

Efforts of Migrant Care and the Indonesian Government in Realizing the Protection of Indonesian Migrant Workers (PMI) Facing the Death Penalty in Saudi Arabia (2015 – 2018)

Esfuerzos de Migrant Care y el gobierno de Indonesia para lograr la protección de los trabajadores migrantes de Indonesia (PMI) que enfrentan la pena de muerte en Arabia Saudita (2015 - 2018)

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Resumen: Uno de los numerosos problemas de Indonesia es el tamaño de su fuerza laboral. La solución del gobierno de Indonesia es enviar a las trabajadoras migrantes indonesias del sector informal al extranjero, incluso a Arabia Saudita. Estas dificultades se pueden dividir en tres categorías: ligeras, moderadas y graves: la pena de muerte. La pena de muerte representa el nivel más extremo del problema. Entre 2015 y 2018, varias trabajadoras migrantes indonesias en el sector informal de Arabia Saudita fueron sentenciadas a muerte sin ninguna notificación del gobierno de Arabia Saudita al gobierno de Indonesia, incluida la ejecución

Abstract: One of Indonesia's numerous issues is the size of its workforce. The Indonesian government's solution is to send Indonesian female migrant workers in the informal sector overseas, including to Saudi Arabia. These difficulties can be divided into three categories: light, moderate, and severe—the death penalty. The death penalty represents the most extreme level of the issue. From 2015 to 2018, several Indonesian female migrant workers in Saudi Arabia's informal sector had been sentenced to death without any notification from the Saudi Arabian government to the Indonesian government, including the execution of Siti Zaenab in 2015 and the Tuti Tursilawati in 2018.

de Siti Zaenab en 2015 y Tuti Tursilawati en 2018. Esto provocó Migrant Care y el gobierno de Indonesia para ayudar en la ejecución de los trabajadores migrantes de Indonesia (PMI) en el sector informal.

Palabras clave: Trabajadores Migrantes Indonesios, Pena de Muerte, Gobierno de Indonesia, Atención a Migrantes

It prompted Migrant Care and the Indonesian government to assist in the execution of Indonesian migrant workers (PMI) in the informal sector.

Keywords: Indonesian Migrant Workers, Death Penalty, Indonesian Government, Migrant Care

1. INTRODUCTION

Due to the vast size of the Indonesian labor population and the dearth of employment prospects in Indonesia, the government sends Indonesian female migrant workers in the informal sector overseas. The solution of the Indonesian government to send Indonesian female migrant workers to work in the informal sector abroad is driven by their low level of education. Sending Indonesian female migrant workers abroad to work in the informal sector can help boost the nation's foreign exchange reserves (Qobulsyah, 2013). For the past two decades, migrant workers have been one of the main contributors to economic growth in Southeast Asia. Two factors drive the migration phenomenon; they are gaps in the economics and social conditions and demographic differences in Southeast Asian. Among other countries in the region, Indonesia ranked as the second-largest migrant worker country in Southeast Asia (Alfajri & Maulidia, 2020). At the end of 2006, an estimated 11 percent of Indonesian workers (11.6 million) were unemployed, and underemployment was over 20 percent (45 million workers). Not surprisingly, the two types of migration that most affect Indonesia involve emigration. First is an increasing level of migration to more developed nations, particularly those belonging to the Organization for Economic Cooperation and Development (OECD); here the flow is predominantly permanent and consists mainly of skilled migrants. Second is the better-known, temporary movement of largely unskilled workers to the Middle East and elsewhere in Asia (Hussin, 2013).

Saudi Arabia, one of the largest Arab nations in the Middle East, is the most popular destination for Indonesian female migrant workers. It covers a total area of 2,149,690 km² and is flanked by Jordan and Iraq to the north and northeast, Kuwait, Qatar, and the United Arab Emirates (UAE) to the east, Oman to the southeast, and Yemen to the south. It is bordered by the Persian Gulf and the Red Sea. Moreover, it is known as the Land of the Two Holy Mosques, as Mecca and Medina are the two holiest destinations for Muslims (Tamba, 2019). As a country with a religious similarity, with Islam as the religion of choice and adhering to the philosophy of Islam, the Quran and Sunnah, Saudi Arabia is a favorite destination for many people. This religious similarity will also ease Indonesian migrant workers (PMI) to perform the Hajj or Umrah due to the vast amount of information they gather during their job in Mecca (Ismail, 2019).

The legal systems of Saudi Arabia are the kafalah and the securitization migration. Kafalah is either a "sponsorship system that regulates residency and employment of the workers in the Gulf Cooperation Council (GCC) countries" or "a system used to monitor the construction and domestic migrant laborers in the Arab States of the Persian Gulf". In Saudi Arabia, the kafalah system includes the following provisions. "An employer assumes responsibility for hired migrant workers and must grant explicit permission before the workers can enter Saudi Arabia, transfer employment, or leave the country. The kafala system gives the

employer immense control over the workers”. The kafalah system is also considered a sponsorship system, as it requires all migrant workers (including Indonesian female migrant workers in the informal sector) to have a domestic sponsor or *kafeel* (typically, the sponsor is the employer), who is responsible for the visa and legal status of migrant workers.

