

Legal Protection of Workers' Rights Against Cases of Unilateral Termination of Employment in Review of Law No. 6 of 2023 on Labour Copyright

Dion Untung Wijaya¹, Yeti Kurniati², Dani Durahman³

Langlangbuana University, Faculty of Law

Article Info

Article history:

Accepted: 2 May 2025

Publish: 8 May 2025

Keywords:

Employers;

Workers/labourers;

Job Creation Law.

Abstract

This research aims to find out the protection of workers' rights for unilateral termination of employment (PHK) carried out by the company. specifically aims to find out: first, how is the form of legal protection of the rights of workers / labourers who experience unilateral termination of employment (PHK) carried out by the company based on Law Number 6 of 2023 concerning Job Creation, second, how can legal remedies be taken by workers / labourers who experience termination of employment (PHK) who are not fulfilled their rights by the employer. This research uses normative juridical legal research methods with a statue approach and conceptual approach. The results of this study indicate that in the event of termination of employment (PHK) has a legal regulatory basis listed in Article 151 of the Job Creation Law which discusses the ways to terminate employment (PHK). Exceptions regarding termination of employment (PHK) are contained in Article 153 of the Job Creation Law. Various reasons for termination of employment (PHK) can be done but not done in a unilateral manner by the company which will harm workers/labourers. Legal protection against unilateral termination of employment (PHK) has been regulated in Article 153 of the Job Creation Law, where in the termination of employment (PHK), the company will be responsible for the termination of employment (PHK).

This is an open access article under the [Lisensi Creative Commons Atribusi-BerbagiSerupa 4.0 Internasional](#)



Corresponding Author:

Dion Untung Wijaya

Langlangbuana University, Faculty of Law

Email: dionuntungwijaya@gmail.com

1. INTRODUCTION

Indonesian human development as a whole has a very important role for the future of the nation and state, this is also inseparable from labour development which is an integral part of national development based on Pancasila and the 1945 Constitution of the Republic of Indonesia. One of the government's progressive efforts at this time is in the field of law and the industrial sector so that it gave birth to Law Number 6 of 2023 concerning Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 concerning Job Creation into Law. This is specifically designed in its preparation using the concept of Omnibuslaw with the basic consideration of creating jobs, increasing worker productivity and increasing investment in the industrial sector.

The concept of Regulation in the form of omnibuslaw is a new concept applied in Indonesia with a system of combining several laws and regulations that are considered capable of replacing several legal norms in one regulation. In addition, this concept is also used as a mission from the government to cut several regulatory norms that are considered no longer in accordance with the development of society and are considered detrimental to

the interests of the state and society, so as to encourage a strategic industrial sector and to support economic growth, increase community productivity and create jobs and alleviate poverty.

Every person is basically entitled to get a decent job, so as to be able to fulfil the needs of life for his family reasonably which can include clothing, food, shelter, education, health, recreation and old age security, because the purpose of workers doing their job is to be able to fulfil these needs. As stated in the 1945 Constitution of the Republic of Indonesia Article 27 Paragraph (2) states that: 'Every citizen has the right to work and a livelihood worthy of humanity.

The number of people who work by binding themselves to employers, especially in private companies, it is hoped that labour law can regulate this relationship based on the existence of a harmonious working relationship. Law No. 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law No. 2 of 2022 on Job Creation into Law states that work relations are relations between employers and workers/labourers based on work agreements that have elements of work, wages and orders. Work relationship is a term for labour relations or known as industrial relations. However, in reality we are aware that the relationship between employers and workers/labourers does not stand alone, because this relationship is influenced by economic, social, political, cultural and other issues.

Problems that occur in the field of labour from year to year attract the attention of many parties. Problems in the field of employment have caused many conflicts between employers and workers/labourers, such as cases of violence, fraud, wages that are not in accordance with standards, the absence of workers' leave rights and what is happening now is the case of unilateral termination of employment (PHK). these cases are important to get legal protection for labour rights.

The impact of termination of employment (PHK) for workers/labourers is enormous, in addition to having to lose their livelihoods, those affected by the termination of employment (PHK) are also difficult to find new jobs. Many companies reduce the number of workers/labourers because they may no longer be able to fulfil their obligations such as paying wages in accordance with the provisions of laws and regulations, or because of the impact of the prolonged economic crisis, so that companies cannot sell their products, or many companies also want to change the status of their workers from permanent workers to contract workers.

