Analysis of Indonesian and Thai Government Policies in Handling Human Trafficking Cases (2021-2023)

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Abstract

This study analyses the policies of the Indonesian and Thai governments in handling human trafficking cases (2021-2023). The study aims to evaluate the effectiveness of both countries' policies in the context of the Tier placement given by the Trafficking in Persons (TIP) report and identify the role of interest groups in influencing policy formulation and implementation. This study uses a descriptive qualitative method with literature analysis, including official documents, international organisation reports, and relevant previous studies. The selection of this method is designed to reveal the discursive patterns of human trafficking policies in both countries. As a conceptual framework, the Advocacy Coalition Framework (ACF) was used to understand how interest groups, such as NGOs, law enforcement officials, and international organisations, influence the policy agenda through cross-sectoral coordination and alignment of policy preferences. The results of the analysis show that this approach provides insights into the pattern of policy formation, where Indonesia focuses on the protection of migrant workers through the ratification of various international conventions and formulating them juridically into national legislation. At the same time, Thailand does the same but emphasises more on preventing exploitation and protecting victims more broadly through amending laws and establishing institutional handling units. Although both countries achieved Tier 2 placement in 2023 after fluctuating during 2021-2022, the study recommends that strengthening evidence-based policies and cross-sectoral collaboration should be kept in mind to ensure optimal sustainability of policy reforms and reduction of human trafficking prevalence in the future.

Keywords: human trafficking, policy, Indonesian government, Thai government, ACF

1. Introduction

The 2023 Trafficking in Person (TIP) report, published by the United States Department of State Publication Office to Monitor and Combat Trafficking in Persons, exposes that global law enforcement identified at least 90,354 victims of human trafficking in 2021 and 115,324 victims in 2022 (State, 2023a). According to the verified statistics, East Asia and the Pacific, encompassing Southeast Asia, are the principal distributors of this issue. This condition certainly has an indirect correlation with the data exposure released by the Walk Free Organization in 2023, where Southeast Asia became one of the highest modern slavery bases in the world with a total estimated prevalence of 61.1 per 1000 population with several victims reaching 4,489,000 people (Walkfree.Org, 2023).

Modern slavery, a fundamental component of human trafficking, is a longstanding phenomenon that cannot be easily separated. Economic inequality is the primary catalyst for the emergence of numerous syndicates that engage in human trafficking in Indonesia for substantial profit. This phenomenon arises from the elevated unemployment rate combined with insufficient job opportunities in Indonesia, prompting individuals to seek employment as migrant workers abroad, attracted by higher salary prospects facilitated by social networks and recruitment agencies in various countries, including Singapore, Hong Kong, Malaysia, Kuwait, the Uni Arab Emirates (UAE), and Saudi Arabia (Febriyanti & Isabella, 2016a). The

consequence is that the regions of Asia and the Middle East harbour numerous victims of the exploitation of Indonesian individuals as manual labourers, driven by debt issues, encompassing sectors such as domestic industry, construction projects, manufacturing, plantations, and extensive docks along the Indian-Pasific Ocean region (Daud & Sopoyono, 2019a).

Similar to Indonesia, in Thailand, the root causes of human trafficking are also fuelled by several internal factors. Its efforts to develop the tourism sector have indirectly led to the development of the commercial sex industry in Thailand's tourism sector (Sihotang & Wiriya, 2021). This image has helped Thailand to be recognised worldwide as a location of prostitution that is legally open to everyone, including foreign tourists. Ironically, some tourist attractions there openly offer sex tourism services with several commercial sex worker actors from both underage to adult women or transgender groups (Nurul et al., 2023a). Economic inequality once again creates a cyclical ecosystem of human trafficking in Thailand that has persisted over time. Often, vulnerable populations, such as many families in rural and underdeveloped areas, are taken advantage of through the sweet promises of traffickers who end up becoming victims of exploitation (Thammasiri, 2024a).

Human trafficking represents a transnational crime that surpasses national boundaries (Nur et al., 2023). Human trafficking is one of the most clandestine criminal activities that can threaten all age groups and genders (Latifah & Noveria, 2014). The offenders of this crime typically comprise extensive, organised syndicates with global influence (Sulaksono, 2018). Human trafficking is by far one of the most dangerous criminal offenses; resembling other criminal offences human trafficking is difficult to investigate and prosecute (Pinatih, 2023). With globalisation, national borders have become a common area to cross, making it easier for human trafficking syndicates to target their desired victims (Dina & Kusumaningrum, 2023).

