Interdisciplinary Social Studies
P-ISSN: 2808-0467
E-ISSN: 2808-5051

Comparative study: Indonesian and Indian government policies in managing the problem of dual citizenship

Yulianto Syahyu*, Universitas Bhayangkara Jakarta Raya, Indonesia

*Email for Correspondence: yulianto.syahyu@dsn.ubharajaya.ac.id

Keywords:

dual citizenship

Indonesian diaspora

Indian diaspora

law number 12 of 2006 concerning citizenship

Overseas Citizenship of India (OCI)

ABSTRACT

The Indonesian diaspora continues to fight for the right to dual citizenship in various countries around the world. The research aims to explore the concepts of limited dual citizenship and the concept of dual citizenship within the context of India with a study of cross-country analysis of Indonesia and India. The study employs normative legal research to analyze dual citizenship policies in these two countries, focusing on the relevant laws and regulations of each country. Furthermore, it utilizes descriptive comparative analysis to provide a comprehensive and systematic comparison of dual citizenry policies between the two countries. The results show that the Indonesian government's policy on the demand for dual citizenship is different in both countries. In addition, there are differences and similarities in the approaches taken by both countries, especially in the Overseas Citizenship of India (OCI) policy and the dual citizenship policy. This research could provide valuable insights for Indonesia in crafting similar policies that facilitate easier access and engagement for its diasa.

This is an open access article under the CC BY-SA license.

INTRODUCTION

One of the problems in the implementation of law in Indonesia is the implementation of citizenship laws and regulations, therefore the issue of citizenship is an interesting issue to discuss (Mustafa, 2007). Dual citizenship has become a dream of the Indonesian diaspora in various countries considering that many diaspora Indonesian citizens with single citizenship often experience various obstacles and limitations (Galstyan, 2023; Marrom et al., 2024; Ramdhani, 2024; Tajuddin & Stern, 2015; Tan & Liu, 2022). The discourse on the need to regulate unlimited dual citizenship is increasingly emerging and is an issue that the Indonesian diaspora continues to fight for in various countries around the world. The demands made by the Indonesian diaspora urged the Indonesian government to be placed in Indonesia. So that Indonesian citizens who are abroad can get citizenship in their domicile country by not breaking away from the status of their original citizens, the pros and cons of diaspora demands related to dual citizenship cannot be avoided (Wijayanti, 2009). Meanwhile, there are a number of facts and data related to the Indonesian diaspora, namely the total population of the Indonesian diaspora is almost the same as the population in Sweden and Austria. Indonesian citizens (WNI) in the United States have an average income of USD 59,000 per year; this income is much higher than the citizens of the United States of America, whose average income is USD 45,000 per year.

It is calculated that 45% of Indonesian diaspora in the United States have academic quality above undergraduate. Meanwhile, the average population of the United States alone who has a similar number of academics is only 27%. Other superior Indonesian diaspora are also spread throughout the world such as Indonesian scientists who are members of the International Association of Indonesian Scientists. The amount of remittances that came in from Indonesian workers throughout 2011 (BNP2TRKI version) reached USD 6.11 billion or equivalent to 53.36 trillion. Every year the diaspora sends foreign exchange to Indonesia up to USD 7 billion or almost 70 trillion. This figure is almost equal to the amount of special autonomy funds in APBN-P transferred by the central government to local governments. The potential of diaspora in various sectors of life can actually contribute to the development of the nation and state, of course with effective utilization through the regulation of the related dual citizenship law (Baser & Féron, 2022; Elo et al., 2022; Ho et al., 2025; Orjuela, 2025; Tan et al., 2021).

In this global era, the distribution of immigrants is carried out by various nations with the aim of going to various nations and countries in the world. Their distribution seems to be building a global basis for an

evolution of diaspora networks. The largest diaspora in the world is the Chinese diaspora, while in second place is the Indian diaspora (Hamzah, 2020). According to the 2018 UN World Migration report, more than 15.6 million Indians live in other countries (Mustafa, 2007). this is the author's first reason for raising the state of India as the theme of the dual citizenship analysis with Indonesia.

Second, India is currently emerging as the country with the fourth fastest growing economy in the world in the last decade. When viewed in terms of economic progress, India grew at an average rate of 7.26 percent the largest in the last five years in 2014 and 2015 followed by India's manufacturing sector at 8.4 percent, an increase of 4.4 percent from the previous year (Wijayanti, 2009). India has also become a lucrative foreign investment destination, with foreign capital inflows of more than USD 31 billion in 2015 exceeding that of the United States and China (Sutedi, 2009). In addition, India has shown rapid progress in the field of information technology development. The leader of one of the companies engaged in information technology, Infosys Tech provides evidence of the company's success in achieving a profit of 543 million US dollars (Mustafa, 2007).

Third, India is a country that applies dual citizenship in its citizenship system. India is also one of the countries that from an early age have considered the diaspora as an asset of its country. The Indian Diaspora is seen as one of the sources of income in enhancing India's development by the local government. India's migration, which is spread to almost all parts of the world, makes India a diaspora that can provide benefits to the country of origin.

Fourth, look at the social facts that have occurred in India in the last few weeks, especially after the passage of the Amendment Citizenship Act, 2019. Which caused a huge wave of protests from the Indian people, especially Muslims to voice inspiration for the new law which was allegedly by several people. Parties discriminate against a class, especially on the point of granting citizenship to illegal immigrants who have lived in India for a long time unless the person is a Muslim. In addition, until the day the author conducts this research, the issue between Muslims and the Indian government, which is sustainable, does not seem to have met a common ground between Muslim community groups and the Indian government.

Seeing the different facts and realities between Indonesian and Indian citizenship arrangements in issuing policies on dual citizenship. This makes the author want to raise and analyze government policies on the demand for dual citizenship in these two countries. Therefore, the study would like to explore the concept of limited dual citizenship and the concept of dual citizenship in India with a study of cross-country analysis of Indonesia and India. The research contributes to the understanding of limited dual citizenship by exploring its implications within the context of India, while also providing a comparative analysis with Indonesia. By examining the nuances of dual citizenship in these two countries, the study highlights the legal, social, and political dimensions of citizenship policies, thereby enriching the discourse on nationality and identity in a globalized world. This cross-country analysis not only reveals the distinct approaches each country takes toward dual citizenship but also offers insights into how these policies affect individuals' rights and responsibilities. Ultimately, the findings may inform policymakers and scholars about the complexities of dual citizenship in diverse cultural and legislative environments.

METHOD

The research employs normative legal research to analyze dual citizenship policies in Indonesia and India, focusing on the relevant laws of each country. Using a library research method, the study involves searching, collecting, and examining laws and regulations related to dual citizenship. It adopts a normative approach to explore legal principles of public policy and their connection to positive laws and concepts applicable in both countries. Additionally, the study aims to identify and clarify problems related to dual citizenship to find suitable solutions.

