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Legal Protection for Gig Economy Workers in Southeast Asia: A Comparative Study on Labor Law Enforcement between Indonesia and Singapore

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ABSTRACT

The rapid expansion of the gig economy across Southeast Asia has fundamentally disrupted traditional labor market structures, creating a significant regulatory void in the protection of platform workers. This article presents a comparative legal analysis of labor law enforcement for gig economy workers in Indonesia and Singapore, two Southeast Asian nations with distinctly different regulatory approaches. Employing qualitative legal research methodology with a normative-comparative approach, this study examines the statutory frameworks, judicial interpretations, and policy instruments governing platform work in both jurisdictions. The findings reveal a striking regulatory divergence: Singapore has enacted the Platform Workers Act 2024, establishing a sui generis legal category for platform workers with mandatory Central Provident Fund contributions, work injury compensation, and collective representation rights. In contrast, Indonesia continues to rely on fragmented regulations that relegate platform workers to ambiguous "partnership" status, excluding them from basic labor protections under Law No. 13 of 2003 on Manpower. The study identifies that less than 3.5% of Indonesian gig workers possess employment social security, while Singapore provides comprehensive coverage to approximately 70,000 platform workers. This article argues that Indonesia's regulatory inertia constitutes a structural inequality that perpetuates worker vulnerability, and recommends the adoption of a hybrid "third category" legal framework inspired by Singapore's progressive model, while adapting it to Indonesia's unique socio-economic context.

Keywords: *Gig Economy, Platform Workers, Labor Law Protection, Indonesia, Singapore*

INTRODUCTION

The twenty-first century has witnessed a paradigm shift in the nature of work, catalyzed by the proliferation of digital technologies and emergence of platform-based business models. The gig economy, characterized by short-term, flexible, and digitally mediated work arrangements, has become a defining feature of contemporary labor markets across the globe. In Southeast Asia, this transformation has been particularly pronounced, with digital platforms such as Grab, Gojek, Foodpanda, and Shopee Food reshaping the transportation, logistics, and service sectors on an unprecedented scale. The region's digital economy has created millions of income-generating opportunities; however, it has simultaneously exposed profound inadequacies in the existing legal frameworks designed for an era of standardized, long-term employment relationships (Lesmana & Samudra, 2025).

The gig economy presents a fundamental challenge to the binary classification that has long underpinned labor law: the distinction between "employees" entitled to comprehensive statutory protections and "independent contractors" who bear the full risks of their enterprise. Platform workers occupy an ambiguous middle ground; they perform work that is economically dependent on platform operators, are subject to algorithmic management and control, and are formally classified as partners or self-employed individuals.

This classification, or more accurately, misclassification, has enabled platform companies to externalize labor costs and responsibilities while retaining substantial control over the terms and conditions of work.

As the largest economy in Southeast Asia, Indonesia has experienced explosive growth in platform-based work. According to the Ministry of Manpower, approximately 4.4 million gig workers are currently active in Indonesia's transportation, logistics, creative, and digital service sectors. This figure represents a significant increase from approximately 2.2 million in 2019, reflecting the rapid expansion of the sector. However, this growth has occurred in a regulatory vacuum. Indonesian labor law, primarily governed by Law No. 13 of 2003 on Manpower, establishes fundamental worker rights, including minimum wages, working time regulations, and social security, but explicitly contemplates a binary employment relationship that excludes platform workers. The subsequent Job Creation Law (Law No. 6 of 2023) did little to address this gap, leaving platform workers in a precarious legal position where they are neither recognized as employees nor afforded the protections that accompany formal employment status (Indra & Nawangsari, 2025).

The consequences of such regulatory failures are severe. Indonesian gig workers routinely work 12 to 13 hours per day, bear all operational costs, including fuel, vehicle maintenance, and internet data, and lack access to minimum wage protections, occupational safety guarantees, and mechanisms for dispute resolution. Research indicates that less than 3.5% of gig workers possess employment social security, and even when coverage exists, it is entirely self-funded without platform contributions. The relationship between workers and platforms is framed as a "partnership" under the Law on Micro, Small, and Medium Enterprises—a legal construction that scholars have characterized as fundamentally ill-suited to address the dependent and asymmetric nature of platform-mediated work.

