



Juridical analysis of dismissal for serious disciplinary violations by garuda cabin crew

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ABSTRACT

This study presents a juridical analysis of employment termination (PHK) imposed on a cabin crew member of PT Garuda Indonesia due to serious disciplinary violations, with a case study based on Court Decision Number 62/Pdt.Sus-PHI/2024/PN.Srg. The central issue examined is the act of carrying goods exceeding the permitted capacity, which was considered a breach of the Collective Labor Agreement (CLA) and customs regulations. The research aims to determine whether such conduct can serve as a valid legal basis for termination under the CLA and to analyze the judge's legal reasoning in resolving the case. Using a normative juridical approach, this study reviews relevant statutory provisions, legal doctrines, and judicial decisions. The findings demonstrate that the employee's actions constitute a serious disciplinary offense that can justify termination if implemented through lawful and proportional procedures. This research contributes theoretically by enriching the study of labor law, particularly concerning the balance between employers' disciplinary authority and workers' legal protection, and practically by offering guidance for companies and judges to ensure that termination decisions comply with justice, legal certainty, and national labor regulations.

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1. Introduction

Indonesia as a rule of law places the law as the main foundation in regulating all aspects of life, including the field of employment (Surya, 2018). The 1945 Constitution explicitly provides guarantees for the right to work, legal protection, and fair treatment for every worker. However, reality in the field shows that employment problems, especially termination of employment (layoffs), are still crucial and recurring issues in Indonesia (Suhartoyo, 2014). Layoffs not only have an impact on losing work, but also have implications for the survival of workers and their families. Therefore, every layoffs must be subject to the principle of legal certainty, justice, and the protection of workers' normative rights (Khakim, 2014).

In the context of the aviation industry, the problem of layoffs has a higher complexity. This is because the aviation sector demands a very strict work discipline in order to maintain the safety and reputation of the company (Suwiryono, 2021). Cabin crew, as part of the forefront of flight services, is bound to operational standards and strict company code of ethics (Bambang, 2015). Violations of these rules are often categorized as severe disciplinary violations that can lead to layoffs (Prabowo et al., n.d.). However, the application of maximum sanctions in the form of layoffs often raises debates, especially regarding the balance between the authority of the company in maintaining internal order and the right of workers to obtain legal protection.

Unlike other industries, the aviation sector involves higher safety risks and international regulatory standards, making disciplinary violations more sensitive and impactful. Layoffs in aviation are therefore not only an employment issue but also linked to flight safety, public trust, and international compliance. This contextual difference requires a more rigorous legal analysis that integrates labor law with aviation safety and customs regulations. Moreover, this study offers a methodological contribution by combining a normative-empirical juridical approach, providing a new perspective that not only examines written legal norms but also evaluates their implementation in real industrial practices. This perspective allows for a more comprehensive understanding of how disciplinary authority and workers' rights interact within highly regulated sectors such as aviation.

Previous research many discussed the problem of layoffs, both in terms of procedural and labor protection against the unilateral actions of entrepreneurs (Utama, 2022). Some studies emphasize the importance of Bipartite deliberations and mediation in resolving labor disputes, while others highlights the need for the application of the principle of proportionality in imposing sanctions. However, there are significant limitations, namely the lack of research that specifically examines layoffs in the aviation sector, especially those involving serious disciplinary violations related to customs and safety rules (Nugroho, 2022). In addition, it is still rare for research that examines how judges in the Industrial Relations Court adjust their legal considerations to the latest post-birth regulations on the work of work creation laws and implementing regulations.

This study was present to fill the gap by analyzing the legitimate layoffs case on the basis of violations of severe discipline by the crew of the cabin of PT Garuda Indonesia (Persero) Tbk. The study is focused on decision number 62/Pdt.Sus-PHI/2024/PN.SRG, which emphasizes the validity of layoffs of two cabin crews that are proven to carry goods exceeding the Customs and Excise provisions for personal purposes. Analysis is focused on two main things: First, whether the action of carrying goods exceeds the capacity can be used as a legal basis for layoffs according to the Garuda Indonesia Joint Labor Agreement (PKB); And secondly, how is the judge's consideration in deciding this case, especially in the current national employment legal framework (Sonhaji, 2019).

The scientific excellence of this study lies in its focus that connects the normative aspects of employment, company regulations through PKB, and the practice of judicial industrial relations. This provides novelty because it presents a sharper analysis of the limits of the authority of the entrepreneur in imposing layoffs and the extent to which legal protection is given to workers. Furthermore, this research is significant because the results not only enrich academic literature in the field of employment law, but can also be a practical evaluation material for strategic companies, judges, and workers (Salsabila et al., 2024). Identification of this issue is important to ensure that the implementation of layoffs is not only legally valid, but also reflects substantive justice, legal certainty, and protection of worker rights as mandated by the constitution.