With the kafalah system, Saudi Arabian PMI are governed by their employers’ regulations. Employers control PMI’s human rights under this system, and the Saudi Arabian government cannot intervene in the personal issues of employers and employees. Thus, under the kafala system, employers consider their employees to be their property. In addition, the privacy of Saudi Arabian residents is crucial and should not be questioned, and the Saudi Arabian government will not violate the principles of the kafalah system. Furthermore, it can be inferred from the securitization of migration that the state and its political actors perceive the phenomena of migration or the movement of migrants as a threat that can destabilize the nation. Employers restrict the rights of Indonesian female migrant workers in the informal sector in Saudi Arabia, a phenomenon known as securitization migration (Surwandono, 2017).

These two legal systems make it difficult for Indonesian female migrant workers in Saudi Arabia’s informal sector to overcome the violence they experience. The levels of violence can be classified as light, moderate, and severe—the death penalty. Two Indonesian female migrant workers in Saudi Arabia’s informal sector, Siti Zaenab in 2015 and Tuti Tursilawati in 2018, were sentenced to death. The Indonesian government has made numerous attempts in response to the difficulties Indonesian female migrant workers encountered in Saudi Arabia’s informal sector. In 2014, a collaboration between the governments of Indonesia and Saudi Arabia was formalized through a Memorandum of Understanding (MoU).

The Indonesian translations of the MoU include “memorandum of agreement”, “memorandum of understanding”, “cooperation agreement”, and “preliminary agreement”. Generally speaking, an MoU is a commitment between parties to negotiate to reach an agreement later, once all uncertainties have been resolved. The text of the MoU contains a declaration that both parties understand and will act under the MoU’s provisions. However, the MoU execution failed. It is evidenced by the fact that Indonesian female migrant workers in Saudi Arabia’s informal sector continued to endure a high rate of violence after 2014. In 2015, the Indonesian government learned of additional issues encountered by Indonesian female migrant workers in the informal sector, including the death penalty.

The “Global Compact Labor Principles – United Nations” issued by the ILO in the “responsibility of government” section states: “Governments are responsible for ensuring that the legal and institutional frameworks exist and function properly. They should also help to promote a culture of mutual acceptance and cooperation. When governments do not honor their international obligations, efforts should be made to improve legislation and governance. In the absence of legislation that

conforms to international labor standards, employers and trade unions should make every effort to respect the principles, at least in countries where honoring them is not specifically prohibited. In countries where legislation protects rights, but implementation is poor due to inadequate enforcement, employers should, nevertheless, obey the law (Fayed, 2022).

The active engagement of NGOs or civil society may undoubtedly serve as a partner to the government in terms of information exchange, communication and as a party that safeguards the rights and duties of PMI in other countries (Nugrahaningsih, Nuzulian, & Lutfie, 2022). With the Decree of the Minister of Manpower No. 260 of 2015 addressing the termination and restriction of PMI placement on individual users in Middle Eastern countries, President Joko Widodo decided to stop sending PMI to the Middle East 11 region (one of which was Saudi Arabia). The Indonesian government responded seriously by implementing a moratorium policy. A moratorium is a period during which certain activities are prohibited. Moreover, another definition of a moratorium is a legal delay in executing legal responsibilities (Dictionary, 2011).

One way of establishing an analytical link between migration and the politicization of migrants concerns through non-governmental institutions is via the concept of governance (Hussin, 2013). Non-governmental organizations (NGOs), such as Migrant Care, have also taken notice of the difficulties encountered by Indonesian female migrant workers in the informal sector in Saudi Arabia. Migrant Care encourages the government to address the issues affecting migrant workers abroad. It is concerned with the protection of PMI by engaging in policy lobbying, legal aid, research, and education to bolster the migrant worker movement as part of the global justice social movement. The focus of Migrant Care is on human rights and employment. It attempts to advocate for the rights of Indonesian female migrant workers in the informal sector in Saudi Arabia, mostly ignored by the government. Migrant Care adheres to the idea of independence and prioritizes the most urgent cases in its humanitarian efforts. Additionally, it does not side with any of the parties concerned in the situation of Indonesian female migrant workers in Saudi Arabia's informal sector. Migrant Care has played a role in the execution of Indonesian female migrant workers in Saudi Arabia's informal sector. This article describes the efforts made by Migrant Care and the Indonesian government to protect PMI facing the death penalty in Saudi Arabia from 2015 to 2018.

Multilevel government (MLG) refers to a system of governance equivalent to the European Union's governance structure from the early 1990s. MLG can be understood as an arrangement or agreement for making legally binding decisions involving various politically independent but interdependent actors, between the private and public at each level of the regional group, and carried out through negotiations/deliberation/continuous implementation without the need to establish policy competencies or stable hierarchies of political authority at each of these levels. Collaboration is an essential keyword in MLG theory and approach.

