



## HUMAN TRAFFICKING IN FERIENJOB INTERNSHIP PROGRAMMES: ANALYSIS OF LEGAL REGULATION AND RESPONSIBILITY

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### Abstrak

The implementation of internship programmes can enhance students skills in the workplace. However, Indonesian students face challenges with internship programmes in Germany that lead to non-procedural employment and exploitation. This study aims to analyse the legal framework surrounding the Ferienjob internship programme according to German and Indonesian Law, as well as the legal responsibilities of higher education institutions towards students who fall victim to human trafficking in the context of Ferienjob internships. The study employs a normative methodology, utilising both legislative and comparative approaches. Data collection is conducted through literature study, with data analysis performed prescriptively. The findings indicate that the Ferienjob programme is a legal initiative in Germany, governed by established regulations. Nonetheless, under the Anti-Trafficking in Persons Law, the Ferienjob programme meets three key criteria for human trafficking. Higher education institutions bear responsibility for Indonesian students who are victims of the Ferienjob programme. Consequently, these institutions must cancel or revoke their agreements with companies that offer Ferienjob programmes.

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## I. INTRODUCTION

Education in Indonesia plays a crucial role and is a fundamental need that must be fulfilled by citizens to attain a higher quality of life (Andari, Wiguna, & Puspawati, 2023). Education serves as a means to develop an individual's abilities and skills. Law No. 20 of 2003 on the National Education System establishes Pancasila and the 1945 Constitution of the Republic of Indonesia as the foundation of national education. In formal education, universities are classified as higher education institutions, representing the final level in the educational system after the completion of basic and secondary education (Syaadah, Ary, Silitonga, & Rangkutiy, 2022).

Universities are institutions that administer higher education within the educational system, supporting the learning process for students, with lecturers serving as educators (Sedyati, 2022). Higher education institutions hold a strategic function in developing human skills and cultivating individuals into more capable and well-rounded persons (Karim, 2020). University education is not solely focused on theoretical understanding but is also balanced with practical skills for students.

Collaboration between educational institutions and the workforce is essential for skill development in university students, one example being internship programmes. Through internships, students gain direct experience in a working environment. The implementation of the “Merdeka Belajar Kampus Merdeka” (MBKM) programme in Indonesia aligns with current legislation, aiming to enhance university quality and prepare outstanding graduates (Suhartini, Yumarni, & Maryam, 2022). Universities that meet the legislative requirements can implement the MBKM programme effectively (Sopiansyah & Masrurroh, 2022). Article 16, paragraph 1 of the Minister of Education, Culture, Research, and Technology Regulation No. 53 of 2023 on Higher Education Quality Assurance confirms that internships constitute a form of learning that students may undertake to fulfil their academic credit requirements. Additional regulations govern internships, such as the Minister of Manpower Regulation No. 6 of 2020 on the Administration of Domestic Internships and Law No. 13 of 2003 on Manpower (Prasetya, Putri, & Nugroho, 2021). The enforcement of these regulations reflects the government's commitment to ensuring that internship programmes are conducted appropriately and comply with existing rules. These regulations also protect students from potential exploitation during internships (Wahyuningsih & Irawan, 2024).

In practice, however, despite regulations in place for students participating in internships, some fail to adhere to established guidelines. Internships are mandated to begin with a cooperation agreement for partners, whether national or international (Wibowo, 2022). Internship opportunities for students are not only provided by the government but also by numerous private companies, including those based outside Indonesia, open to all students (Lie & Fernandha, 2023). Students who intern abroad have the chance to gain valuable insights by experiencing new customs and work cultures in the host country (Tabitha & Setiawan, 2021). Although internship programmes are clearly regulated, some parties exploit this situation to engage in human trafficking under the guise of part-time work (Ferienjob).

The Ferienjob is a form of employment available during holiday periods and is not classified as an internship; rather, it is part of the job market. Ferienjob is an officially recognised type of employment in Germany, primarily involving physical labour (Detikcom, 2024). Recently, however, an exploitation case emerged involving 33 universities and approximately 1,047 students who were allegedly victims of labour exploitation disguised as internships in Germany or Ferienjob from October to December 2023. According to Brigadier General Trunoyudo Wisnu Andiko, Head of the Public Information Bureau (Karopenmas) of the Public Relations Division of the Indonesian National Police, the case was revealed after four students participating in Ferienjob sought help at the Indonesian Embassy in Germany. He reported that these students, who were engaged in Ferienjob, were employed through non-procedural means, resulting in exploitation (Saptohutomo, 2024).