The event of termination of employment (PHK) often raises a problem that is not easy to resolve, both regarding the procedure for termination of employment (PHK) itself, as well as the legal consequences that occur because of it. Some of the causes of the conflict arising from the Termination of Employment (PHK) dispute originate from various things. Based on Law No. 13/2003 on Manpower, it is explained that the termination of employment (PHK) to workers/labourers is regulated with quite strict conditions, which limit the potential arbitrariness of employers in conducting PHK. Article 151 states that in the event of termination of employment (PHK), it must be preceded by negotiations and PHK can only be carried out after a determination from the Industrial Relations Dispute Resolution Institution.

Termination of employment which is carried out unilaterally by the employer can lead to disputes between workers/labourers and employers over the termination of employment which is carried out arbitrarily, and can eliminate the rights of workers/labourers or not in accordance with the provisions of the applicable laws and regulations and is very detrimental to the workers/labourers. Workers/labourers consider that layoffs are only one of the reasons used by employers/companies to transfer the status of workers from permanent workers to contract workers. This is a form of injustice for workers/labourers.

With reference to these problems, it is necessary to discuss the Termination of Employment (PHK), the rights of workers/labourers and the role of the state by enacting relevant laws in the field of Manpower and is expected to be able to guarantee the basic rights of workers/labourers and guarantee equal opportunities and treatment without discrimination on any basis to achieve the welfare of workers/labourers and their families while taking into account the development of the progress of the business world.

2. RESEARCH METHOD

The research method in this writing is normative legal research using the approach of legislation and cases. The object of research is the Industrial Relations Court Decision, namely Decision Number 162/Pdt.Sus-PHI/2024/PN Bdg. The data used is secondary data in the form of primary raw materials (Court Decisions) and secondary legal materials (books, journals, and research reports) through literature studies. The collected legal materials are then analysed qualitatively and then presented descriptively in order to answer the problems in this paper. The type of research conducted is by using a research method through a descriptive analysis approach. This analysis is very important, because with this analysis it will be known the form of legal protection of the rights of workers/labourers affected by unilateral termination of employment (PHK) carried out by the company.

3. RESEARCH RESULTS AND DISCUSSION

3.1. Definition of Termination of Employment (PHK)

Problems that are often faced by workers/labourers are problems regarding termination of employment (PHK). This problem is often carried out by large companies which are carried out unilaterally by the company to its workers. The problem of layoffs is something that is avoided by workers because it will have an impact on the lives of workers and their families because it will have an impact on the family's economy. Layoff is the end of a cooperation relationship or work agreement between an employer and a worker/labourer either because of agreed provisions or layoffs carried out unilaterally by the company.

Termination of Employment (PHK) starts from the employment relationship process, where this process involves the relationship between a worker and a company. This working relationship describes the position of both parties which shows the rights and obligations of workers to the company or vice versa. Labour relations occur after a work agreement between superiors and subordinates who bind themselves to each other, to provide a job by providing wages or compensation to workers who have carried out their work. In this sense, it means that the worker in doing his work is under the orders of the leader or employer.

According to Sativa Husni, Termination of Employment (PHK) is the end of the employment relationship due to a certain matter which results in the end of rights and obligations between employers and workers. Layoffs can also occur due to violations or fatal mistakes made by workers/labourers or also due to other factors such as permanent closure of the company, changes in company status and others. Djumadi added that termination of employment means the end of working relations for workers/labourers from all forms of work agreements. Manulang argues that there are several definitions of the term layoff, namely:

- a. Termination, namely the termination of the employment relationship due to the completion or expiration of the agreed work contract;
- b. Dismissal, which is the termination of employment because the worker/labourer commits a disciplinary violation that has been determined;

- c. Redundancy, which is due to the company's development by using new technological machines, such as the use of industrial robots in the production process, the use of heavy equipment that can only be operated by one or two people who replace a number of workers, and this results in the dismissal of workers;
- d. Retrenchment, which is associated with economic problems that make companies unable to provide wages to their employees.