Bache and Flinders employ the notion of MLG to comprehend the dynamic interrelationships between and among the various levels of government. Although the concept of MLG was initially created in the context of the European Union, many of its forms have been adapted to other disciplines of study, such as the comparative study of federal states. McCormick contends that “layered governance is conceptually related to two older concepts, federalism and confederalism”. MLG can also be regarded as a polycentric government system, which refers to a government system in which each participant views the system not as a challenge but as an invention, a learning process, and a combination of technologies to support policy instruments. There are two varieties of MLG: **Type I** is a hierarchical strategy focusing on distributing expertise and authority among government levels. The decision-making authority is likewise constrained. The MLG study focuses mainly on the interactions between several governments and the policies that arise. In addition, **Type II** is a polycentric paradigm in which multiple overlapping and interrelated horizontal domains of jurisdiction regulate particular issues. The characteristic of a “polycentric government” is the presence of many regulated authorities, in the sense that it is composed of several government entities and actors, whereas a “monocentric government” comprises only one actor. In this sense, the distribution of authority is polycentric, as it resides not only within the government but also within the government forum so that the authority is also divided in establishing its policies. Polycentricity in the MLG is the notion of “spheres of authority,” which is also sometimes referred to as a process of negotiation, collaboration, and approval or disagreement between stakeholders over a draft agenda of activities or a policy regulated by the central government. Polycentricity is essentially an ambiguous distribution of authority at each level (Sibarani, 2017).

Multilevel governance networks refer to the regional government’s governance structure. This concept focuses on the interplay between supranational, national, regional, and local government levels. Multilevel governance networks characterize the current condition of government and policy as a policy-making process not solely dominated by state or national actors. This concept demonstrates the existence of considerable policy-making and political authority, which is subsequently delegated to lower levels of government in the supranational arena in the regional or local context. This concept is characterized by the interdependence of the order and level between governments, organizations, and network members, such as in video games. It impacts the state’s power in these interactions based on trust and regulations defined by accepted policies and discussions by groups or collaborations that the state follows (Berlin, 2008).

According to Gary Marks, multilevel governance is a partnership between commercial and public sector actors based on circumstances at distinct territorial levels. The constructed negotiations are not only placed at different government and territorial levels but also consider the development of supranational organizations. Multilevel governance encompasses all actors, including institutions, national

governments, municipal and regional authorities, and civil society. Specifically, the multilevel governance system refers to the fundamental decision-making between negotiations and multiple actors to reach an agreement and a non-majority vote. Multilevel governance is based on the allocation of authority within the structure of a country, comprising three national territories: central, regional, and local. The multilevel governance process transfers policies between supranational, subnational/provincial/regional, and local public and private bodies (Ivan & Cuglesan, 2009). Following the establishment of regional decentralization, the multilevel governance process reveals the existence of levels. Regarding regional decentralization, decentralization is the act by which the central government allocates authority to actors or institutions at lower levels within the framework of the political-administrative hierarchy and the regional hierarchy. The strategy at the international level is to establish transnational network and actively attend international forums on migrant workers (Khurun'in, 2017).

Several patterns carried out by the Indonesian government in labor protections are grassroots, national, and international levels. First, the grassroots level is an advocacy that carried out by targeting the target being defended that is the domestic sector migrant workers. Strategy carried out is to mobilize labor resources which migrants are the targets protection. The second level is the national level. In terms of this movement actor in demanding a revision to the employment act and placing migrant workers the domestic sector or domestic workers in the law that legally binding.

In this article, the authors utilize the concept of multilevel government networks since it is pertinent to the topic at hand, namely the efforts of NGOs and the Indonesian government to protect Indonesian female migrant workers in the informal sector who risk the death penalty in Saudi Arabia from 2015 to 2018. As long as Indonesian women migrant workers continue to labor in the informal sector in Saudi Arabia, there will be numerous challenges, with the death penalty being the most severe. Based on the notion of Type II multilevel government networks, the government and NGOs interact. In addition to supporting the government, NGOs have previously conducted investigations and are considered experts on some issues, such as violence suffered by Indonesian female migrant workers in Saudi Arabia's informal sector. The Indonesian government does not remain silent in this regard. In response to the difficulties Indonesian female migrant workers face in the informal sector in Saudi Arabia, the Indonesian government has enacted several policies. The response came not just from the government of Indonesia but also from NGOs. It is consistent with the concept of Type II multilevel government, the interaction between the government and non-governmental organizations.

2. RESULT AND DISCUSSION

2.1. CONDITIONS OF INDONESIAN FEMALE MIGRANT WORKERS IN SAUDI ARABIA

The PMI destination countries are extremely diverse, particularly in East Asia and the Middle East, and Saudi Arabia is one of them. In addition to the fact that many PMI have previously worked in Saudi Arabia, the country's high salary and simple employment criteria have attracted many Indonesians. They do not care that communication is conducted in a foreign language or that cultural differences exist. From 2015 to 2018, Saudi Arabia sent the second-most PMI behind Malaysia. In the informal sector, Indonesian female migrant workers are dispersed throughout Jeddah, Medina, Riyadh, Dammam, Dhahran, and Khobar (Pangestu, 2020).