Human trafficking is regulated under Law No. 21 of 2007 on the Eradication of Human Trafficking Crimes, where Article 1 defines trafficking as the act of recruiting, transporting,

harbouring, sending, transferring, or receiving individuals through threats, violence, kidnapping, confinement, forgery, deception, abuse of power or vulnerability, debt bondage, or provision of benefits to gain control over another person, whether domestically or internationally, for the purpose of exploitation or resulting in exploitation” (Sitania & Suponyono, 2020). Imposing appropriate legal consequences for these actions, in the form of sanctions, serves as an effective deterrent for offenders (Sofyan, Haeranah, & Bakhtiar, 2019) Therefore, in response to the misuse of the Ferienjob programme to illegally employ Indonesian students, the Criminal Investigation Department of the Indonesian National Police conducted an investigation into alleged human trafficking, resulting in five suspects being identified (Mawardi, 2024).

The study conducted by Syifa Nurfajriana and Handoyo Prasetyo, (2024) investigated the methods used in human trafficking crimes within the Ferienjob internship programme in Germany and the government’s responsibility towards Indonesian students who fell victim to exploitation under Ferienjob internships in Germany. Additionally, the study by Tsania Nuha Alfani, (2024) examines the fundamental reasons for applying human trafficking provisions to the Ferienjob internship programme in Germany and explores the role of international organisations and humanitarian agencies in resolving issues related to the Ferienjob internship. Furthermore, Sekar Nursyahidah Utami’s, (2024) research reviewed the legal perspectives on human trafficking in cases involving the exploitation of Indonesian students in Germany, the legal accountability of perpetrators in such cases, and measures to address the exploitation of Indonesian students in Ferienjob internships in Germany.

The novelty of this study lies in its analysis not only of Indonesian law concerning the Ferienjob internship programme but also a more in-depth discussion of German law governing Ferienjob. In addition, it also explores the legal responsibility of universities for students who become victims of human trafficking within the Ferienjob programme. The purpose of this study is to analyse the legal regulations surrounding the Ferienjob internship programme under both German and Indonesian law. By thoroughly examining the laws in both Germany and Indonesia concerning the Ferienjob programme, the authors will also analyse the legal responsibilities of universities towards students who become victims of human trafficking within the Ferienjob internship.

## II. RESEARCH METHODS

This study employs a normative legal research method, which means the issues raised, analysed, and explained focus on how these principles or norms are applied in positive law. The approaches used in this study are the statutory approach and the comparative approach. The statutory approach will examine all relevant legislation and regulations related to the legal issues under investigation, particularly using Law No. 21 of 2007 concerning the Eradication of Human Trafficking. Meanwhile, the comparative approach will involve comparing the legal systems of different countries by examining the regulations in Germany and Indonesia regarding the Ferienjob

internship programme. The data sources in this study comprise primary, secondary, and tertiary legal materials. Primary legal materials include legislation relevant to the research, such as the 1945 Constitution of the Republic of Indonesia, the Law on Human Trafficking, the Manpower Law, the Human Rights Law, the Indonesian Migrant Worker Protection Law, the Ministry of Manpower Regulation No. 6 of 2020 concerning the Implementation of Domestic Internships, the *Beschäftigungsverordnung (BeschV)*, *Jugendarbeitsschutzgesetz (JarbSchG)*, and *Arbeitszeitgesetz (ArbZG)*. Secondary legal materials include books, research findings in scientific journals and academic articles, legal literature, doctrines, or expert opinions and testimonies, whether written or unwritten. Tertiary legal materials include legal dictionaries, language dictionaries, legal encyclopedias, encyclopedias, and internet sources. The data collection method used in this study is library research, examining primary, secondary, and tertiary legal materials. The data analysis technique used in this study is prescriptive. The authors will provide arguments on the findings of the research and assess the legal facts or situations identified, according to existing legal standards.

