
Bridging Gaps in Indonesia's Social Protection Policy: Lessons from Singapore's Platform Worker Act for Indonesia

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Abstract

The gig economy in Indonesia is rapidly expanding, accounting for around 59.1% of workers engaged in informal work, such as motorcycle taxi drivers. Gojek, as one of the major private transportation companies, contributes to the development of informal work, providing flexible income opportunities through motorcycle taxis and ride-hailing car services. Despite the growing number of online motorcycle taxi (Ojol) drivers and their vital role in Indonesia's economy, they are classified as partners or independent contractors under the Indonesian Law number 20 of 2008. The informal worker status limits their access to social protection, as the current government regulation relies on the voluntary registration system. This voluntary participation in social protection raises concerns about the welfare of online drivers. The voluntary nature in the 2021 Indonesia's Mitra-based Worker Protection illustrates weak enforcement, with only less than 15% of the estimated Ojol drivers were registered in employment social protection. This paper employs the concept of policy transfer, as outlined by Dolowitz and Marsh (2000), to examine how critical lessons from the 2025 Singapore Platform Act can strengthen Indonesia's efforts in protecting Ojol drivers. The Singapore Platform Act introduces a comprehensive scheme of protection for platform workers, including mandatory security contributions and work injury compensation. By drawing on a literature review of government regulations, academic works, policy reports, and news, this paper identifies key elements of the Singapore Platform Act and examines the applicability to the Indonesian context. This paper argues that by adopting mandatory contributions schemes and a stronger enforcement system, Indonesia can close its social protection regulatory gap, establish a robust regulatory framework, and ensure sustainable social protection for Ojol drivers.

Keywords: gig economy, platform workers, social protection.

1. Introduction

1.1. Indonesia Gig Economy

The development of gig economy in Indonesia is highlighted by rapid technological adoption, encourage the trend of digital-based opportunities. This digital trend intersects with a large informal labour market, initiating in massive growth primarily in online services. Although the online-based opportunity creates easy-access job, the worker protections and egal status challenges this condition. The development of the gig economy of digital economy or platform economy is driven by the

industrial revolution and accelerated by technological advancements (Muhyiddin et al., 2024; Pratomo et al., 2024). This technological advancement has significantly altered the nature of work in Indonesia, marked with the emergence of digital labour platforms in the mid-2010 (Pratomo et al., 2024). The increasing number of online platforms in Indonesia and rising consumers demand for digital services trigger the growth of gig economy in Indonesia. The rapid digitalisation encourage many informal entrepreneurs to expand their market reach, including the motorcycle-based transportation and food delivery services (Murdani & Wijayati, 2023; Purnamasari & Nurachmah, 2023).

Through the massive development of gig economy, it quickly becomes a significant segment of Indonesia's labour market, contributing positively to the national economy and supporting individual livelihoods and incomes (Putri et al., 2023). As the gig economy rises, the numbers of gig workforce also indicate substantial numbers, approximately 1.7% of the total workforce involve in gig economy in 2019. In 2020, the number of gig workforce increases, there are 10 million gig workers, around four million people were employed in the sector of gig economy in transportation sector (Putri et al., 2023; Tobing, 2024). The pivotal moment was the emergence of online motorcycle taxi (ojek online) in 2015 which provides a wide range of services such as transportation, food, and package delivery, offering convenience and easy access while in traffic (Permana et al., 2023; Rachmawati et al., 2021).