Table 1. Human Trafficking Index by Country in Southeast Asia (2021-2023)

Country	2021	2023	Fluctuation	Rank of (2021-2023)
Myanmar	6.50	8.50	+2.00	1
Cambodia	7.50	8.50	+1.00	2
Indonesia	6.50	7.50	+1.00	3
Malaysia	6.50	7.50	+1.00	3
Philippines	7.00	7.50	+0.50	4
Laos	6.50	7.00	+0.50	5
Thailand	6.50	7.00	+0.50	5
Vietnam	6.50	7.00	+0.50	5
Singapore	5.50	5.50	=0.00	6
Brunei Darussalam	4.50	5.50	+0.50	7
Timor-Leste	4.00	4.50	+0.50	8

Source: Global Initiative Against Transnational Organized Crime (GI-TOC, 2023a)

In 2023, the Global Organized Crime Index investigation positioned Southeast Asia as the third out of five regions in Asia with the highest incidence of human trafficking cases. This also makes Southeast Asia fourth out of twenty-two sub-regions that contribute to human trafficking cases, with a total score of 6.86 out of 10, making the fluctuation index at +0.72 throughout 2021-2023. Indonesia and Thailand are two ASEAN countries that contribute to crime. During 2021-2023, the human trafficking index of these two countries tends to fluctuate but continues to show an increase, and the difference is not very significant. In 2021, Indonesia's human trafficking index was at a score of 6.50, which then increased to 7.50 in 2023, as well as Thailand, which also experienced an increase from the previous score of 6.50 in 2021, which increased to 7.00 in 2023 (GI-TOC, 2023c).

Table 2. Human Trafficking Index by Region in the World (2021-2023)

Region	2021	2023	Fluctuation	Rank of (2021-2023)
East Africa	7.39	7.78	+0.39	1
Western Asia	7.61	7.71	+0.10	2
Southern Asia	6.88	7.56	+0.68	3
South-Eastern Asia	6.14	6.86	+0.72	4
Central America	6.44	6.75	+0.31	5
West Africa	6.17	6.33	+0.16	6
Eastern Asia	6.00	6.20	+0.20	7
Central Africa	5.95	6.05	+0.10	8
South America	5.46	5.92	+0.46	9
North Africa	6.08	5.92	-0.16	9
Central Asia & the Caucasus	5.75	5.88	+0.13	10
Central & Eastern Europe	5.68	5.79	+0.11	11
North America	4.50	5.00	+0.50	12
Melanesia	4.63	5.00	+0.37	12
Southern Europe	4.75	4.94	+0.19	13
Western Europe	4.55	4.73	+0.18	14
Southern Africa	4.54	4.62	+0.08	15
Caribbean	4.27	4.50	+0.23	16
Northern Europe	4.13	4.44	+0.31	17
Micronesia	3.90	4.00	+0.10	18
Australia & New Zealand	3.50	3.50	=0.00	19
Polynesia	2.83	2.83	=0.00	20

Source: Global Initiative Against Transnational Organized Crime (GI-TOC, 2023b)

The increasing prevalence of trafficking in Indonesia and Thailand has similar catalysts. Several previous studies have identified these factors and found some indicators, ranging from economic disparity and unemployment factors to ineffective regulations related to migrant workers (Daud & Sopoyono, 2019b; Febriyanti & Isabella, 2016b; Thammasiri, 2024b). While there are many analyses of law enforcement and policy effectiveness, there are limited studies on the influence of interest groups in shaping public policies to combat trafficking in Indonesia and Thailand. In a study conducted by (Subono et al., 2019), it was stated that differences in the structure of crime influence the policy focus agenda between countries by what they prioritize. This statement also concludes that the cooperation framework in combating human trafficking through institutional coordination of ASEAN countries, including Indonesia and Thailand, does not seem to show an optimal effect because it is not practically implemented in the national framework. This confirms that although many studies have highlighted the collaboration between government institutions and civil society, few have examined how such collaboration contributes to creating more comprehensive and effective policies.