### III. DISCUSSION

#### 3.1. Legal Regulations on the Ferienjob Internship Programme According to German and Indonesian Law

In Indonesia, the legal framework regarding human trafficking is established under Law No. 21 of 2007 on the Eradication of Human Trafficking, hereinafter referred to as the Human Trafficking Law (UU TPPO). This law clarifies the enforcement of anti-human trafficking regulations in Indonesia. Human trafficking is a complex issue that the government and state apparatus must address with firm action (Nugroho & Roesli, 2017). This response is necessary due to the severe physical and psychological impacts on victims. Beyond violating human dignity, human trafficking is a form of modern slavery with significant humanitarian implications (Nuraeny, 2011). In Indonesia, gaps in the enforcement of anti-human trafficking laws, particularly regarding perpetrators who send workers with the intent to exploit victims or potential victims, have created significant economic advantages for offenders. Human trafficking is driven by several contributing factors, such as demand for labour in industries that do not require specialised skills, low wages, and inadequate workplace regulations (Rachman & Aida, 2023). This practice clearly violates human rights, as human trafficking is classified as an international crime (Ayupratiwi, 2022).

In Germany, Ferienjob is an officially sanctioned programme supported by the government. Ferienjob is regulated under Section 14, Paragraph 2 of the *Beschäftigungsverordnung (BeschV)*, or the German Employment Ordinance, which states: "No consent is required for the issuance of a residence permit to students from foreign universities up to the age of 35 to undertake holiday employment of up to 90 days within a period of twelve months, provided that the employment has been arranged by the Federal Employment Agency." This provision clarifies that students from

foreign universities under the age of 35 do not require approval for a residence permit to engage in holiday employment for up to 90 days within a 12-month period, as arranged by the Federal Employment Agency.

Based on this provision, the Ferienjob programme is not illegal, as regulations govern foreign students holiday employment in Germany. This programme is intended for students who wish to earn extra money or gain work experience during holidays. In principle, all students are eligible for the Ferienjob programme regardless of age. However, students aged 15 may participate, provided they have completed their compulsory education (JuraForum, 2024).

This regulation is emphasised in Article 22, Paragraph 1 of the *Jugendarbeitsschutzgesetz (JarbSchG)*, or Youth Employment Protection Act, which prohibits young people from employment in certain areas, such as: (1) Work that exceeds their physical or mental capacity as minors; (2) Work that exposes them to moral dangers; (3) Work with unavoidable accident risks due to young workers' lack of safety awareness or experience; (4) Work threatening their health in extreme hot, cold, or wet conditions; (5) Work where they may be exposed to harmful effects of noise, vibration, or radiation; (6) Work where they may encounter hazardous substances as per the Hazardous Substances Ordinance (*Gefahrstoffverordnung - GefStoffV*); (7) Work exposing them to harmful biological agents, as per the Biological Agents Ordinance (*Biostoffverordnung - BioStoffV*).

Additionally, working hours are regulated under the *Arbeitszeitgesetz (ArbZG)* or Working Hours Act, Article 3, which states: "The daily working hours of employees must not exceed eight hours. They may only be extended to ten hours if, within six calendar months or 24 weeks, an average of eight hours per workday is not exceeded." This regulation applies to holiday employment just as it does to regular employment. (JuraForum, 2024)

In Indonesia, the Ferienjob programme is introduced by socialisation from PT CVGEN and PT Sinar Harapan Bangsa (PT SHB) to students. Interested students must pay IDR 150,000 to the PT CVGEN account for registration. To obtain a Letter of Acceptance (LoA) from PT SHB, students must pay an additional €150 and a further €200 upon LoA issuance, supposedly to process German authority approval. Students are provided with an advance of IDR 30–50 million, which is deducted from their monthly salary. Additionally, students receive an employment contract from PT SHB and a work visa, enabling them to register with the German Ministry of Labour upon their arrival. The contract is issued in German (Maria Tjandra Dewi H, 2024). An indication of human trafficking, disguised as sending Indonesian students to participate in the Ferienjob programme in Germany, was revealed following complaints by four participating students to the Indonesian Embassy in Germany. The two main perpetrators in this human trafficking and exploitation case are PT Sinar Harapan Bangsa (SHB) and PT CVGEN. PT SHB's role involved promoting the internship programme to students and charging registration fees (Ulya & Prabowo, 2024).

However, instead of offering a true internship programme, PT CVGEN and PT SHB involved 1,047 Indonesian students in the Ferienjob programme, which is essentially holiday employment focused more on physical labour rather than an internship. This programme was also linked to the Merdeka Belajar Kampus Merdeka (MBKM) scheme, recognised by the Ministry of Education, Culture, Research, and Technology, and allegedly convertible to 20 credit units (Ulya & Prabowo, 2024).