Furthermore, it utilizes descriptive comparative analysis to provide a comprehensive and systematic comparison of dual citizenship policies between Indonesia and India. This comparative analysis seeks to highlight differences and similarities in the approaches taken by both countries. The research relies on secondary data obtained from literature sources, including books, journals, articles, and online resources, to support its findings.

RESULTS AND DISCUSSION

Concept of Citizen and Citizenship

Citizens of a country can be distinguished as:

1. Native citizens (*indigenous*), namely the original inhabitants of the country. For example, the Javanese, the Madurese, the Dayak and so on are native Indonesian citizens;
2. Citizens of foreign descent (*vreemdeling*), namely foreign citizens who have become Indonesian citizens. For example, Indonesian citizens of Chinese descent, the Middle East, India and so on.

Things that need to be remembered: "citizens of the state of a country do not always become a resident of that country." For example, Indonesian citizens residing abroad. Residents of a country are not always

citizens of the country in which they live. For example, foreigners are housed living in Indonesia. Within a country is sometimes found groups minority, namely the group of people that amounts to little, which is legally has the status of a particular national citizenship, but have inner nature-born social culture that is different from the nation 's (Husni, 2010). Hence, this means that the group has not been fully assimilated.

The idea of nationality (citizenship) could actually trace of the historical development of citizenship that comes from the Roman civilization to the western modernity. Thoughts that grew up in Ancient Greece have provided a strong foundation for the theorization of citizenship, especially in modern citizenship, one of which was from Aristotle (322-384 BC), a famous thinker, scientist, logician and philosopher at the time. His work entitled *Politics* has provided important information about the state of Athens as a city (*polis*) in the period of Greek Ancient were democratic as well as the presence of citizens in the policy (*Polites*/*politeia*) (Heckman et al., 2012).

The authority of a state organization includes the human groups within it. The group can be distinguished between citizens and non-citizens (foreigners). Citizens as supporters of a state are the basis for the existence of a state. Put another that the citizens of the state is one of the essential elements for a country, in addition to other elements. The terms polis, *polites* and *politeia* become key words or are known as part of Aristotle's term, which will later be translated as *state*, *citizen*, and constitution. These three terms cannot be separated and to understand one thing, the other must also be understood. It is said that "*to understand what a constitution (politeia) is, we must inquire into the nature of the city (polis); and to understand that since the city is a body of citizens (politeia) we must examine the nature of citizenship*" (Darmoyo & Adi, 2007).

Citizens themselves can be interpreted as people as part of a population who are elements of the state (Astuti, 1999). This term is also commonly referred to as a servant or servant of the state. Although such term residents of countries deemed more appropriate to their position as free men when compared to the term slave and servant state, because citizen implies participants, members or citizens to be part of a country. This assumption is not excessive and is quite reasonable. As a member of an alliance, namely the state, which was established with common strength, on the basis of shared responsibility, and for the common interest or purpose as well (Manulang, 2001), citizens are required to be active against the state.

For this reason, the term citizen is considered more appropriate, because it contains an active meaning. While the term servant or state subjects implies a passive citizen and only becomes an object of the state. For this reason, every citizen has equal rights before the law. All citizens have certain rights, privacy, and responsibilities. The concept of dual citizenship was born because of the existence of two countries that claim citizenship over a person, and can be related to certain factors including:

1. Citizenship obtained from the blood line (*ius sanguinis*)
2. Acquired citizenship based on place of birth (*ius soli*)
3. Citizenship obtained by marriage (*jure matrimonii*)
4. Citizenship acquired by naturalization
5. Citizenship acquired by adoption
6. Citizenship earned due to investments made
7. Citizenship obtained based on religion
8. Citizenship obtained by virtue of his position (*ius oficii).*

Bipatride occurs when a child whose parent country adheres to *ius sanguinis* is born in another country that adheres to the *ius soli* principle, and then both countries assume that the child is a citizen. For example, prior to the agreement between the Indonesian Foreign Minister Soenario and the Chinese Foreign Minister Chow, Chinese people domiciled in Indonesia (*ius soli*) were Indonesian citizens and Chinese citizens (*ius sanguinis*). To prevent Bipatride, Law no. 62 of 1958 Article 7 states that, a foreign woman who marries an Indonesian citizen can obtain Indonesian citizenship by making a statement, provided that she must leave her original citizenship.

When in practice these two factors meet and relate to a person, dual citizenship can apply if the laws of each country allow. There are three ways of acceptance that can apply if the citizenship factors meet, namely full, limited acceptance of dual citizenship, and rejection of dual citizenship. Dual citizenship is limited to a certain age. Within a certain period of time the holder of dual citizenship must give up one of his nationalities. In the event that the state refuses to have dual citizenship, one of the citizenships will be void. Initially, according to the traditional view, it showed a rejection of the concept of dual citizenship because basically citizenship was seen as the only link between the individual and a sovereign state according to the conception that existed at that time (Darmoyo & Adi, 2007).

Citizenship law is part of the sovereignty of a country to determine who is part of that country, so citizenship is enforced rigidly. Granting a citizenship from another country can be considered a violation of the principle of sovereignty (Hamzah, 2020). In addition, it will also cause instability in the diplomatic relations

of countries in the world. Another issue of concern is the issue of international civil law related to the personal status of someone who has dual citizenship.

The reluctance of international law to accept dual citizenship is clearly regulated in the 1930 Convention on Certain Questions Relating to the Conflict of Nationality laws, then the Council of Europe in 1963, also made the Convention on the Reduction of Cases of Multiple nationality (Prabowo, 2010). In the preamble to the 1930 United Nations Convention, it was stated that "*... efforts of humanity should be directed is the abolition of all cases both of statelessness and double nationality"* . but as much as possible reduce the number of cases of citizenship as much as possible. At the same time a view that is pro-dual citizenship is also growing but not very popular. George Bancroll, an American diplomat in the 19th century who promoted the *North American Bancroft Treaty* , said"*... as soon tolerate a man with two wives as a man with two countries*," as a metaphor that analogizes dual citizenship with the practice of polygamy, if polygamy can be considered normal by society, so should dual citizenship.

While for the Chinese before the birth of Law no. 62 of 1958, to determine citizenship, an agreement was held between Indonesia and China. known as the Soenario - Chow agreement on April 22, 1955 which was promulgated by Law no. 2 of 1958, stipulates that all Chinese domiciled in Indonesia must make a choice of citizenship firmly and in writing.