Termination of Employment (PHK) is the cessation of employment relations that can occur in the world of work, the reason for the occurrence of PHK can be due to the expiration of the agreed or agreed time and can also occur due to a dispute between workers / labourers and employers and for other reasons. or the last option choice with reasons that must be truly considered by the company. Layoffs can also be called termination of employment for certain reasons, this is very influential on workers because these workers will lose income and can no longer fulfil their needs to the fullest. Therefore, in the event of termination of employment, the company must be able to calculate the amount of compensation that should be received by the terminated worker. Then the layoff procedure should also be carried out based on the applicable laws and regulations so as not to cause various kinds of problems, and must be carried out as well as possible so as to maintain the relationship between the company and workers/labourers.

The regulation of layoffs in the Job Creation Law is an event that is not expected, especially by the workers / labourers, in Article 81 number 40 paragraph (1) of Law Number 6 of 2023 concerning Job Creation states that 'Employers are prohibited from terminating employment on the grounds of':

- a. Unable to enter work due to illness according to a doctor's certificate for a period not exceeding 12 (twelve) months continuously;
- b. Unable to carry out his/her work due to fulfilling obligations to the state in accordance with the provisions of the Laws and Regulations;
- c. Performing worship ordered by his/her religion;
- d. Married;
- e. Becoming pregnant, giving birth, miscarriage or breastfeeding her baby;
- f. Having blood ties and/or marital ties with other workers/labourers in one company;
- g. Establishing, becoming a member of and/or managing a trade union/labour union, workers/labourers conducting trade union/labour union activities outside working hours, or within working hours upon the agreement of the employer, or based on the provisions stipulated in the work agreement, company regulation, or collective work agreement;
- h. Reporting employers to the authorities regarding the actions of employers who commit criminal offences;
- i. Different ideology, religion, political sect, ethnicity, colour, class, gender, physical condition or marital status; and
- j. In a state of permanent disability, illness due to a work accident or illness due to work relations which according to a doctor's certificate whose recovery period cannot be ascertained.

Termination of employment carried out for the reasons referred to above is null and void. If in the event that termination of employment cannot be avoided, the intention and reasons for termination of employment must be notified by the employer to the worker/labourer and/or trade union/labour union. In the event that workers/labourers who have been notified of the layoff and refuse the layoff, then the settlement of the

layoff shall be conducted through bipartite negotiations between the employer and workers/labourers and/or trade unions/labour unions. In labour law, there are several types of termination, namely:

- a. Termination of Employment (PHK) by the employer;
- b. Termination of employment (PHK) by the worker/labourer;
- c. The employment relationship is terminated by law;
- d. Termination of employment (PHK) by the court.

3.2 Legal Protection in Industrial Relations

According to Hans Kelsen, law is an order that is coercive towards human behaviour. Law is a primary norm that establishes sanctions and law is all rules of behaviour in an organised community that are enforced by the authorities. From some of these definitions, it can be concluded that the law is a set of rules made by parties granted authority with the aim of regulating human behaviour that has a compelling and binding nature.

Philipus M. Hadjon argues that legal protection is the protection of dignity, as well as recognition of human rights owned by legal subjects based on legal provisions from arbitrary actions. Meanwhile, according to Muchsin, legal protection is an action or effort to protect the public from arbitrary acts committed by the authorities. Legal protection aims to create order and tranquillity so as to enable humans to enjoy their nature and dignity. According to Philipus M. Hadjon, the principles of legal protection for the community based on Pancasila can be divided into 2 (two) two, among others:

1. Principles of Recognition and Protection of Human Rights, namely the principle of legal protection for the community against government actions sourced from the concept of recognition and protection directed at limiting and placing obligations on society and government.
2. The principle of the rule of law, which underlies the formation of legal protection for the community against government actions, which is said to be the goal of the rule of law.

We can know that legal protection is an act of effort to protect society, its dignity and dignity owned by each legal subject from arbitrary actions that may be carried out by the authorities against certain interests that are not in accordance with legal regulations. The state of law is a state based on law, in carrying out any action must be based on and accounted for legally. Indonesia is a state of law that has Pancasila and the 1945 Constitution as the basis for legal protection for all levels of society.

In industrial relations, this form of legal protection aims to ensure the continuation of the labour relations system without any pressure from strong parties against weak parties. In this case, employers are obliged to implement the provisions for the protection of workers in accordance with the prevailing laws and regulations. The scope of protection for workers according to Law Number 13 Year 2003 on Labour includes:

1. Protection of occupational safety and health;
2. Protection of morals and decency;
3. Treatment in accordance with human dignity and religious values.