In stark contrast, Singapore has emerged as a regional pioneer in platform worker protection. On September 10, 2024, the Singapore Parliament unanimously passed the Platform Workers Act, which came into effect on January 1, 2025. The Act recognizes platform workers currently limited to ride-hailing and delivery services—as a distinct legal category, neither employees nor self-employed, and provides them with three core protections: mandatory Central Provident Fund (CPF) contributions for retirement and housing adequacy, workplace injury compensation coverage comparable to that of traditional employees, and the right to collective representation through Platform Work Associations. Approximately 70,000 regular platform workers in Singapore, constituting around 3% of the resident workforce, are covered by this legislative framework (Andriani et al., 2026).

The juxtaposition of these two regulatory approaches raises fundamental questions about the role of law in responding to technological disruption and the appropriate balance between labor flexibility and worker protection. While Singapore has adopted a proactive legislative approach that establishes a new legal category for platform work, Indonesia has maintained a reactive stance that preserves the formal binary classification while effectively excluding a growing segment of the workforce from its legal protection. This regulatory divergence is not merely a technical distinction but reflects deeper differences in legal philosophy, industrial relations traditions, and the political economy.

This study undertakes a comparative legal analysis of labor law enforcement for gig economy workers in Indonesia and Singapore. The comparative method is particularly appropriate for this inquiry because it enables the identification of alternative regulatory models and the assessment of their relative effectiveness in addressing the common challenges. By examining the statutory frameworks, judicial interpretations, and policy instruments in both jurisdictions, this study seeks to answer three interrelated research questions: First, how do the legal frameworks of Indonesia and Singapore define the status of gig economy workers, and what protections do they afford? Second, what are the practical implications of these regulatory approaches for workers' access to social security, occupational safety, and collective bargaining? Third, what lessons can Indonesia learn from Singapore's regulatory experience to develop a more inclusive and protective legal framework for platform workers?

The significance of this study extends beyond the two countries examined. As the International Labour Organization (ILO) advances the adoption of a Convention on Decent Work in the Platform Economy, Southeast Asian nations face increasing pressure to align their domestic legal frameworks with emerging international standards. The comparative analysis of Indonesia and Singapore thus offers valuable insights for policymakers across the region, who are grappling with similar challenges. Moreover, the findings contribute to the broader scholarly discourse on the regulation of non-standard work and the adaptation of labor law to the realities of the digital economy (Kurniati & Abdillah, 2025).

The remainder of this paper is organized as follows. Section 2 reviews the relevant literature on gig economy regulation, situating Indonesian and Singaporean experiences within broader comparative and theoretical contexts. Section 3 describes the qualitative research methodology employed, including the normative-comparative approach, data sources, and the analytical framework. Section 4 presents the findings of the comparative analysis, organized around the dimensions of legal status, social security protection, occupational safety and health, and collective representation. Section 5 discusses the implications of these findings for legal reforms in Indonesia. Finally, Section 6 concludes with recommendations for policymakers and directions for future research.

METHOD

This study employs a qualitative legal research methodology with a normative-comparative approach. Qualitative legal research is particularly suited to examining legal frameworks, their interpretation, and their practical effects, as it enables the researcher to engage deeply with legal texts, scholarly commentary, and empirical evidence of legal implementation. The comparative dimension is essential for identifying alternative regulatory models and assessing their relative effectiveness in addressing common challenges in the field.

This study follows a structured comparative research design, analyzing the legal frameworks of Indonesia and Singapore across four key dimensions: (1) legal status and classification of platform workers, (2) social security protection, (3) occupational safety and health, and (4) collective representation and bargaining rights. These dimensions were selected because they represent the core elements of labor protection and are the primary areas in which regulatory divergence between the two jurisdictions is evident (Creswell, 2021).

Data Sources

The study draws on three categories of data sources:

Primary Legal Sources: For Indonesia, the primary legal sources include Law No. 13 of 2003 on Manpower, Law No. 6 of 2023 on the Job Creation Law, and the proposed Bill on Gig Worker Protection introduced in September 2025. For Singapore, the primary sources include the Platform Workers Act 2024 (Act No. 26 of 2024), Work Injury Compensation Act, and Central Provident Fund Act. These statutes form the formal legal framework within which platform workers are regulated in India.

