



Hybrid Work System, Employee Productivity, Job Satisfaction, Journalists and Editors, Media Industry, KOMPAS Gramedia

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ABSTRACT

This study aims to analyze the form of legal protection for workers in the gig economy sector in the digital economy era, focusing on a comparative study between the European Union and Southeast Asia. The gig economy phenomenon that is growing rapidly through digital platforms such as online transportation services, freelance marketplaces, and food delivery services, presents new challenges related to the legal status of workers, social protection, and often unclear employment relationships. The research method used is normative legal research with a comparative approach. Data sources were obtained from international legal instruments, regulations in the European Union (e.g. EU Directive on Platform Work), regulations in several Southeast Asian countries, as well as academic literature and relevant court rulings. The analysis was carried out by examining the differences and similarities of legal norms, worker protection mechanisms, and the effectiveness of their implementation in each region. The results show that the European Union has been more progressive in formulating legal instruments that provide minimum protection for gig economy workers, such as access to social security, the right to transparent employment contracts, and protection against arbitrary termination. Meanwhile, in Southeast Asia, most regulations are still limited, with approaches that tend to place gig workers as independent partners, so the legal protections are relatively weak. In conclusion, there is a regulatory gap between the European Union and Southeast Asia in protecting gig economy workers. The implications of this study underscore the need for regional regulatory harmonization in Southeast Asia that adopts good practices from the European Union, so that the rights of digital workers can be protected without hindering economic innovation. This research also opens up opportunities for policymakers to formulate an adaptive legal framework that is able to balance the interests of workers, platform companies, and the state.

Keywords: legal protection, gig economy, digital economy, European Union, Southeast Asia.

INTRODUCTION

The development of the digital economy has revolutionized the world of work through the emergence of digital labour platforms—platforms that bridge the supply and demand of jobs in the form of gigs—resulting in new work models that are flexible,

on-demand, and often transnational (International Labour Organization [ILO], 2021). The rapid growth of platform workers has sparked a global debate about the categorization of employment status, social security access, and the platform's responsibility for working conditions. Several

international studies and reports emphasize that without regulatory adjustments, millions of platform workers are at risk of socio-economic vulnerability. (ILO, 2021; ILO, World Employment and Social Outlook, 2021).

To strengthen the comparative foundation of this study, it is important to present empirical data illustrating the scale of the gig economy in both the European Union and Southeast Asia. According to the European Commission (2024), approximately 28 million individuals in the EU are currently engaged in platform-based work, with projections estimating this number will increase to 43 million by 2025. The distribution of these workers is concentrated in sectors such as ride-hailing, food delivery, and online freelance services, where algorithmic management systems heavily determine working conditions. Meanwhile, in Southeast Asia, the gig economy has expanded even more rapidly due to the digitalization of post-pandemic economies. The Asian Development Bank (ADB, 2023) and ILO (2022) report that more than 150 million people in ASEAN countries engage in informal or platform-based work—representing about 26–30% of the region’s workforce. Indonesia alone accounts for over 36 million digital freelancers and platform workers, while countries like the Philippines, Thailand, and Malaysia have also seen exponential growth driven by the dominance of super-apps such as Grab, Gojek, and Foodpanda. Despite this scale, the regulatory framework in Southeast Asia remains fragmented and largely sector-specific, contrasting sharply with the EU’s cohesive approach.

In response, the EU took a significant legislative step by formulating the first rules at the bloc level on platform workers—introducing the presumption of employment based on the criteria of platform control, algorithmic transparency, and the right to appeal against automated decisions—which were published and intensely discussed in

2023–2024 (Pape, 2024; European Parliament, 2024). On the other hand, Southeast Asian countries have shown a variety of weak and fragmentary approaches—from limited protection efforts through sectoral regulations to national initiatives that have not addressed the issue of employment status as a whole—resulting in a protection disparity between the two regions. (Muhammad Nur et al., 2023; ASEAN/ASEAN-related reports).