Therefore, using the Advocacy Coalition Framework (ACF) analysis, this study aims to fill this gap by looking at the influence of interest groups such as NGOs, law enforcement officials, women's and children's empowerment agencies, or international organizations in influencing each technical implementation of anti-trafficking policies in Indonesia and Thailand. The ACF aimed to enhance the literature on policy formulation by addressing certain identified needs (Weible et al., 2011). This approach underlines the importance of interest groups in formulating rules and policies, where, in this case, the perceptions and preferences of interest groups oversee each policy formulation fully to ensure that public problems are addressed and appropriate solutions are found (Sabatier & Weible, 2007a). The urgency of this

study emphasizes Indonesia and Thailand because both countries play a significant role in the process of human trafficking in Southeast Asia. Indonesia, as the country with the largest population in ASEAN, is the highest supplier of such cases, especially from migrant labor (Monique & Puspamawarni, 2020). At the same time, Thailand has a strategic position as a country of origin, transit, and destination for many human trafficking processes from time to time (Davy, 2014a). By comparing the policies of the two countries, this study is able to explore the challenges and differences in social, political, and economic conditions in countries in the same region. By limiting the scope, this study also seeks to provide a more comprehensive and applicable picture for other countries in the same region to improve their policies and cooperation in an effort to deal with human trafficking cases.

2. Method

Descriptive qualitative, centered on literature analysis to articulate the research findings, was the central methodology for writing this study. The qualitative approach was used to examine the object's condition proportionally by emphasizing data collection that reflects the actual reality through themes and discursive patterns in the literature (Abdussamad, 2021). Descriptive in qualitative studies refers to depicting and describing events, phenomena, and social situations under study (Waruwu, 2023). In this case, the descriptive seeks to understand phenomena through in-depth interpretation and analysis (Saefuddin et al., 2023). The desk analysis focuses on finding and examining literature sources comparable in background and scope to the study, whether through scholarly articles, policy reports, or documents from NGOs and international organizations (Adlini et al., 2022). Through this approach, thematic and discursive analyses will be conducted to identify key patterns and discourses around human trafficking policy. The Advocacy Coalition Framework (ACF) facilitates the sustainability of the study topic. As evidence of new findings is gathered, it becomes the basis for future studies involving a broader and more relevant conceptual framework discourse. This also opens up vast opportunities for continuing qualitative studies based on primary data, such as in-depth interviews with survivors and related policy actors.

3. Result and Discussions
3.1. Result

Human trafficking is an issue that has long been the focus of concern for many, including non-governmental organizations, as it concerns the most fundamental antithesis of human dignity (Ramadhani et al., 2023). On a global scale, Amnesty International and Human Rights Watch (HRW) are some of the non-governmental actors that play a strategic role in addressing human trafficking. The study conducted by (Meriläinen & Vos, 2015) explains that there is a dynamic integration relationship between these non-governmental actors and the issue of human trafficking, where there is a long debate between them before the formation of policies, which also affects the final decision-making. Through the analyses conducted in this study, it can be confirmed that the application of the Advocacy Coalition Framework (ACF) in the scheme of the existence of interest groups has crucial implications in Indonesia and Thailand for the direction of establishing a policy to deal with human trafficking. The existence of interest groups helps in collecting statistical data empirically, identifying external factors that cause the occurrence of related phenomena in a more complex manner to collaborating with various relevant stakeholders ranging from national governments and international organizations that have significant influence to expand the reach and process of further study to obtain new findings that can contribute to more effective preventive measures against human trafficking in the future.

The results of this study show that despite the massive role of non-governmental actors including interest groups, existing policies have not been fully maximized in reducing the

prevalence of human trafficking in either the Indonesian or Thai context. This is due to a number of factors, including continuing economic inequality, weak regulations for migrant workers, and a lack of coordination between agencies involved in addressing the issue (Muliadi & Adnan, 2024; Tunneekul & Chitsawang, 2023; Wiradirja, 2015). However, the collaboration that takes place by involving these interest groups can directly expand their reach to negotiate more proper regulations, follow up on law enforcement mechanisms, and offer more holistic prevention measures. Therefore, the coordination between the government, NGOs, and international organizations can be a concrete effort to ensure that the policies formulated are based on empirical evidence and responsive to the challenges on the ground.