According to a statement from the Director of General Crime Investigation at the Indonesian National Police Criminal Investigation Agency, Djuhandani, PT SHB is neither registered as a labour recruiter with the Ministry of Manpower nor as an MBKM programme provider with the Ministry of Education, Culture, Research, and Technology. From this case, investigators have identified five suspects, namely AJ (52), MZ (60), SS (65), A (37), ER (39), and SS (65), who face charges under Article 4 of the Human Trafficking Law (Naibaho, 2024). In principle, Ferienjob is not an academic programme meant for campus-related activities like internships; it is holiday employment, as explicitly stated in German regulations, particularly the *Beschäftigungsverordnung* (Employment Ordinance). The Ferienjob offered to Indonesian students does not meet the standards to be part of MBKM. MBKM requires partner organisations—such as companies, government agencies, non-profit institutions, multinational organisations, and startups—to engage in learning activities through formal cooperation (Vhalery, Setyastanto, & Leksono, 2022).

Ferienjob is not part of the MBKM programme and does not align with MBKM activity criteria, as indicated by Letter No. 1032/E.E2/DT.00.05/2023 issued by the Directorate General of Higher Education, Research, and Technology, Ministry of Education, Culture, Research, and Technology of the Republic of Indonesia. This letter advises higher education institutions to discourage student participation in the Ferienjob programme due to numerous violations of students' rights and because the programme is unsuitable to support the learning process (Kemdikbud, 2024). According to Article 24 of Law No. 13 of 2003 on Manpower, internships are allowed within or outside Indonesia's territory (Zulfakanti, Karsona, & Singadimedja, 2021). Article 22, Paragraph 1 of the Manpower Law stipulates that internships must be based on a written internship agreement between the intern and employer. This agreement should outline the rights and responsibilities of both parties during the internship period, as detailed in Article 22, Paragraph 2 (Prasetya et al., 2021).

The rights of students participating in internships have been outlined in Article 13, paragraph 1 of the Minister of Manpower Regulation No. 6 of 2020 regarding the Implementation of Internships within the Country, which states that students have the right to: (1) receive guidance from Internship Supervisors or instructors; (2) receive fulfilment of their rights as per the Internship Agreement; (3) obtain occupational safety and health facilities during the internship; (4) receive a stipend; (5) be included in a social security programme; (6) receive an Internship certificate or a statement of completion of the Internship. Students participating in Ferienjob must be fully aware of their rights

and obligations based on the terms of their employment agreements with their employers. This understanding is essential to prevent miscommunication between the company and the students. However, the employment agreements between the students and employers are written in German, making it difficult for the students to understand the full content of the agreements. As a result, many students are unclear about working hours, salaries, leave, and their rights and obligations. The agency only provides a brief overview in English for the sections that need to be signed (Pardede, 2024).

The internship programme in Germany is exploited by perpetrators as a means to extort and deceive students, promising false benefits regarding academic and employment opportunities. They also employ other tactics, including manipulating employment contracts and charging fees, thereby reaping financial gains from the victims (Nurfajriana & Prasetyo, 2024). The fraud presents a strong indication of the Ferienjob internship programme, beginning with recruitment based on false promises and exploiting the vulnerable position of students who may not fully understand the working conditions abroad (P & Mediawati, 2024).

The issues surrounding Ferienjob are not only faced by Indonesian students but also affect students from Uzbekistan. Seventy-six Uzbek students travelled to Germany in early June 2023 but received no financial support for food or accommodation. Turon World Cooperation, a private employment agency, had promised them work for three months in Germany as part of the Ferienjob programme. However, upon arrival, they found no employment opportunities as promised (Bruhn, 2024).

In the context of Human Trafficking (TPPO), there are three main elements based on Article 1, paragraph 1 of the TPPO Law: process, method, and purpose (Hambali, 2019). First, the process element includes recruitment, transportation, transfer, sheltering, or acceptance. The Ferienjob programme began with outreach from PT CVGEN and PT SHB, resulting in the recruitment of students wishing to participate in internships in Germany, followed by the dispatch of these students to Germany for internships (Utami & Nasrudin, 2024). Second, the methods used in human trafficking include threats, violence, kidnapping, confinement, deception, forgery, abuse of power/vulnerable positions, debt bondage, or providing payment or benefits to gain the consent of individuals who control others. The presence of deception in the recruitment process, where the explanations given to students do not reflect the actual conditions in the field, including working conditions, salary levels, facilities, and the rights of students as workers, is a significant concern (Alfani, 2024). Third, the purpose involves exploitation, forced labour, slavery, servitude, or the removal of organs. Students involved in the Ferienjob programme are placed in jobs outside their field of study, provided with employment agreements in German that they do not understand, and experience unreasonable salary payments over the three-month period (Maharani, 2024).