Many empirical and normative studies have examined various aspects of the gig economy: the ILO (2021) and the WESO report provide a global overview and highlight social security issues and the classification of employment relationships; Comparative studies conclude that the EU tends to be more progressive in providing a minimum legal framework for platform workers, while ASEAN/Southeast Asia faces structural barriers that include economic heterogeneity, regulatory capacity, and social policy priorities. At the national level, studies of Indonesia, Malaysia, the Philippines, and Thailand show a common problem: workers are often classified as independent contractors or partners, which limits their access to traditional employment rights (Ulil Albab et al., 2023; David, 2024; Fairwork Philippines, 2023; JIL Malaysia, 2024). The literature also highlights the algorithmic management dimension, data transparency, and collective rights as focal points of modern regulation.

Although there are studies in the region and some initial comparative studies (e.g. Nur et al., 2023), there are still several important research gaps: (1) few normative-comparative studies that integrate the EU’s latest policy developments (Platform Work Directive, 2023–2024) with actual legal responses in post-pandemic Southeast Asian countries; (2) lack of analysis that juxtaposes the legal implications of management algorithms (automated decision-making) as well as enforcement and compliance mechanisms in both areas; and (3) the lack of implementable policy recommendations that take into account

ASEAN's structural conditions (legal heterogeneity, informal labour market) rather than the relatively uniform EU framework. (Pope, 2024; Nur et al., 2023; ASEAN reports).

This study intends to fill this gap by presenting a comparative study that combines normative analysis of legal texts (including the EU Platform Work Directive) and evaluation of implementation practices in examples of Southeast Asian countries (e.g., Indonesia, Malaysia, the Philippines, and Thailand). The novelty of the research lies in: (a) including the latest post-2023 EU regulatory developments as a benchmark; (b) review the protection of new aspects such as algorithm transparency, the right to appeal against automated decisions, and control indicators affecting presumptive employment; and (c) formulate contextual policy recommendations for ASEAN that maintain a balance between platform innovation and worker protection. (Pope, 2024; WILLIAM, 2024; Nur et al., 2023).

The main objective of this study is to analyze and compare the forms of legal protection for gig economy workers in the context of the digital economy between the European Union and Southeast Asia. This study seeks to identify existing regulatory gaps, as well as evaluate the extent to which legal instruments in both regions are able to provide protection for workers' basic rights, including social security, employment status, and job security. In addition, this study aims to explore the best practices that have been implemented in the European Union, in order to provide relevant recommendations for policymakers in Southeast Asia. Thus, this research is expected to contribute to the development of a more adaptive, fair, and balanced legal framework, which not only protects the interests of workers, but also encourages the growth of digital innovation and economic sustainability in the era of globalization.

RESEARCH METHODS

This study uses a normative legal research design with a comparative approach. This design was chosen because the focus of the research lies in the analysis of laws and regulations, international legal instruments, and legal practices applied in the European Union and Southeast Asia in providing protection for gig economy workers. The approaches used are the statute approach, the conceptual approach, and the comparative approach. The legislative approach is used to examine the regulations in force in the European Union and Southeast Asia, the conceptual approach to examine the theory of labor relations, labor protection, and digital workers' rights, while the comparative approach is to compare the effectiveness and weaknesses of regulations in both regions.

The research data source consists of primary, secondary, and tertiary legal materials. Primary legal materials include international legal instruments (e.g. the EU Directive on Platform Work, ILO Convention), EU regulations, and laws and regulations in several Southeast Asian countries. Secondary legal materials are in the form of academic literature, legal journals, reports of international institutions, and the results of previous research related to the gig economy. Tertiary legal materials are in the form of legal dictionaries, encyclopedias, and other supporting sources. The research sample was determined by purposive sampling by selecting the main relevant regulations, namely EU regulations related to platform workers and labor regulations in ASEAN countries such as Indonesia, the Philippines, and Singapore.

The data collection technique is carried out through literature studies by browsing legal documents, scientific publications, and international reports. The data obtained were then analyzed using normative qualitative analysis techniques with juridical comparative methods. This analysis is carried out by identifying legal norms, testing their

conformity to the principles of worker protection, comparing between the European Union and Southeast Asia, and drawing conclusions about the most effective regulatory model. With this method, the research is expected to be able to provide a comprehensive overview of the legal protection of gig economy workers and provide policy recommendations based on international best practices.

RESULTS AND DISCUSSION

Legal Status of Gig Economy Workers

The results of the study show that there are fundamental differences between the European Union and Southeast Asia in

determining the legal status of *gig economy workers*.

European Union: most regulations are starting to recognize platform workers as workers with minimum protections. *The EU Directive on Platform Work* (2021), for example, provides the right to transparent employment contracts, access to social security, and protection from unilateral termination of employment.