One of the most prominent findings of this study reveals the role of external interest groups in pressuring national governments to evaluate their policies through the Trafficking in Person report, which is published under the auspices of the US Department of State. The TIP evaluates the efforts of countries around the world. It provides a cluster ranking of effective measures taken by countries to prevent and combat human trafficking, including the protection of victims. The report covers various forms, ranging from slavery, forced labor, prostitution, and child exploitation. In its output, the report ranks countries based on the standards of the 'Trafficking Victims Protection Act' (TVPA). Under the standards set out in the TVPA, the report will rank a country in Tier 1, Tier 2, Tier 2 Watch List, or Tier 3 based on the status and achievements of its government in combating the problem through categorizations created and tested at least twice in a reporting period (Hamid et al., 2017; Strock, 2022). The Tier placement can be explained in the definition according to (Saner et al., 2018) as follows:

1. Tier 1: Countries whose governments fulfill all the minimum TVPA standards.
2. Tier 2: Countries whose governments have not fulfilled the minimum TVPA standards but have made substantial efforts to reach those standards.
3. Tier 2 Watch List: Countries whose governments have not fulfilled the minimum TVPA standards but have made substantial efforts to reach those standards and:
   a) the total number of victims of human trafficking is substantial or is seeing significant growth;
   b) there is a lack of evidence demonstrating enhanced efforts to address severe forms of trafficking in persons compared to the prior year; and
   c) the determination that a country is exerting considerable efforts to achieve compliance with minimum requirements was founded on its affirmation of undertaking further actions in the forthcoming year.
4. Tier 3: Countries whose governments have not fulfilled the minimum TVPA standards and have not made substantial efforts to reach those standards.

From the explanation of the results above, it can be seen the significance of the Trafficking in Persons (TIP) report for countries around the world where it can draw a green signal for government agencies to make improvements and review the process of combating the crime of trafficking in persons, especially in the context of policies and legislation. Although the Trafficking Victims Protection Act (TVPA) standard is a categorization that was initially only applied to the United States and its states, over time, the measure has been applied on a broader scale to cover countries in all parts of the world. This will positively enable various non-governmental actors, international organizations, and interest groups to use the TIP ranking platform as a reference to assess the effectiveness and even release a country's track record on this issue. This, in turn, will enable governments to push for more relevant and impactful policies that address the actual preferences on the ground.

3.2. Discussion
Indonesian Government Policy on Human Trafficking

With a population of more than 277,5 million (2023), combating human trafficking in Indonesia is not an easy task. The geographical condition of the archipelagic country is a supporting factor that makes it easier for syndicates to spread to various parts of the country, including those that cannot be reached. Regarding the prevention of this problem, the Indonesian government has issued regulations in the 2015 National Medium-Term Development Plan (RPJMN) in Volume I of the Joko Widodo - Yusuf Kalla administration, which emphasizes the protection of Indonesian migrant workers abroad (Marsel et al., 2022). The primary aim of this migration strategy is to safeguard all Indonesian citizens and migrant workers, ensure the realisation of rights and the promotion of human rights and offer legal, economic, and social protection. In addition, related to international migration to the opportunity of criminal offences of trafficking in persons, this regulation is possible as a basis for researching to see the effectiveness in the process of solving international migration problems while providing protection against trafficking crimes for Indonesian migrant workers.

The continuation of this regulation was then renewed in Volume II of the Joko Widodo - Ma'ruf Amin administration. Through Presidential Regulation Number 19/2023, which includes the National Action Plan for the 2020-2024 National Medium-Term Development Plan (RPJMN), the Indonesian government has reaffirmed the law enforcement efforts of trafficking offenders; however, empirically, when people become victims, the government does not immediately intervene to arrest the perpetrators (Nurhaliza et al., 2024). This presidential order amends the previous regulation, Number 69/2008, which outlined the duties of the task force unit for the avoidance and handling of trafficking in persons. Several prior provisions have been assessed and revised, including Chapter 6, which elucidates the leadership in the prevention and management of human trafficking; Chapter 11, which pertains to the secretariat system of the trafficking in person task force; and Chapter 30, which provides a comprehensive overview of the policy budget to be implemented (Kemensetneg.RI, 2023).

