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Implementation Of The Principle Of Equality Before The Law In The Settlement Of Industrial Relations Disputes In The Industrial Relations Court

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Abstract

The State of Indonesia is a State of law. One of the principles of the rule of law is the guarantee of the exercise of the power of an independent judicial institution, free from all interference by extra-judicial powers. The judicial power itself is an independent power, one of which is through the Principle of Objectivity which requires that dispute resolution will be good and acceptable to all parties, if carried out impartially (impartially), objectively, and fairly. The hopes above arise from the existence of the Principle of Equality Before the Law, which is one of the three meanings of the Rule of Law. The principle of Equality Before the Law arises from the modern legal system inspired by the paradigm of Positivism which assumes that the law must be objective and sterile from any influence outside the law. The implementation of the Equality Before The Law Principle in resolving industrial relations disputes at PHI is interesting for further investigation because the parties to the dispute in industrial relations are employers and workers/workers who are socially and economically clearly "not equal". The approach used in this study is the Socio-legal approach method (Socio-legal approach), which is a legal research method in addition to analyzing the implementation of the principle of Equality Before The Law in the normative law enacted, namely UU.No . 2 of 2004. Through this research, we can find the concept of industrial relations justice that is able to apply the ideal principle of Equality Before The Law.

Keywords: *Equality Principles Before, Industrial Relations Court*

1. Introduction

The objective and impartial settlement of cases is based on Article 4 paragraph (1) of Law Number 48 of 2009 affirming "The court adjudicates according to law without discriminating against people". That is, the judge in examining and deciding the case submitted to him must be objective and must not be partial to certain parties. The above expectations, arise as a result of the existence of the Principle of Equality Before The Law which is one of the 3 (three) meanings of the Rule of Law (Hukium State) in addition to the Supremacy of law and Results of ordinary law of the land proposed by Albert Venn Dicey (B. Arief Shidarta, 2016) The principle of Equality Before The law is defined as equality before the law or the equal submission of all groups, which means no one is above the law. The principle of Equality Before The law is one of the principles arising from the modern legal system inspired by the paradigm of Positivism which assumes that the law must be objective and sterile from any influence outside the law.

This school grew in the 1900s in Western Europe which was strongly influenced by the convergence between positivism in the natural sciences and the social order of capitalism with its main figure Auguste Comte (1798-1857). But in practice, it is often found that the principle of Equality Before The Law cannot be applied effectively. Even Adji Samekto mentioned that

Equality Before The Law or justice for all is just a myth, but in practice what is widely seen and felt is the opposite: justice not for all (Adji Samekto, 2013)

As mentioned above, one of the main premises of the principle of Equality Before The Law is that the law must be sterile from interests so that it must be objective and impartial. However, it will be interesting for us to analyze more deeply if we look at the reality of relationships that can give rise to legal relations, which also have the potential to create conflicts such as labor relations between employers and workers/workers.

One of the basic principles of employment relations is to create a harmonious and fair relationship accompanied by adequate social security protection that can ensure the continuity of work and business. Harmonization of labor relations is the basic capital to create good productivity on an ongoing basis. A harmonious situation is expected to be able to encourage workers/laborers and entrepreneurs to fulfill their rights and obligations fairly so that the relationship is able to fulfill and advance welfare dynamically(Siti Nurhayati, 2018).

In practice, legal and social relations have the opportunity to cause conflict. As a legal relationship, an employment relationship has the potential for conflict. Many factors cause conflict. Differences in interests and goals are one of the classic factors provoking conflict. Conflict is inevitable. Conflict is deeply embedded in the fabric of life. Humanity has always struggled with conflict, until now we are required to pay attention to conflict. We need a way to reduce fear of conflict(Siti Nurhayati, 2018)

One example of a conflict arising in an employment relationship is what is now referred to as an industrial relations conflict/dispute. In reality in the field, especially in the settlement of industrial relations disputes in the Industrial Relations Court (PHI), the implementation of the Equality Before The Law Principle is very interesting for the author's attention to be investigated further. This is because there are at least 3 (three) special characteristics related to industrial relations dispute resolution issues, namely: 1. Parties to Industrial Relations Disputes, 2. Types of Industrial Relations Disputes, 3. History of the establishment of the Industrial Relations Court (PHI) (Siti Nurhayati, 2016)

One of the institutions mandated to be established in resolving industrial relations disputes in accordance with Article 56 of Law No. 2 of 2004 is the establishment of a special court, namely the Industrial Relations Court (PHI) which is in a general judicial environment which is expected to be able to resolve industrial relations disputes quickly, precisely, fairly and cheaply as expected, both by employers and workers/workers.