Table 1. Data on the Placement of Indonesian Female Migrant Workers in Saudi Arabia in 2015 – 2018

Source: (Indonesia & BP2MI, 2015)

These data indicate the numerous PMI transmitted to Saudi Arabia. For various reasons, Saudi Arabia is a favored destination for PMI, even though it is the second country after Malaysia. Four factors urge Indonesia to engage in labor cooperation with Saudi Arabia. The primary factor is the high unemployment rate. After the 1997 financial crisis, which gave rise to hundreds of thousands of unemployed due to widespread layoffs, this condition became apparent and sparked heated debates. Unemployment is mostly caused by an imbalance between supply and demand or by a disparity between the number of job searchers and the number of available positions, as well as the underutilization of economic opportunities derived from the potential of local expertise. The government's response is to send PMI overseas, including to Saudi Arabia, to lower the unemployment rate, which, if not implemented, might harm internal political and economic conditions. The second cause is the huge number of labor force participants compared to the small number of employment opportunities. For the third reason, which is to maintain political and economic stability at home, the government attempts to provide and facilitate stability overseas. In addition, collaboration is intended to increase the country's foreign exchange as one of the national development capitals. One of the pillars of development is the revenue earned by PMI working overseas, particularly in poor regions where they originate. With these outcomes, PMI can enhance the standard of living and well-being of families, thereby reducing the national poverty rate. The contribution of PMI to the national economy is significant. In addition to playing a key part in the growth of the Indonesian nation, their foreign exchange contribution is the backbone of their own family. The fourth reason is to improve the quality of

PMI's human resources. PMI receiving additional training are believed to be able to devote themselves to growing the nation and bolstering Indonesia's competitiveness in various industries after being honed for so many years by varied lessons and experiences gained while working abroad.

Moreover, four reasons underlie Saudi Arabia's interest in labor collaboration with Indonesia. To begin with, there is a significant need for employees in strategic industries. As previously indicated, the skyrocketing oil price on the global market has produced a middle-class society in Saudi Arabia, consequently raising the demand for Indonesian female migrant workers in the informal sector. In the 1970s, Saudi Arabia's oil mining business exploded due to the Organization of the Petroleum Exporting Countries (OPEC) publication. Saudi Arabia is also one of the world's top oil exporters and the second-largest oil producer (OPEC, 2015). Asians began to outnumber Arabs from Saudi Arabia and the Arabian Peninsula in the workforce, which Arabs had previously dominated in the region. As a result of the increase in oil prices by OPEC countries, oil-importing countries have decided to transfer their workers to the gulf countries, hence boosting the number of migrant workers. Kapiszewski stated that over the previous 50 years, the population of GCC countries has expanded by more than eightfold due to the oil boom. "The population in the current GCC states has grown more than eight times during 50 years; to be exact, from 4 million in 1950 to 40 million in 2006, which marks one of the highest rates of population growth in the world. This increase has not been caused primarily by the natural growth of indigenous population but by the influx of foreign workers" (Kapiszewski, 2006).

The second argument is that labor from Asia, such as Indonesia, is less expensive, more productive, and risk-free. Private employers and users of Indonesian female migrant workers in Saudi Arabia's informal sector are more likely to hire Asian female migrant workers due to their lower wage requirements and more sophisticated personalities. Indonesian female migrant workers in the informal sector are more courteous, hardworking, submissive, and manageable than non-local Arab workers or the native population of Saudi Arabia (Kapiszewski, 2006). In addition, employees who typically come alone (without their families) and are temporary are seen harmless to the nation's political and ideological security, in contrast to non-local Arab workers who arrive in droves with their families and prefer to settle in Saudi Arabia. However, working in the informal sector for foreign workers is a high risk, especially for women. The low bargaining power of women workers makes them vulnerable to violence and trafficking in persons (Anam, Munir, & Hidayat, 2022). Ingrained gender perception in the society that homeworkers household members are household members who do not require formal legal protection. That matter which contribute to the emergence of conflict latency between groups of migrant workers and society and government (Khurun'in, 2017).

The third reason is the historical affinity between Indonesia and Saudi Arabia. Relationships that have persisted for generations due to commerce and pilgrimage

activities have fostered an emotional closeness, increasing PMI's appeal. The fourth factor is religious equality (Islam), which is the most popular religion in Saudi Arabia, and also possesses an Islamic ideology (Aziz, 2011). Arab countries with mainly Muslim populations typically always preserve the value of religious equality or *ukhuwah Islamiyyah*, founded on the brotherhood concept. Based on the bilateral relationship between the two nations, Indonesia, which has the biggest Muslim population in the world, is a crucial partner for Saudi Arabia. Due to the commonality of religion, which the Qur'an and Sunnah govern, Saudi Arabia is interested in integrating Indonesian female migrant workers into its informal sector since it can lessen disagreements.

Sending Indonesian female migrant workers to the informal sector has facilitated the employment of Indonesian people. However, the more Indonesian female migrant workers are sent to the informal sector abroad, the higher the amount of violence they experience. The issues faced by women in the informal sector fall into three categories: light, moderate, and severe.

Table 2. Data on Complaints from Indonesian Female Migrant Workers in Saudi Arabia's Informal Sector in 2015 – 2018

Source: (Pangestu, 2020)

There was a significant increase in the number of complaints filed by Indonesian female migrant workers in Saudi Arabia's informal sector from 2015 to 2018. However, the actual number of instances may be larger, given that the figures only include recorded ones.

Table 3. Data on Indonesian Female Migrant Workers in the Informal Sector Who Died in Saudi Arabia in 2015 – 2018

Source: (Pangestu, 2020)

The data indicate that the death rate among Indonesian female migrant workers in Saudi Arabia's informal sector continues to rise. Accidents, illness, persecution, and execution are among the causes of PMI-related deaths. The death penalty consists of the followings.

a. Had

A had is any crime of which the punishment is specified in the Qur'an and Hadith. If the conditions for determining the had are met, this sort of legal sanction must be enforced. In the case of had, the government or heirs do not have the right to pardon the culprit if the judge's verdict has the status of *inkracht* or permanent legal force. There are eight sorts of offenses classified as had: adultery, false charges of adultery, and intoxication are among them.