Secondary Legal Sources: Secondary sources included academic journal articles, legal commentaries, policy briefs, and reports from international organizations. Particular attention was paid to publications from the ILO, the Ministry of Manpower of Singapore, and the Ministry of Manpower of Indonesia. These sources provide scholarly analyses and policy contexts that inform the interpretation of primary legal materials.

Empirical Data: Empirical data on the scale of platform work, social security coverage, and worker outcomes were drawn from government statistics, research reports, and media sources. These data enable the assessment of how legal frameworks translate into practical outcomes for workers in the garment industry.

Analytical Framework

The analysis was conducted in three stages. First, a doctrinal analysis examines the statutory provisions, judicial interpretations, and administrative regulations governing platform work in each jurisdiction. This involves a close reading of legal texts and the identification of key legal categories, definitions, and protective mechanisms.

Second, a comparative analysis identifies the similarities and differences between the two legal frameworks across the four dimensions identified above. This involves a systematic comparison of the legal rules, their scope of application, and the rights and obligations they create for workers, platform operators, and the state.

Third, an evaluative analysis assesses the adequacy of each legal framework in light of the normative standards of decent work and capabilities approach. This involves considering the practical implications of legal rules for workers' well-being, access to social protection, and ability to participate in decisions affecting their working conditions.

Validity and Reliability

This study employed several strategies to ensure the validity and reliability of the findings. Triangulation involves cross-checking information from multiple sources, including primary legal texts, secondary scholarship, and empirical data. Member checking, where feasible, involved presenting preliminary findings to experts in Indonesian and Singaporean labor law for validation. The comparative method enhances validity by enabling the identification of patterns and anomalies across jurisdictions.

Limitations

This study had several limitations. First, the rapid pace of regulatory change, particularly in Singapore, where the Platform Workers Act came into effect in January 2025, means that empirical data on implementation are limited. Second, this study focuses on formal legal frameworks rather than examining the practical enforcement of legal protections, which may vary significantly. Third, the study is limited to two jurisdictions and does not examine other Southeast Asian countries, such as Malaysia, the Philippines, and Thailand. Fourth, this study does not include primary data collection through interviews or surveys, relying instead on secondary sources and official statistics.

Despite these limitations, this study provides a comprehensive and timely comparative analysis that contributes to the scholarly understanding of gig economy regulation in Southeast Asia and offers practical recommendations for legal reform.

RESULT & DISCUSSION

Legal Status and Classification of Platform Workers

The comparative analysis reveals a fundamental divergence in how Indonesia and Singapore classify platform workers for legal purposes.

Indonesia: Indonesian law does not recognize platform workers as a distinct legal category. Under Law No. 13 of 2003 on Manpower, workers are classified as either employees (buruh/pekerja) who have an employment relationship with an employer or independent contractors who provide services under commercial contracts. Platform workers are uniformly classified as "partners" (mitra) under commercial agreements, a classification that excludes them from the scope of labor law protections.

The partnership model, derived from the Law on Micro, Small, and Medium Enterprises, was never intended to govern the relationship between individual workers and multinational platform companies. However, Indonesian courts have generally upheld this classification, reasoning that platform workers retain flexibility in choosing their working hours and are not subject to direct supervision by the employer. This judicial approach has been criticized by scholars who argue that algorithmic management constitutes a form of control that satisfies traditional tests for employment status.

The proposed Bill on Gig Worker Protection, introduced in September 2025, establishes a distinct legal category for gig workers and provides them with basic protections. However, as of mid-2026, this bill has not been enacted, leaving platform workers in legal limbo.

Singapore: The Platform Workers Act 2024 creates a sui generis legal category for "platform workers," defined as individuals who contract with platform operators to provide ride-hailing or delivery services. Platform workers are explicitly neither employees nor self-employed; they constitute a third category with rights tailored to the specific characteristics of their work.

The Act's approach preserves the flexibility that attracts workers to platform employment while addressing their most acute vulnerabilities. Platform workers are subject to platform operators' rules on service levels, pricing, and payment terms; however, they retain some autonomy in determining their working hours. This hybrid status reflects a pragmatic compromise between the competing values of flexibility and protection.