Southeast Asia: most countries still categorize gig workers as *independent contractors*. This has an impact on limited access to social security, health insurance, as well as protection of working hours and minimum wage.

Table 1. Comparison of the Legal Status of Gig Economy Workers

Regulation Aspects	European Union	Southeast Asia (Indonesia, Philippines, Singapore)
Legal status of workers	Recognized as a contract worker with minimum protection	The majority are considered independent partners
Social & health protection	It is mandatory for the platform to include workers	Optional, depending on national scheme
Right to an employment contract	Transparent & mandatory	Inconsistent, often informal
Unilateral layoff protection	There is an appeal mechanism	Not yet available
Minimum wage & hours worked	Set	Not specifically regulated

Social Protection and Health Insurance

European Union: platform workers are entitled to social security, including health insurance, pensions, and sick leave. Southeast Asia: most gig workers are not covered by

social security schemes, unless they voluntarily enroll. For example, in Indonesia, there is only an independent BPJS Employment option.

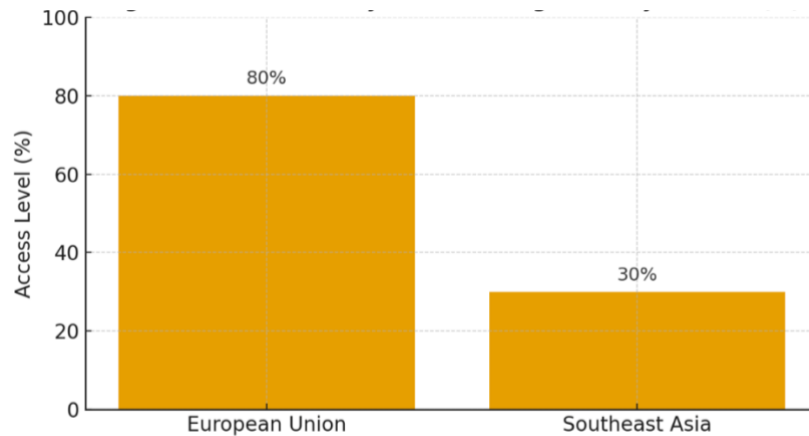


Figure 1. Social Security Access for Gig Economy Workers (%)

Algorithm Transparency and Platform Oversight

The results of the study found that in the European Union there are already regulations that require transparency in the use of algorithms, especially related to work management and wage determination. Meanwhile, in Southeast Asia, these regulations do not yet exist, so they often cause uncertainty for workers.

Gender Equality and Protection of the Rights of Vulnerable Workers

The European Union has integrated issues of gender equality and social inclusion in the protection of platform workers, while Southeast Asia is still limited to general employment issues.

The general findings of the study show that the EU is ahead of the curve in balancing

digital innovation and worker protection. This is reflected in comprehensive and progressive regulations, so that they are able to guarantee basic rights for gig workers without hindering the development of the digital economy. In contrast, Southeast Asia is still in its early stages, with relatively weak regulations and tends to favor platform companies more than their workers. This condition creates gaps in the aspects of social protection, job security, and recognition of the legal status of gig workers. Therefore, there is an urgent need to harmonize regulations at the Southeast Asian regional level in order to be able to keep up with global trends while ensuring a balance between the interests of workers, companies, and governments in the digital economy ecosystem.

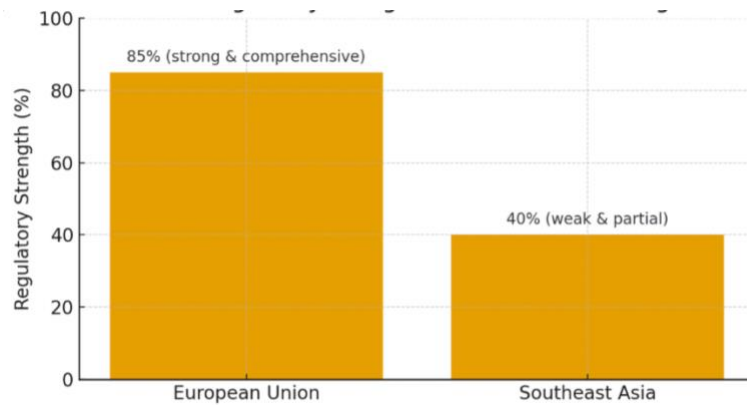


Figure 2. The Level of Regulatory Strength of the Protection of Gig Economy Workers