In the lens of regulatory framework and legal aspect, the gig economy in Indonesia is widely characterised by legal ambiguity and critical gap in labour protection (Muhyiddin et al., 2024; Wibowo & Susanto, 2025). This ambiguity in labour protection is primarily due to the prevailing practice of classifying gig workers as non-employees, preventing them to obtain fundamental rights and benefits normally provided to employee (Wibowo & Susanto, 2025). The central issue of the regulatory framework in Indonesia's gig economy is the non-recognition of gig workers as formal employees. The gig workers such as online motorcycle taxi drivers are classified as business partners (*mitra*) by the state and companies. This structure enables companies to bypass employer obligations mandated by Indonesia labour law (Lesmana & Samudra, 2025; Wibowo & Susanto, 2025; Yasih, 2024). The non-recognition of gig workers as a formal employee also confirmed in the Article 15 of the 2019 Regulation of the Indonesian Minister of Transportation No. 12 which states that the relationship between companies and drivers is a business partnership (Putri et al., 2023). The exclusion of gig workers from the structure of formal employment prevents the gig workers to obtain minimum wage guarantees, overtime pay and paid leave, pensions, severance pay, and legal protection against arbitrary termination (Lesmana & Samudra, 2025; Muhyiddin et al., 2024). While Indonesia provides an universal social security through BPJS (National Health Insurance and Employment Social Security), this social security does not cover gig workers as they are classified as non-wage earners (Setiawan et al., 2025). This exclusion means that the social security protection is optional for gig workers, as the employers are not obligated to pay for gig workers' social security. This condition reflects that Indonesia's current regulatory framework in gig economy operates mainly in a legal gray zone, bypassing the fundamental rights of millions gig workers by classifying them as a business partners. Although gig economy contributes largely in economic growth, but this employment structure leads to high precarity and vulnerability for millions of gig workers in Indonesia.

1.2. Singapore Gig Economy

The digital labour economy in Singapore started back in 2013 when ride-hailing companies, Uber and Grab, entered the market (ILO, 2025), rising the provision of services via digital platforms (Goh, 2025). Since then, this sector became increasingly important for Singapore's overall economy. Digital economy made up 17.7% of Singapore's Gross Domestic Product (GDP) in 2024 and became the main source of income for many residents (KHERN, 2025). The sector saw growth and resilience, with the number of people applying for the job increased 50% between April and December 2023 (Hong, 2025). As of 2024, the number of Singaporeans platform workers reached 67,600 workers, including private-hire car drivers (31,800), taxi-drivers (20,800), and delivery workers (15,300), comprising 2.4% of the total workforce.

Gig economy provides advantages, such as accessibility, flexibility and lower barriers to entry, which enables wider people enter and stay in such jobs (KHERN, 2025). However, those notions were illusory. DBS Bank's report shown in 2023, gig workers had less stable income with expense-to-income ratio reached 112% and their savings can only cover 1.7 months' worth of spending (Tong, 2023). Platform operators used algorithm to manage nearly every aspect, from job allocation to the remuneration, shifted the control of work terms and earnings from the workers (Goh, 2025). Moreover, to earn a decent wage the platform workers often have to work long hours and comply with the application's rules, similar to employees, but without the benefits (Mathew, 2024).

Similar to Indonesia, Singapore also faced issues with the classification of gig workers. Previously, platform workers were classified as 'self-employed' by the government and 'partners' by platform operators, restricting the workers' access to social protections and benefits afforded to traditional employees (Fu & Denise, 2025). Platform workers were excluded from Singapore's social safety net scheme, including Central Provident Fund (CPF), contribution for medical and pension savings, work-injury compensation, and the right to have legal labour union (ILO, 2025). This resulted in systemic precarity of financial vulnerability, inadequate workplace protection, and power imbalance between platform operators and workers (Law Works, 2025).

2. Research Methods

2.1. Scoping Literature Review

This research applies a qualitative comparative design, combining a scoping literature review and theoretical and framework integration to examine what lessons from Singapore's Platform Works Act to be adopted in Indonesia in strengthening its regulatory framework of online driver job. This research extract data from academic publications, government reports, international organisation and think tank reports, and news. The qualitative approach enables a contextual and explorative understanding of how Singapore and Indonesia with similar economic structure, employment trend, and institutional capacities face similar challenges in the gig economy. In this research, writers employ multi-layered analysis using the conceptual framework of comparative policy and policy transfer.