Table 1: Comparative Legal Status of Platform Workers

Dimension	Indonesia	Singapore
Legal Classification	"Partner" (mitra) under commercial law	"Platform Worker" under statutory law
Employment Relationship	Not recognized	Recognized as distinct third category
Governing Law	Law No. 13/2003 (implicit exclusion)	Platform Workers Act 2024 (explicit inclusion)
Judicial Approach	Upholds partnership classification	Statutory definition supersedes judicial discretion
Legislative Reform	Proposed Bill (not enacted)	Act in force since January 2025
Scope of Application	All platform sectors	Ride-hailing and delivery only

Source: Author's compilation from primary legal sources

Social Security Protection

Social security protection is one of the most significant areas of regulatory divergence between the two countries.

Indonesia: Indonesian gig workers are largely excluded from the national social security system administered by the BPJS Ketenagakerjaan. While Law No. 13 of 2003 mandates social security coverage for employees, platform workers classified as partners are not. Research indicates that less than 3.5% of gig workers possess employment social security, and even when coverage exists, it is entirely self-funded without platform contributions.

The Ministry of Manpower has acknowledged this gap and proposed including platform workers in revisions to the Manpower Law, with proposed protections including health insurance, pensions, and work accident insurance. However, these proposals remain aspirational rather than being implemented. Some platform companies have voluntarily provided limited social security coverage to high-performing drivers, but this is discretionary rather than rights-based.

Singapore: The Platform Workers Act mandates comprehensive social security coverage for platform workers through the CPF system. Platform operators are required to contribute to both employer and employee CPF accounts for platform workers, ensuring retirement and housing adequacy for them. The contribution rates will gradually increase over five years to align with those of salaried employees.

The Act also provides work injury compensation coverage comparable to that available for traditional employees under the Work Injury Compensation Act. This addresses the significant occupational safety risks faced by platform workers, particularly in the ride-hailing and delivery sectors, where traffic accidents are common.

Table 2: Comparative Social Security Protection

Protection Type	Indonesia	Singapore
Retirement Savings	None (self-funded only)	Mandatory CPF contributions (operator + worker)
Health Insurance	None (optional self-enrollment)	MediSave contributions
Work Injury Compensation	None (self-insurance only)	Mandatory insurance (operator-provided)
Coverage Rate	< 3.5% of workers	100% of covered platform workers
Platform Contribution	None	Yes (gradually increasing)
Legal Basis	None (voluntary only)	Statutory mandate

Occupational Safety and Health Protection

Occupational safety and health protections for platform workers differ markedly between the two jurisdictions.

Indonesia: Indonesian occupational safety laws, primarily governed by Law No. 1 of 1970 on Occupational Safety, apply to workplaces where there is an employment relationship. Platform workers, who are classified as partners, are excluded from these protections. They bear the full costs of operational safety, —including vehicle maintenance, fuel, and insurance, —without any contribution from platform operators.

The absence of occupational safety protection has serious consequences. Platform workers in Indonesia routinely work 12-13 hours per day, driven by algorithmic systems that incentivize longer working hours. This creates a significant risk of fatigue-related accidents, which are entirely borne by workers without access to compensation or rehabilitation.

Singapore: The Platform Workers Act extends workplace health and safety protections to platform workers, including mandatory work-injury compensation coverage. Platform operators are required to provide insurance that offers coverage comparable to that available for traditional employees. This ensures financial security for platform workers in the event of an incapacitating accident.

The Act also establishes a framework for addressing occupational safety concerns through the Platform Workers Trilateral Group, which brings together the government, unions, and platform operators to develop recommendations for safeguarding platform workers' livelihoods, safety, and well-being.

Table 3: Comparative Occupational Safety Protection

Protection Type	Indonesia	Singapore
Legal Coverage	None (partners excluded)	Yes (statutory mandate)
Work Injury Compensation	None	Yes (operator-provided insurance)

Protection Type	Indonesia	Singapore
Working Time Regulation	None	Limited (through insurance incentives)
Safety Cost Allocation	Worker bears all costs	Shared (operator insurance)
Enforcement Mechanism	None	Trilateral Group + statutory penalties

Collective Representation and Bargaining Rights

The right to collective representation and bargaining is a fundamental element of labor protection that varies significantly between the two countries.

Indonesia: Indonesian labor law recognizes workers' right to form and join trade unions under Law No. 21 of 2000 on Trade Unions. However, this right is contingent on the existence of an employment relationship. Platform workers classified as partners are not entitled to form or join trade unions and are not covered by collective bargaining agreements.