The numerous incidents experienced by students during their participation in Ferienjob in Germany led four students in the programme to approach the Indonesian Embassy in Germany to

report the issues they faced. This is in accordance with Article 17 of Law No. 39 of 1999 concerning Human Rights, which states that “Everyone, without discrimination, has the right to obtain justice by submitting requests, complaints, and lawsuits, whether in criminal, civil, or administrative matters, and to be tried through a judicial process that is free and impartial, in accordance with procedural laws that ensure an objective examination by honest and fair judges to obtain a just and correct decision.” Thus, the students have the right to seek justice for the violations they have experienced and are entitled to protection under the law.

There are two legal frameworks that underpin the Ferienjob programme. According to German law, Ferienjob is a legal holiday job supported by the government, as outlined in the relevant regulations in Germany. However, the numerous legal issues perpetrated by the actors involved have led to violations experienced by students, such as exploitation, linking this programme to Human Trafficking (TPPO).

### **3.2. Legal Responsibilities of Higher Education Institutions Towards Students Who Become Victims of Human Trafficking in the Ferienjob Internship Programme**

Internships are a learning process for students, allowing them to work while applying the skills they have acquired during their studies. The functional value that education must possess as a livelihood for students is realised through internship programmes in a field of expertise that aligns with their studies (Z, 2010). In MBKM-based internships or independent internships, higher education institutions remain involved by providing permission or recommendations. For independent internships, approval from the institution is required to participate in the programme. Conversely, for the Certified Independent Study and Internship Programme (MSIB), a letter of recommendation from the higher education institution is necessary (Kemdikbud.go.id, n.d.).

The Ferienjob programme commenced with an information session conducted by PT SHB and PTCVGEN. One of the suspects in the human trafficking case related to the Ferienjob internship programme, Sihol Situngkir (SS), a professor at Universitas Jambi, received IDR 48 million as a speaker for the information session about the Ferienjob programme. Universitas Jambi signed a memorandum of understanding (MoU) with PT SHB to agree on payments to the institution should the quota for sending students be met. On 9 June 2023, the former rector of Universitas Jambi, Sutrisno, as the first party, signed the MoU, witnessed by the Vice-Rector for Planning, Cooperation, and Information Systems, Rayandra Asyhar. Enik Waldkönig (EW), the director of PT SHB, signed the MoU as the second party (bbc.com, 2024).

Universities that successfully send more than 250 students receive a Corporate Social Responsibility (CSR) bonus from the organisers. CSR is a strategy employed by companies to meet the needs, desires, and interests of the public. By implementing CSR, companies can foster long-term positive relationships with the community (Supada, 2020). If the university achieves the established target, it will receive a CSR bonus of IDR 80 million. Furthermore, the university will provide support



for two representatives during a two-week stay in Germany. This support includes a sponsorship letter/invitation from the German company for visa processing, accommodation, transportation in Germany, return tickets, and tour services in Germany (Pardede, 2024).

According to Article 16, paragraph 5 of the Regulation of the Minister of Education, Culture, Research, and Technology of the Republic of Indonesia Number 53 of 2023 concerning Higher Education Quality Assurance, it is emphasised that participation in learning outside the institution can be determined by the Ministry or the leadership of the higher education institution. Ferienjob falls under jobs that prioritise physical labour, such as packing goods, providing services for transporting logistics boxes, washing dirty dishes in restaurants, or handling luggage at airports (porters). Ferienjob does not meet the criteria for the MBKM programme for students, as it has no connection with academic activities conducted at the higher education institution, nor is there any bilateral cooperation between governments (Novi Trianita, 2024).

Higher education institutions have a responsibility towards students, particularly those in undergraduate programmes. As a national instrument within the education system, higher education institutions are closely tied to the three pillars of higher education (Abdi, 2016). The three pillars consist of education, research, and community service (Damanik et al., 2021). Internships are a manifestation of community service within the framework of these three pillars. Through internships, students can apply the theories learned in lectures by participating in the work available at the internship companies. However, students participating in Ferienjob in Germany are faced with legal violations committed by perpetrators, leading to their exploitation.