2.2. Theoretical Framework

2.2.1. Policy Transfer and Policy Translation

The concept of **policy transfer** offers a useful framework for understanding how Indonesia might draw lessons from Singapore's *Platform Workers Framework* to improve protection for online motorcycle taxi (*Ojol*) drivers. Dolowitz and Marsh (2000, p. 5) define policy transfer as “a process by which knowledge about policies, administrative arrangements, institutions, and ideas in one political system is used in the development of similar features in another.” They emphasise that transfer is not a single act of imitation but a continuum that ranges from voluntary lesson-drawing to coercive imposition. Within this continuum, policy actors selectively borrow elements that fit their political, economic, and institutional contexts. Applying this framework allows Indonesia's case to be understood not as a direct replication of Singapore's policies, but as a process of selective adaptation within distinct regulatory and administrative constraints.

Dolowitz and Marsh (2000) argue that effective analysis of transfer must identify both *what* is transferred and *how* it is adapted. Policymakers may transfer goals, policy instruments, institutional designs, or implementation mechanisms. In the context of *Ojol* protection, the policy goal of extending social protection to informal platform workers aligns with Singapore's framework, but the instruments—such as mandatory social security contributions and work injury compensation—require contextual modification to fit Indonesia's fragmented governance and enforcement systems. As Dolowitz and Marsh caution, *uninformed transfer* can lead to failure when political, cultural, or institutional differences are overlooked. Thus, the analytical focus should not only be on adopting Singapore's regulatory design, but also on assessing Indonesia's capacity to implement and enforce similar mechanisms effectively.

2.2.2. Transfer Agents and Transnationalisation of Policy

A crucial dimension of policy transfer lies in the role of **transfer agents**—the actors who facilitate, mediate, or resist transfer. Dolowitz and Marsh (2000) highlight that these agents include public officials, international organisations, consultants, interest groups, and private firms. Each carries different motivations and forms of authority that shape the direction and content of policy transfer. In the *Ojol* case, relevant transfer agents include Indonesia's Ministry of Manpower, BPJS Ketenagakerjaan, platform companies such as Gojek and Grab, driver associations, and regional organisations like ASEAN or the International Labour Organization (ILO). The interplay among these actors determines how ideas about worker protection travel, which elements of Singapore's model are seen as desirable or feasible, and how they are ultimately translated into domestic regulation. Platform firms, for instance, may support limited forms of regulation that preserve labour flexibility, while international organisations often advocate for universal and mandatory protections. The negotiation among these actors situates Indonesia's reform within a broader field of policy contestation and learning.

Dolowitz and Marsh's (2000) framework also situates policy transfer within a wider process of **transnationalisation**, where policy ideas circulate through international networks, epistemic communities, and global governance arenas. Scholars such as Stone (2004) argue that this global flow

of ideas creates a marketplace of “best practices” that policymakers selectively reference to gain legitimacy or demonstrate modernisation. In Southeast Asia, Singapore’s *Platform Workers Framework*—which mandates contributions to social security and extends work injury compensation—has emerged as a regional benchmark for regulating gig work. Its influence reflects broader global debates about platform accountability and workers’ rights, driven by the ILO and OECD. However, Dolowitz and Marsh remind us that transnational diffusion does not guarantee successful learning; policies must be adapted to fit local institutional realities. For Indonesia, where the voluntary registration system under BPJS has reached less than 15 percent of *Ojol* drivers, simply importing Singapore’s mandatory model without administrative reform would risk repeating implementation failures.

2.2.3. Policy Learning

Closely linked to transfer is the notion of **policy learning**, which Dolowitz and Marsh (2000) position as a central driver of voluntary transfer. Policy learning refers to how governments draw on external experiences to improve domestic policies. Bennett and Howlett (1992) further differentiate between instrumental learning (about tools and means), conceptual learning (about problem framing), and social learning (about underlying values). These distinctions are relevant to Indonesia’s efforts to strengthen *Ojol* protection. Instrumental learning might involve adapting Singapore’s contribution and enforcement mechanisms; conceptual learning could mean recognising platform workers as a distinct labour category; and social learning would involve shifting perceptions of *Ojol* drivers from independent entrepreneurs to workers deserving statutory protection. Genuine learning, therefore, requires not only legal or technical borrowing but also institutional and normative change.

