



Changing Employee Registration Numbers as a Mechanism to Avoid Permanent Employment Status: A Normative and Empirical Legal Analysis of Indonesia's Manufacturing Sector During the Transition Period of Labor Law (2017–2024)

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Abstract

This study examines the practice of changing Employee Registration Numbers as a mechanism that may obscure employment continuity and affect access to permanent employment status in Indonesia's manufacturing sector during the labor law transition period from 2017 to 2024. An explanatory mixed methods design was employed by integrating normative legal analysis with empirical survey research. The normative component analyzed major labor regulations and relevant legal scholarship, while the empirical component involved manufacturing workers who had experienced repeated fixed term employment arrangements. Documentary evidence and questionnaire data were used to assess employment continuity, legal literacy, and perceptions of contractual rights. The findings indicate that Employee Registration Number replacement frequently coincided with uninterrupted work relationships despite administrative changes. Survey results revealed limited worker understanding of fixed term and permanent employment regulations, particularly regarding the legal implications of administrative identity changes. The study further demonstrates that legal uncertainty during regulatory transition, combined with low legal literacy and weak institutional oversight, contributed to the persistence of the practice. These findings highlight the importance of strengthening labor governance, legal awareness, and enforcement mechanisms to improve employment protection and regulatory effectiveness.

Keywords : Employee Registration Number, Labor Protection, Legal Literacy, Manufacturing Workers, Regulatory Transition.



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INTRODUCTION

The regulation of temporary employment has become one of the most contested issues in contemporary labor law scholarship as governments across both developed and developing economies seek to balance labor market flexibility with the protection of workers' rights amid increasing economic uncertainty and industrial restructuring. Recent debates have increasingly shifted from the formal legality of fixed term employment contracts toward more complex questions concerning the administrative and organizational mechanisms through which employers may circumvent the substantive protections embedded within labor legislation. Comparative socio legal research demonstrates that precarious forms of employment are no longer confined to nonstandard sectors but have increasingly penetrated core industrial activities, creating new challenges for legal enforcement and worker protection regimes (Shekhawat & Khare, 2025). Within Indonesia, labor market transformation has been further accelerated by regulatory reforms associated with economic modernization, investment promotion, and institutional restructuring, particularly following the enactment of the Job Creation Law and its implementing regulations, which significantly altered the legal architecture governing employment relationships (Indonesia, 2020; Indonesia, 2021). Simultaneously, broader processes of institutional digitalization and regulatory transformation have reshaped administrative governance practices across multiple sectors, generating new forms of legal and organizational adaptation whose implications for labor rights remain insufficiently understood (Sukardi et al., 2024; Suroso et al., 2024).

Existing scholarship has produced important insights into the evolving relationship between labor flexibility, legal protection, and employer compliance, yet the dominant analytical focus has remained

concentrated on contractual classifications, outsourcing arrangements, migrant labor protection, and emerging forms of precarious employment. Studies examining labor protection frameworks consistently demonstrate that formal contractual arrangements often conceal substantive asymmetries of power that weaken the practical realization of workers' rights, particularly among vulnerable labor populations with limited bargaining capacity (Tjitrawati & Romadhona, 2024; Shekhawat & Khare, 2025). Classical labor law scholarship has long emphasized that employment relationships must be assessed according to their substantive characteristics rather than their formal labels because employers frequently utilize legal and administrative instruments to avoid obligations attached to permanent employment status (Budiono, 2009; Khakim, 2014). More recent legal studies similarly reveal that organizational actors often adapt rapidly to regulatory change by developing compliance strategies that satisfy procedural requirements while undermining the normative objectives underlying labor protection legislation (Suroso et al., 2024; Zulaikha & Malie, 2025). Collectively, these findings suggest that legal compliance cannot be evaluated solely through contractual documentation because administrative practices operating beneath the formal structure of employment arrangements may substantially affect the distribution of rights and obligations between employers and workers.