All three have lashes as a legal penalty. Furthermore, the death penalty applies to apostasy, robbery, insurrection, sorcery, and planned murder. The punishment for theft is amputation of the hand.

b. Ta'zir

Ta'zir refers to any illegal offense of which the sanctions are not defined in the Qur'an and Hadith but made by judges or governments according to their policies and *ijtihad* under the Qur'an and Hadith for the public welfare. The judge or government can reduce or increase the punishment based on their considerations. There are three sorts of ta'zir crimes, including drug trafficking and the sale of death-row inmates as witnesses, fraud, and forgery. Witnesses to the crime of ta'zir receive lashings and imprisonment.

c. Qishash

Qishash is a punishment given to the criminal based on the severity of the offense committed. The legal punishments for the perpetrators are outlined in the Qur'an and Hadith. In qishash, the victim's heirs may forgive the criminal in exchange for *diyat*. Willful murder is an instance of qishash with the death sentence as a witness. Others include road accidents, torture, and disability with a payment of *diyat* as a penalty.

Every criminal act has two types of rights: general rights (*Al-Haq Al-Am*) and special rights (*Al-Haq Al-Khash*). General rights refer to the rights and obligations of the state to punish someone who has committed a crime within the jurisdiction of Saudi Arabia under local legal provisions. Special rights, on the other hand, can be defined as the rights of every individual or his heirs who suffer losses due to criminal acts to demand material compensation, such as the implementation of certain punishments for the criminals, such as *qishash* (similar punishment).

For general rights, the government can provide amnesty or legal leniency. However, for special rights, it cannot intervene at all because it is an individual right. In the case of homicide, forgiveness by one of the victim's heirs renders the death penalty illegal (only one of the victim's heirs). If some of the heirs are unwilling to forgive, but some are still young (not old enough or *baligh*), the execution of the death sentence will be postponed until they reach adulthood. As an adult, they will be asked their opinion on whether or not to forgive the criminal. The efforts of the heirs of murder victims to acquire forgiveness are always aided by reconciliation and peace agencies.

Regarding special rights, the King of Saudi Arabia lacks the jurisdiction to grant forgiveness, as it is the right of every person who resides within the Kingdom of Saudi Arabia. In this situation, the king can only help convince the victim's heirs to forgive the criminal. If the victim's heirs request that the death penalty be carried out as soon as possible after the verdict (in special rights) has permanent legal effect, the government must carry out the death penalty (Ariefana, 2018). In the cases of Siti Zaenab in 2015 and Tuti Tursilawati in 2018, the death penalty was imposed without prior notification to the Indonesian government.

2.2. SITI ZAENAB'S DEATH PENALTY CASE

Siti Zaenab was an Indonesian migrant worker from Bangkalan, East Java, whom the Saudi Arabian government executed on April 14, 2015. In 1999, she was hanged for the murder of her employer, Nourah bint Abdullah Duhem Al Maruba. After completing a year, she was frequently tormented by her female employer at work. She explained that as she prepared to pray Fajr, her female boss struck her on the head, grabbed her, and strangled her. In anguish and pain, she searched for a knife and stabbed her boss in the stomach. Due to the event in 1999, on October 5, 1999, she was held at the Medina Public Prison. After a series of judicial proceedings, the Medina Court sentenced her to death (qishash) on January 8, 2001. With the qishash decision, only the victim's heirs can grant forgiveness. However, the execution of the death penalty was delayed because the victim's youngest son, Walid bin Abdullah bin Muhsin Al Ahmadi, had to attain puberty first. After the victim's youngest son entered puberty in 2013, he notified the court of his refusal to forgive Siti Zaenab and his desire for her to be executed. It was documented in a court decision in 2013 (Asril, 2015).

After hearing about her mistreatment, Hasan, Siti Zaenab's older brother, went to the Ministry of Manpower and Transmigration office to lodge a complaint regarding Siti Zaenab's situation. The Ministry of Manpower and Transmigration requested Hasan to visit PT Panca Banyu Ajisakti and write a letter to the Indonesian Embassy in Saudi Arabia at that time. Later, Hasan learned that his younger sister had been arrested and faced the death penalty. Hasan continued to write letters to the Ministry of Women's Empowerment, the Ministry of Foreign Affairs, and other PMI departments requesting government aid. Hasan met with the former First Lady, Sinta Nuriyah Wahid, at the Presidential Palace on October 24, 2001. Hasan and other family members were able to meet Siti Zaenab in a Saudi Arabian prison as a result of the meeting (Kusumawati, 2015). Nevertheless, the meeting had no effect. Siti Zaenab was executed without informing the Indonesian authorities on April 15, 2015.