Labour law was born from the idea of providing protection for workers/labourers who are considered to be the weaker party in the employment relationship, so that the goal of social justice in the field of employment can be realised through existing legal means. Manpower development is based on Pancasila and the 1945 Constitution of the Republic of Indonesia which is implemented on the principle of integration through cross-sectoral functional coordination at the central and regional levels.

The purpose of this labour law is to achieve or implement social justice in the field of employment and protect workers against the arbitrariness of unlimited power on the part of employers. Another role of labour law is to:

1. Empowering labour optimally and humanely;
2. Realise equality of employment opportunities and supply of labour; work in accordance with the needs of national development;
3. Providing protection to labour in realising welfare;
4. To improve the welfare of labour and their families.

The nature of labour law can be private and public, because this labour law regulates the interests of individuals, in terms of private law this regulates the relationship between employers and workers/labourers, namely where they enter into an agreement called a work agreement, while in terms of public law is in certain cases the government participates in labour issues with legal sanctions issued by the government through legislation.

Article 6 of the Labour Law states that every worker has the right to receive equal treatment without discrimination from employers. The legal protection of workers involves various aspects, such as social security, working hours, minimum wages, the right to unionise and assemble and the most important is the protection of the safety of the workers themselves. Every worker is given the opportunity to obtain work opportunities that are in accordance with his or her abilities and expertise, and is given a decent wage or reward so as to ensure the welfare of himself or herself and his or her dependent family. Thus, work protection can be carried out either by providing guidance, compensation or by increasing the recognition of human rights, physical and socio-economic protection through the norms that apply in a company. Increased protection for workers is a vehicle that must be created properly so that workers can carry out their obligations optimally.

The form of protection provided by the government is by making regulations that bind workers/labourers and employers, providing guidance, and carrying out industrial relations processes. Juridically, based on Article 27 of the 1945 Constitution of the Republic of Indonesia, the position of workers/labourers is the same as that of employers, but socially and economically the position of both is certainly not the same, where the position of the employer is higher than that of workers/labourers. As a result of the difference in socio-economic position, this can result in the existence of a *dienstverhoeding* relationship, which can lead to a tendency for employers to act arbitrarily towards workers/labourers.

The purpose of providing legal protection to workers/labourers is to ensure a harmonious system of work relations without pressure from strong parties to weak parties. In addition, the purpose of this legal protection does not only cover the ongoing employment relationship but also when the employment relationship ends. A work agreement can end or due to the actions of the employer to lay off, so this is where the purpose of legal protection works to provide the fulfilment of the rights of workers/labourers before and after the end of the employment relationship. The most important legal protection in termination is regarding the correctness of the worker's status in the employment relationship and the correctness of the reason for termination. Therefore, these legal rules give rise to the rights of workers/labourers which include severance pay, long service pay (service money), housing and medical compensation, and separation pay.

Legal protection of termination of employment can be known from the form of implementation of protection in the event of a case of unilateral termination of employment by the company, if all regulations on workers' rights are fulfilled by the

company. Law cannot be measured only juridically but also sociologically and philosophically. According to Soepomo, legal protection of labour is divided into three forms, namely:

1. Economic protection, namely the protection of workers/labourers in the form of sufficient income, including when workers/labourers are unable to work against their will;
2. Social protection, namely the protection of workers/labourers in the form of occupational health insurance and freedom of association and protection of the right to organise;
3. Technical protection, which is the protection of workers/labourers in the form of work security and safety.

Legal protection of workers/labourers is stated in Article 4 letter c of Law Number 13 Year 2003 on Manpower which states 'One of the objectives of manpower development is to provide protection to workers in realising welfare'. Therefore, this legal protection is a manifestation of human rights. According to Abdul Hakim, labour protection is intended to ensure a harmonious system of work relations without any intervention or pressure from the company to workers/labourers, meaning that this labour protection is a guarantee that must be obtained for every worker/labourer who works to protect his/her safety and welfare during work.

3.3 How is the settlement of industrial relations disputes in cases of unilateral termination of employment (PHK) (Analysis of Decision Number 162/Pdt.Sus-PHI/2024/PN Bdg).

Problems related to employment still often occur in Indonesia, especially in terms of unilateral termination of employment (PHK) carried out by the company, so in this case the company must provide the rights of workers / labourers in accordance with applicable legal provisions. The relationship between employers and workers adheres to the principle of freedom so that layoffs cannot be carried out unilaterally and must go through the mechanism stipulated in the Job Creation Law.