The proposed Bill on Gig Worker Protection guarantees gig workers' right to associate. However, as the Bill has not been enacted, platform workers in Indonesia currently lack legal mechanisms for collective representation or negotiation with platform operators.

Singapore: The Platform Workers Act establishes a legal framework for collective representation through Platform Work Associations. These associations are empowered to represent platform workers in negotiations with platform operators and advocate for better working conditions, fair payment terms, and improved benefits.

The Act builds on the work of three existing associations—the National Taxi Association, the National Private Hire Vehicles Association, and the National Delivery Champions Association— that have been advocating for platform worker protections since 2010. The NTUC has played a central role in this advocacy, working with tripartite partners to secure the Act's passage.

Table 4: Comparative Collective Representation Rights

Dimension	Indonesia	Singapore
Right to Associate	None (partners excluded)	Yes (statutory right)
Collective Bargaining	None	Yes (through Platform Work Associations)
Union Recognition	No	Yes (NTUC-affiliated associations)
Dispute Resolution	None	Trilateral mechanism
Legal Basis	None	Platform Workers Act 2024

Scale and Scope of Platform Work

The scale of platform work in both countries provides context for understanding the significance of these regulatory approaches.

Indonesia: Approximately 4.4 million gig workers are active in Indonesia's transportation, logistics, creative, and digital service sectors. This represents a substantial portion of the workforce, particularly given that approximately 59% of Indonesian workers (86.6 million) are employed in the informal sector. The gig economy has grown rapidly, with approximately 2.2 million workers in 2019.

Singapore: Approximately 70,000 regular platform workers are active in Singapore's ride-hailing and delivery sectors, representing approximately 3% of the resident workforce. This number has grown from approximately 50,000 in previous years and continues to increase. The Platform Workers Act covers all regular platform workers in the ride-hailing and delivery sectors, ensuring comprehensive protection for this growing workforce segment.

The comparative analysis reveals a stark divergence in regulations between Indonesia and Singapore. Singapore has enacted comprehensive legislation that creates a distinct legal category for platform workers and provides social security, occupational safety, and collective representation protections. In contrast, Indonesia maintains a binary legal framework that excludes platform workers from labor protections, leaving them in a precarious position with limited access to social security, no occupational safety protections, and no collective representation rights.

Table 5: Summary of Comparative Findings

Dimension	Indonesia	Singapore
Legal Status	Partner (excluded from labor law)	Platform Worker (distinct legal category)
Social Security	< 3.5% coverage; self-funded	100% coverage; operator + worker contributions
Work Injury Compensation	None	Mandatory insurance
Collective Representation	None	Platform Work Associations
Regulatory Approach	Reactive/incremental	Proactive/comprehensive
Worker Coverage	4.4 million (all sectors)	70,000 (ride-hailing/delivery)
Legal Certainty	Low (proposed Bill not enacted)	High (Act in force)

Discussion

The stark regulatory divergence between Indonesia and Singapore raises important questions regarding the factors that shape legal responses to the gig economy. Several explanations merit consideration for this finding.

Legal Tradition and Institutional Capacity: Singapore's legal system, rooted in English common law, has demonstrated greater flexibility in adapting to new forms of work through statutory innovation. The Platform Workers Act represents a pragmatic response to regulatory challenges, creating a new legal category rather than attempting to fit platform work into existing categories. Indonesia's civil law tradition, while not inherently inflexible, has been slower to adapt, with courts and legislators adhering to established categories even when they no longer serve their intended purpose (Hakim, 2025).

Industrial Relations and Tripartism: Singapore's success in enacting the Platform Workers Act reflects its strong tradition of tripartism collaboration between the government, unions, and employers. The NTUC and affiliated worker associations played a central role in advocating for the Act, working with the government and platform operators to develop a regulatory framework that balances competing interests. While formally tripartite, Indonesia's industrial relations system has been less effective in addressing the challenges of platform work, with worker organizations having limited influence over policy development.

Political Economy and Development Priorities: Indonesia's regulatory caution may reflect concerns about the impact of regulation on the growth of the digital economy. The government has prioritized investment and job creation, viewing platform companies as engines of economic growth and employment generation. Singapore, with its more developed economy and stronger social safety net, has pursued a more protective regulatory approach without significant concerns about stifling innovation (Fadhlulloh et al., 2023).

