uncertainty created by this provision can lead to instability among workers, who feel unprotected from the unilateral actions of employers. This situation can lead to uncertainty in labour relations and reduce workers' productivity and motivation (Vinita et al., 2023).

Unilateral layoffs that are not accompanied by clear legal protection further exacerbate the power imbalance between workers and employers. In this situation, workers are in a weaker position and are vulnerable to potential exploitation, as they do not have adequate mechanisms to defend their rights before the layoff decision is taken. This condition creates injustice in industrial relations, which could have been avoided with fairer and more balanced regulations (Mighty & Global, 2022).

D. CONCLUSION

The stipulation allowing for unilateral termination based on urgent misconduct in Article 52 paragraph (2) of PP 35/2021 carries the potential to breach the constitutional rights of workers, as enshrined in the 1945 Constitution, specifically their entitlement to employment and a dignified livelihood (Article 27 paragraph 2), alongside their right to just legal certainty (Article 28D paragraph 1). Dismissal without a fair dispute resolution mechanism creates legal uncertainty and violates the procedures in Law No. 13/2003 on Labour. Such a unilateral dismissal is also in conflict with the due process of law principle enshrined in Article 28D paragraph (1) of the 1945 Constitution, which guarantees equitable legal protection and the right to self-defense. Termination carried out without the proper legal procedure clearly undermines the fundamental presumption of innocence. The Constitutional Court has affirmed that criminal-related layoffs must go through the courts, but the practice is often ignored, creating an imbalance of power between employers and workers and reducing justice and legal certainty for workers.

REFERENCES

1. Alam, S., & Arif, M. (2020). Perlindungan Hukum Terhadap Pekerja: Perspektif Tanggung Jawab Konstitusional Negara. *Kalabbirang Law Journal*, 2(2), 123-133.
2. Alifya, D. (2021). Analisis Hukum Penerapan Pemutusan Hubungan Kerja Akibat Kesalahan Berat Pekerja Paska Putusan MK No. 012/Puu-1/2003 Tanggal 28 Oktober 2004 (Studi Putusan Pengadilan Hubungan Industrial pada PN Medan). *Kumpulan Karya Ilmiah Mahasiswa Fakultas Sosial Sains*, 1(01).

3. Arsalan, H., & Putri, D. S. (2020). Reformasi Hukum dan Hak Asasi Manusia Dalam Penyelesaian Perselisihan Hubungan Industrial. *Jurnal HAM*, 11(1), 39-49.
4. Azhar, A. M. (2021). *Tinjauan Yuridis Pemenuhan Hak-Hak Pekerja yang Menerima Pemutusan Hubungan Kerja Akibat Kesalahan Berat Pasca Putusan Mahkamah Konstitusi Nomor 012/PUU-I/2003 (Studi Putusan Nomor: 360/Pdt. Sus-PHI/2017/PN. Mdn)* (Doctoral Dissertation, Universitas Medan Area).
5. Fernando, A. (2022). *Tinjauan Terhadap Kewajiban Pemberian Uang Pesangon Sebagai Kompensasi Pemutusan Hubungan Kerja (PHK) (Studi Kasus Pemberian Pesangon Pada Karyawan PHK di PT Ramajaya Prakmukti)* (Doctoral Dissertation, Universitas Islam Riau).
6. Gunawan, B. (2022). *Pemberhentian Tidak Dengan Hormat Aparatur Sipil Negara (ASN) Ditinjau Dari Prespektif Teori Keadilan* (Doctoral dissertation, Universitas Islam Riau).
7. Hidayatullah, Q. W., & Nugroho, A. (2022). Analisis Yuridis Terkait Perundingan Dalam Pemutusan Hubungan Kerja. *NOVUM: JURNAL HUKUM*, 133-143.
8. Iftitah, A., Puspitasari, N. R., Yulianti, N., Putra, M. T. P., & Kunarso, K. (2023). Kesetaraan Gender Dalam Hukum Ketenagakerjaan. *Eksekusi: Jurnal Ilmu Hukum dan Administrasi Negara*, 1(2), 31-46.
9. Khair, O. I. (2021). Analisis Undang-Undang Cipta Kerja Terhadap Perlindungan Tenaga Kerja di Indonesia. *Widya Pranata Hukum: Jurnal Kajian dan Penelitian Hukum*, 3(2), 45-63.
10. Khakim, A. (2022). *Aspek Hukum Pemutusan Hubungan Kerja (PHK) Pasca Berlakunya UU Cipta Kerja*. Bandung: Citra Aditya Bakti.
11. Laoly, H. N. (2023). *Pemenuhan Hak Pekerja Terhadap Pemutusan Hubungan Kerja Pada Masa Pandemi Menurut Hukum Ketenagakerjaan Indonesia* (Doctoral Dissertation, Hukum Administrasi Negara).
12. Milinum, S. N. (2022). Problematika Fleksibilitas Outsourcing (Alih Daya) Pasca-Undang-Undang Nomor 11 Tahun 2020 tentang Cipta Kerja Kluster Ketenagakerjaan. *Jurnal Hukum Lex Generalis*, 3(5), 412-432.
13. Muslihin, I., Garwan, I., & Abas, M. (2021). Tinjauan Yuridis Upaya Penyelesaian Perselisihan Pemutusan Hubungan Kerja (PHK) Sepihak Ditinjau Dari Undang-Undang Nomor 13 Tahun 2003 Tentang Ketenagakerjaan (Studi Putusan Nomor 141/Pdt. Sus-PHI/2018/PN Bdg). *RECHTSCIENTIA: Jurnal Mahasiswa Hukum*, 1(2), 21-40.
14. Nasution, A. P. (2023). *Referensi Hukum Ketenagakerjaan dan Perburuhan Perspektif Undang-Undang Cipta Kerja Terbaru 2023*. Malang: Literasi Nusantara.
15. Paisal, P. (2020). *Kajian Yuridis Asas Praduga Tidak Bersalah Dalam Proses Peradilan Pidana Perkara Tindak Pidana Pembunuhan No 29/PID. B/2015/PN. MRB* (Doctoral Dissertation, Universitas Batanghari).
16. Peraturan Pemerintah Republik Indonesia Nomor 35 Tahun 2021 Tentang Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat, dan Pemutusan Hubungan Kerja/ Government Regulation of the Republic of