In this connection, an interesting thing to be investigated further is the relationship between the Principle of Equality Before The Law and the Industrial Relations Court. As is known that according to the Principle of Equality Before The Law, parties who dispute before the law (read: court) will be treated equally. Here the law/court as it should be according to this principle, must be neutral, and objective and must not take sides with either party to the dispute (Nurhayati, 2017) .

Parties to disputes in industrial relations, as mentioned earlier, are employers and workers/workers who are distinctly different socially and economically. Their relationship, however, was initially due to economic interests, where entrepreneurs as owners of capital needed people who needed work. Although politically and legally they are considered equal, it is undeniable that in practice they are truly "not equal", this can be seen if we observe that their

employment relationship is based on an employment agreement whose work agreement content has been determined by the employer.

Even though politically and legally they are considered to be in an equal position, it cannot be denied that in practice they are indeed "not equal", this can be seen if we observe that their work relationship is based on a work agreement where the contents of the work agreement have been determined by the entrepreneur, meanwhile, individual dispute resolution has not been accommodated. In addition, it is also the Law. No. 12 of 1964 concerning Termination of Employment (PHK) in Private Companies. Both laws are considered unable to keep up with developments so that Law No. 2 of 2004 was issued which contains the types of industrial relations disputes and their resolution mechanisms (Siti Nurhayati, 2018)

2. Literature Review

Development of Industrial Relations Disputes

Industrial relations that take place between employers and workers/workers are not always harmonious and dynamic. It is possible that at any time the relationship will be colored by disputes. Pameo stated that industrial relations disputes will always occur as long as there are employers and workers. This was triggered by the difference in interests between employers and workers/workers which in turn caused many problems in industrial relations. History of the development of industrial relations disputes and their settlement mechanisms in Indonesia (formerly the Dutch East Indies), preceded by the arrangements contained in Article 116g. R.O. Stbl. 1847 No. 23, concerning employment agreements and labor agreements by not looking at the amount of money and not looking at the class of citizens of the parties concerned (H.R. Abdulsalam, 2019). Along with the development of reforms, regarding employment, the Government and the House of Representatives of the Republic of Indonesia succeeded in producing Law No. 13 of 2003 on Manpower. Related to the settlement of this industrial relations dispute, it is stated in the General Explanation of Law No. 13 of 2003 concerning Manpower that: "The development of industrial relations in accordance with the values of Pancasila is directed to foster harmonious, dynamic and equitable relations between production process actors. Institutional development and means of industrial relations including collective labor agreements, bipartite cooperation institutions, tripartite cooperation institutions, industrial relations correction, and industrial relations dispute resolution."

As a logical consequence of this new law, the previous laws governing labor, namely Law No. 22 of 1957 concerning the Settlement of Labor Disputes and Law No. 12 of 1964 concerning Termination of Employment in Private Companies, are no longer valid. If described, there are several aspects as the background to the promulgation of Law No. 2 of 2004 concerning the Settlement of Industrial Relations disputes, namely:(Siti Nurhayati, 2016)

First, since the enactment of Law No. 5 of 1986 (last amended by Law No. 51 of 2009 concerning State Administrative Court/PTUN), then the decision of the Central Labor Dispute Resolution Committee (P4P) which was originally final, by parties who did not accept the decision can be filed a lawsuit at the PTUN, which can then be requested for cassation efforts at the Supreme Court. This process takes a relatively long time which is not suitable to be applied in labor cases (industrial relations) that require quick resolution because they are related to the production process and labor relations.

Second, there is ministerial authority to postpone or cancel P4P decisions or commonly called veto rights. This veto is government interference, and is no longer in accordance with the paradigm that develops in society, where the role of government should have been reduced.