With the issuance of an announcement by the company about layoffs and company closure by PT Alenatex suddenly without going through the applicable procedures on 04 April 2024, with Number. 024/PERS/ALN/IV/2024 which states that the company will be closed starting on 6 April 2024 until an indeterminate time. This is the cause of the dispute between the company and the workers, coupled with information from the management of the company which only offers severance pay to employees of PT Alenatex for the amount of severance pay of only Rp. 1,000,000.00 (one million Rupiah) per year x employee tenure, this makes workers even more confused and dissatisfied with the decision. Finally, the workers filed a lawsuit to the Industrial Relations Court at the Bandung District Court, then the panel of judges gave Decision Number 162/Pdt.Sus-PHI/2024/PN Bdg.

Based on the rule of law, workers/labourers who have been terminated are entitled to receive their rights from the company, if workers/labourers have not received their rights then they can take several steps or efforts to fight for them. Legal efforts that can be taken are by making a report to the Labour Supervisory Officer of the Manpower Office, can be done by bipartite and tripartite methods. In addition, Article 176 of the Labour Law states that labour inspection is carried out by competent and independent labour inspectors to ensure the implementation of labour laws and regulations. This provision means that civil servants in the regions usually come from the Manpower Office who are appointed by the government to supervise the implementation of Law No. 13 of 2003 and Law No. 6 of 2023 of the Republic of Indonesia.

The existence of the Job Creation Law as a legal provision for the implementation of development in the labour sector and the existence of this labour law is part of positive law that regulates the relationship between employers, workers/labourers and the government. Policy provisions regarding employment are important matters that have an essential role in the business activities of a company. Based on Law Number 6 of 2023 concerning Job Creation in CHAPTER IV Employment Article 81 number 12 concerning Amendments to Article 56 aya (1) of Law Number 13 of 2003 concerning Manpower, states 'Work agreements are made for a certain time and an indefinite time', then we can distinguish work agreements into two types, namely:

1. A fixed-term employment agreement (PKWT), as mentioned in Article 1 point 10 of Government Regulation of the Republic of Indonesia Number 35 of 2021, namely 'A fixed-term employment agreement, hereinafter abbreviated as PKWT, is a work agreement between a worker/labourer and an employer to establish a working relationship for a certain period of time or a certain job'. Workers in this specific time work agreement are also referred to as contract workers.
2. Non-permanent work agreement (PKWTT), as stated in Article 1 point 11 of Government Regulation of the Republic of Indonesia Number 35 of 2021, namely 'Non-permanent work agreement, hereinafter abbreviated as PKWTT, is a work agreement between workers/labourers and employers to establish a permanent employment relationship'. Workers in this indefinite period work agreement are also referred to as permanent workers.

Based on the results of the author's observation at the research location in the legal remedies taken in the dispute of unilateral termination of employment of workers/labourers of PT Alenatex that in certain circumstances, there were several cases where workers/labourers who in a legal perspective should not have terminated employment unilaterally with workers because workers/labourers had carried out their obligations as workers with the maximum to increase company production.

However, after the decision of the Industrial Relations Court Judge at the Bandung District Court at the first level with Decision Number 162/Pdt.Sus-PHI/2024/PN Bdg in a dispute over termination of employment, the company still does not want to be responsible and has not paid severance pay and service money and others in terms of termination of employment that has occurred, in the end the workers / labourers through the trade union will report the employer in this case the owner of the company PT. Alenatex to the West Java Regional Police, this is in accordance with Article 81 number 66 of Law Number 6 of 2023 concerning Job Creation which states that Employers / Companies that do not pay workers' severance pay are subject to criminal sanctions of imprisonment for a minimum of one year and a maximum of four years and / or a fine of at least Rp100 million and a maximum of Rp400 million.

4. CONCLUSION

Termination of employment (PHK) has been explicitly regulated in Law Number 6 of 2023 on the Stipulation of Government Regulation in Lieu of Law Number 2 of 2022 into Law on Job Creation Law. Several factors that can be the reason for layoffs are listed in the Job Creation Law. This is one of the legal bases for employers/companies to terminate workers/labourers. The case of PT Alenatex Bandung is one example of a case of unilateral layoffs carried out by employers/companies that violate the provisions in the Job Creation Law and Law Number 13 of 2003 concerning Labour. The rights of workers listed in these laws and regulations such as severance pay, service pay and unearned wages are clearly in violation of the law. Workers who are unilaterally dismissed must receive legal protection as stipulated in the Manpower Law and the Job Creation Law as a form of legal protection

provided by the government to protect the rights of workers/labourers. Companies that carry out unilateral layoffs have violated the applicable legal provisions and must get sanctions so that nothing like this happens again.