- Indonesia Number 35 of 2021 Concerning Fixed-Term Employment Agreements, Outsourcing, Working Hours and Rest Hours, and Termination of Employment
17. Perkasa, A. W. A. P., Puspitasari, M., Ritonga, R., & Hanita, M. (2022). *Strategi Adaptasi Kelompok Buruh Terhadap Pengesahan UU Cipta Kerja Dalam Perspektif Ketahanan Sosial*. Depok: Sekolah Kajian Tratejik dan Global.
 18. Qamar, N. (2022). *Hak Asasi Manusia Dalam Negara Hukum Demokrasi: Human Rights in Democratiche Rechtsstaat*. Jakarta: Sinar Grafika.
 19. Rachman, Y. (2022). *GERAKAN BURUH INDONESIA: Perlawanan di era transisi Demokrasi terhadap Neoliberalisme-Jejak Pustaka*. Jejak Pustaka.
 20. Sari, L. (2024). Penerapan Asas Praduga Tak Bersalah Terhadap Validitas Bukti di Proses Penyidikan Pidana. *Causa: Jurnal Hukum dan Kewarganegaraan*, 6(5), 31-40.
 21. Tantri, S. (2022). *Implikasi Putusan Mahkamah Konstitusi Nomor 91/PUU-XVIII/2020 Terhadap Kedudukan UU Cipta Kerja dan Aturan Turunannya dalam Sistem Hukum Indonesia* (Doctoral Dissertation, UIN Prof. KH Saifuddin Zuhri).
 22. *Undang-Undang Dasar Negara Republik Indonesia Tahun 1945/ Constitution of the Republic of Indonesia 1945*
 23. *Undang-Undang Republik Indonesia Nomor 13 Tahun 2003 Tentang Ketenagakerjaan/Law of the Republic of Indonesia Number 13 of 2003 Concerning Manpower*
 24. *Undang-Undang Republik Indonesia Nomor 6 Tahun 2023 Tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 tentang Cipta Kerja Menjadi Undang-Undang/ Law of the Republic of Indonesia Number 6 of 2023 Concerning the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law*
 25. Vinita, K. R., Evantrino, M. D., Budisafitri, D. B., & Meiralda, K. S. (2023). Pengesahan PERPU Cipta Kerja Menjadi UU Dalam Prespektif Negara Demokrasi. *Madani: Jurnal Ilmiah Multidisiplin*, 1(4).