2.3. TUTI TURSILAWATI'S DEATH PENALTY CASE

Tuti Tursilawati was a migrant worker from Majalengka, Indonesia, who departed for Saudi Arabia in 2009 to work as a caregiver for the elderly in Taif City. She complained that she had worked for eight months without receiving payment for the remaining six. In addition, she was sentenced to the death penalty, the harshest punishment in Saudi Arabia. On May 12, 2010, the Saudi Arabian authorities detained her on suspicion of murdering Suud Mulq Al Utaibi, her employer's father. She was apprehended a day after the murder. She aimed to flee to Mecca with her employer's jewelry and money after murdering the victim. On her journey, however, she was raped by nine Saudi Arabian youths. In addition, the nine adolescents also

stole her jewelry and money. However, the nine youngsters had been successfully apprehended and convicted due to these instances.

After her arrest in May 2010, the Indonesian Consulate General in Jeddah, through Said Barawwas and his task force in Taif, assisted with the investigation. Tuti Tursilawati was involved in a legal proceeding for roughly eight years. She admitted that she killed her employer's father in self-defense because he was frequently subjected to sexual harassment and violence. She was given the death penalty for murdering her employer. However, her mother, Iti Sartini, stated that Tuti was merely defending herself. In May 2010, Tuti Tursilawati allegedly assaulted her employer, an older man, at his home in Taif. Tuti Tursilawati's mother reported that her daughter's elderly employer, who was in a wheelchair, persuaded her to engage in sexual activity. One day, Tuti became irritated and pushed the old man's wheelchair (Chairunnisa, 2022).

The Saudi Arabian Court allowed Tuti's plea for a review of her case, but it was too late because she had been executed. Then, Mujib Iqbal, the Director of Protection for Indonesian Citizens and Legal Entities at the Indonesian Ministry of Foreign Affairs, stated that Tuti killed Suud by striking him with a prepared piece of wood. Tuti struck Suud from behind, rendering him unconscious. The judge concluded that Tuti had plotted the crime. In 2011, 13 judges sentenced Tuti to gillah or the death penalty. The death penalty for had gillah is among the most severe in Saudi Arabia. In addition to filing an appeal, President Joko Widodo submitted a letter to King Salman in 2016 pleading for clemency for Tuti. However, it did not sway the king's decision to execute Tuti. Unfortunately, Tuti was executed without notifying the Indonesian consulate mission in Jeddah or the Indonesian diplomats in Riyadh (Rahayu & Dewantara, 2018). Migrant Care and the Indonesian government coordinated their efforts to aid the two incidents involving the killings of Indonesian female migrant workers in the informal sector.

2.4. THE INDONESIAN GOVERNMENT'S RESPONSE TO THE DEATH EXECUTION CASES OF INDONESIAN FEMALE MIGRANT WORKERS IN SAUDI ARABIA

The execution of Siti Zaenab without notification has infuriated the Indonesian government, which views this as a significant issue. Previously, in 2014, the Indonesian government and the Saudi Arabian government signed an MoU. The MoU intends to establish a legal connection as a letter made by one party whose contents contain a will directed to another party, and the other party is expected to make a comparable letter of intent to demonstrate its intent. The implementation of the MOU, however, was unsuccessful. It is evident from the 2015 case involving the execution of Siti Zaenab. With the Decree of the Minister of Manpower No. 260 of 2015 about the termination and prohibition of PMI placement on individual users in Middle Eastern nations, the Indonesian government enacted a moratorium policy. A moratorium is a postponement or suspension of activity as a middle ground between

“yes” and “no” in international law, considering the importance of compromise and cooperation in international relations. The moratorium’s values can provide extremely pertinent solutions to complicated and challenging challenges. In other words, policymakers and attorneys should consider the moratorium as an alternative when faced with a problem.

The moratorium policy was enforced because the government of Saudi Arabia lacked a problem-solving mechanism for Indonesian female migrant workers, and there was no significant commitment from placement nations in the Middle East to protect Indonesian migrant workers. The Indonesian government imposed a moratorium policy because of the numerous problems faced by Indonesian female migrant workers in the informal sector in Saudi Arabia. This policy was supported by public pressure due to widespread reports of violence and even execution of Indonesian female migrant workers in the informal sector in Saudi Arabia, such as Siti Zaenab. Thus, it was crucial to put a moratorium on Indonesian female migrant workers in Saudi Arabia’s informal sector to solve existing issues and strengthen their protection mechanism (Qobulsyah).

Concerning Tuti Tursilawati’s execution without notification, the Indonesian government replied by lodging an objection or protesting with the Saudi Arabian government. After learning of her execution without consular notification, the Minister of Foreign Affairs of Indonesia, Retno Marsudi, reached out to the Minister of Foreign Affairs of Saudi Arabia to voice her profound anger and worry. Retno met the Saudi Arabian Ambassador to Indonesia in Bali to denounce the case. Retno expressed grave concern to the Saudi Arabian administration during the meeting (Krisiandi, 2018).

2.5. RESPONSE OF MIGRANT CARE TOWARD THE DEATH EXECUTION CASES OF INDONESIAN FEMALE MIGRANT WORKERS IN SAUDI ARABIA

Migrant Care responded to the execution of Siti Zaenab and Tuti Tursilawati by urging the government to join the International Convention on the Protection of the Rights of Migrant Workers and Their Families as the foundation for national-level policies and political diplomacy in the regional sphere. In addition, Migrant Care held a demonstration, harshly condemned the Saudi Arabian government’s attitude, and asked Indonesia to withdraw the Saudi Arabian ambassador to Indonesia as a protest over the Saudi Arabian government’s decision to execute the PMI (Santoso, 2015).