5. ACKNOWLEDGEMENT

The author would like to thank the informants who willingly provided all the information and data that the author needed.

6. BIBLIOGRAPHY

- Abdul Hakim, “*Dasar-Dasar Hukum Ketenagakerjaan Indonesia*”, Citra Aditya Bakti, Jakarta, 2014
- Agusmidah, “*Dilematika Hukum Ketenagakerjaan, Tinjauan Politik Hukum*”, Sofmedia, Jakarta, 2018
- Asikin, Zaenal, “*Dasar-Dasar Hukum Perburuhan*”, Raja Grafindo Persada, Jakarta, 2012
- Asri Wijayanti, “*Hukum Ketenagakerjaan Pasca Reformasi*”, Sinar Grafika, Jakarta, 2014.
- Bambang.S & R.Joni, “*Hukum Ketenagakerjaan*”, Cetakan ke I, Pustaka Setia, Bandung, 2019
- Eko Wahyuni, dkk., “*Hukum Ketenagakerjaan*”, Sinar Grafika, Jakarta, 2018
- Imam Soepomo, “*Hukum Perburuhan Bidang Hubungan Kerja*”, Djambatan, Jakarta, 2009
- Lalu Husni, “*Hukum Ketenagakerjaan Indonesia*”. Raja Grafindo Persada, Jakarta, 2011
- Malau, Parningotan, “*Perlindungan Hukum Pekerja/Buruh Atas Kesehatan dan Keselamatan Kerja*”, Sofmedia, Jakarta, 2018
- Muchsin, “*Pengantar Hukum Indonesia*”, Medan Area University Press, Medan, 2012
- P Salim, “*Pengaruh Undang-undang Cipta Kerja Terhadap Pemenuhan Upah Minimum Pekerja*”. Raja Grafindo Persada, Jakarta, 2023
- Peter Mahmud Marzuki, “*Penelitian Dasar-dasar Hukum Normatif*”, Kencana Prenadamedia Group, Jakarta, 2015
- Sativa Husni, “*Pengantar Hukum Ketenagakerjaan*”, Literasi Nusantara Abadi, Malang, 2020
- Soehatman Ramli, “*Sistem Manajemen Keselamatan Dan Kesehatan Kerja*”. Dian Rakyat, Jakarta
- Soepomo & Abdul Khakim, “*Pengantar Hukum Ketenagakerjaan*”, Citra Aditya Bakti, Bandung
- Yati Nurhayati, “*Buku Ajar Pengantar Ilmu Hukum*”, Nusa Media, Bandung
- Undang-Undang Dasar Negara Republik Indonesia Tahun 1945
- Undang-undang Nomor 13 Tahun 2003 Tentang Ketenagakerjaan
- Undang-undang Nomor 6 Tahun 2023 Tentang Penetapan Peraturan Pemerintah Pengganti Undang-Undang Nomor 2 Tahun 2022 Tentang Cipta Kerja Menjadi Undang-Undang
- Peraturan Pemerintah Nomor 35 Tahun 2021 Tentang Perjanjian Kerja Waktu Tertentu, Alih Daya, Waktu Kerja dan Waktu Istirahat dan Pemutusan Hubungan Kerja
- Rudi Febrianto Wibowo dan Ratna Herawati, “*Perlindungan Bagi Pekerja Atas Tindakan Pemutusan Hubungan Kerja (PHK) Secara Sepihak*”, Jurnal Pembangunan Hukum Indonesia, Fakultas Hukum Universitas Diponegoro, Volume 3 Nomor 1 Tahun 2021
- Aldiyansah, “*Buruh dan Permasalahan yang Tidak Kunjung Habis*”. Artikel. Jawa Pos. 11 Oktober. 2017
- Zaini, Ahmad, “*Pengaturan Pemutusan Hubungan Kerja (PHK) Menurut Peraturan Perundang-Undangan Ketenagakerjaan*, Jurnal Fakultas Hukum Universitas Pembangunan Nasional, <https://doi.org/10.37035/ajh.v13i1.1753>.