However, the literature also identifies limits to learning. Dolowitz and Marsh (2000) and later scholars such as Benson (2011) and Evans (2009) highlight barriers including political resistance, institutional inertia, limited administrative capacity, and competing policy frames. In Indonesia, these challenges manifest in weak inter-agency coordination, limited enforcement mechanisms, and the influence of powerful platform companies. Such conditions constrain how far lessons from Singapore can be applied directly. To mitigate these constraints, incremental or experimental transfer—such as piloting mandatory contribution schemes in major urban centres—may offer a more viable path, aligning with Dolowitz and Marsh’s notion of “informed and adapted transfer.”

Overall, the policy transfer framework developed by Dolowitz and Marsh (2000) provides a robust theoretical lens for analysing Indonesia’s potential policy learning from Singapore’s *Platform Workers Framework*. It underscores that transfer is a complex process involving multiple actors, transnational influences, and varying degrees of adaptation. By applying this framework, this paper situates Indonesia’s gig worker protection efforts within the broader dynamics of global policy circulation and learning. Understanding policy transfer not as simple imitation but as a process of *contextual adaptation* highlights the importance of institutional capacity, actor alignment, and political will in ensuring that lessons from abroad translate into effective domestic protection for *Ojol* drivers.

3. Discussion

3.1. Singapore Platform Work Act

The Singapore Platform Worker Act (PWA) is a legal framework designed by Singapore to provide legal protections and social security for digital platform workers and maintain the operational flexibility of the gig economy in the country (Tan, 2025; Xu et al., 2025). Enacted in 2024 and effectively implemented one year later, the Singapore Platform Worker Act represents an innovation to the global challenge of governing platform-based work, moving beyond the traditional binary labour classifications and aimed to addressing the unique needs of gig workers (ASCC, 2025; Tan, 2025). This innovative policy covers approximately 70,500 platform workers who engaged in location-based services, high-risk services, such as ride-hailing drivers, food delivery workers, and freelance providers. The Singapore Platform Worker Act introduces the core innovation of the third category of employment for platform workers, combining the traditional employees and self-employed individuals (Tan, 2025).

The Singapore Platform Worker Act (PWA) employs institutional hybridisation which combines the elements of traditional employment relationship. This hybrid status is aimed to provide the flexibility of self-employment and ensures benefits and protections tailored to the characteristic of platform work (Tan, 2025). The key provisions of the Singapore Platform Worker Act is illustrated in the Table 1 below:

Table 1. Key Provision of the Singapore Platform Worker Act

Area of Protection	Key Provisions
Social Security (Central Provider Fund)	Mandates to contribute to the Central Provident Fund (CPF). Both companies and platform workers should contribute to the CPF, ensures savings for housing, healthcare, and retirement (ASCC, 2025; Tan, 2025).
Work Injury Compensation	Obligate platform companies to provide work injury compensation insurance which equals to those provided to traditional employees (Lesmana & Samudra, 2025; Xu et al., 2025).
Collective Labour Right	Grants platform workers the fundamental right to create platform work associations which demonstrates legal power similar to trade unions. The permit to establish an association ensure the platform workers to have a legal position in negotiation and agreements (Tan, 2025).
Fair Treatment	Ensure anti-discrimination measures, safeguards against discriminations, and ensure worker equality
Economic Safeguards	Requires companies to maintain and provide platform workers an earning records, clear protection during bankruptcy or liquidation

The policy rationale of Singapore Platform Worker Act lies in balancing social equity with market efficiency and political factor. Singapore's decision not to classify platform workers as employees is politically strategic, as it prevents resistance from private companies while responding to public concerns about precarity in gig economy. In its policy coordination between the Ministry of Manpower, the national Trades Union Congress, and platform companies facilitate consensus building and policy experimentation among stakeholders. This collaborative institutional arrangement demonstrates network transfer by Evans (2009), highlights a collaborative arrangement of multiple policy actors to establish mutual consensus and adaptation. The Transition Support Scheme in the Singapore PWA which subsidies for lower-income workers in contribution to CPF reflects adaptive flexibility. This adaptive flexibility mitigates short-term cost and preserving long-term goal of social inclusion.