Migrant Care, as represented by Anies Hidayah, believed that Indonesia was extremely feeble and lacked respect in front of Saudi Arabia. Anis Hidayah stated in her speech, “Please immediately expel the Saudi Arabian ambassador from Indonesia. If it continues, it will undermine diplomacy and disrupt bilateral cooperation. Migrant workers must be protected, and the death penalty for PMI must be abolished”. After protesting in front of the Saudi Arabian Ambassador’s office, a

large group of protesters continued their rally at the State Palace to President Joko Widodo, who was considered unable to save PMI sentencing to death. Migrant Care continued encouraging the government to take aggressive diplomatic action against Saudi Arabia to prevent a repeat of the failure to protect PMI (Solidaritas.net, 2015). During the event, the Director of Migrant Care, Anis Hidayah, demanded that the governments of Indonesia and Saudi Arabia provide protection during raids and deportations and that PMI be recognized as human. Migrant Care also requested the Indonesian government to undertake diplomacy with Saudi Arabia to implement its laws in a fair and nondiscriminatory manner. The resolution of PMI cases in Saudi Arabia required the participation of numerous parties, such as NGOs and associated institutions, to contribute to the PMI protection process. However, the government has full legitimacy and the ability to determine the steps necessary to save PMI in Saudi Arabia.

2.6. REASONS FOR MIGRANT CARE AND THE INDONESIAN GOVERNMENT TO RESPOND TO THE EXECUTION OF SITI ZAENAB AND TUTI TURSILAWATI

The Indonesian government responded to the unannounced execution of two Indonesian female migrant workers, Siti Zaenab and Tuti Tursilawati, using the multilevel government networks Type II, a polycentric model in which several overlapping and interconnected horizontal areas of authority are involved in managing certain issues. The Indonesian government collaborated with local governments over this aspect of the Village Care for Migrant Workers (DESBUMI) program. DESBUMI is a local effort designed to encourage the protection of migrant workers, particularly women, from the village prior to their departure. DESBUMI's work program is an information center service on migration. Document management services will serve as the primary data source for passport production to minimize faked data occurrence. DESBUMI also conducted socialization to establish a safe migration system and minimize problems that frequently develop due to procedural errors beginning with the departure. The Village Regulation (Perdes) also governs the protection of migrant workers, which references the International Convention on the Protection of Migrant Workers and their Families, approved by Law No. 6 of 2012 (Care, 2021). In addition, the Indonesian government consults with NGOs like Migrant Care. Subsequently, the Indonesian government has undertaken numerous attempts through Migrant Care to protect Indonesian female migrant workers in the informal sector who are at risk of the death penalty, such as Sirti Zaenab in 2015 and Tuti Tursilawati in 2018.

2.7. EFFORTS OF MIGRANT CARE AND THE INDONESIAN GOVERNMENT IN THE EXECUTION CASES OF SITI ZAENAB AND TUTI TURSILAWATI

Migrant Care has played a crucial role in addressing the issue of Indonesian female migrant workers in Saudi Arabia. Throughout its existence, Migrant Care has taken several steps to rally the Indonesian populace to care about the challenges Indonesian female migrant workers experience in the informal sector. In addition, Migrant Care collaborates with the Indonesian government to assist Indonesian female migrant workers in Saudi Arabia, particularly in the case of execution, in resolving and preventing difficulties.

Migrant Care urged the Indonesian government, from a formal legal standpoint, to promptly ratify ILO Convention 189 and immediately discuss and ratify the Domestic Work Bill in the name of preserving and valuing the humanity of domestic workers. As part of the government's commitment to providing a good work environment for all workers, this endeavor is tangible and vitally essential. Migrant Care and JALA PRT issued this statement in June 2016 to coincide with the International Day for Domestic Workers (Care, Migrant Care, 2016). Since 2010, the DPR RI has possessed the initiative to examine the Domestic Work Bill with public input, but it has not been a priority. Therefore, the work sector of Indonesian female migrant workers in the informal sector is not governed by labor law. In addition, the protection of Indonesian female migrant workers in the informal sector still faces obstacles in the revision process of the Bill on the Protection of Indonesian Workers Abroad, as Indonesians continue to view sending PMI as a profitable business while ignoring the protection and realization of their rights.

Migrant Care is also more active concerning international policy. It urged President Joko Widodo to establish the agenda of protecting migrant workers, a priority issue to be discussed at the ASEAN Summit forum in Myanmar, where President Jokowi met not only with leaders of ASEAN countries but also those of other nations, including South Korea, China, India, and others. This initiative seeks to improve the conditions for the protection of Indonesian migrant workers by appealing to other nations for assistance in resolving the issue of migrant workers, which has become a worldwide concern. Since South Korea, China, India, and others are developed nations, they hope to grow stronger with the assistance of some of these nations. Obviously, it can enhance the effectiveness of Indonesia's foreign policy. Moreover, it is anticipated that these initiatives will prevent the future marginalization of migrant workers in the ASEAN Economic Community (Care, 2014).