The most widespread case of apatride was when there were many refugees who fled Vietnam in the 1970s as a result of the Vietnam War. This state of statelessness is sad for those who have to experience it. There is absolutely no protection from a country, unable to have passports of certain countries. If they have to be expelled from the country where they live, where should they be sent? While Bipartite or dual citizenship will occur if a person have two nationalities. The fact that bipartite often occurs is when a resident of a country who comes from another nationality is granted citizenship by the country he lives in, without he renounces his original citizenship (his ancestors).

Dynamics of the Citizens Constitution in Indonesia and India

History of the Development of the Indonesian Citizenship Law

a. Dutch Colonial Period

In books (in Indonesian) that discuss the provisions of Article 13 *Indische Staatsregeling* (IS) and Article 163 IS It is customary to use the term "original Indonesian", there is no word "nation". The use of the term "original Indonesian" is considered based on various aspects. the chapter titles in IS (chapter eight) is " *van de ingezetan* " that is "about people" not on nationality (citizenship) (Hamzah, 2020). This understanding is understandable. Indonesia at that time (the Dutch East Indies) was not an independent country, although it had state characteristics. Indonesia is part (as a colony) of the Kingdom of the Netherlands. The same goes for Suriname and Curacau. The population of Indonesia is the Dutch subjects (*Nederlands ondedanen*). The term "Dutch *subject* " is similar to the term “British Subject” for residents of the British colony. These designations are intended to differentiate from the term “British citizen,” which is a citizen of the parent territory (country). Likewise, the term 'Dutch *subject* ' to distinguish from Dutch citizens who are called "*nenderlanders*" i.e. Dutch people.

Because the Dutch East Indies were colonized by the Dutch, at that time everything about citizenship was regulated by the laws of the Netherlands. The main points in this matter are the Law (Wet) dated December 12, 1892 concerning *"Nederlanderlschap Eningezetenschap*" of Dutch nationality and the population of the Kingdom of the Netherlands. There are two kinds of "Nederlanders" (Dutch people), namely: (1) people Dutch by birth and by descent (*ius sanguinis*), (2) people who become Dutch by naturalization or citizenship. According to article LO, a foreigner (*vreemdeling*) is a person who is not a Dutch person and who does not otherwise become "*Nederlands onderdaan*" or Dutch subjects (Heckman et al., 2012).

Regarding these Dutch subjects, there is another Law (Wet) dated February 10, 1910 (*staatsblad* 1910-269) concerning Dutch subjects who are not Dutch. According to article 1 of this Act: from people who are not Dutch, there are Dutch subjects (*Nederlands onderdaan*) the following people:

1) They were born in the Dutch East Indies, Suriname, and Curacao to parents who reside there or, if the father is unknown from the mother who resides there (with some exceptions regarding the children of the Foreign Consul);
2) Those born in the Dutch East Indies, Suriname and Curacao, who:
   a) His parents are unknown;
   b) His parents did not stay there and did not have a nationality or his nationality is not known;
   c) His father, although he did not remain silent there, was a Dutch subject;
   d) Her mother. even if they don't stay here, they are Dutch subjects, if their fathers are without nationality or whose nationality is not known:
3) Dutch wife;
4) The child of a Dutch subject even though born outside these areas, who is under the age of 18 years or is married.

5) The child is sub-four who after marriage or after reaching the age of 18 years settles in these areas.

According to article 2 the status of a person as a Dutch subject is lost:

1) By naturalization or citizenship of an unmarried man or woman in a foreign country;
2) For a woman who marries a citizen of a foreign country, unless the woman is not possible to become a citizen of that foreign country;
3) By entering the military service of a foreign country without permission from the local government;
4) For people who are not native Indonesians, who after being outside the area within 3 months have not reported themselves to a Dutch Consul on the spot;
5) For women, who are included in sub I and 2, after she then gets nationality from her husband;
6) With the cancellation of that status by those in power in certain cases. Thus, during the Dutch East Indies era, there was no Indonesian citizenship, but only Dutch rule, so that at that time in Indonesia the notion of foreigner (*vreemdeling*) and these Dutch subjects were divided into three groups, that is:
   a) Dutch people
   b) Indonesian people (*inlander*)
   c) Foreign *easterners* (*vreemde Oosterling*)
      These three groups were later named differently, namely:
      (1) Nederlands onderdaan - Nederlanders or subject-Dutch consisting of Dutch people
      (2) Nederlands onderdaau - *niet Nederlaluler van inheemse oorsprung* (Dutch subjects who are not Dutch and consist of native Indonesians.
      (3) Nederlands onderdaan-niet
      Nederlanders van uitheemsche oorsprung or Dutch subjects who are not Dutch and are not native Indonesians, namely Europeans. Not Dutch and Foreign Easterners such as Chinese, Arabs, Indians, and others. In this case the Japanese are equated with Europeans, not Dutch (Hamzah, 2020).

The Dutch East Indies was not a country, so the Indonesian homeland in the Dutch era did not have citizens. according to the regulations of the Dutch East Indies, residents/residents of the Indonesian homeland, who are not foreigners, are called subjects of the Dutch state which can be divided as follows:

1) The subject of the Dutch state of the Dutch;
2) The subjects of the Dutch state are not Dutch but who include Bumiputera:
3) Dutch state is not the Netherlands but not Bumiputera, for example: the Eastern foreign (Chinese, Indian, Arabic and others).

b. Japanese Occupation Period

Indonesia was occupied by Japan from March 1942 until August 17of 1945, the Japanese government did not issue an official regulation regarding citizenship in Indonesia. However, in practice, people in Indonesia who are not Japanese, whether native Indonesians or people of Dutch, Chinese, Arab, etc. descent, are no longer seen as Dutch subjects or Nederlands onderdaau. So people who are outside of social life, and other people in Indonesia who are not Japanese, are considered equal in position as commoners. In this period citizenship is not regulated.

c. Post Independence Period

When Indonesia was proclaimed on August 17, 1945, the Republic of Indonesia did not yet have a Constitution. A day later on August 18, 1945 PPKI ratified the 1945 Constitution, regarding citizenship the 1945 Constitution stated, among others (Soedarjadi, 2009):

1) Article 26 paragraph (I) stipulates that "Those who become citizens are native Indonesians and people of other nationalities ratified by law as Indonesian citizens", whereas;
2) Article 26 paragraph (2) stipulates that "Requirements regarding citizenship are stipulated by law".

As the implementation of Article 26, on April 10, 1946, Law no. 3 of 1946. What is meant by Indonesian citizens according to Law no. 3 of 1946 are:

1) People who are native to the territory of Indonesia;
2) People born and domiciled and domiciled within the territory of the Indonesian state;
3) Children born within the territory of the State of Indonesia.