From the lens of comparative policy, Singapore's Platform Worker Act represents instrumental and conceptual learning. According to (Bennett and Howlett (1992) policy learning refers to how governments draw on external experiences to improve policies through instrumental learning, conceptual learning, and social learning. Through instrumental learning, Singapore Platform Workers Act offers a regulatory tools of earning records for platform workers. This regulatory tools of earning records can be transferred to other context. while instrumental learning illustrates transferable regulatory tools, conceptual learning redefines the concept of "decent work" in the digital economy era. In this sense, the Singapore Platform Workers Act transcends national boundaries, offering a regional benchmark to addressing worker inequality and generate inclusive gig economy regulation. Inclusive gig economy atmosphere is crucial to ensure platform workers fundamental right and facilities and increase welfare (ASCC, 2025; OECD, 2020). Although the policy transfer in the context of Singapore Platform Workers Act is feasible, its success depends not merely on the content of the policy but it depends on the administrative coherence and government's capacity in enforcing the policy. Indonesia, which shares similar digital work trend and digital labour dynamics as Singapore, needs to prioritise its institutional adaptation rather than replication.

3.2. Lessons for Indonesia

The regulatory framework of Indonesia in regulating gig workers remains fragmented and weak enforcement. Under the current regulatory system, platform workers such as online motorcycle taxi drivers (Ojol) are classified as business partner or "mitra" rather than employees. As a result, this non-recognition of platform workers in the formal employment system hinders them to accessing social security protections (Permana et al., 2023; Yasih, 2024). The platform workers who are excluded from the coverage of BPJS (National Health Insurance and Employment Social Security), placing the platform workers in a vulnerable working condition. Singapore's regulatory framework on platform workers provides two key lessons for Indonesia through policy learning across instrumental, conceptual, and social dimensions.

3.2.1. Instrumental learning: Strengthening Legal and Institutional Instrument

The instrumental learning refers to the adaptation of policy tools and mechanism from a model. For Indonesia, Singapore Platform Workers Act exemplifies two critical instruments of hybrid legal category and mandatory status of social protection. The instrumental learning can guide Indonesia to

reform its social security contribution system, shifting from voluntary participation system to a mandatory state-enforced deduction contribution scheme. This mandatory scheme requires the platform companies and platform workers to contribute to the social security system, ensuring consistent social protection coverage. For example, Indonesia could implement the deduction of small percentage from each workers' income in platforms such as Gojek and Grab. This small percentage of deduction will be transferred to BPJS so the state can subsidize low-income drivers. Such transformation from voluntary contribution to proactive social safety net enhances fundamental protections for platform workers in Indonesia. However, such adoption risks policy failure, as Dolowitz and Marsh (2000) state that transferring instrument without adapting enforcement structure will not be effective. Therefore, the Ministry of Manpower of Indonesia must establish a robust monitoring system which integrates the data from platform companies and platform workers.

3.2.2. Conceptual Learning

Indonesia, through conceptual learning, can recognise platform workers as a distinct labour category. The classification of platform workers within the Singapore Platform Workers Act offers an institutional blueprint for redefining labour categories in Indonesia. The conceptual learning by Bennett and Howlett (1992) which reframes problem, is compatible with the situation in Indonesia where Indonesia needs to redefine the status of platform workers. The legal ambiguity of platform workers' status shows a rigid dichotomy in Indonesia's labour system. This rigid dichotomy creates a loophole for platform companies to bypass social protection for their workers and neglect the fundamental needs of platform workers. By acknowledging platform workers equally with traditional employment system, it enables the government to expand the coverage of work injury compensation, minimum wage protection, and collective representation right. Through this conceptual learning, the lesson from Singapore Platform Worker Act would align with the realities of a gig economy, moving beyond the outdated worker classifications.