The legal theories that form the analytical foundation in this study are the Theory of Legal Certainty (Gustav Radbruch), the Theory of Justice (John Rawls), and the Theory of Legal Protection (Philipus M. Hadjon). These theories are used to assess the proportionality of disciplinary sanctions, the legality of layoffs under company regulations and national labor law,

and the extent to which the rights of workers are protected. In addition, this study employs a normative-empirical juridical approach, combining the examination of written laws and legal doctrines with empirical field analysis, such as court decisions, interviews, and practical implementation within PT Garuda Indonesia.

2. Method

The method used in this study is normative-empirical juridical, which is a legal research method that combines two approaches, namely normative and empirical (Muhaimin, 2020). The normative approach focuses on literature studies to examine positive legal norms, principles, legal theory, and relevant court decisions (Efendi & Ibrahim, 2018). In other words, normative aspects are used to understand the law in the sense of “law in books” or law as written (Marzuki, 2017). Meanwhile, the empirical approach sees how the law applies and is implemented in practice, through observation, interviews, or field data, so as to reflect “law in action.” The combination of the two allows researchers not only to examine the compatibility of legal norms theoretically, but also assess the effectiveness of its application in people’s lives (Armia, 2022). Thus, normative-empirical juridical research provides a more comprehensive picture of a legal problem, both in terms of conceptual and implementative. The purpose of the normative-empirical juridical research is to provide a comprehensive understanding of a legal issue by studying the applicable legal norms while looking at how the norms are implemented in practice (Bungin, 2012). This approach aims to assess the extent of the suitability between written law and reality in the field, identify weaknesses or legal vacuums, and measure the effectiveness of law in achieving the goals of justice, certainty, and benefits (Wiraguna, 2024). Thus, normative-empirical research is not only theoretical, but also applicative because it is able to produce useful recommendations, both in legal renewal or improvement of the practice of law implementation by employers, workers, and law enforcement officials (Nadiffa & Saebani, 2024).

In a study of PT Garuda Indonesia’s cabin layoffs based on decision number 62/Pdt.Sus-PHI/2024/PN.Srg, the normative-empirical juridical approach has an important role to provide a complete analysis. In terms of normative, the object of this research study is a positive legal provision that forms the basis of layoffs, such as Law Number 13 of 2003 concerning Manpower, Law Number 11 of 2020 concerning Work Cipta, PP Number 35 of 2021, as well as Garuda Indonesia’s Collective Work Agreement (PKB) which expressly prohibits the cabin crew from carrying goods beyond the provisions. This normative analysis aims to see whether workers’ actions can be classified as legitimate disciplinary violations as a reason for layoffs (Sonata, 2014).

While in terms of empirical, research examines the facts of the field that arises in the case, such as the chronology of violations, the Garuda Indonesia internal examination process, as well as judges’ considerations in granting the valid layoffs even though there has been no action from the external customs authority (Yanova et al., 2023). This empirical study shows how legal norms are applied in the practice of industrial relations and how judges interpret and balance the interests of the company and the protection of workers’ rights. By combining these two approaches, normative-empirical juridical research in this case aims not only to assess the validity of layoffs from the perspective of written legal rules, but also reveal the effectiveness of the application of law in practice and provide recommendations to prevent injustice or abuse of future authority.

The interview respondents in this study consisted of key stakeholders, including members of the cabin crew affected by the layoffs, representatives of the PT Garuda Indonesia management, labor union officials, and judges of the Industrial Relations Court. These respondents were selected purposively based on their direct involvement or expertise related to the case, ensuring relevant and reliable data sources.

The observation procedure was carried out by attending selected industrial relations court sessions, reviewing company disciplinary hearings, and examining the implementation of internal company rules. Field data were collected through documentation and direct observation of case proceedings, recorded systematically, and verified by cross-checking with interview responses and supporting legal documents to ensure data accuracy.

The empirical data analysis technique involved qualitative descriptive analysis, focusing on the interpretation of findings from interviews, observations, and document reviews. Data were categorized, compared, and synthesized with normative findings to identify patterns, consistencies, and discrepancies between legal provisions and practical enforcement.

Empirical data will be analyzed using an inductive approach, where the researcher identifies factual patterns emerging from interviews and observations, then interprets them in light of normative legal standards. This process allows empirical findings to answer the research questions about how disciplinary authority and workers' protections are applied in practice, ensuring that each fact contributes to understanding the legal reasoning behind layoffs.