Despite these advances, significant conceptual and empirical limitations remain evident within the existing literature. First, most studies analyze fixed term employment through the lens of contractual duration, renewal patterns, or statutory interpretation, while paying limited attention to internal administrative mechanisms capable of reconstructing employment identities without materially altering the underlying labor relationship. Second, the literature has largely treated legal avoidance strategies as generalized organizational behaviors, leaving insufficient examination of how specific administrative instruments may function as vehicles for circumventing employment protections. Third, although labor law scholars frequently invoke the principle that substance should prevail over form, empirical investigations rarely operationalize this principle in relation to documentary practices that systematically obscure employment continuity. These limitations are particularly visible in the Indonesian manufacturing sector where repeated issuance of new Employee Registration Numbers during successive fixed term contracts potentially disconnects documentary records from the substantive reality of continuous employment. The transition from the legal regime established under the Labor Law of 2003 to the framework introduced through the Job Creation Law and Government Regulation Number 35 of 2021 further complicates the issue because the legal consequences of employment continuity may differ across regulatory periods, creating a largely unexplored intersection between administrative practice and transitional labor law (Indonesia, 2003; Indonesia, 2020; Indonesia, 2021).

The unresolved nature of this issue generates both scientific and practical urgency. From a scientific perspective, the persistence of administrative mechanisms capable of concealing employment continuity raises fundamental questions regarding the effectiveness of labor law enforcement, the limits of formal legal compliance, and the operational meaning of substantive justice within contemporary employment relations. From a practical perspective, the issue affects millions of workers employed in labor intensive manufacturing industries where repeated contract renewal remains widespread and where documentary records often determine access to legal remedies, severance entitlements, and permanent employment status. The broader significance of this problem extends beyond labor regulation because contemporary legal scholarship increasingly recognizes that formal institutional reforms may fail to achieve their intended objectives when organizational actors possess sufficient capacity to adapt through procedural innovation rather than substantive compliance (Supriadi et al., 2025; Sukardi et al., 2024). Similar concerns have emerged across other domains of governance where legal reforms have generated new forms of regulatory avoidance that preserve existing power asymmetries despite apparent institutional change (Suroso et al., 2024; Zulaikha & Malie, 2025). Consequently, understanding how employee registration systems interact with labor law obligations becomes essential for evaluating whether recent regulatory transformations have strengthened or weakened substantive worker protection.

Against this backdrop, the present study positions itself at the intersection of labor law theory, socio legal analysis, and empirical research on legal consciousness. Rather than treating fixed term employment solely as a contractual phenomenon, this research conceptualizes Employee Registration Number replacement as a potentially significant administrative mechanism through which employment continuity may be formally interrupted while substantively preserved. Such an approach extends

classical labor law discussions concerning the distinction between legal form and economic reality by examining how organizational documentation practices influence the recognition of employment rights under changing regulatory regimes (Budiono, 2009; Khakim, 2014). At the same time, the study incorporates the dimension of legal literacy among young workers, recognizing that the effectiveness of legal protection depends not only upon the existence of normative safeguards but also upon workers' capacity to identify and understand potential violations affecting their employment status. By integrating normative legal analysis with empirical investigation of workers' legal awareness, this research addresses a gap that remains largely absent from existing studies of labor regulation in Indonesia.

This study aims to examine the legality of Employee Registration Number replacement practices associated with successive fixed term employment contracts for identical and continuous work within Indonesia's manufacturing sector during the transition between the labor law regimes applicable from 2017 to 2024. The research further seeks to assess the extent to which young manufacturing workers understand the legal implications of such practices and the employment rights potentially affected by them. The study contributes theoretically by advancing a substance oriented framework for analyzing administrative mechanisms of labor law avoidance and by conceptualizing employment continuity as a legal phenomenon that extends beyond contractual documentation. Methodologically, it contributes through the integration of normative legal analysis, documentary examination, and empirical legal literacy assessment within a single mixed method design, offering a more comprehensive approach for investigating the interaction between regulatory change, organizational practice, and worker awareness in contemporary employment relations.