Overview of the Gig Economy as a Global Issue

The development of digital technology in the last two decades has brought significant changes in the structure of the global economy. One of the most prominent phenomena is the emergence of the gig economy, which is an economic model based on temporary, flexible, and generally mediated by digital platforms. Jobs in the gig economy are usually on-demand or based on specific projects, which include various fields ranging from online transportation, food delivery, freelance marketplaces, to skill-based services such as graphic design or content writing (De Stefano & Aloisi, 2022). This phenomenon is considered an integral part of the transformation of the global digital economy that is changing the traditional paradigm of employment relations.

Globally, the gig economy is seen as both an opportunity and a challenge. In terms of opportunities, this system offers work flexibility, access to additional income, as well as opportunities for individuals to work without being tied to rigid formal employment relationships (Kalleberg & Dunn, 2016). The McKinsey Global Institute report (2016) even estimates that more than 162 million people in Europe and the United States are engaged in some form of independent work, which is largely supported by digital platforms. This figure continues to increase in line with

internet penetration, smartphone use, and market demand for instant services.

However, on the other hand, the gig economy also poses a number of complex problems. The legal status of workers is often unclear, as they are not fully categorized as formal workers with employment rights, but also not fully as independent entrepreneurs (Prassl, 2022). As a result, many gig workers do not obtain social protection, health insurance, employment insurance, or protection against unilateral termination. This results in economic vulnerability, especially for those who rely entirely on gig work as their primary source of income (Berg et al., 2018).

Another issue that has emerged in the gig economy is the practice of algorithmic management. Digital platforms often use algorithms to organize job allocation, determine wages, and even assess worker performance. Despite its efficiency, these systems raise concerns regarding digital discrimination, lack of transparency, and uncertainty in workers' earnings (Mateescu & Nguyen, 2019). In this context, the debate about workers' right to know algorithmic mechanisms has become one of the important issues in the global labor law discourse.

The gig economy phenomenon is also closely related to the issue of globalization and labor market transformation. The International Labour Organization (ILO, 2021) emphasizes that digital platforms contribute to the creation of new jobs, but at the same time deepen the

gap in access to social protection. Developed countries such as the European Union are beginning to respond with progressive regulation, while developing countries, including in Southeast Asia, are still struggling to formulate adaptive legal frameworks. This shows that there is a global imbalance in readiness to face the challenges of the digital economy.

In addition, the gig economy has gender and social implications. Research shows that female workers tend to be more exploited due to lower wages, limited access to high-paying jobs, and double burdens in domestic and digital jobs (Hunt & Machingura, 2016). Migrant workers also face similar vulnerabilities, as they often do not have access to legal guarantees in the destination country (ILO, 2021). Therefore, the issue of the gig economy is not only limited to employment issues, but is also closely related to social justice and human rights.

Thus, it can be concluded that the gig economy is a multidimensional global issue. It not only represents the change of the digital economy, but also becomes an arena of attraction between technological innovation, market flexibility, and the need to protect workers' rights. The differences in responses between countries show that the gig economy is not just a local phenomenon, but a global challenge that requires a comprehensive and harmonious regulatory approach.

Theoretical Framework and Concept of Workers' Legal Protection

Labor Relations Theory in Employment Law

In the tradition of employment law, employment relationships are built on the basis of a contract between an employer and an employee. The contract is the basis for the emergence of rights and obligations, where workers are obliged to provide services or labor, while employers are obliged to provide wages and social protection in accordance with applicable legal standards (Collins, 2010). This conventional labor relations model puts

workers in a relatively protected position due to the recognition of formal status as an employee.

However, in the context of the gig economy, the construction of employment relationships becomes blurred. Gig workers are often positioned as "independent contractors," who are legally considered outsiders, not part of a formal employment relationship. Consequently, basic workers' rights such as minimum wage, social security, sick leave, and protection against unilateral termination do not apply automatically (De Stefano, 2016). This poses a challenge to traditional theories of labor relations built in the conventional industrial era.