To ensure the validity and reliability of the empirical data, triangulation was applied by comparing information from different data sources (interviews, observations, and documents). In addition, each empirical finding was validated by referencing applicable legal norms, prior case studies, and expert reviews to minimize bias and strengthen the credibility of conclusions.

To minimize bias in interpreting empirical facts, the researcher applies source triangulation and peer debriefing. Each statement from respondents is verified through documentary evidence and cross-checked with judicial findings. The researcher also maintains analytical neutrality by separating personal interpretations from the respondents' legal reasoning, ensuring objectivity throughout the analysis process.

In selecting the relevant articles or clauses within the Collective Labor Agreement (PKB), the researcher focused on provisions directly governing serious disciplinary violations, workers' obligations, and company disciplinary procedures—specifically Article 49 (q) which regulates termination grounds. This selective analysis was aimed at maintaining the study's relevance and focus on the legal reasoning underlying the layoffs.

Not all norms related to termination of employment (PHK) were analyzed in this study; only those directly related to serious disciplinary violations were examined. This limitation was intentionally applied to maintain analytical depth and to align with the research objective of understanding the legal and judicial interpretation of layoffs caused by severe disciplinary breaches.

The normative and empirical findings complement each other by bridging the gap between "law in books" and "law in action." The normative analysis provides the legal foundation and conceptual justification for termination, while the empirical results demonstrate how those norms are implemented in practice. The synthesis of both approaches creates a balanced conclusion that reflects both the legality and fairness of PHK decisions within the aviation industry.

Nevertheless, this methodological approach has certain limitations. The qualitative nature of the empirical data may lead to subjective interpretations influenced by respondents' perspectives or limited access to confidential company documents. Additionally, since the research focuses on one company and case, the generalizability of findings may be constrained. These limitations may affect the external validity of the study but do not reduce its analytical depth or internal consistency.

By combining these methodological steps, this research ensures a comprehensive and credible examination of both the theoretical legal framework and its empirical application within the context of industrial relations in Indonesia's aviation sector.

The object of study in normative-empirical juridical research is a legal norm as well as the reality of its application in the field. In terms of normative, the object of study includes laws and regulations, legal doctrine, legal principles, contracts or work agreements, to court decisions relevant to the issue under study. While in terms of empirical, the object of study is the practice of applying the legal norms in real life, such as the behavior of the parties involved, the mechanism of dispute resolution, the effectiveness of law enforcement, and its impact on the community. Thus, normative-empirical research places the law not only as text written in the regulations, but also as a living social practice and is carried out by the legal subjects. The approach in normative-empirical juridical research basically combines two main points of view. First, the normative approach, namely examining the law in terms of written rules (law in books). At this stage, researchers use the statute approach (statute approach) to review relevant regulations, conceptual approaches (conceptual approach) to understand the principles and legal doctrines, as well as case approaches (case approach) to analyze court decisions that are the object of study. Second, the empirical approach, which is to see how the law is applied in practice (law in action). In this approach, researchers can use a sociological approach through collecting field data, interviews, observations, or analysis of the behavior of the parties, as well as a juridical-practical approach to assess the effectiveness of the application of law in completing disputed fish (Benuf & Azhar, 2020).

In the context of research on Garuda Indonesia cabin layoffs based on decision number 62/Pdt.Sus-PHI/2024/PN.SRG, a normative approach is used to analyze the legal basis of layoffs based on the Labor Law, Work Copyright Law, PP 35/2021, and Garuda Indonesia PKB, while the empirical approach is used to review the facts of the trial, judges' considerations, and the impact of the application of the legal norms and the company. By combining both, research can provide a comprehensive picture of the validity, effectiveness and justice of the application of employment law in this case.

In normative-empirical juridical research, data collection techniques are carried out through two main ways, namely literature studies and field studies. The literature study is used to obtain secondary data consisting of primary legal materials, such as relevant laws and regulations (Law No. 13 of 2003 concerning Manpower, Law No. 11 of 2020 concerning Work Copyright, PP No. 35 of 2021, and PKB Garuda Indonesia), secondary legal material in the form of literature, legal journal, and previous research, as well as tertiary legal materials such as legal dictionaries and encyclopedia conceptual. Meanwhile, field studies are used to obtain primary data, conducted through interviews with related parties, such as workers, trade unions, management of PT Garuda Indonesia, as well as labor law experts; observation of the practice of dispute resolution and internal mechanisms of the company; As well as documentation in the form of court decisions, Bipartite minutes, or other supporting documents. By combining these two techniques, this research can provide a comprehensive picture of the legal validity of the Garuda Indonesia Cabin Legal and its application in the practice of industrial relations.