Scale and Composition of Platform Work: The scale of platform work in Indonesia 4.4 million workers compared to 70,000 in Singapore presents different regulatory challenges. Regulating a large and diverse platform workforce requires more comprehensive and costly interventions than regulating a smaller and more concentrated workforce. Moreover, Indonesia's platform workers are concentrated in transportation and logistics, sectors with significant informal dynamics that complicate regulatory interventions.

Singapore's Platform Workers Act offers valuable lessons for Indonesia's ongoing efforts to develop a regulatory framework for platform work. Several elements of the Singaporean model are particularly relevant (Shekhawat & Khare, 2025).

The "Third Category" Approach: Singapore's creation of a distinct legal category for platform workers offers a pragmatic solution to the binary classification problem. By recognizing platform workers as neither employees nor independent contractors, the Act preserves flexibility while ensuring basic protection. This approach has been endorsed by scholars as "a feasible and legally sound framework to bridge the gap between full-time employment and independent contracting in Indonesia.’’

Gradual Implementation: The Act's phased approach to CPF contributions gradually aligning with employee contribution rates over five years acknowledges the adjustment costs for platform operators and workers. This gradual approach reduces resistance from platform operators while ensuring that workers ultimately achieve comparable social security coverage. Indonesia could adopt a similar phased approach to social security contributions, beginning with basic protection and progressively expanding coverage (Mironova et al., 2022).

Tripartite Governance: The Act's establishment of a trilateral framework for platform worker protection—involving the government, unions, and platform operators provides a model for the ongoing governance of platform work. Indonesia's existing tripartite institutions can be adapted to address platform work, creating a forum for dialogue and negotiation among stakeholders.

Collective Representation: The Act's recognition of Platform Work Associations addresses the collective action problem that has long plagued platform workers. By providing a legal framework for collective representation, the Act enables workers to negotiate collectively with platform operators, addressing the power imbalance that characterizes platform work in the Netherlands. Indonesia's proposed Bill on Gig Worker Protection includes similar provisions for worker associations, but these have not yet been implemented (Komang Ayu Tri Aryani, 2026).

While Singapore's regulatory model offers valuable lessons, its direct transplantation to Indonesia faces several challenges.

Legal and Institutional Differences: Indonesia's legal system and institutional arrangements differ significantly from those of Singapore. The civil law tradition, judiciary structure, and regulatory agency capacity all affect the feasibility of implementing a Singapore-style regulatory framework. Moreover, Indonesia's decentralized governance structure, with significant authority vested in regional governments, complicates the implementation of national-level regulations ("Assessing Legal Protections against Cyberstalking: A Comparative Analysis of Malaysia, Singapore, Indonesia, and India," 2026).

Economic and Social Context: Indonesia's larger and more diverse economy, with a substantial informal sector and significant inequality, presents different regulatory challenges. A regulatory approach that works in Singapore's relatively homogeneous and well-regulated economy may not be appropriate for Indonesia's more heterogeneous and less regulated economy (Lie & Anastasya, 2026).

Political Economy Constraints: The power of platform companies in Indonesia, combined with the government's emphasis on investment and job creation, may constrain the scope of regulatory reform. Platform operators have successfully resisted reclassification in other jurisdictions and are likely to oppose any regulatory approach that significantly increases their costs.

Implementation Capacity: Implementing a comprehensive regulatory framework for platform work requires significant administrative capacity, including the ability to monitor compliance, enforce regulations and adjudicate disputes. While Indonesia's regulatory agencies are capable, they may lack the resources and expertise needed to effectively implement a Singapore-style framework.

Given these challenges, Indonesia may benefit from developing a hybrid regulatory model that incorporates elements of the Singaporean approach while adapting to local conditions. Several principles should guide this development in the future.

Legal Recognition: The most fundamental reform is the legal recognition of platform workers as a distinct category with rights and protections. The proposed Bill on Gig Worker Protection provides a foundation for this. Enacting this Bill should be a priority, as it would establish a legal basis for platform worker protection.

Phased Social Security Expansion: Rather than attempting to achieve full social security coverage immediately, Indonesia could adopt a phased approach that begins with basic protections (work accident and death benefits) and progressively expands to include retirement savings, health insurance, and other benefits. This phased approach would reduce resistance from platform operators while ensuring that workers receive at least basic protection.