Labour Protection Theory

The theoretical framework of worker protection departs from the view that workers are weaker parties in the employment relationship than employers or capital owners. Therefore, labor law is here to improve the bargaining position of workers through the regulation of minimum wages, working hours limits, work safety, and social protection (Davidov, 2016). This theory is relevant in the context of the gig economy because platform workers often do not have the same bargaining position as the giant platform companies that control the market.

In the theory of worker protection, employment relations are not solely understood on the basis of written contracts, but also on the substance of economic relations. In other words, although gig workers are legally called "independent partners", the fact is that they remain in an economic dependence on digital platforms. It is this dependence that theoretically justifies the need for adequate legal protection (Aloisi & De Stefano, 2020).

The Concept of Decent Work in the ILO Perspective

Another relevant theoretical framework is the concept of decent work introduced by the

International Labour Organization (ILO). Decent work emphasizes four main pillars, namely: (1) decent employment opportunities, (2) social protection, (3) basic rights of workers, and (4) social dialogue (ILO, 2019). In the context of the gig economy, the main challenge is how to ensure that platform-based work still meets decent work standards, even if it is done flexibly and digitally.

The ILO (2021) emphasizes that although the gig economy opens up new economic opportunities, without adequate legal protection, workers will be trapped in precarious work. Therefore, the concept of decent work is one of the main references in formulating employment policies in the digital era.

Social Justice and Human Rights Theory

The theoretical framework of worker protection can also be seen from the perspective of social justice and human rights. Work is the fundamental right of every individual, as stipulated in Article 23 of the Universal Declaration of Human Rights (UDHR) which states that everyone has the right to work, fair wages, and decent working conditions (United Nations, 1948). In this case, legal protection for gig workers is not only an economic issue, but also a human rights issue.

The theory of social justice put forward by John Rawls (1971) is also relevant, especially the difference principle which emphasizes that socio-economic inequality is only acceptable to the extent that it benefits the weakest groups. In this context, labor regulations that ignore gig workers can be seen as a violation of the principle of fairness, because the gig worker group is precisely the most vulnerable party in the digital economy.

Progressive Legal Theory in Answering Digital Challenges

In facing the dynamics of the gig economy, progressive legal theory as proposed by Satjipto Rahardjo (2009) can be an

important foundation. Progressive law sees law not as a static instrument, but as a dynamic means of responding to social change. Thus, legal protection for gig workers must be formulated adaptively, not just fixated on the old legal category (employee vs contractor), but adjusted to the real needs of the community.

This theory is in line with developments in the European Union that are trying to fill a legal vacuum by introducing a minimum category of protection for platform workers, even if they are not formally full-time employees. This approach emphasizes the importance of legal innovation in protecting workers in the midst of the development of digital technology.

The theoretical framework presented above is the conceptual foundation for understanding and analyzing the legal protection of gig economy workers. Employment relations theory helps explain why gig worker status is often debated. Worker protection theory emphasizes the need for legal intervention to improve workers' bargaining positions. The concept of decent work from the ILO provides global normative standards that can be used as a reference in formulating policies. The perspective of social justice and human rights expands the discourse to the global realm of morality and ethics. Meanwhile, progressive legal theory emphasizes that the law must move with the changing times.

By integrating these various theoretical frameworks, this study can provide a comprehensive analysis of the challenges and opportunities for legal protection of gig economy workers. In addition, this framework is also a foothold in comparing the effectiveness of regulations between the European Union and Southeast Asia, as well as in formulating more adaptive and equitable policy recommendations.

Regulatory Conditions in the European Union

The European Union (EU) has become one of the most progressive regions in responding to the legal challenges presented by *the gig economy*. Normatively, the protection of digital workers in the EU is rooted in the European Pillar of Social Rights which emphasizes the right to fair working conditions, social protection, and equality of opportunity (European Commission, 2017).

In December 2021, the European Commission proposed the EU Platform Work Directive, which aims to clarify the legal status of platform workers as well as introduce algorithm transparency rules. One of the most significant aspects of this regulation is the legal application of the *presumption of employment*, where gig workers are considered employees unless the company can prove otherwise (European Commission, 2021). This approach reverses the burden of proof that has been detrimental to workers, thereby strengthening their legal position. In addition, some EU member states have adopted progressive national regulations. For example, Spain published Ley Rider in 2021 that required app-based delivery companies to recognize couriers as permanent workers (Ramos & Alonso, 2022). France and Italy also regulate minimum rights of platform workers, including social insurance and workers' compensation. However, although regulation in the EU is relatively advanced, implementation still faces challenges, such as the resistance of global platform companies and regulatory variations between member states. However, in general, the EU has shown consistency in balancing digital innovation with social protection.