The establishment of a task force unit for the prevention and handling of trafficking in persons by the Ministry of Women's Empowerment and Child Protection (KEMENPPA-RI) signifies one of the concrete implementations of the strategic policy, specifically referring to Chapter 6 and Chapter 11, which aims to increase public awareness of information about the crime of trafficking. This socialization activity is a step towards a joint commitment across ministries to central and local governments, involving the general public to improve coordination and foster a strong collaborative approach to preventing human trafficking (Kemenko.PMK, 2023). In this regard, the government will continue to monitor the situation through these institutional units; controls at the central and local levels will also continue to be harmonized through various policies and collecting more concrete and actual technical data (Komdigi, 2023).

The Indonesian government also continues to give serious attention and focus to the issue of trafficking abroad for Indonesian citizens who are victims of this illegal practice. The human trafficking incident in Cambodia in July 2022, which claimed 202 Indonesian victims with the mode of sending migrant workers, became an important issue for the authorities. The repatriation of all victims to their homeland was successfully handled by the Ministry of Foreign Affairs (KEMLU-RI) in August 2022, one month after going through a series of coordination processes with the Embassy of the Republic of Indonesia (KBRI) for Cambodia located in Phnom Penh City ('Ishmah et al., 2023). Recognizing the large number of migrant workers supplied by Indonesian citizens, including the many cases of human trafficking from this context, urged the government to establish affiliations with various external parties, including international organizations. Since 2000, the International Organization for Migration (IOM) has made extensive humanitarian contributions to the process of addressing the crime of human trafficking in Indonesia; this support includes counselling funds, basic needs assistance, health

services, and financial resources for humanitarian programs aimed at victims of trafficking, facilitated by collaborative efforts with the Australian government (Oktavian et al., 2018).

As a sovereign state with an essential role in the global arena, Indonesia continues to endeavour to eradicate this problem on a broader scale. The Indonesian government has ratified several international conventions against trafficking in persons and transnational organized crime and formulated them into legislation, such as Law Number 5/2009, which contains the ratification of the United Nations Convention Against Transnational Organized Crime (UNTOC) and is still in force today. With the ratification of these provisions into Indonesian legislation, UNTOC has juridically become part of the national law applicable in Indonesia (Andika, 2018). This verifies that the provisions to accommodate what is stipulated in the convention must eventually be transformed into new international criminal law principles. These updates to the regulations also confirm that Indonesia has taken responsibility in the process of implementing efforts to prevent and alleviate the criminalization of human trafficking in line with established steps and procedures. The implementation of the national criminal policy that continues to undergo this transformation confirms that external influences, including interest groups, in this case through the UN institution, oversee the Indonesian government in formulating policies that are more optimal in efforts to combat human trafficking cases.

On the other hand, the Indonesian government has also given serious attention to this issue and is focusing on it internationally. As a crime involving an inter-state network, the government recognizes that the effectiveness of multilateral cooperation is an important pioneer in accelerating the process of handling this case. Indonesia's success in hosting the 42nd ASEAN Summit in Labuan Bajo in 2023 indirectly impacted the formulation of a more optimal policy for handling human trafficking offences. The ASEAN Leaders' Declaration on Combating Trafficking in Persons Caused by the Abuse of Technology, which consists of fifteen main points, provides new obligations for the government to improve and strengthen procedures for handling trafficking in persons in Indonesia, including through law enforcement, practices, and joint investigations (Puspitasari & Iqbal, 2023; Sartika & Burhanuddin, 2023). The declaration also encourages all ASEAN member states to decide on definitive measures to tackle this high-priority issue jointly. Addressing human trafficking cannot rely solely on internal efforts but also requires coordination between various networks to achieve optimal results. As a procedural step, member states have ratified four commitment documents covering the 'one health' initiative, the ASEAN village network, the protection of migrant workers during emergencies, and the welfare of migrant fishermen (Baparekraf.RI, 2023; Indonesia.go.id, 2023). These documents also serve as a comparison for the issuance of blueprints at the 29th ASEAN Socio-Culture Community (ASCC), which is a series of the 42nd ASEAN Summit.