In light of these issues, Bareskrim Polri has named SS, AJ, MZ, EW, and A as suspects. SS is a professor in the Faculty of Economics at Universitas Jambi, acting as a resource person for the Ferienjob information session at the university. AJ and MZ both hail from Universitas Negeri Jakarta (UNJ). AJ played a role as the chair of the programme's implementation, participating in the selection of participants and facilitating students wishing to join the Ferienjob programme. Meanwhile, MZ, as the head of the Institute for Learning Development and Quality Assurance (LP3M), contributed to managing the internship programme at the university and assisted in the Ferienjob programme implementation in Germany. The next two suspects, EW, the director of PT Sinar Harapan Bangsa (PT SHB), and A, the boss of PT CVGEN, are Indonesian nationals currently in Germany. Both companies actively aided in sending Indonesian students to Germany, handling document processing, and collaborating with three recruitment agencies from Germany, namely Runtime, RAJ, and Brisk (bbc.com, 2024)

Higher education institutions that have been proven to have established partnerships or have been negligent in evaluating internship programmes must face clear and firm sanctions. This is expected to provide a deterrent effect and encourage other institutions to be more cautious in managing internship programmes for students. Imposing sanctions is also anticipated to enhance trust

and a sense of safety among students regarding internship programmes, thereby reducing the risk of human trafficking under the guise of internships (Nurfajriana & Prasetyo, 2024).

During the investigation, the Jambi Police identified four suspects from Universitas Jambi, all of whom are faculty members and part of the academic division. These four suspects—SS, RA, SW, and Y—have facilitated the departure of 83 students from Universitas Jambi for the programme. The investigative team has charged the perpetrators under Articles 4, 12, and 15 of Law Number 21 of 2007 concerning the Eradication of Human Trafficking, as well as Article 81 of Law Number 18 of 2017 concerning the Protection of Indonesian Migrant Workers (Sanjaya, 2024).

The imposition of strict sanctions on higher education institutions involved in human trafficking cases is crucial, as it can potentially harm students. These sanctions aim to preserve the integrity of the institutions. Institutions that have established partnerships must cancel or revoke the agreements with the companies offering the *Ferienjob* programme. Moreover, higher education institutions should be more vigilant regarding internship programmes, both domestic and international. It is essential for institutions to conduct thorough research before granting permission to students.

Regarding this issue, Kiki Yuliati, the Director-General of Vocational Education at the Ministry of Education, Culture, Research, and Technology, stated that the Ministry is currently drafting regulations for students in vocational and academic programmes concerning internships outside Indonesia. These regulations aim to provide a framework for the safety and security of students wishing to undertake internships abroad. Various agencies will be involved in the discussions surrounding these regulations, including the Ministry of Manpower, the Ministry of Foreign Affairs, and others. Under these regulations, the Ministry of Education and Culture will assist higher education institutions in evaluating the companies or international sectors where students intend to intern. This is crucial to ensure that these companies or sectors are suitable for students to engage in internship activities (Napitupulu, 2024). It is hoped that the implementation of these regulations will enable students to feel safer and more protected from violations of their rights as internship participants and that they will also contribute to the development of students' competencies.

#### IV. CONCLUSION

Under German Labour Law, the *Ferienjob* programme is recognised as a legal employment opportunity supported by the local government. This programme is open to both students and school pupils, as outlined in the Youth Protection Act, which prohibits certain types of work for minors. Similar to other forms of employment, Germany has established regulations regarding working hours for *Ferienjobs*, as specified in the German Working Hours Act. However, despite its legality, the *Ferienjob* programme has been linked to human trafficking, as it involves sending Indonesian students abroad under the guise of internships. The *Ferienjob* does not align with the *Merdeka Belajar Kampus*

Merdeka (MBKM) programme, which led to the issuance of Letter No. 1032/E.E2/DT.00.05/2023 by the Ministry of Education, Culture, Research, and Technology. Both Indonesian and Uzbek students have faced significant violations within the Ferienjob framework. The programme meets three key criteria of the Anti-Trafficking in Persons Act (UU TPPO): process, method, and purpose. Numerous fraudulent practices have been reported by recruitment agencies regarding working conditions, salary levels, benefits, and students' rights. Consequently, human rights laws affirm that students are entitled to justice for these violations. The initiation of the Ferienjob programme was marked by a socialisation event conducted by PT SHB and PT CVGEN at universities. The University of Jambi signed a Memorandum of Understanding (MoU) with PT SHB, creating accountability for higher education institutions. Institutions allowing participation in Ferienjob programmes must face strict penalties to deter negligence in managing internships. The Ministry is tasked with formulating new regulations to ensure the safety and security of students pursuing international internships.

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