3. Analysis and Results

The research results indicate that the termination of employment (PHK) of PT Garuda Indonesia cabin crew for carrying goods exceeding the capacity limit does have a legal basis under the company's Collective Labor Agreement (PKB). However, the imposition of immediate layoff sanctions is deemed disproportionate if not preceded by a guidance mechanism and progressive sanctions, as emphasized in Law No. 11 of 2020 concerning Job Creation and Government Regulation No. 35 of 2021. The judge in Decision No. 62/Pdt.Sus-PHI/2024/PN.Srg still refers to the old legal framework (Law No. 13 of 2003), creating a gap between the latest legal norms and their application in court. Compared to previous research, the majority of previous studies have focused on industrial relations dispute resolution procedures, worker protection, or normative analysis of layoff regulations in general. These limitations have not addressed specific issues related to the aviation sector and the implications of serious disciplinary violations for layoffs. The findings of this study differ by revealing the

interaction between national regulations, the company's PKB, and the judges considerations in judicial practice. The novelty of this research lies in its analytical focus on the synchronization of post-Job Creation Law regulations with layoff dispute resolution practices in the aviation sector, a topic rarely discussed before.

The identified legal gap significantly affects both judicial decision-making and company practices in executing layoffs. Because judges and employers often refer to outdated laws (Law No. 13 of 2003) instead of the reformed legal framework (Law No. 11 of 2020 and PP No. 35/2021), inconsistencies emerge in interpreting the legality and proportionality of sanctions. This gap results in legal uncertainty and uneven enforcement of workers' rights, leading companies to apply layoff mechanisms that may not align with current standards of justice and procedural fairness.

This study also identifies a crucial correlation between disciplinary violations and criminal offenses. In the context of labor law, a disciplinary violation refers to the breach of company regulations or ethical codes that affect the employment relationship, while a criminal offense involves actions that violate state laws and are subject to criminal sanctions. The distinction lies in the legal consequences: disciplinary sanctions, such as suspension or termination, aim to maintain workplace order and are administrative in nature, whereas criminal sanctions seek to protect public order through punishment under the criminal justice system. In this case, although the cabin crew's actions had potential criminal implications under customs law, they should not immediately justify employment termination without due process, as each legal domain—criminal and labor—has separate procedures and objectives.

The analytical and practical novelties of this study are concrete in two respects. Analytically, it integrates the interpretation of disciplinary authority within the company's PKB and the national labor framework post-Job Creation Law, bridging the conceptual gap between employment discipline and criminal accountability. Practically, it offers a structured model for proportional and fair layoff implementation that prioritizes progressive discipline, legal certainty, and due process. This model can serve as a policy reference for human resource departments and judicial practice in similar cases.

3.1. The Mechanism for Carrying Goods Exceeding the Capacity Requirement by Cabin Crew Can Be Used as a Legal Basis for Termination of Employment According to the Collective Labor Agreement of PT. Garuda Indonesia

Based on research and analysis of the Industrial Relations Court Decision at the Serang District Court Number 62/Pdt.Sus-PHI/2024/PN.Srg, it was found that the actions of PT Garuda Indonesia's cabin crew in carrying goods exceeding the permitted capacity should not be considered a valid basis for termination of employment (PHK) (Sinaga et al., 2023). While this action does constitute a disciplinary violation, it is more appropriate to handle it through a coaching mechanism or tiered administrative sanctions in accordance with the principle of progressive discipline. This principle emphasizes gradual enforcement of discipline with the primary goal of improving employee behavior or performance, rather than imposing immediate dismissal sanctions (Kota & Sari, 2024).

Article 49 (q) of PT Garuda Indonesia's Collective Labor Agreement (PKB) does provide a basis for serious violations to result in dismissal. However, the application of the maximum sanction in this case is deemed inconsistent with the principles of justice, legal certainty, and protection of workers' rights. Furthermore, with the enactment of the Job Creation Law and Government Regulation No. 35 of 2021, layoffs must be implemented through stricter procedures, prioritizing deliberation, mediation, and the imposition of proportionate sanctions. This study found that PT Garuda Indonesia unilaterally terminated workers' employment without waiting for a final and binding criminal court decision and stopped paying workers' wages without a valid legal basis. These actions violate the principle of the presumption of innocence, the protection of workers' normative rights, and applicable laws and regulations (Maksum, 2024).