From the results of a study conducted by (Islam et al., 2024), it was stated that, in general, the implementation of policies to combat the criminal offense of trafficking in persons in Indonesia still faces several complex and diverse challenges as a whole. Some points that are quite highlighted in this case are the limited budget allocation and human resources needed, which hinders the acceleration process in handling these problems. In addition, the struggle to achieve a legitimate legal status policy certainly requires the collaboration of all related subsystems; in its implementation, the intervention of the government and the state is inevitable in this case, even though it must still pay attention to elements of justice (Nurrahmah et al., 2023). This evidence suggests crucial challenges along the way, as there are often different perspectives between government and non-government actors when it comes to aligning on a single step and goal for handling these cases. Poor coordination between government and non-government actors means that there is often a gap in communication and collaboration between parties involved in legal and victim protection (Seftiniara et al., 2024; Sumaya, 2024). This

phenomenon is the basis for creating an echo chamber that has the potential to hinder comprehensive efforts to formulate more appropriate policies to provide services and access to victims of trafficking.

Thai Government Policy on Human Trafficking

As the Global Slavery Index explains, Thailand is home to 610,000 victims of trafficking over two and a half decades, and the situation shows no signs of changing in the coming years (ECPAT, 2020). The world knows Thailand as a country with sexual freedom status, although empirically, the statement is in line with the facts on the ground. Still, it is not entirely so because Thailand also has specific laws and regulations that limit the practice, especially those that are prone to lead to the context of criminality about one's human rights. The economic disparity that exists in most Thai communities is the main problem that drives them to want to earn a significant income at once in a short period; engaging in prostitution is the final path taken to get this solution (Nurul et al., 2023b). One of these things began when the Thai government focused a lot of attention on developing the tourism sector, which has long been a major contributor to the country's foreign exchange earnings. The Thai government's policy on tourism, complete with promotions, tourist destinations, and all supporting facilities, has resulted in the public seeing it as a sex paradise where people can experience it, including foreign tourists (Molasy & Febrina, 2022). To make matters worse, some tourist attractions in Thailand blatantly offer sex tourism services to tourists. It is not uncommon for underage women, adults, and even transgender groups to be willing to become actors in these activities to earn coffers of income to sustain life.

Seeing the reversal of the situation, the implementation of the trafficking policy became a priority focus that began to be implemented by the Thai government, especially starting in 2015, which showed its massiveness. The 5-Plan Strategic Framework became the opening policy of the period, which was formulated and established after a case of human trafficking that involved many parties, especially highlighting the large scale of interference and one of the high-ranking Thai army officials (Omega et al., 2023). This then indirectly urges the Thai government to immediately ratify the United Nations Inter-Agency Project (UNIAP) policy regarding collaborative cooperation by formulating it into national legislation. In Chapter 35, the provisions about recognizing the right to survival for children and adolescents are explained, including providing access to health care, counselling, and educational development (Agustina, 2016). This also confirms that implementing the above provisions is a proactive effort made by the state to actualize responsibility for the collaborative step.

The move may be possible due to external push factors, including Thailand's ranking in the TIP report, multilateral diplomacy, and EU pressure on the massive number of victims of forced labor in several industrial sectors. The signing of the Palermo Protocol on human trafficking in 2008 has led to amendments to the Prevention and Supressions of Human Trafficking Act (PSHTA) to adapt to the times and conditions of society, the enactment of additional legislation, the installation of corruption prevention measures, and institutional innovations such as policy-level committees, new courts, and investigative agencies (Hoque, 2022). Civil society institutional units, international organizations, and external reports and pressures (US & EU TIP report), among others, were important driving forces behind the government's initiation of regulatory reconstruction.

In general, network management to prevent trafficking offenses in Thailand has improved, and the general provisions of the policy have integrated coordination among task force units. In the study conducted by (Santad & Ratchadapunnathikul, 2018), it was explained that five agencies at the provincial level coordinated with the central network to conduct direct operations in the field when they received signals of instructions on indications of human trafficking crimes. The Provincial Labour Protection and Welfare Office, the Provincial Office

of Social Development and Human Security, the Provincial Public Health Office, the Provincial Labour Office, and the Royal Thai Police are five of these key institutional units that the Thai government is transforming into vital state networks at the local level to accelerate the handling of trafficking cases in unreachable areas, follow up on reporting on a more centralized scale, as well as provide resolution measures for affected victims.