Regulatory Conditions in Southeast Asia

Southeast Asia is in a more complex and lagging position when it comes to legal

protection of gig workers. In general, the employment law framework in this region still focuses on traditional employment relationships based on permanent contracts (*formal employment*), making it difficult to accommodate digital workers. Indonesia, for example, through Law Number 13 of 2003 concerning Manpower and the Job Creation Law (2020), has not explicitly regulated the status of gig workers. Online motorcycle taxi workers, couriers, or *digital freelancers* are still positioned as business partners, so rights such as social security and the minimum wage do not fully apply (Putri & Susanti, 2022).

In Malaysia, platform workers are categorized as *self-employed*, so they are outside the scope of formal employment law (Zainal, 2021). The Philippines is relatively advanced in integrating freelancers into the social security system through the *Social Security System (SSS) program*, but there are no specific regulations regarding the legal status of platform workers (Serrano, 2022). In general, regulations in Southeast Asia tend to favor the flexibility of platform companies, under the pretext of supporting innovation and job creation. However, this comes at the expense of legal certainty and guarantees of protection for gig workers.

Comparative Analysis: EU vs Southeast Asia

Comparisons show a significant gap between the EU and Southeast Asia. The European Union emphasizes the principle of *decent work* and expands the scope of the law to protect gig workers. In contrast, Southeast Asia is still in its infancy, with weak and fragmentary regulations.

The following table summarizes the main differences:

Table 2. gap between the EU and Southeast Asia

Aspects	European Union	Southeast Asia
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Legal status of workers	Presumption of employment	Self-employed/independent partner
Social protection	Compulsory social security (state + company)	Limited, often voluntary
Algorithm transparency	Regulated in the EU Platform Work Directive	Not yet regulated
Collective rights	Recognized (digital union)	Weak, almost non-existent
Policy approach	Progressive, workers' rights as a priority	Business flexibility as a priority

These differences show that the European Union has successfully integrated worker protection into digital economy policies, while Southeast Asia still faces a dilemma between attracting digital investment and protecting workers.

Critical Issues: Algorithms, Worker Status, and Social Security

Critical issues related to the gig economy include several interrelated aspects, namely the algorithm as the "digital boss", the legal status of workers, and social security and welfare. First, algorithms play an important role in regulating the work of gig workers, including in order distribution, performance assessment, and unilateral termination (deactivation) (Kellogg et al., 2020). In the European Union, regulations are beginning to emphasize algorithmic transparency to protect workers, while in Southeast Asia the issue is still relatively ignored, leaving workers in a state of high uncertainty. Second, the legal status of workers is the main debate, whether they are categorized as employees or independent contractors. The European Union has pushed for the implementation of the presumption of employment, which places gig workers as employees unless the company can prove otherwise, while in Southeast Asia workers are still seen as independent partners, weakening their legal protections. Third, access to social security and welfare for gig workers is generally limited. Workers often do not get the right to health, pension, or employment insurance. The European Union requires platform companies to participate in the payment of social security contributions,

while in Southeast Asia the mechanism tends to be voluntary and inconsistent (ILO, 2021).

Implementation Challenges in Southeast Asia

Despite the awareness of the importance of regulation, implementation in Southeast Asia faces various challenges. The existing legal framework is still oriented to the conventional industrial paradigm and has not adapted to the dynamics of the digital economy. The dominance of global platform companies, such as Grab, Gojek, and Foodpanda, adds complexity as their lobbying power can soften existing regulations (Ford & Honan, 2022). In addition, the state's capacity to enforce labor laws is still limited, including field supervision, making it difficult to guarantee platform compliance. Regional fragmentation is also an obstacle because there is no common legal framework at the ASEAN level that comprehensively regulates platform workers.

These findings confirm the relevance of labor relations theory and employment law in the context of the digital economy. The formal status of workers is at the heart of legal protection, and Southeast Asia, which still places gig workers as independent partners, shows the weak application of Labour Protection Theory. The ILO's decent work framework that emphasizes social security, basic rights, and decent working conditions is more reflected in EU policies than in Southeast Asia. This emphasizes that labor law cannot be separated from the principle of social justice, as emphasized by Rawls (1971) and Rahardjo (2009).