Third, in Law No. 22 of 1957, only trade unions / trade unions can be parties to the settlement of industrial relations disputes. With the enactment of Law No. 21 of 2000 concerning Trade Unions / Trade Unions which is animated by International Labour Organization (ILO) Convention Number 87 concerning Freedom of Association and Protection of the Right to Organize, which has been ratified by Indonesia, it opens the opportunity for every worker/worker to form/follow the worker/labor organization he likes. However, on the other hand, the right of workers/trade unions not to organize must also be respected. Therefore, Law No. 22 of 1957 which requires litigants to be trade unions/trade unions is no longer in accordance with the new paradigm in the field of industrial relations, namely democratization in the workplace.

Industrial Relations Dispute Resolution Mechanism

The provisions of Law No. 2004 have provided several alternatives as solutions for how to resolve industrial relations dispute cases. In principle, the settlement of industrial relations dispute cases can be done either through mechanisms outside the Court (Non-ligitation) or through the Industrial Relations Court (PHI). Thus, there are three forms of polarization in the settlement of industrial relations dispute cases according to the normative paradigm of the provisions of Law No. 2 of 2004, that is, it can be done through Bipartite, Tripartite negotiations, and can also be through the Industrial Relations Court (PHI).(Siti Nurhayati, 2016)

a. Out-of-Court Settlement (Non-Litigation).
   Settlement of industrial relations disputes outside the Court (Non-Litigation), can be pursued bipartite through bipartite negotiations or tripartite, namely through Mediation, Consultation, and Arbitration
b. Settlement through the Industrial Relations Court (PHI).
   The Industrial Relations Court (PHI) is the last institution in the settlement of industrial relations disputes after Conciliation and Mediation other than through Arbitration, which was established based on Law No. 2 of 2004.

Thus, the Industrial Relations Court is one of the specialized courts which is within the General Court. As we know in the general judicial environment itself, In addition to the Industrial Relations Court, other special courts have also been established such as the Corruption Court, Commercial courts, and human rights courts.

Regarding the position of the Industrial Relations Court as part of the District Court, Asri Wijayanti stated that PHI is a special form of court from the District Court (Asri Wijayanti, 2014). The competence of the District Court includes civil cases and criminal cases. With respect to civil litigation, the District Court judge will rule only as demanded by the Plaintiff and must not give more verdicts than are demanded. Industrial Relationship Disputes are part of employment tenure cases which are part of civil law.

In relation to the implementation of the principle of Equality Before The Law in the Industrial Relations Court, the discussion must also include elements of the court system developed in the judicial institution, which includes elements: of structure, substance, and legal culture.

Furthermore, with regard to the applicable procedural law, in accordance with the provisions of Article 57 of Law No, 2 of 2004 on Industrial Relations Dispute Resolution it is stated that "The

procedural law applicable to the Industrial Relations Court is the civil procedural law applicable to the Court within the General Court, unless specifically provided for in this Law. In other words, it is clearly seen that in principle all civil procedural laws applicable in the General Court apply in the Industrial Relations Court. However, there are several differences in procedural law provisions that apply in the Industrial Relations Court (PHI) as stated in Law No. 2 of 2004 with civil procedural law in the General Court (PN) including matters: Lawsuit requirements, Place of claim, Case costs, Type of procedure, Peace, Judge's Council, Limit of authority, Legal Representative, Time to decide, Basis of decision, Submission of judgment, Execution costs, Legal remedies (Juanda Pangaribuan, 2017).

3. Methods

Nature of Research

This study used descriptive research. Descriptive research aims to describe precisely the characteristics of a particular individual, condition, symptom, or group to determine the spread of a symptom or to determine whether there is a relationship between one symptom and another symptom in society (Amiruddin dan H. Zainal Asikin, 2017)

Types of Research

Types of Normative Legal Research. Normative Law Research is research that refers to legal norms contained in laws and regulations (Soejono Soekamto, n.d.). This library research is research that examines the study of documents, which uses various secondary data such as laws and regulations, court decisions, and legal theories, and can be in the form of scholars' opinions.

Collection Methods

Data The data collection technique in this study uses the socio-legal approach method (Socio-legal approach), which is a legal research method in addition to analyzing the implementation of the principle of Equality Before The Law in the normative law enacted / positive law, namely: Law No. 2 of 2004 concerning the Settlement of Industrial Relations Disputes in the Industrial Relations Court, also examines the reality of the implementation of the principle of Equality Before The Law in the practice of proceedings in the Industrial Relations Court in accordance with the Law experienced by the parties concerned, namely judges, advocates / lawyers, employers/employers' associations and workers/workers or trade unions/labor.