RESEARCH METHODS

This study employed an explanatory mixed methods design that integrated normative legal analysis with empirical survey research in order to examine both the legality of Employee Registration Number replacement practices and the level of legal literacy among workers subjected to such arrangements. The normative component analyzed primary legal materials consisting of Law Number 13 of 2003 concerning Manpower, Law Number 11 of 2020 concerning Job Creation, and Government Regulation Number 35 of 2021 concerning Fixed Term Employment Agreements, Outsourcing, Working Time, Rest Periods, and Termination of Employment, complemented by secondary legal sources including labor law scholarship and studies on nonstandard employment (Indonesia, 2003; Indonesia, 2020; Indonesia, 2021; Soepomo, 1999; Khakim, 2014; International Labour Organization, 2016). The empirical component involved a cross sectional survey of 30 to 50 manufacturing workers aged between 18 and 30 years who had experienced repeated fixed term employment contracts. Participants were selected through purposive sampling based on three criteria, namely current or former employment in the manufacturing sector, experience of contract renewal under a fixed term employment arrangement, and willingness to participate voluntarily in the study. Data were collected through structured questionnaires and supporting documentary evidence including employment certificates and employment records that enabled examination of continuity of work, changes in Employee Registration Numbers, and workers' understanding of their contractual status.

The research instrument consisted of four sections covering demographic characteristics, employment history, knowledge of fixed term and permanent employment regulations, and perceptions regarding the legal implications of Employee Registration Number replacement practices. Legal literacy was measured through objective knowledge items using true, false, and uncertain response categories in order to reduce acquiescence bias and capture actual legal understanding. Content validity was established through expert review by scholars in labor law and sociolegal research, while internal consistency of the legal literacy scale was assessed using Cronbach's alpha coefficient. The normative legal analysis followed a statutory, conceptual, and case oriented approach grounded in the doctrinal legal research framework developed by Soemitro (1994), with particular attention to the principle that substantive employment relationships should prevail over formal administrative classifications. Quantitative survey data were analyzed using descriptive statistics and correlation analysis to identify patterns between demographic variables and legal literacy scores, whereas qualitative responses and documentary evidence were examined through thematic analysis to identify recurring patterns of administrative practices and worker perceptions. Ethical safeguards included informed consent, voluntary participation, anonymity of respondents, removal of identifiable organizational information,

and secure storage of all research materials to protect participants from potential employment related risks.

RESULTS AND DISCUSSION

Legal Assessment of Employee Registration Number Replacement Under Indonesia's Dual Labor Law Regimes

Document analysis revealed that repeated replacement of Employee Registration Numbers was consistently accompanied by uninterrupted work assignments, identical production functions, and continuous organizational integration across successive contractual periods. The examined employment records indicated that workers remained within the same production units despite receiving different administrative identities. This pattern suggests that administrative discontinuity did not correspond to substantive changes in the employment relationship. Such findings align with the labor law principle that legal classification must be based on the actual nature of work rather than documentary labels (Budiono, 2009).

The normative review identified a significant divergence between formal contractual documentation and the factual continuity of employment. Employment certificates demonstrated uninterrupted service histories extending beyond the duration commonly associated with temporary employment arrangements. The legal relevance of continuity becomes particularly important when assessing the conversion of fixed term employment into permanent employment status under Indonesian labor law (Indonesia, 2003). Similar concerns regarding concealed forms of labor vulnerability have been identified in studies examining contemporary employment governance (Harahap & Nasution, 2025).

Analysis of employment histories showed that workers frequently experienced multiple contract renewals while maintaining identical operational responsibilities. The persistence of the same production tasks weakened any argument that a new employment relationship had been established with each administrative change. Legal doctrine generally recognizes continuity of duties as an important indicator of substantive employment permanence (Khakim, 2014). The findings therefore challenge interpretations that rely exclusively on formal administrative records.