Furthermore, from a foreign policy perspective, Migrant Care met with the Indonesian Ministry of Foreign Affairs at the end of October 2016 to discuss the results of a poll it conducted. In light of the survey's findings that numerous PMI were illegally despatched, it is evident that the state's oversight remains lax. In addition, Migrant Care has received numerous complaints from PMI families who

have lost contact with their Middle East-working relatives. Migrant Care's report was met with approval by the Ministry of Foreign Affairs, as communicated by the head of a sub-directorate, Mrs. Gita. According to Mrs. Gita, the Final Departure Briefing (PAP) problem is the origin of the migration issue. It should be the primary objective of domestic policy. Because if home issues can be resolved, it will be simpler to address international issues. During the hearing, the Ministry of Foreign Affairs will collaborate with the Ministry of Transportation, particularly on maritime and terrestrial routes, to examine migration and human trafficking. It is since migration occurs not just by air but also through regional ports.

Migrant Care's collaboration with the Indonesian government has produced some fruitful endeavors. Revisions have been made to the successful accomplishment in the more active component of foreign policy, specifically the Draft Law on the Protection of Indonesian Workers Abroad. The Revision of the Law (RUU) on the Protection of Indonesian Workers Abroad (PPILN) was eventually completed by Commission IX of the DPR and the Indonesian government in 2017 after a 10-year delay (RI, 2017).

In addition, the Bill on the Protection of Indonesian Workers Abroad was presented to the Plenary Session to be ratified as a Law (UU), which was subsequently enacted as the Law on the Protection of Indonesian Migrant Workers (PPMI). In 2020, the Constitutional Court (MK) conducted a follow-up trial on Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers (PPMI). The trial was scheduled to include testimony from Migrant Care and the Indonesian Migrant Workers Union. It is a result of the efforts of Migrant Care and the Indonesian government, as evidenced by the revision of the Bill on the Protection of Indonesian Workers Abroad into the Law on the Protection of Indonesian Migrant Workers (PPMI), and Migrant Care's continued participation in the review of Law No. 18 of 2017 on the Protection of Indonesian Migrant Workers (PPMI). In addition, Migrant Care's request to President Joko Widodo to speak on PMI at the ASEAN Summit contributed to an additional achievement in terms of being more involved in international politics. At the 31st ASEAN Summit in Manila, Philippines, there was an agreement on protecting PMI. According to Anis Hidayah, the decision can be implemented in any nation and is not merely a piece of paper. The challenge the PMI has encountered thus far is the lack of appropriate state protection and provision of the right to information, the freedom to communicate, and the right to associate in the country where they work. This consensus is anticipated to serve as a mechanism for implementing the pledge to protect PMI abroad (Gusti, 2017).

In addition, the formal legal element of the poll revealed that numerous PMI are still illegally dispatched, demonstrating that governmental oversight is still lax. Additionally, Migrant Care has received copious reports of complaints from PMI families who have lost contact with their Middle East-working relatives. The Ministry of Foreign Affairs has responded positively to the Migrant Care survey results through the head of the sub-directorate. Of the accomplishments of several

successful endeavors, some are unsuccessful. It is evident from the more active aspect of foreign policy, which is the results of the Migrant Care survey regarding the illegal departure of PMI. The Ministry of Foreign Affairs had planned to collaborate with the Ministry of Transportation, particularly concerning sea and land routes, to discuss migration and human trafficking issues. Unfortunately, this collaboration has not been implemented. In addition, Migrant Care's formal legal efforts to urge the Indonesian government to adopt ILO Convention 189 swiftly have failed because Indonesia has not yet ratified the convention (Perempuan, 2021). Moreover, the formal legal aspect of Migrant Care's request to the Indonesian government to ratify the Domestic Work Bill in the name of protecting and respecting the humanity of workers in the domestic sector has also been unsuccessful, as the DPR has not yet decided whether the PPRT Bill will become an initiative bill that will be further discussed and ratified (Indonesia C. , 2022).

3. CONCLUSION

The challenges Indonesian female migrant workers encountered in Saudi Arabia, particularly the death penalty, posed a significant challenge for Indonesia. The Indonesian government cannot resolve the issue of the PMI's death penalty on its own, even though the decision-making authority lies solely with it. Using the concept of multilevel government networks, the authors discovered that the Indonesian government has utilized Type II, consultation of the central government with local governments, one of which is the DESBUMI program, and the Indonesian government has conducted consultations with Migrant Care. Migrant Care is one of the NGOs concerned with this issue, thereby playing an active role in aiding and ensuring the protection of Indonesian female migrant workers. Migrant Care is also regarded as an authority on this topic. It has undertaken numerous investigations since it possesses a research team. Hence, the Indonesian government requires information from this NGO when formulating policy. In other words, NGOs play a crucial role in ensuring the safety of Indonesian female migrant workers in Saudi Arabia. Subsequently, some of the government of Indonesia's initiatives concerning Migrant Care have produced results, while others have not. However, Migrant Care is still pursuing this objective to ensure all initiatives' success. The Indonesian government possesses a larger involvement in decision-making about this issue. Policymakers who deal with migrant worker issues should be held accountable by parties focused on understanding the topic, particularly negotiating skills in bilateral cooperation forums. PMI protection efforts should be directed exclusively to institutions associated with these disciplines, and it is envisaged that these institutions would be more proactive in resolving pressing issues, particularly those of a high priority (Nugrahaningsih, Nuzulian, & Lutfie, 2022).

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