The panel of judges in this case subsequently ordered PT Garuda Indonesia to pay workers' dues, as they were found guilty of unilateral termination without proper procedures, the suspension of salary payments during the legal process, and a violation of the presumption of innocence. Although the two cabin crew members were ultimately found guilty of criminal offenses, the panel of judges still determined that they were entitled to severance pay commensurate with their length of service.

This finding differs from previous research, which generally only focused on the procedural aspects of layoffs or general worker protections. This study provides novelty by demonstrating that, in the aviation sector, the application of layoff sanctions must consider the principles of proportionality, progressive discipline, and synchronize with the latest regulations following the Job Creation Law. Thus, this study emphasizes the importance of harmonizing regulations within the company's collective labor agreement (PKB), national law, and worker protection principles in resolving industrial relations disputes.

These findings can also be generalized to the broader aviation industry, as the disciplinary structure and operational risks are largely uniform across airlines. The proportional and multi-level disciplinary approach proposed in this study can serve as a preventive model for airlines in managing employee violations without compromising legal compliance or flight safety. Moreover, it underscores the need for all aviation companies to align their internal regulations with evolving national labor policies to prevent procedural injustice and maintain international operational credibility.

3.2. Judge's Consideration Mechanism in Deciding Case No. 62/Pdt.Sus-PHI/2024/PN.Srg

Based on research and interviews with Mr. Rendra, S.H., M.H., Judge at the Class 1A Serang District Court, it was found that the examination and decision process in case No. 62/Pdt.Sus-PHI/2024/PN.Srg went through systematic stages in accordance with statutory provisions. The legal facts proven at trial indicate that PT Garuda Indonesia's cabin crew carried goods exceeding customs capacity for commercial purposes, thus violating SOPs and Article 49 (q) of the Garuda Indonesia Collective Labor Agreement. From a civil perspective, this action can be classified as a breach of contract because the employee failed to fulfill his obligations under the employment agreement. Therefore, the panel of judges deemed the legal basis for internal termination of employment valid (Diagunyah & Panjaitan, 2023).

However, this research identified fundamental problems. First, the termination sanctions imposed did not fully align with the principles of proportionality and progressive discipline as stipulated in Government Regulation No. 35 of 2021. This principle emphasizes that sanctions must be implemented in a hierarchical and documented manner before imposing the harshest penalty, namely dismissal. Second, the panel of judges still relied on Law No. 13 of 2003, even though this provision has been updated through Law No. 11 of 2020 concerning Job Creation and Government Regulation No. 35 of 2021. This creates a discrepancy with the principle of **lex posterior derogat legi priori**, which requires the use of the latest regulations to ensure legal certainty.

Previous research has tended to focus on normative worker protection or general industrial relations dispute resolution procedures, without specifically examining the relationship between company collective labor agreements (CLAs), the latest regulations, and judicial considerations in the aviation sector. The findings of this study provide novelty by demonstrating the importance of harmonizing civil law (employment agreements), national labor law, and customs criminal law (Diagunyah & Panjaitan, 2023). Thus, this study confirms that layoffs cannot be the sole solution without considering aspects of justice, legal certainty, and protection of workers' rights, as well as the need to implement tiered development mechanisms and parallel criminal law enforcement to maintain the integrity of labor law enforcement in Indonesia.

4. Conclusion

Based on the research objective, which examined whether carrying items exceeding the permitted capacity by cabin crew could be a valid basis for termination of employment under the PT Garuda Indonesia Collective Labor Agreement (PKB), and the judge's considerations in Decision Number 62/Pdt.Sus-PHI/2024/PN.Srg, the conclusion is: Termination of employment based on serious disciplinary violations should not be carried out unilaterally without going through progressive disciplinary mechanisms, bipartite deliberation, and mediation as required by Law No. 11 of 2020 concerning Job Creation and Government Regulation No. 35 of 2021. Although the Garuda Collective Labor Agreement stipulates that such violations can result in termination, the application of the maximum sanction must still consider the principles of proportionality, legal certainty, and the protection of workers' normative rights. The judge in this case still referred to the old legal basis (Law 13/2003), which was deemed less relevant following the labor law reforms. These findings highlight the need for synchronization between company regulations and updated national labor laws to ensure that termination procedures reflect both justice and legal certainty. Therefore, it is recommended that companies particularly state-owned enterprises such as PT Garuda Indonesia revise internal disciplinary policies to align with the latest legal framework and emphasize progressive discipline before imposing termination. For judges, these findings serve as a guideline to integrate the principles of proportionality and fairness in future employment dispute decisions. For workers, this study implies the importance of understanding their normative rights and actively engaging in dispute resolution mechanisms to prevent arbitrary or disproportionate dismissals.

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