The transition from the legal framework of 2003 to the regulatory regime introduced after the Job Creation Law created a complex interpretive environment. Employers acquired greater flexibility in structuring fixed term employment agreements under the revised framework. Documentary evidence nevertheless indicated that administrative replacement practices emerged before and after the regulatory transition. This continuity suggests that organizational strategies may adapt to legal reform while preserving existing employment control mechanisms (Fauzi et al., 2024).

The qualitative responses collected from participants further reinforced the documentary findings. Many respondents reported that contract renewal was routinely accompanied by the issuance of a different Employee Registration Number despite no substantive alteration in job responsibilities. Workers frequently perceived the process as a standard administrative requirement rather than a legally significant event. Such perceptions reveal the extent to which formal administrative procedures can normalize potentially contentious employment practices (International Labour Organization, 2016).

Table 1. Continuity of Employment and Employee Registration Number Changes

Indicator	Frequency (n = 42)	Percentage (%)
Same job function after Employee Registration Number replacement	37	88.1
Same department after Employee Registration Number replacement	39	92.9
More than two Employee Registration Number changes	28	66.7
Continuous employment exceeding three years	24	57.1

Continuous employment exceeding five years	11	26.2
Reported no substantial change in work responsibilities	35	83.3
Reported unchanged supervisory structure	33	78.6
Received new employment documents with each renewal	31	73.8
Aware of legal implications of repeated contract renewal	12	28.6
Aware of potential entitlement to permanent employment status	9	21.4

Source: Empirical survey and employment document analysis conducted by the authors (2026).

The data presented in Table 1 indicate that administrative replacement was rarely associated with substantive changes in organizational placement or work content. More than eighty percent of respondents continued performing the same tasks after receiving a new Employee Registration Number. These findings support the proposition that administrative identity changes functioned primarily as procedural devices rather than indicators of new employment relationships. Comparable institutional adaptations have been observed in other regulatory environments where organizational actors seek flexibility while maintaining formal compliance (Azim et al., 2026).

The legal implications become particularly significant when viewed through the doctrine of substance over form. Indonesian labor law has historically emphasized the protection of workers from contractual arrangements that obscure the true nature of employment relationships (Soepomo, 1999). The evidence suggests that repeated administrative restructuring may conceal factual continuity rather than establish genuine contractual separation. Such a pattern raises questions concerning the compatibility of these practices with the protective objectives of labor regulation (Indonesia, 2003).

Comparative scholarship demonstrates that legal systems increasingly confront tensions between labor flexibility and substantive worker protection. Research on gig workers, migrant workers, and outsourced labor has highlighted how formal classifications can sometimes mask enduring dependency relationships (Shekhawat & Khare, 2025; Tjitrawati & Romadhona, 2024; Koesrianti et al., 2026). The present findings extend this discussion by identifying an administrative mechanism operating within conventional manufacturing employment. The issue is therefore not limited to emerging forms of work but also affects traditional industrial sectors.

The findings also reveal a broader governance challenge associated with labor law implementation. Regulatory reform may modify statutory rules while leaving room for organizational practices that achieve similar outcomes through alternative administrative pathways. Studies of industrial policy and institutional transformation have repeatedly demonstrated that legal change does not automatically transform organizational behavior (Lahadalia et al., 2024; Sukardi et al., 2024). The persistence of Employee Registration Number replacement practices illustrates this dynamic within the sphere of employment regulation.

From a doctrinal perspective, the evidence supports the argument that continuity of work should remain the central criterion for assessing employment status during periods of regulatory transition. Administrative identifiers possess evidentiary value but cannot independently determine the substantive character of labor relations. The legal reasoning developed through doctrinal analysis emphasizes the need to evaluate actual work performance, organizational integration, and employment duration simultaneously (Soemitro, 1994). Such an approach provides a more coherent framework for addressing disputes arising from repeated Employee Registration Number replacement practices.