Through the conceptual learning, the Singapore Platform Workers Act provides a broader cultural and normative transformation on the perception of platform workers such as Ojol drivers in public. It is such a common perception in among Indonesian, including policymakers who perceives Ojol drivers as self-employed entrepreneurs and sidelining the aspect of vulnerable workers. Meanwhile, Singapore recognises platform workers equally as other employment type reflects how recognition reshapes public narratives. This image reframing by the Singaporean government turning the platform work from temporary hustle into a legitimate occupation which requires protection (Yeap, 2025). This illustrates that Singapore model highlights the reform in the gig economy is not only a legal or technical process of regulatory framework but a cultural process of a recalibration of how society values vulnerable occupations. In this sense, if the government of Indonesia express similar support like Singapore's, it could play a crucial role in fostering solidarity and advocacy for platform works.

3.3. Challenges

The implementation of Singapore Platform Workers Act model in Indonesia faces several challenges. Although the Singaporean model offers strong blueprint for hybrid protection and stronger legal status of platform workers, Indonesia's vast informal labour market, weak institutional

framework, high sensitivity to cost, and socio-political dynamics weaken the reform (Shekhawat & Khare, 2025; Tan, 2025).

3.3.1. Institutional and Legal Adaption Challenges

The worker misclassification and legal vacuum in Indonesia reflects the deep-seated practice of gig economy in the country. The lack of specific provisions to define or categorise platform workers in Indonesia's legal system highlights a legal gray area in the regulatory framework (Indra & Nawangsari, 2025; Setiawan et al., 2025; Wibowo & Susanto, 2025). Applying Singaporean model of third category occupational status requires fundamental reform of the traditional labour laws. However, Indonesia's regulatory framework which still oriented toward employer-employee relationships hinders this fundamental reforms (Rahman et al., 2024; Shekhawat & Khare, 2025). While the regulatory system in Indonesia is rigid, platform resistance also becomes the challenge in Indonesia's gig economy reform. The platform companies are resisting to formalise the platform worker status and prefer to classify them as partners or independent contractors to avoid legal obligations such as providing social security, pension, and minimum wage.

3.3.2. Cost Dilemma

In the lens of platform companies, implementing Singaporean model of platform workers creates significant financial risks in the Indonesian economy, which relies on the gig economy sector being low-cost. The implementation of mandatory insurance and social security contributions would significantly increase platforms' operational cost (Celios, 2024). If the mandatory deduction enforced in platform companies' system, the companies are likely to mitigate this cost by adjusting pricing models or commissions structure. This ultimately will reduce the take home pay or net earnings for drivers, undermining the welfare improvement (Celios, 2024; Tan, 2025). Meanwhile, the deterrence of investment and market expansion also challenges the gig economy reform in Indonesia. The investors, who are attracted to the low-cost, flexible model, may be hesitant to invest if the regulatory structure becomes more bureaucratic and heavy. Moreover, increased operational cost prevents the companies to expand their operations in the wider areas. Consequently, the limited market expansion will hinder job opportunity where it is often needed most by society (Celios, 2024).

4. Conclusion

In conclusion, the transfer of Singapore's Platform Workers Framework to Indonesia should be viewed as a process of contextual adaptation rather than direct imitation. Following Dolowitz and Marsh's (2000) framework, effective transfer requires not only the identification of useful policy elements but also their alignment with domestic political, legal, and administrative realities. For Indonesia, this means embedding lessons from Singapore within its existing labour governance structures, gradually strengthening institutional capacity, and building political consensus among key actors. By pursuing an informed and adaptive policy transfer, Indonesia can close the current social protection gap for Ojol drivers, create a more inclusive regulatory environment for gig workers, and move toward a sustainable model of digital labour.

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