The Thailand Anti-Trafficking in Persons (TATIP) was formed in 2018 to optimize handling these cases. It is under the directorship of the Centre for Child and Women Protection and Anti-Trafficking in Persons (ASEAN-ACT, 2016). In 2021, Thailand's Anti-Trafficking in Persons (TATIP) reported that of the 182 trafficking cases identified by the established unit. The Thai government has substantially enhanced the hotline and complaint process in response to this crisis. The [1300] helpline, overseen by the Ministry of Social Development and Human Security (MSDHS), was created to respond to more than 64 occurrences of human trafficking, comprising 11 instances of forced labor, 20 instances of exploitation, 31 cases of prostitution, and one instance each related to begging and commercial surrogacy (Royal Thai, 2021). Establishing the TATIP also influenced the revision of the Anti-Human Trafficking Act B.E 2551/2008, which included new statutory provisions. The results of the thesis study stated by (Nasukha, 2023) revealed that during the Prayut Chan Ocha government, changes were made to the provisions of the Anti Human Trafficking Act B.E 2551/2008, which explained that perpetrators of human trafficking offenses would be sentenced to 4-5 years imprisonment with a fine of THB 400,000-1,200,000 (article 52: paragraph 1) and in (article 52: paragraph 2) if the identified victim is 15-18 years old, the perpetrator concerned will get an additional sanction with 6-15 years imprisonment and a fine of THB 600,000-1,500,000. This amendment was made to revise the provisions in the previous law that were considered too superficial and quite favorable to the perpetrators. By providing more specific and detailed penalties for perpetrators, this policy is expected to be a preventive measure for the Thai government in addressing and minimizing the scale of trafficking cases in the future.

Thailand's efforts in addressing this problem do not end there. At the regional level, the Thai government is also actively involved in establishing cooperative affiliations, especially with countries in the Mekong subregion, which are very vulnerable locations for this crime (Jayangkula, 2019). COMMIT, the Coordinated Mekong Ministerial Initiative Against Trafficking, is a high-level dialogue forum established as a result of the initiative to develop a series of bilateral or multilateral cooperation among countries in the region to eradicate the issue of trafficking (Rani et al., 2022). COMMIT's journey was marked by the ratification of the Memorandum of Understanding on Cooperation Against Trafficking in Persons in the Greater Mekong Sub-Region in 2004 by all six member countries in the region, including Thailand, Cambodia, Laos, Myanmar, Vietnam, and the People's Republic of China. In 2022, the COMMIT Regional Task Force Meeting (COMMIT-RTF) was officially held again. During the meeting, a review of the implementation of the 4th Phase Action Plan agreement valid from 2015-2022 was conducted; this led to a discussion to establish a framework for developing the 5th Action Plan agreement for the upcoming period (Thai.Embassy, 2022). Through its membership in COMMIT, Thailand is committed to working closely with all member countries to improve the quality of life and formulate more optimal policies for preventing and addressing human trafficking collaboratively.

Thailand's significance in combating human trafficking is beginning to show light after the government made proactive efforts through increased cooperation with the United States Agency for International Development (USAID). The affiliation has been ongoing since the 1960s but only showed reciprocal benefits starting in 2011 when Thailand was ranked Tier 2 in the human trafficking rankings after being Tier 3 in 2009-2010 with deteriorating handling conditions. The study (Davy, 2014b) explains, that under Obama's second term, USAID contributed to the disbursement of funds to anti-trafficking NGOs and networks in various

countries. Save the Children International and World Vision International are two NGO networks that often collaborate on anti-trafficking campaigns in Thailand through USAID funding. Together with USAID, the Thai government also increased collaboration with partners in various regions, including Bangkok, Chiang Rai, Sa Kaeo, Phang Nga, Tak, Phuket, and Phitsanulok, prioritizing the rights of migrant workers and individuals in various sectors, including fisheries (Usaid.gov, 2023b). Through these efforts, a Memorandum of Understanding (MoU) was made as a firm commitment to improve connectivity technology at sea. The MoU facilitated the creation of security regulations related to a two-way communication network that allows personnel to report their activities on the high seas regularly, thus providing a precautionary measure to prevent indications of trafficking vulnerabilities in the water sector (Usaid.gov, 2023a).