From these provisions, it can be seen that the principle adopted in this Law is *Ius Soli.* UU no. 3 of 1946 was subsequently amended by Law no. 6 and 8 of 1947. As Law no. 3 of 1946, if it is observed from the Law that citizenship adopted in Indonesia adheres to the *ius soli* principle which can be seen in articles 1 (a) and (b), namely:

1) Indonesian citizens are original Indonesians within the territory of the Indonesian state;

2) A Person who was born and resides in Indonesia for at least 5 consecutive years and is 21 years old, unless he/she expresses an objection to becoming a citizen (Soedarjadi, 2009).

History of the Development of Indian Citizenship Act

Citizenship Act of India

The award of a person as a citizen of India is regulated by Part II of the Indian Constitution (Articles 5 to 11). According to Article 5 all persons residing in India at the time of the inception of the Constitution are citizens of India as well as persons born in India. The President of India is referred to as the First Citizen of India. The law related to this issue is the Citizenship Act 1955, which was amended by the Citizenship (Amendment) Act of 1986, 1992, 2003, 2005, 2015 and 2019. The 1986 amendment limited citizenship by birth to require at least one person elders must be citizens of India. The 2003 amendment further limits that aspect by requiring that parents cannot be illegal immigrants. The 2003 amendment also mandates the Government of India to establish a national register of citizens. The 2019 amendments provide easier access to citizenship for persecuted selected minorities, namely Hindus, Sikhs, Buddhists, Jains, Parisians, and Christians from Muslim-majority neighbors Bangladesh, Pakistan and Afghanistan who entered India before December 2014. Both measures this has given rise to large-scale protests in India in 2019.

The "oil boom" that occurred in the early 1970s in the Gulf countries attracted many Indians to pursue a better economy. Migrants who have been successful then encourage young people from India to participate in migration. This continues and the Indian diaspora in the Gulf states continues to grow over time. Remittances to their home countries (remittances) gradually help their families who are in poverty and of course become one of the country's income (Mahendra & Harefa, 2020).

Until mid-1970, the Indian government had not seen any benefit from the Indian diaspora. In 1980, the Prime Minister of India at that time then invited several Indian diaspora to come back to India to assist India's development in several core sectors including the telecommunications sector (Husni, 2010). In 1990, with the adoption of a liberal economic system, the Indian diaspora was given the impetus to be even more active in India's development.

The formation of the Indian diaspora community itself actually existed before the initiative of the Indian government to gather these diaspora. In 1989, the Indian diaspora in the United States took the initiative to hold the first global convention of People of Indian Origin in New York. The main triggers establishment of this convention is the number of cases of violations of the right to basic human experienced by the Indian diaspora in the world where the largest is in the year 1987 military coup against the government of Fiji which is dominated by the Indian diaspora. This convention then resulted in the formation of the first global organization of the Indian diaspora, namely the Global Organization of People of Indian Origin (GOPIO). GOPIO then filed a petition to the United Nations regarding the case of violation of human rights.

In 2000, a special team was formed by the Indian government, namely the *High Level Indian Diaspora* Committee to further examine the issue of the Indian diaspora in the world. After visiting several countries on various continents, this special team then submitted a report containing several recommendations. These include holding a meeting of the Indian diaspora from around the world by the Indian government (*Pravasi Bharatiya Divas/PBD*), providing a *dual nationality* policy, and seeking to provide voting rights for the Indian diaspora with various terms and conditions. These recommendations are aimed at bringing the Indian diaspora closer to their homeland, facilitating the mobilization of the Indian diaspora to support the country's development, and opening up space for the participation of the Indian diaspora in the country's development (Hamzah, 2020).

Prime Minister Dr. Manmohan Singh in 2004 then established a new ministry to take care of the interests of the Indian diaspora in the world, namely the Ministry of Non-Resident Indians' Affairs which later changed its name to the Ministry of Overseas Indian Affairs (MOIA) in September 2004. The emigration division of the Ministry of Manpower then transferred to MOIA and the NRI division of the ministry of foreign affairs was also transferred to MOIA under the name Diaspora division. MOIA also handles all aspects of Indian migration and return migration. The initial mission of the MOIA was "To establish a robust and vibrant institutional framework to facilitate and support mutually beneficial networks with and among Overseas Indians to maximize the development impact for India and enable Overseas Indians to invest in and benefit from the opportunities in India."

The main point of this mission is how MOIA can become an institution that can facilitate and support mutually beneficial networks with the Indian diaspora. In addition, MOIA must also maximize the Indian diaspora to exert influence for India's development. MOIA has three main objectives in its performance, namely:

1) Facilitate sustained interaction of overseas Indians with India and offer them a wide variety of service in economic, social and cultural matters.

2) Extend institutional support for individual initiatives and community action to harness the knowledge, skills and investible resources of overseas India to supplement the national development efforts.
3) Transforming management of emigration through, appropriate domestic interventions and international cooperation.

To achieve these three objectives, MOIA then established several agencies to streamline their performance. These agencies include:

a) Overseas Indian Facilitation Center (OIFC), a body that cooperates with the confederation of Indian Industry (CII) to provide services in the economic, investment and business fields.
b) India Development Foundation (IDF), a body to provide facilities for Indian diaspora philanthropy to be channeled to India's social development.
c) Indian Council of Overseas Employment (ICOE), the body that focuses its research and work on the job market for the Indian diaspora.
d) Global Indian Network of Knowledge (Global-INK), an electronic platform that facilitates the distribution of knowledge aimed at enhancing the capabilities and experiences of the Indian diaspora.
e) Overseas/Indian Centers (OIC), an agency located in the two countries with the largest Indian diaspora, namely the United States and Abu Dhabi, to serve Indian diaspora issues.

Citizenship of India Amendments 2019

The Citizenship (Amendment) Act 2019 was passed by the Indian Parliament on 11 December 2019. This Act is an amendment to the Citizenship Act of 1955 which essentially provides a path to Indian citizenship for illegal Hindu, Sikh, Buddhist, Jain and Buddhist migrants. Christian religious minorities, who had fled persecution in Pakistan, Bangladesh and Afghanistan before December 2014. Muslims from these countries are not granted the same rights. The policy is the first time religion has been openly used as a criterion of citizenship under Indian law (Darmoyo & Adi, 2007).

Under the Act, one of the requirements for citizenship by naturalization is that the applicant must have lived in India for the past 12 months, and for 11 of the previous 14 years. The law loosens the 11-year to 15-year requirement for people belonging to the same six religions and three countries. This law frees the tribal areas of Assam, Meghalaya, and Tripura from its application. It also excludes areas governed through the Inner Line license, which includes Arunachal Pradesh, Mizoram and Nagaland. Muslims from Pakistan, Bangladesh and Afghanistan are not offered the eligibility to become citizens under the new law. Critics question the exception. The amendment limits itself to its Muslim-majority neighbors in India and secondly, it is unaware of Muslims being persecuted in those countries.