Seeing global trends, Southeast Asia needs to immediately harmonize regulations to ensure worker protection so that they do not lag behind international standards, create a level playing field so that platforms do not exploit regulatory differences between countries, and support the integration of the digital economy in the ASEAN region, which is the main agenda in the ASEAN Digital Masterplan 2025. By adopting the principles of the European Union, Southeast Asia has an opportunity to build a legal framework that balances the protection of workers and the sustainability of digital innovation, while adapting to global economic dynamics.

CONCLUSION

This research concludes that the rapid growth of the gig economy poses major challenges to conventional labor law systems in both the European Union and Southeast Asia. The EU has made significant progress in reconciling digital innovation with worker protection through the Platform Work Directive, which strengthens algorithmic transparency, establishes presumptions of employment, and ensures access to social protection. Conversely, Southeast Asian countries remain at an early regulatory stage, characterized by fragmented frameworks that often prioritize platform growth over worker welfare—leaving gig workers vulnerable to precarious conditions, limited social protection, and legal ambiguity. These findings reaffirm the relevance of labor relations theory, labor protection theory, and the decent work framework in shaping adaptive legal approaches to digital labor. Policy harmonization at the regional level is crucial for ASEAN to establish a fair competitive environment and safeguard workers' fundamental rights while supporting innovation in the digital economy. However, this study is limited by its normative-comparative design and secondary data reliance, which may not fully capture the lived realities of platform workers across diverse

sectors. Future research should incorporate empirical case studies, quantitative surveys, and cross-country analyses to explore how legal reforms interact with socio-economic conditions, platform governance, and worker agency. By deepening this comparative inquiry, future studies can contribute to the formulation of sustainable and context-sensitive labor policies for the evolving digital economy.

REFERENCES

- Aloisi, A., & De Stefano, V. (2020). Essential jobs, remote work and digital surveillance: Addressing the COVID-19 pandemic panopticon. *International Labour Review*, 159(1), 1–42.
- ASEAN Secretariat. (2025). Gig economy, rural–urban mobility, and poverty in ASEAN (ASCC Trend Report No. 19, 2025). https://asean.org/wp-content/uploads/2025/08/ASCC-RD_Trend-Report_PA19-2025.pdf
- Berg, J., Furrer, M., Harmon, E., Rani, U., & Silberman, M. (2018). *Digital labour platforms and the future of work: Towards decent work in the online world*. Geneva: International Labour Office.
- Collins, H. (2010). *Employment law*. Oxford University Press.
- Daud, S. N. M. (2024). Adapting to the gig economy: Determinants of financial ... (artikel). *Journal / Elsevier (ringkasan tersedia di ScienceDirect)*. <https://www.sciencedirect.com/science/article/abs/pii/S031359262400002X>
- Davidov, G. (2016). *A purposive approach to labour law*. Oxford University Press.
- De Stefano, V. (2016). The rise of the “just-in-time workforce”: On-demand work, crowdwork, and labour protection in the gig economy. *Conditions of Work and Employment Series No. 71*, ILO.
- European Commission. (2017). *European Pillar of Social Rights*. Brussels.