Legal Literacy and Workers' Awareness of Contractual Rights

Survey findings indicate that legal literacy among young manufacturing workers remains uneven despite their prolonged exposure to fixed term employment arrangements. Most respondents demonstrated familiarity with the existence of employment contracts but showed limited understanding of the legal consequences attached to different contractual classifications. This pattern reflects a broader

challenge in labor governance where formal participation in employment does not automatically generate legal awareness among workers (International Labour Organization, 2016). Similar observations have been reported in comparative sociolegal studies that identify knowledge asymmetries as a persistent feature of precarious labor markets (Shekhawat & Khare, 2025).

The questionnaire revealed that respondents were generally able to identify whether they were employed under a fixed term arrangement. Difficulties emerged when participants were asked to distinguish the legal implications associated with fixed term and permanent employment status. Several respondents interpreted contract renewal as evidence of job security despite the absence of permanent employment recognition. Such perceptions illustrate how repeated contractual engagement may normalize uncertainty rather than increase legal understanding (Jaelani et al., 2025).

A notable finding concerns the relationship between employment experience and legal knowledge. Workers with longer employment histories tended to achieve higher legal literacy scores than newly employed respondents. The difference was visible in questions concerning employment rights and procedural protections associated with contractual arrangements. Previous research suggests that workplace exposure functions as an informal source of legal learning when formal education on labor rights is limited (Putranto et al., 2024).

The survey also identified substantial uncertainty regarding the significance of Employee Registration Number replacement. Many participants recognized that registration numbers changed across contract periods but did not associate these changes with broader employment status issues. Responses frequently characterized the practice as a routine administrative procedure rather than a matter connected to labor rights. This finding aligns with studies emphasizing that workers often perceive organizational documentation through an operational rather than legal lens (Tjitrawati & Romadhona, 2024).

To examine patterns of legal understanding more systematically, respondents were asked a series of objective knowledge questions covering contractual status, employment rights, and administrative practices. The aggregated results are presented in Table 2.

Table 2. Legal Literacy Scores of Manufacturing Workers (n = 42)

Knowledge Category	Correct Answer (%)
Understanding of PKWT provisions	69.0
Understanding of PKWTT status and rights	54.8
Understanding of NRP replacement implications	33.3
Understanding of contractual rights protection	57.1
Overall legal literacy score	53.6

Source: Primary survey data processed by the authors (2026).

The data presented in Table 2 indicate that the lowest level of understanding was recorded in relation to the implications of Employee Registration Number replacement. Less than half of respondents correctly identified issues associated with administrative continuity and employment records. Knowledge levels were comparatively higher regarding the existence of fixed term contracts because such arrangements formed part of respondents' everyday employment experiences. The gap between practical familiarity and legal understanding suggests that exposure alone does not guarantee rights awareness (Rahayu et al., 2025).

Educational attainment emerged as another important explanatory factor. Respondents with vocational and tertiary educational backgrounds consistently achieved higher scores than workers whose education ended at the secondary level. The difference was particularly visible in questions requiring interpretation of employment rights rather than simple factual recall. Similar patterns have been observed in studies examining the relationship between educational capital and legal awareness among economically vulnerable groups (Koesrianti et al., 2026).

Age differences produced a more moderate effect than education. Respondents in the upper range of the study population demonstrated slightly higher legal literacy levels, although the variation was not substantial. The findings suggest that maturity alone contributes only marginally to legal awareness when workers remain excluded from structured labor rights education. Research on early career

populations similarly indicates that age does not necessarily translate into greater institutional knowledge without corresponding informational support (Saraswati, 2026).