There is no doubt that the national protest against the Citizenship Amendment Act 2019 (CAA) (Hamzah, 2020). The controversy in India has underlined deep divisions within the country and within the international community. The world press frequently publishes what damage has been done to India's foreign policy that has been completed and its global position after the CAA. The significant problem is that India continues to move towards isolation on the global stage and its trusted allies are also questioning India's constitutional commitment to minority rights. Many countries have openly expressed their concern about certain past developments in India and doubt whether it will maintain its secular and heterogeneous character or insist on associating itself with some of the world's most famous "Majority States" (Darmoyo & Adi, 2007).

Notably the raison d'être for the controversial Citizenship Amendment Act 2019 has two main reasons for religious persecution in three Muslim-dominated countries and correcting the fault of partition. Looking at the reasons, it seems pretty convincing but in fact both reasons are misunderstood and historically flawed (Prabowo, 2010). The CAA classification is unreasonable as it is mandated to comply with Articles 14, 21 and 25 of the Indian Constitution. The government has no answer as to why religious minorities in Muslim sects such as the Shia, Baloch and Ahmediyah, whose members face the most severe religious persecution in Pakistan, Bangladesh and Afghanistan have been excluded. Furthermore, the government has no answer as to why persecuted groups from other neighboring countries such as Rohingya from Myanmar, Madhesis from Nepal, Tamil Elam from Sri Lanka and Muslims from China blatantly ignore the "secularity, progressivity and inclusiveness" ideas of the Amendment Act 2019 citizenship. This makes the intention to deny protection to Muslims clear, even though it is a universally recognized fact that Muslims are no safer from religious persecution than other communities. There are many such persecutions, as in the case of the Ahmediyah and Shia sects in Pakistan, Taslima Nasrin in Bangladesh, and even Salman Rushdie in almost every Islamic country. The CAA failed to recognize the solid truth that religious persecution should not be based on the religion of the victim.

Pakistan, Afghanistan and Bangladesh are Muslim-majority countries that have modified their Constitutions in recent decades to declare Islam the official religion of their countries because according to the

Indian government, Muslims in these Islamic countries are "unlikely to face religious persecution". The government maintains that Muslims cannot be "treated as a persecuted minority" in these Muslim-majority countries. The BBC states that while these countries have provisions in their constitutions guaranteeing non-Muslim rights, including the freedom to practice their religion, in practice the non-Muslim population has experienced discrimination and persecution.

Similar measures for persecuted religious minorities, excluding religion. Majority, have been treated in other secular countries such as the United States. The Religious Persecution Assistance Act, United States 2016 states "Syrian nationals who are a religious minority in their home country: must be classified as refugees of special humanitarian concern, must qualify for priority two processing under the refugee resettlement priority system".

Policy Analysis of the Indonesian and India Governments on Dual Citizenship Demands

Analysis of Indonesian Government's Policy on the Demand for Dual Citizenship

In Indonesia, dual citizenship status is still limited, namely to children of mixed marriage status because the legal politics of citizenship in Indonesia still adheres to the principle of single nationality. In the case of mixed marriages, for example, both Law Number 62 of 1958 concerning Indonesian Citizenship (hereinafter referred to as the Old Citizenship Law) and Law Number 12 of 2006 concerning Indonesian Citizenship (hereinafter referred to as the New Citizenship Law) do not provide Indonesian citizenship status. Automatically for foreign women who marry Indonesian men. However, if the foreign woman wants to become an Indonesian citizen, she must submit an official application according to the applicable regulations. Likewise, an Indonesian woman who is married to a foreign man can still maintain Indonesian citizenship, if she wants to follow her husband's citizenship to become a foreigner, then the woman is required to submit an application according to the applicable regulations. This of course can lead to differences in nationality in the family of a mixed marriage (Darmoyo & Adi, 2007).

Differences in citizenship do not only occur between husband and wife couples in a mixed marriage, but also occur in children of mixed marriages. According to the Old Citizenship Law, citizenship for children from mixed marriages follows the nationality of the father, if a child born in a mixed marriage of an Indonesian mother and a foreign father, the child automatically becomes a foreigner, resulting in differences in citizenship between the child born and his mother. The difference in nationality between a foreign child and an Indonesian mother creates many legal problems, both during the period of the mixed marriage and after the dissolution of the mixed marriage. There are many cases that arise, where the Old Citizenship Law cannot protect children born to an Indonesian citizen in a mixed marriage, especially when the marriage is discontinued and the child who is a foreigner must be in the care of an Indonesian citizen and resides in the State of Indonesia, which in fact is an Indonesian citizen (Suprantio, 2014).

Limited Dual Citizenship in Law Number 12 of 2006

Now, the enactment of the new Law Number 12 of 2006 concerning Indonesian Citizenship is a big leap from the previous citizenship law, namely Law Number 62 of 1958. Although in principle it is the same, namely Single citizenship, in this law The principle of limited dual citizenship was introduced for children resulting from mixed marriages up to the age of 21 (twenty one) years to choose one of their parents' nationalities.

The law also shows the application and principle of determining citizenship status as seen in the provisions of Article 4 of Law Number 12 of 2006 concerning Citizenship of the Republic of Indonesia. Those who are not yet 18 years old or unmarried and after the child is 21 years old, the child can choose his or her nationality according to his will (Prabowo, 2010). It is clear that the implementation of the dual citizenship concept is only limited to children resulting from mixed marriages until the child is 18 years old or already married. When the child is 18 years old or married, then he must choose one of the two nationalities that he previously had. The application of dual citizenship status adopted in Law Number 12 of 2006 can be called a breakthrough to overcome the problems that arise in mixed marriages, as well as after the dissolution of mixed marriages, where there are differences in citizenship between parents and children resulting from the marriage which often makes the child's rights are protected.

In addition, the enactment of Law Number 12 of 2006 is also intended to provide legal certainty in the form of citizenship of the Republic of Indonesia for children resulting from mixed marriages of an Indonesian citizen mother and a foreign father. Other fundamental changes from Law No. 12 of 2006 are:

a. Adhering to 4 principles of citizenship, namely:
    1) The principle of *ius sanguinis* (law of the blood) is a principle that determines a person's citizenship based on descent, not based on the country of birth.
    2) The limited *ius soli* (law of the soil) principle is the principle that determines a person's citizenship based on the country of birth, which is limited to children in accordance with the provisions stipulated in this Law.
    3) The principle of single citizenship is the principle that determines one nationality for everyone.