Data Type

This study used Secondary Data. Secondary Data in terms of binding strength according to Ronny Hanitijo Soemitro is divided into Primary Law material, Secondary Law material, and Tertiary Law material (Bambang Sunggono, 2017). The Secondary data is divided into:

a. Primary Legal Materials, which are binding materials consisting of (1) Law No. 21 of 2000 concerning Trade Unions/Trade Unions. (2) Law No. 13 of 2003 concerning Manpower. (3) Law No. 2 of 2004 concerning Settlement of Industrial Relations Disputes. (4) Law No. 03 of 2009 concerning the Supreme Court. (5) Law No. 48 of 2009 concerning the Power of the Judiciary. (6) Law No. 49 of 2009 concerning General Courts. (7) Law No. 30 of 1999 concerning Arbitration and Alternative Dispute Resolution. (8) Civil Code (Burgelijk Wetboek). (9) Compilation of Employment Law and Social Security.

b. Secondary Legal Materials, which consist of literature materials for Books, Scientific Journals, and the Internet.

c. Tertiary Law Materials, namely legal materials that are complementary in nature to provide additional instructions or explanations to Primary and Secondary Legal materials. Tertiary Law materials contained in the study include the Legal Dictionary and the Big Dictionary Indonesian.

Data Analysis

Qualitative Research Method is a research method based on philosophy, which is used to examine scientific conditions (experiments) where researchers as instruments, data collection techniques, and qualitative analysis are more pressing on meaning (Sugiyono, 2018). Qualitative Analysis of this data is sourced from legal materials based on concepts, theories, and laws and regulations regarding the Implementation of the Principle of Equality Before The Law in Resolving Industrial Relations Disputes in the Industrial Relations Court (PHI)

4. Results

To get answers and discuss the problems posed and the objectives to be achieved in this study, an analysis of quantitative data and qualitative data obtained from research using a system approach will be carried out, so that as stated by Lawrence M. Friedman, the analysis must be carried out on the three elements of the legal system, namely Structure, Substance, Legal Culture/culture.

The position of the Industrial Relations Court as one of the institutions in resolving industrial relations disputes.

Relating to the first element of the legal system, namely Structure, as stated in the Introduction the research on the implementation of the principle of Equality Before The Law, took the location of research at the Industrial Relations Court (PHI) Medan, so the following is described about the history of the establishment of the Medan Industrial Relations Court (PHI) and the development of industrial relations dispute cases it handles and its analysis as follows::

1. Position and Establishment of Medan Industrial Relations Court.

The jurisdiction of PHI Medan covers the entire jurisdiction of North Sumatra Province. PHI Medan began accepting cases of industrial relations disputes in March 2006. For conditions in April 2021, the number of career judges serving in PHI Medan amounted to 7 (seven) people, while the Adhoc Judges were 5 (5 people) from the Trade Union/Trade Union element, and 4 people from the Employer/APINDO element.

2. Case Development in Medan Industrial Relations Court.

The development of the number of cases entered in the last seven years (2015 to - 2021) in the Medan Industrial Relations Court (PHI), according to the plaintiff is 2,353 cases with details of the Plaintiff from the Worker/Labor side 2,100 cases while the Plaintiff from the Employer = 253 cases.

Dari data tersebut di atas, maka jumlah perkara perselisihan hubungan industrial yang masuk ke Pengadilan Hubungan Industrial (PHI) Medan dalam tujuh tahun terakhir tersebut adalah sebanyak 2.353 perkara atau rata- rata 336 perkara pertahun. Dari sisi Subjek Penggugat dalam perkara PHI, maka terlihat bahwa rata-rata Penggugat perkara PHI adalah dari Pihak Pekerja/Buruh lebih banyak/dominan yaitu 2.100 (89 %) sedangkan Penggugat dari Pihak Pengusaha hanya 253 perkara (11 %).

Meanwhile, the number of cases of industrial relations disputes according to the Type of Case entered in PHI Medan, from 2014-2020, the following data were obtained: 1. Layoff disputes: 1,917 cases, 2. Rights Disputes: 344 cases, 3. Conflict of Interests: 85 cases, 4. Disputes between SP/SB: 7 cases

From the data mentioned above, it can be concluded that 1,917 (81.5) % of industrial relations dispute cases in PHI Medan are Termination of Employment (PHK).