Platform Contributions: A key element of any regulatory framework is requiring platform operators to contribute to workers' social security. Currently, Indonesian gig workers bear the full cost of social security coverage if they have any coverage at all. Mandating platform contributions would address this inequity and ensure that the costs of platform work are shared more fairly (Almufarrida & Malie, 2025).

Collective Representation: Establishing a legal framework for platform worker associations would address the collective action problem and empower workers to negotiate with platform operators. This could be modeled on Singapore's Platform Work Associations, with adaptations to Indonesia's industrial relations context.

Algorithmic Transparency: A distinctive challenge of platform work is algorithmic management. Indonesian regulations should address algorithmic transparency, requiring platform operators to disclose the factors that determine task allocation, pricing, and worker evaluation. This would enable workers to understand and challenge the algorithmic decisions that affect their livelihoods.

The comparative analysis of Indonesia and Singapore has broader implications for Southeast Asian countries. As the ILO advances toward adopting a Convention on Decent Work in the Platform Economy, Southeast Asian nations face increasing pressure to align their domestic legal frameworks with emerging international standards. The Singaporean model offers a template for progressive regulation that other countries in the region could adapt to their local contexts to achieve the same.

However, the divergence between Indonesia and Singapore highlights the diversity of regulatory approaches in the region. There is no one-size-fits-all solution to the challenges of platform work regulations. Each country must develop a regulatory framework that reflects its legal traditions, institutional capacities, economic contexts, and political realities.

The ASEAN High-Level Forum on Decent Work in the Platform Economy, held in February 2026, provides a platform for regional dialogue and knowledge-sharing. Through such forums, Southeast Asian nations can learn from each other's experiences and develop coordinated approaches to regulating platform work. The ILO's renewed partnership with Singapore on labor and decent work further supports regional cooperation in platform work regulation.

The findings of this study have implications for the theoretical understanding of labor law and the gig economy. First, they demonstrated the inadequacy of binary classification systems in addressing new forms of work. The Indonesian experience shows that maintaining a binary system while excluding new work forms from protection leads to regulatory gaps and worker vulnerability. The Singaporean experience shows that creating new legal categories can address these gaps while preserving the law’s flexibility.

Second, the findings highlight the importance of institutional factors in shaping the regulatory outcomes. Singapore's strong tripartite institutions enabled the development and enactment of the Platform Workers Act. Indonesia's weaker tripartite institutions have been less effective in addressing platform work despite similar challenges. This suggests that institutional capacity and industrial relations are important determinants of regulatory outcomes.

Third, the findings contribute to the capabilities approach to labor rights by demonstrating how legal frameworks enable or constrain workers' capabilities. Singapore's regulatory framework enables platform workers to achieve security, participation, and dignity in their working lives. Indonesia's regulatory framework, which excludes platform workers from protection, constrains their capabilities and perpetuates their vulnerability.

CONCLUSION

This comparative legal analysis examined the regulation of gig economy workers in Indonesia and Singapore, revealing a stark divergence in legal frameworks and worker protections. Singapore has enacted the Platform Workers Act 2024, creating a sui generis legal category for platform workers and providing them with social security, occupational safety, and collective representation. In contrast, Indonesia maintains a binary legal framework that excludes platform workers from labor protections, leaving approximately 4.4 million workers in a precarious position with limited access to social security, no occupational safety protections, and no collective representation rights. The findings demonstrate that regulatory choices have significant implications for worker well-being. Singapore's proactive regulatory approach has provided comprehensive protection to approximately 70,000 platform workers, addressing their most acute vulnerabilities while preserving the flexibility that attracts workers to platform employment. Indonesia's reactive approach has perpetuated worker vulnerability, with less than 3.5% of gig workers possessing employment social security and no legal mechanism for collective representation of workers. Several recommendations have emerged from this analysis. First, Indonesia should prioritize enacting the proposed Bill on Gig Worker Protection, which would establish a distinct legal category for gig workers and provide them with basic protections. Second, Indonesia should adopt a phased approach to social security expansion, beginning with basic protection and progressively expanding coverage. Third, Indonesia should mandate platform contributions to workers’ social security, ensuring that the costs of platform work are more fairly shared. Fourth, Indonesia should establish a legal framework for platform worker associations to empower workers to negotiate collectively with platform operators. Fifth, Indonesia should address algorithmic transparency by requiring platform operators to disclose the factors that determine task allocation, pricing, and worker evaluation.

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