4) The principle of limited dual citizenship is the principle that determines dual citizenship for children in accordance with the provisions stipulated in this Law.

b. Regulates 8 main principles in addition to the 4 principles of Citizenship above, namely:
   1) Theaprinciple of national interest: citizenship regulations prioritize the national interests of In donesia, which is determined to maintain its sovereignty as a unitary state that has its own ideals and goals.
   2) The principle of maximum protection: the government is obliged to provide full protection to every Indonesian citizen under any circumstances, both at home and abroad.
   3) The principle of equality in law and government: that every Indonesian citizen gets equal treatment in law and government.
   4) The principle of substantive truth: a person's citizenship procedure is not only administrative in nature but is also accompanied by the substance and requirements of an application that can be justified.
   5) The principle of non-discrimination: the principle that does not differentiate treatment in all matters relating to citizens on the basis of ethnicity, race, religion, class, sex and gender.
   6) The principle of recognition and respect for human rights. This principle in all matters relating to citizens must guarantee, protect and honor human rights in general and the rights of citizens in particular.
   7) The principle of openness is the principle that determines that all matters relating to citizens must be carried out openly.
   8) The principle of publicity is the principle that determines that a person who gains or loses the Citizenship of the Republic of Indonesia is announced in the State Gazette of the Republic of Indonesia so that the public knows it.

c. Granting Limited Dual Citizenship status for children resulting from mixed marriages between Indonesian Citizens and Foreign Citizens until the age of 18 years or already married and after that he is required to choose one of his citizenship statuses (Article 6 of Law Number 12 of 2006). Basically, Law Number 12 of 2006 does not recognize the principle of bipatride, namely the dual citizenship system, nor does it recognize the principle of apathy, namely without citizenship, but dual citizenship granted to children in this Law is an exception.

d. Proof of Citizenship of the Republic of Indonesia (SBKRI) for Indonesian citizens of descent (ethnic Chinese, Indian, Arab, etc.) is no longer required. Proof of Citizenship of the Republic of Indonesia is a policy of the new order government which is regulated through the Regulation of the Minister of Justice Number JB/3/4/12 of 1978 which states that every Indonesian citizen must apply for a Proof of Citizenship of the Republic of Indonesia to the Minister of Justice, especially for those who are descendants of the Republic of Indonesia. Foreigners who have become Indonesian Citizens and have matured but do not have proof of Indonesian Citizenship.

From a social point of view, the background of the limited dual citizenship status regulation for children resulting from mixed marriages in Law Number 12 of 2006 is discriminatory treatment of children resulting from legal mixed marriages from an Indonesian citizen mother and a foreign citizen father, a child who born outside of a legal mixed marriage to a foreign mother who is recognized by an Indonesian citizen father as his child and the child of an Indonesian citizen mother born outside a legal marriage to a foreign citizen father, i.e. there is no guarantee of legal certainty as an Indonesian citizen, because before Law Number 12 of 2006 was born, Indonesia adhered to the *ius sanguinis* principle in determining a person's citizenship status so that the citizenship status of children resulting from legal mixed marriages or outside of legal marriages was determined based on lineage or blood relationship with father. This is another form of apartheid (Segregation) or state sponsored racial discrimination expressed through legal and customary instruments (Suprantio, 2014).

In the context of eliminating discrimination in Indonesia, the Government has ratified the Convention on the Elimination of all forms of discrimination against women through Law Number 7 of 1984. Article 3 of this ratified convention states that participating States must enact laws that guarantee the implementation and enjoyment of human rights. One of the laws that have been made to regulate and protect human rights is Law Number 39 of 1999 concerning Human Rights. From 1958 until now there have been 6 (six) International Human Rights Instruments that have been ratified by the Government of the Republic of Indonesia, namely:

a. Convention on the Political Rights of Women (Law Number 68 of 1958, July 17, 1958)
   1) Convention on the Elimination of All Forms of Discrimination against Women (Law Number 7 of 1984, 24 July 1984);
   2) Convention on the Rights of the Child (Presidential Decree No. 36 of 1990 Dated August 25, 1990);
   3) International Convention Against Apartheid in Sport (Law No. 48 of 1993, 22 May 1993);

4) Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Law (Law Number 5 of 1998, September 28, 1998);

b. Limited dual citizenship status for children resulting from mixed marriages is regulated in:
   1) Law Number 12 of 2006 concerning Citizenship of the Republic of Indonesia Article 4 Indonesian citizens are (Wijayanti, 2009):
      a) Every person who based on the legislation and/or based on the agreement of the Government of the Republic of Indonesia with other countries prior to the enactment of this Law has become an Indonesian citizen;
      b) Children born from a legal marriage of an Indonesian citizen father and mother;
      c) Children born from a legal marriage of an Indonesian citizen father and a foreign mother;
      d) Children born from a legal marriage of a foreign citizen father and Indonesian citizen mother;
      e) A child born from a legal marriage to an Indonesian citizen mother, but the father does not have citizenship or the law of the country of origin of the father does not grant citizenship to the child:
      f) Children born within a grace period of 300 (three hundred) days after the death of their father from a legal marriage and the father is an Indonesian citizen:
      g) Children born out of legal marriage to an Indonesian citizen mother;
      h) Children born out of legal marriage to a foreign mother who is recognized by an Indonesian father as her child and the acknowledgment is made before the child is 18 (eighteen) years old or unmarried;
      i) Children born in the territory of the Republic of Indonesia who at the time of birth the citizenship status of the father and mother was not clear;
      j) A newborn child found in the territory of the Republic of Indonesia as long as the father and mother are unknown;
      k) Children born in the territory of the Republic of Indonesia who if the father and mother do not have citizenship or their whereabouts are unknown:
      l) Children born outside the territory of the Republic of Indonesia from a father and mother who are Indonesian citizens who due to the provisions of the country where the child was born give citizenship to the child concerned;
      m) The child of a father or mother, whose citizenship application has been granted, then the father or mother dies before taking the oath or swearing allegiance.

Article 5 (Wijayanti, 2009)

(1) Children of Indonesian Citizens who are born out of legal marriage, are not yet 18 (eighteen) years old or are not yet married are legally recognized by their foreign fathers who are still recognized as Indonesian Citizens.
(2) Children of Indonesian Citizens who are not yet 5 (five) years old are legally adopted as children by Foreign Citizens based on court decisions and are still recognized as Indonesian Citizens.

Article 6

(1) In the event that the citizenship status of the Republic of Indonesia for the child as referred to in Article 4 letter c, letter d, letter h, letter i, and Article 5 results in the child having dual citizenship, after being 18 (eighteen) years old or already married, the child must declare that he/she chooses one of their nationalities.
(2) Statement to choose citizenship as referred to in paragraph (1) be in writing and submitted to officials by attaching documents as specified in the legislation.
(3) The statement to choose citizenship as referred to in paragraph (2) is submitted no later than 3 (three) years after the child turns 18 (eighteen) years old or is married.