Next, with regard to the results of the trial, in terms of whether it comes to a verdict or stops in the middle of the examination/trial for certain reasons justified by law, the following data are obtained: 1. Not until the verdict: 323 cases, 2. Until the verdict: 2,030 cases.

Meanwhile, from the data of cases examined/tried above, it can be seen that 2,030 (86%) cases reached a verdict, while those that were examined for certain reasons justified by the Law were 323 (14%) cases.

Of the number of cases that were decided in 2012, namely 237 cases, it turns out that 85 cases were won by workers/workers 72 (31%) cases were won by employers and the remaining 80 (33%) cases mean not winning one party (partially granted).

Furthermore, of the cases that have been decided, namely 237 cases, further legal remedies have been filed (Cassation / PK) as many as 184 cases (Cassation 155 &; Review / PK = 29) or 78% of cases. This indicates that the decision is considered to lack the sense of justice of the party who filed the legal remedy.

5. Discussion

What layoffs mean for the Parties and their relationship to the Principle of Equality Before The Law.

As has been presented in the data above, First, almost nine out of ten Plaintiffs (89%) industrial relations dispute cases submitted to PHI Medan are by Workers / Workers, and Second eight out of ten (81%) cases are Termination of Employment (PHK). From this data, of course, two questions that we can ask, namely First is why the majority / dominant Plaintiff Subject is Worker/laborer. The second question is why the majority / dominant type of cases filed is Termination of Employment.

From the two conclusions of the data mentioned above, it can be seen that the case of termination of employment (PHK) is interesting to get special attention in this study. This is because termination of employment is the termination of employment relations between employers and workers/laborers. So with this Termination of Employment, there will be no legal relationship between the parties. For workers/workers, this is certainly very important for the continuity of income / further income, which in the end is also very influential for the survival of their families in the future. Thus, it can be understood that most workers/workers who will be laid off by employers are mostly trying to want to be able to work again (Not laid off).

In contrast to the conditions of workers/workers, for employers, the exit/layoff of one or even several workers/workers, in management (operational and financial) rarely causes serious problems in the future for the survival of the company. The difference in conditions/positions between workers/workers and employers as described above, is also evidence that in practice the principle of Equality Before The Law is quite difficult to apply in the judiciary, including in the layoff process at the Industrial Relations Court (PHI). To strengthen this conclusion, two Supreme

Court rulings can be put forward, namely the Supreme Court of the Republic of Indonesia. No. 700/Pdt. Sus/2011 and Decision of the Supreme Court of the Republic of Indonesia. No. 299/Pdt. Sus/2012, which in essence in the two Supreme Court Decisions granted layoffs because industrial relations were no longer harmonious.

Implementation of Equality Before The Law Principles in PHI in general

Regarding the institution of the Court that must uphold the principle of Equality Before The Law, for its implementation in the Medan Industrial Relations Court (PHI), Some judge respondents stated that in labor relations, the position of workers / laborers is weaker. Meanwhile, according to the provisions of article 57, the procedural law used in PHI is a civil procedural law that applies to general courts except those specifically regulated in Law No. 2 of 2004. This means that to achieve justice, PHI must actually pay attention to the workers/workers, especially in the event (formal aspect), not the material. And this according to researchers does not contradict the principle of Equality Before The Law."

Therefore, the principle of equality before the law (Equality Before The Law) is still not implemented properly in PHI, In practice, workers still often hold demonstrations/mass mobilizations of SP / SB members on a large scale in front of the PHI building which is certainly not very conducive and is a psychological pressure for judges to give their decisions fairly. Meanwhile, parties who interfere with the PHI session cannot be sanctioned as an act of "Contempt of Court". For example, in 2014, several PHI Medan judges were forced to evacuate through AC ceilings because the PHI Medan building was occupied by SP/SB members who did not accept the PHI judge's decision at that time."

Meanwhile, the relationship between the principle of Equality Before The Law and procedural procedures in PHI (in accordance with Law No. 2 of 2004), as well as the provisions contained in Article 57 of Law No. 2 of 2004 which states that the procedural law applicable to PHI is the Civil Procedure Law applicable to the Court within the General Court, except as specifically regulated in this Law. An interesting thing that can be seen is that Civil Procedure Law is generally enforced with the assumption and assumption that the litigants are in an equal position.