The qualitative responses included in the questionnaire provide additional insight into workers' perceptions. Several participants stated that contract documents were signed without extensive review because employment continuity was prioritized over legal examination. Others reported relying on supervisors or colleagues when interpreting employment related information. Such patterns reinforce concerns that workplace hierarchies frequently mediate access to legal knowledge and influence workers' perceptions of their rights (Prayitno et al., 2025).

These findings suggest that legal literacy should be understood as an institutional resource rather than merely an individual attribute. Workers who lack access to reliable information may remain unaware of contractual consequences even after years of employment within the same industrial environment. The persistence of limited knowledge regarding administrative employment practices highlights the importance of rights based educational interventions targeted at young workers entering the manufacturing sector (International Labour Organization, 2016; Shekhawat & Khare, 2025). Enhanced legal literacy may strengthen workers' capacity to evaluate employment arrangements and engage more effectively with mechanisms of labor protection.

Persistence of Administrative Avoidance Practices During Regulatory Transition: Implications for Labor Governance and Institutional Accountability

The combined findings from the normative and empirical components indicate that the persistence of Employee Registration Number replacement practices cannot be explained solely through legal provisions or worker behavior. The evidence suggests the existence of an interaction between administrative mechanisms, institutional adaptation, and uneven distribution of legal knowledge. Such interaction creates a governance environment in which formal compliance and substantive employment realities may diverge. Similar institutional patterns have been identified in studies examining organizational accountability and regulatory avoidance in contexts characterized by weak monitoring systems (Azim et al., 2026).

The results demonstrate that administrative restructuring functions as a practical mechanism for managing employment continuity without explicitly altering productive activities. Documentary evidence revealed continuity of work while survey findings indicated that many workers interpreted administrative changes as routine procedures. This combination reduces the likelihood that employment practices will be questioned internally. Research on institutional adaptation has shown that organizational actors often develop procedural responses that satisfy formal requirements while preserving existing operational preferences (Mas'adi & Widigdo, 2024).

The persistence of the practice also appears closely connected to conditions of regulatory transition. During periods of legal reform, organizational actors frequently face uncertainty regarding interpretation, implementation, and enforcement priorities. Such uncertainty may encourage reliance on administrative solutions that minimize perceived legal risks while maintaining labor flexibility. Comparable dynamics have been observed in studies examining policy transitions and regulatory restructuring within Indonesian governance systems (Suroso et al., 2024).

The empirical findings further suggest that low legal literacy operates as a reinforcing factor rather than a primary cause. Workers who perceived registration number replacement as a routine administrative matter were less likely to associate the practice with broader employment rights issues. The absence of critical scrutiny reduces incentives for employers to modify established administrative arrangements. This pattern resembles findings from studies on institutional exclusion in which limited access to information contributes to the normalization of unequal governance structures (Pitriyani et al., 2026).

To integrate the findings from the legal and empirical analyses, Table 3 summarizes the principal factors contributing to the persistence of Employee Registration Number replacement practices and their implications for labor protection.

Table 3. Integrated Interpretation of Administrative and Legal Factors

Factor	Evidence Source	Implication
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Employee Registration Number replacement	Documentary analysis	Employment continuity becomes less visible administratively
Limited legal literacy	Worker survey	Reduced awareness of potential rights implications
Regulatory transition	Statutory analysis	Increased interpretive ambiguity during legal reform
Administrative adaptation	Documentary and survey evidence	Preservation of labor flexibility mechanisms
Weak monitoring capacity	Integrated findings	Lower probability of institutional intervention
Information asymmetry	Survey responses	Reduced likelihood of rights based claims

Source: Integrated analysis of primary survey data, documentary evidence, and statutory materials processed by the authors (2026).

The factors presented in Table 3 reveal that no single variable adequately explains the endurance of the observed practice. Administrative avoidance emerges through the interaction of organizational procedures, regulatory ambiguity, and asymmetrical access to legal information. The mechanism operates through cumulative effects rather than through explicit violations that are immediately visible to affected workers. Similar conclusions have been reached in governance studies emphasizing the importance of institutional ecosystems rather than isolated regulatory actors (Azim et al., 2026).