There are several illustrations regarding the advantages and disadvantages of implementing the concept of dual citizenship (Dual Nationality) for the diaspora as listed in the table below.

Table 1. The illustrations regarding the advantages and disadvantages of implementing the concept of dual citizenship (Dual Nationality) for the diaspora

Advantages of Unlimited Dual Nationality Concept	Disadvantages of the Unlimited Dual Nationality Concept
Improving the economy, namely: increasing GDP, ease of transactions, investment, business and encouraging development and development	Strict supervision is needed to avoid disruption of socio-economic resilience due to the ease of transactions and investments by dual citizenship

Increase competitiveness and state revenue	Can still get different behavior (political and social rights)
Creating new jobs	Confusion in implementing rights and obligations as a citizen
Bridges for investment, negotiation, technology transfer and infrastructure development	Low social participation for both countries
Encouraging the improvement of working relations between countries (economic, social, legal)	Encouraging family or relatives to move or migrate
Maintaining regional stability or international peace	Allows it to act illegally or evade the law.

Seeing the difficulty of realizing dual citizenship in Indonesia, the immigration approach in guaranteeing and maintaining the love of the Indonesian diaspora can be the main alternative solution. Related to the immigration issue and by looking at the practice in other countries, such as India, with the concept of granting Overseas Citizenship of India (OCI) where OCI holders who are ex-Indian citizens can travel to India without having to have a visa. In addition, OCI owners can work without being accompanied by a work permit even though there are still certain work restrictions. This is different from that in Indonesia, even though foreigners are ex-WNIs; they still get the same treatment, namely having a visa and a residence permit like foreigners.

This difference in rules often results in the term "complicated" by immigration officials, who actually carry out the rules that apply in Indonesia. In addition, OCI holders have the opportunity to immediately obtain their Indian citizenship after the individual renounces other citizenships. This of course does not apply and is not regulated in the laws and regulations in Indonesia.

The Indian Government's Alternative Policy Analysis of the Dual Citizenship Demand

There are a number of countries that have taken a policy by issuing special identification card registrations for their diaspora and giving some privileges to their diaspora which are usually only given to their citizens as an effort to attract the Diasporas potential in the development of the country. In 2002 the Indian Diaspora High Level Committee formulated the Overseas Citizenship of India (OCI) policy as another effort to implement dual citizenship (alternative). Through thorough investigation and deliberation, policy OCI Card issued by the Indian government in 2005 after the amendment of the Law of Citizenship India in 1955.

In general, there are several diaspora policies taken by the Indian government in the 2012-2013 annual report, including Pravasi Bharatiya Divas (PBD), Persons of Indian Origin Card (PIO), Overseas Citizens of Indians (OCI), and Scholarship Program for Diaspora Children (SPDC), as well as the Know India Program (KIP). From these several programs, the authors highlight the Original Indian Descendants Card (PIO) and OCI, which card will function as the right to dual citizenship status for the diaspora in Southeast Asia.

Through a comparative analysis of the rights or benefits obtained in the Overseas Citizenship of India (OCI) policy and the dual citizenship policy. There is a significant difference which shows that the Overseas Citizenship of India (OCI) policy is not or is not the same as the dual citizenship policy (India Citizenship Act, 1955 point 7c). It can be illustrated that through the OCI card policy, the Indian diaspora has obtained several conveniences in fully contributing to the country's development, including:

a. Get convenience to enter and exit the country of India and without any restrictions to visit or stay in India;
b. Get convenience for education and work in India;
c. Obtain the same rights and treatment as Indian citizens in the economic, financial and educational fields;
d. Gain convenience to invest, own housing and other properties even though they cannot own or acquire productive land/land (agriculture, plantations, forestry, and mining).

Apart from the various facilities and rights that will be obtained by the Indian diaspora as a subject of OCI policies. There are also restrictions for OCI card holders as a differentiator from the dual nationality policy. These limitations include:

a. The Indian diaspora cannot vote in general elections.
b. No can be a member of the House of Representatives or the Legislative Council/parliament.
c. Cannot serve as president, judge of the Supreme Court, High Court, or other strategic positions.
d. Unable to work in government except on special request from the Indian state government.
e. Couldn't get Indian passport.

Through this policy, the Indian government has succeeded in exploiting the potential of its diaspora. Within a period of 10 (ten) years, India has succeeded in attracting its diaspora potential and has

become one of the countries with a very large Global Power beating other countries including countries that implement the dual citizenship policy. Some of the facts of its success (diaspora effect) include:

a. The Indian diaspora is about 2% of the total population of India, but the total income from them is equal to 35% of India's total Gross Domestic Product (GDP).
b. Based on World Bank data, India has become the country with the first largest number of remittances. India's total remittances in 2012 were US$ 70 million, beating China, the Philippines and other developed countries that adopted dual citizenship. In addition, based on data from the International Monetary Fund (IMF), India is the country with the largest economic growth. India's economic growth in 2014 was 7.2% and in 2015 it rose by 7.5%, beating China and other developed countries.

Some of these facts show that the Indian state is able to create mutually beneficial conditions between the interests of the state and the diaspora through immigration and population policies that are flexible for diaspora without changing their citizenship system. The purpose of procuring the card is to re-establish the emotional bond of Indian citizens with their homeland, India. Not only that, the economic impact is also greater. The Indian government hopes that those who have PIO/OCI cards can contribute to supporting the Indian economy. PIO itself is a descendant of Indian origin living abroad. At least, they have a passport or both parents have been registered as Indian citizens, or also have a wife or husband from India. The Indian Diaspora has the advantage of acquiring a PIO/OCI card. They no longer need a visa when visiting India. They also don't have to bother reporting themselves as foreign nationals if they stay there for less than 180 days. They also have equal civil rights with Non-Resident Indians (NRI) in all areas except land ownership rights. If you look at the benefits obtained by the Indian Diaspora, these advantages are very strategic.

Unfortunately, the policy is still being applied selectively. The Indian government does not apply it to all Indian diaspora. Only certain countries have the opportunity to register as dual citizenship. Take a look at the Indian government's policy blueprint below (Soedarjadi, 2009):

“36.57. The Committee wishes to emphasize that at this stage dual citizenship is proposed to be granted only to the citizens of Indian origin in certain specified countries such as countries of North America, Europe, Australia, New Zealand, Singapore, etc, those are highly developed countries. It is to those countries that the migration of Indians took place after India became independent. Most of those who migrated to those countries were Indian citizens. Some of them continue to be Indian citizens and hold Indian passports. Many of them are under pressure to take the citizenship.”