So it must also be treated equally in both the rights and obligations of litigants. In reality, it is certainly difficult to accept if both parties in industrial relations disputes (Workers and Workers/workers) who are clearly "not equal" are treated equally both in rights and obligations in litigation in court.

Therefore, the discussion regarding the relationship between the Equality Before The Law Principle and the procedure for events at PHI in accordance with Law No. 2 of 2004. The author will start from the analysis of the content of the material in Law No. 2 of 2004. In this regard, after an analysis of the material of the Law. No. 2 of 2004, out of the total content of all material consisting of eight chapters and 126 articles, Therefore, data and facts are obtained that some of the contents of the articles below are related to the Principle of Equality Before The Law, namely those relating to: Case costs, Judge's oath, Filing a lawsuit, Perfecting the lawsuit, Legal Representatives, Panel of judges, Examination Proceedings and Legal Remedies.

The description and analysis of Article No. 2 of 2004 relating to the principle of Equality Before The Law is as follows: 1. Case Costs (Article 58); 2. Judge's Oath (Article 60 paragraph 1); 3. Domicile of the lawsuit (Article 81) &; Collective Action (Article 84); 4. Settlement of the Claim (Article 82 paragraph 2); 5. Legal Representative (Article 87); 6. Tribunal of Judges and Adhoc

Judges (Article 88 and Article 92); 7. Examination process/event (Article 98 paragraph 1); 8. Legal remedies (Article 56).

In addition, one of the important principles of judicial relations besides the principle of Equality Before The Law is the principle of Fast, Precise, Fair and Cheap PHI Justice, felt by almost all Respondents has not been able to be realized optimally.

6. Conclusion

From the description in the discussion and the results of the research mentioned above, the following conclusions can be drawn:

1. The Embassy of the Industrial Relations Court (PHI Central Jakarta) as one part of the industrial relations dispute resolution institution only accepts cases after the parties do not use alternative non-ligitation solutions through arbitration or through bipartite, conciliation, and mediation that fail. PHI Central Jakarta has tried to apply the principle of Equality Before The Law as much as possible even though it is felt that it is still far from the expectations of justice seekers (employers and workers/workers). One of the facts, the position of the employer looks stronger in terms of employers fighting for their intention to carry out termination of employment (PHK) on the grounds that industrial relations are not harmonious, even though there is still a desire for workers/workers to work. This is reinforced by several Supreme Court rulings. RI No. 700 K / Rev. Sus / 2011 and No. 229 K / Rev. Sus / 2012.

2. The relationship between the principle of Equality Before The Law and the procedure/procedure in the settlement of industrial relations disputes in the Industrial Relations Court (PHI), as regulated according to Law No. 2 of 2004 concerning the Settlement of Industrial Relations Disputes, has been reflected in the implementation of the principle of Equality Before. The Law, as in the provisions on case costs, oath of the judge, filing of a lawsuit, the consummation of a lawsuit, attorneys, panel of judges, method of trial, and legal remedies. However, there are also several provisions that actually contradict the principle of Equality Before. The Law, namely the tendency of lawmakers to defend the interests of workers/workers.

7. References

Amiruddin dan H. Zainal Asikin. (2017). *Introduction to Legal Research Methods*. Rajawali Pres.

Asri Wijayanti. (2014). *Post-Reformation Labor Law*. Sinar Grafika.

Bambang Sunggono. (2017). *Legal Research Methods*. PT. Raja Grafindo Persada.

H.R. Abdulsalam. (2019). *Employment Law,*. Restu Agung.

Juanda Pangaribuan. (2017). *Position of Lecturer in Labor Law*. Bumi Intitama Sejahtera,.

Nurhayati, S. (2017). *The influence of brand image, price and promotion on the purchase decision of Samsung mobile phones in Yogyakarta*. Jurnal Bisnis, Manajemen, Dan Akuntansi, *4*(2).

Siti Nurhayati. (2016). *Settlement of industrial relations disputes outside the court at the office of the North Sumatra Provincial Manpower and Migration Office*. Responsif, *2*(2), 15–29.

Siti Nurhayati. (2018). *Reconstruction of legal politics in the implementation of progressive law-based industrial relations court rulings* [Disertasi]. Andalas.

Soejono Soekamto, S. M. (n.d.). *Normative Legal Research: A Brief Review*.

Sugiyono. (2018). *Quantitative, Qualitative, and R&D Research Methods*. Alfabeta.