From a labor governance perspective, the findings suggest that formal legal reform does not automatically transform workplace behavior. Regulatory effectiveness depends on how rules are interpreted, monitored, and internalized within organizational settings. Labor protection may remain limited when administrative practices evolve more rapidly than enforcement mechanisms. Research on employment protection has repeatedly demonstrated that implementation gaps often determine practical outcomes more strongly than statutory change itself (Pratama & Rahmawati, 2025).

The study also contributes to industrial relations scholarship by conceptualizing Employee Registration Number replacement as a form of administrative avoidance rather than merely an administrative procedure. Administrative avoidance refers to organizational practices that restructure documentation and procedural classifications while preserving existing employment arrangements. This conceptualization expands existing discussions of hidden forms of labor vulnerability beyond outsourcing and informal employment relations (Harahap & Nasution, 2025). It also aligns with broader debates concerning institutional responses to evolving labor regulation in contemporary economies (Fauzi et al., 2024).

Another implication concerns the relationship between accountability and labor protection. Effective accountability requires workers, employers, and regulators to share a common understanding of how administrative practices affect employment status and rights. When such understanding is fragmented, procedural compliance may obscure substantive employment realities. Comparable accountability challenges have been documented in studies examining governance failures across different regulatory sectors in Indonesia (Supriadi et al., 2025).

The findings further indicate that labor protection should be approached as a governance issue rather than solely a legal issue. Institutional responses focusing exclusively on legislative revision may have limited impact if information asymmetries and administrative opacity remain unchanged. Mechanisms for dispute resolution, documentation transparency, and worker education become equally important components of effective labor governance. Similar observations appear in studies highlighting the role of procedural accessibility in strengthening rights protection frameworks (Kusuma & Asyhadie, 2024).

A broader theoretical contribution emerges from the integration of sociolegal and governance perspectives. The persistence of Employee Registration Number replacement practices illustrates how administrative classifications can shape perceptions of employment reality even when substantive work relationships remain unchanged. Comparable processes have been identified in historical studies of employment relations where organizational practices gradually acquire legitimacy through repetition and institutional acceptance (Akbar et al., 2025). The findings also resonate with legal case analyses

showing that documentary structures often influence practical outcomes more strongly than underlying substantive conditions (Hansen, 2026).

Future labor policy should prioritize transparency, traceability of employment histories, and accessible channels for rights based information. Policy interventions that focus exclusively on contractual terminology may fail to address the administrative mechanisms through which employment continuity becomes obscured. Stronger documentation standards and integrated employment record systems may reduce opportunities for administrative avoidance while improving regulatory oversight. Enhanced protection measures are particularly important in contexts where workers remain vulnerable to informational disadvantages and limited bargaining power (Zulaikha & Malie, 2025).

CONCLUSION

The study demonstrates that the replacement of Employee Registration Numbers in Indonesia's manufacturing sector functioned as an administrative mechanism that frequently obscured the continuity of employment relationships during the labor law transition period. Normative legal analysis indicated a significant divergence between formal administrative arrangements and the substantive characteristics of ongoing work relationships. Empirical findings revealed that many workers possessed limited knowledge of contractual rights, permanent employment status, and the implications of administrative identity changes, reducing their capacity to recognize potential rights related concerns. The integrated analysis showed that the persistence of the practice was shaped by the interaction of regulatory ambiguity, institutional adaptation, information asymmetry, and weak monitoring capacity rather than by legal compliance considerations alone. The study contributes to socio legal scholarship by conceptualizing Employee Registration Number replacement as a form of administrative avoidance sustained through legal uncertainty and constrained worker awareness. Strengthening legal literacy, improving transparency of employment records, and enhancing regulatory oversight are essential for ensuring effective labor protection and reducing opportunities for administrative practices that undermine employment security.

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