The policy clearly excludes the Indian diaspora in Southeast Asia. It is clear that the word “highly developed countries” proves that Southeast Asian countries are not included in that category because all of them are developing countries, except Singapore. Of course, the categorization holds its own meaning: The Indian government is simply taking advantage of the Indian diaspora from its economic prospects. The country has a high GDP Especially considering that the registration requirements require a registration fee of 365 US dollars and are only valid for 20 years (Soedarjadi, 2009).

Furthermore, if we analyze the reasons for the Indian government in restricting the policy, the phrase "took place after India becomes independence" explains the relationship between understanding time and place is not appropriate. However, the bond between place and time is fluid. Precisely that situation must be realized as long as there is emotional closeness in it. As a result, the use value can change (Soedarjadi, 2009). This condition actually puts a distance between the Indian diaspora in Southeast Asia and their homeland. Moreover, they seem to be sidelined by the policy. In addition, the above policy explains India's reasons why diaspora identity is restricted to individuals who have official Indian citizenship.

So, in general, the policies of the states of India and Indonesia have very significant differences in several aspects. The policies taken by the governments of India and Indonesia are certainly inseparable from the social and legal needs of the people of the two countries.

CONCLUSION

The research concludes that Indonesia's old Citizenship Law was inadequate in promoting equality, leading to the adoption of Law Number 12 of 2006, which introduced limited dual citizenship for children of mixed marriages until age 21. While this law marks progress in reducing discrimination, it fails to address the broader demands for dual citizenship from the diaspora, limiting their potential contributions. In contrast, India's Overseas Citizenship of India (OCI) card policy provides its diaspora with privileges typically reserved for citizens, fostering emotional connections and economic contributions without altering citizenship status. The author recommends that both countries develop more accommodating policies for their diasporas to harness their potential effectively. Future research should focus on creating comprehensive dual citizenship policies and analyzing the effectiveness of frameworks like India's OCI to enhance engagement and contributions from expatriates, ultimately benefiting national development.

REFERENCES

Astuti, D. (1999). *Jejak Seribu Tangan*. Liberty.

Baser, B., & Féron, É. (2022). Host state reactions to home state diaspora engagement policies: Rethinking state sovereignty and limits of diaspora governance. *Global Networks*, *22*(2). https://doi.org/10.1111/glob.12341

Darmoyo, S., & Adi, R. (2007). *Trafiking Anak untuk Pekerja Rumah Tangga: Kasus Jakarta*. Pusat Kajian Pembangunan Masyarakat, Unika Atmajaya bekerjasama dengan USAID, Solidarity Center, JCMC.

Elo, M., Täube, F. A., & Servais, P. (2022). Who is doing "transnational diaspora entrepreneurship"? Understanding formal identity and status. *Journal of World Business*, *57*(1). https://doi.org/10.1016/j.jwb.2021.101240

Galstyan, N. (2023). Diaspora–Homeland Relations Re-examined. In *The Armenian Diaspora and Stateless Power*. Bloomsbury. https://doi.org/10.5040/9780755648245.0010

Hamzah, A. A. (2020). *Analisis Perkembangan Harga Bahan Pangan Pokok di Pasar Domestik dan Internasional*. Hamzah.

Heckman, J. J., Pinto, R., Savelyev, P. A., Blair, C., Benjamin, D., Browning, M., Cattan, S., Dodge, K., Duckworth, A., & Finklestein, A. (2012). Web Appendix to Understanding the Mechanisms Through Which an Influential Early Childhood Program Boosted Adult Outcomes. *American Economic Review*.

Ho, E. L.-E., Parreñas, R. S., & Yeoh, B. S. A. (2025). Migration and citizenship pathways in/beyond Asia. *Ethnic and Racial Studies*, 1–14. https://doi.org/10.1080/01419870.2024.2441910

Husni, L. (2010). *Pengantar Hukum Ketenagakerjaan*. Rajawali Pers.

Mahendra, A., & Harefa, B. (2020). Perlindungan Hukum Terhadap Identitas Anak Sebagai Pelaku Tindak Pidana Dalam Proses Peradilan Pidana. *Jurnal Kertha Semaya*, *8*(10), 1629–1649.

Manulang, S. (2001). *Pokok-pokok Hukum Ketenagakerjaan di Indonesia*. Bhineka Cipta.

Marrom, M. A. N., Roesminingsih, E., Yulianingsih, W., & Khamidi, A. (2024). Public Relations Management in Building the School Image at Sekolah Indonesia Johor Bahru. *International Journal of Emerging Research and Review*, *2*(4), 000087. https://doi.org/10.56707/ijoerar.v2i4.87

Mustafa, M. E. (2007). *Prinsip-Prinsip Beracara Dalam Penegakan Hukum Paten di Indonesia Dikatikan Dengan TRiPs-WTO*. PT Alumni.

Orjuela, C. (2025). The 'ideal citizen' abroad: engaging Rwanda's young generation diaspora. *Globalizations*, *22*(1), 34–50. https://doi.org/10.1080/14747731.2023.2275363

Prabowo, R. (2010). Kebijakan Pemerintah Dalam Mewujudkan Ketahanan Pangan Di Indonesia. *Mediagro*, *62*(2), 62–73.

Ramdhani, H. (2024). Political Negotiations in The Issue of Dual Citizenship in Indonesia. *Proceeding of International Conference on Digital, Social, and Science*, *1*(01), 305–312.

Soedarjadi. (2009). *Hak dan Kewajiban Pekerja – Pengusaha*. Pustaka Yustisia.

Suprantio, S. (2014). " Testimonium De Auditu " Dalam Peradilan Pidana Binding Force of the Constitutional Court Decision on " Testimonium De Auditu " in Criminal Judiciary. *Yudisial*, *7*(65), 34–52.

Sutedi, A. (2009). *Hukum Perburuhan*. Sinar Grafika.

Tajuddin, A., & Stern, J. (2015). From Brown Dutchmen to Indo-Americans: Changing Identity of the Dutch-Indonesian (Indo) Diaspora in America. *International Journal of Politics, Culture and Society*, *28*(4). https://doi.org/10.1007/s10767-015-9197-z

Tan, Y., & Liu, X. (2022). China's Evolving Diaspora Engagement Policy: Transnational Linkages And Stakeholder Perceptions. *Diaspora: A Journal of Transnational Studies*, *22*(2). https://doi.org/10.3138/diaspora.22.2.2022.06.16

Tan, Y., Liu, X., & Rosser, A. (2021). Transnational linkages, power relations and the migration–development nexus: China and its diaspora. *Asia Pacific Viewpoint*, *62*(3). https://doi.org/10.1111/apv.12323

Wijayanti, A. (2009). *Hukum Ketenagakerjaan Pasca Reformasi*. Sinar Grafika.