- European Commission. (2021). Proposal for a Directive on improving working conditions in platform work. Brussels.
- European Parliament. (2024). Improving the working conditions of platform workers (Legislative Train / Briefings). European Parliament.
<https://www.europarl.europa.eu/legislative-train/theme-a-europe-fit-for-the-digital-age/file-improving-working-conditions-of-platform-workers>
- European Trade Union Institute (ETUI). (2024). The EU Platform Work Directive. ETUI.
<https://www.etui.org/publications/eu-platform-work-directive>
- FAIRWORK. (2023). Fairwork Philippines Ratings 2023 (Fairwork Project).
<https://fair.work/wp-content/uploads/sites/17/2023/08/Fairwork-Philippines-Ratings-2023.pdf>
- Ford, M., & Honan, V. (2022). The gig economy in Southeast Asia: New research agendas. *Journal of Contemporary Asia*, 52(4), 615–633.
- Hunt, A., & Machingura, F. (2016). A good gig? The rise of on-demand domestic work. Overseas Development Institute.
- ILO. (2021). World Employment and Social Outlook 2021: The role of digital labour platforms. Geneva.
- International Labour Organization (ILO). (2019). Decent work: Concept and indicators. Geneva: ILO.
- International Labour Organization (ILO). (2021). The role of digital labour platforms in transforming the world of work. ILO.
https://www.ilo.org/global/publications/books/WCMS_771749/lang-en/index.htm
- Japan Institute for Labour Policy and Training (JIL). (2024). Evolving workstyles, evolving challenges: A Malaysian perspective on gig labour relations. *Japan Labour Issues*, vol. 8, no. 50 (Special Issue 2024).
<https://www.jil.go.jp/english/jli/documents/2024/050-05.pdf>
- Kalleberg, A. L., & Dunn, M. (2016). Good jobs, bad jobs in the gig economy. *Perspectives on Work*, 20(1), 10–14.
- Kellogg, K. C., Valentine, M. A., & Christin, A. (2020). Algorithms at work: The new contested terrain of control. *Academy of Management Annals*, 14(1), 366–410.
- Leenoi, P. (2021). How to improve working conditions for gig workers in ... (ILO/working paper / policy brief). ILO.
<https://www.ilo.org/media/381846/download>
- Mateescu, A., & Nguyen, A. (2019). Algorithmic management in the workplace. Data & Society Research Institute.
- McKinsey Global Institute. (2016). Independent work: Choice, necessity, and the gig economy. McKinsey & Company.
- Nur, M., Asmorojati, A. W., Megawati, S., Zuliyah, S., & Isdiyanto, I. Y. (2023). A comparative assessment of digital platform worker protection in the EU and ASEAN. *LEGALITY: Jurnal Ilmiah Hukum*, 31(2), 367–391.
https://www.researchgate.net/publication/375598739_A_comparative_assessment_of_digital_platform_worker_protection_in_the_EU_and_ASEAN
- Pape, M. (2024). EU directive on platform work (EPRS | European Parliamentary Research Service). European Parliament.
https://www.europarl.europa.eu/RegData/etudes/ATAG/2024/760437/EPRS_ATAG%282024%29760437_EN.pdf
- Prassl, J. (2022). Humans as a service: The promise and perils of work in the gig economy. Oxford University Press.
- Putri, A., & Susanti, D. (2022). Perlindungan hukum pekerja gig economy di Indonesia. *Jurnal Hukum dan Pembangunan*, 52(3), 451–472.

- Ramos, J., & Alonso, A. (2022). The Spanish 'Rider Law': A step forward for gig workers' rights. *European Labour Law Journal*, 13(2), 145–164.
- Rawls, J. (1971). *A theory of justice*. Harvard University Press.
- Satjipto Rahardjo. (2009). *Hukum progresif: Sebuah sintesa hukum Indonesia*. Kompas.
- Serrano, M. (2022). Social protection for platform workers in the Philippines. *Asian Labour Review*, 5(1), 77–92.
- Sutassanamarlee, D. (2024). Narrowing the gender divide: Thailand's platform economy and digital work (policy brief). JustJobs Network. https://justjobsnetwork.org/files/narrowing-the-gender-divide-thailand%E2%80%99s-platform-economy-and-digital-work_june-2024.pdf
- The Associated Press. (2023, December 13). New EU gig worker rules will sort out who should get the benefits of full-time employees. AP News. <https://apnews.com/article/gig-economy-workers-europe-regulation-58ebf22a4853b9a21f558919fb9782df>
- Ulil Albab, S. H. S., Hasan, A. M., & Sibarani, K. B. (2023). Legal protection of gig workers in Indonesia: Reviewing legal justice, certainty, and expediency. *JILI (Jurnal Ilmu Hukum Indonesia)*, Vol. 1 No.1 (2023). <https://jurnal.ugm.ac.id/v3/JILI/article/download/7452/3273/>
- United Nations. (1948). *Universal Declaration of Human Rights*. United Nations General Assembly.
- Wibowo, S. G. (2025). Legal protection for gig workers in the digital economy. East & South Institute / ESJ. <https://esj.eastasouth-institute.com/index.php/eslhr/article/view/705>
- Zainal, N. (2021). Gig economy and legal challenges in Malaysia. *Malaysian Journal of Law*, 28(1), 55–73.