Referring to the Country Report on Anti-Human Trafficking Efforts 2023 of the Royal Thai Government, in general, the implementation of policies on the prosecution, protection, and prevention of human trafficking offenses in Thailand has made significant progress through various efforts and technical mechanisms that have been thoroughly strengthened and tightened by relevant agencies (Royal Thai, 2023). In more detail, the national referral mechanism (NRM) in the 3Ps (Prosecution, Protection, and Prevention) has been effectively implemented through various measures, including capacity building of responsible actors, evaluating the 3P SOPs by adapting them to conditions on the ground and implementing the NRM at the local level to identify challenges and issue updated recommendations for policy-level decisions. External pressure from the US Department of State also contributed significantly to the passage of the Anti-Trafficking Act of 2008 after its annual TIP report consistently highlighted Thailand as a country that did not meet the minimum standards of the Trafficking Victims Protection Act (TVPA) (Chantavanich, 2020). Knowing its reputation in the global spotlight, in addition to the fear of sanctions, led Thailand to normatively ratify the provision into national legislation, which in turn made it one of the countries in Asia with the best anti-trafficking legal framework regarding the Palermo Protocol of the United Nations Convention against Transnational Organized Crime (Prajit et al., 2024; Riback, 2018). Despite being in line with the Palermo Protocol in terms of prosecution, protection, and prevention and having undergone two amendments (2015 & 2017) in the implementation process, the Anti-Trafficking in Persons Law has not fully become a written rule that is implemented holistically in real life. This can be said when trafficking cases in Thailand still show an increasing prevalence during the almost sixteen years of the policy's enactment.

Policy Comparison in Advocacy Coalition Framework (ACF)

Through the discussion presented in the previous section, the findings of this study identify the influence and involvement of interest groups, including non-governmental actors from NGOs, law enforcement agencies, and international organizations, in overseeing the process and technical validation of policies established about human trafficking. The study explores the external pressures that lead relevant agencies within a country's sub-government to prioritize and proactively pursue further action. Although not direct, a comparison of the results of various related studies shows that the policy direction taken is still very relevant to what is initiated and expressed in the preferences of the interest groups concerned.

In the Indonesian context, one of the things that can be identified is the role of IOM in contributing to humanitarian assistance through various facilities and long-term programs. This affiliation has encouraged the Indonesian government to ratify the United Nations Convention Against Transnational Organized Crime (UNTOC) and juridically formulate the provisions into national legislation. Meanwhile, in the context of Thailand, one of the findings that can be highlighted is the consistency of the government's lousy image, which is known to the world through the TIP report. The ranking system that places Thailand as a country with minimal

efforts to achieve TVPA standards indirectly urges relevant parties to ratify various international conventions and establish various handling units. One of these is the Thailand Anti-Trafficking in Persons (TATIP), which aims to optimize handling efforts by identifying various reports that indicate the crime of trafficking in persons.

This statement confirms that ACF participates in a series of processes to influence, intervene, and involve the role of the formation, ratification, and establishment of policies, regulations, and statutory provisions related to human trafficking that the government passes on a national, regional, or international scale. Referring to the explanation revealed by (Jenkins-Smith & Sabatier, 1994a), the Advocacy Coalition Framework was created to offer a causal theory of the policy process, serving as an alternative to the conventional phases heuristic. ACF emphasizes collaboration between advocacy coalitions consisting of various stakeholders from various community representatives with different perspectives in interpreting and articulating a policy that concerns the public (Sabatier, 2018). Given that preference filtering is a fundamental component of the model, coalitionists will typically reject information that suggests the invalidity of a policy and elaborate on those beliefs with other coalitionists to exert influence for the change or establishment of the current policy in place; assuming that trust is the main glue of the coalition, collective action problems become commonplace due to the massive competition over differing views in the influencing process (Fenger & Klok, 2001; Sabatier, 1998b). This implies that if coordination between coalitions fails, then the policies formulated will most likely not work optimally due to differences in power or influence from those that were previously competitively interdependent (Fenger & Klok, 2001; Sotirov & Memmler, 2012a).
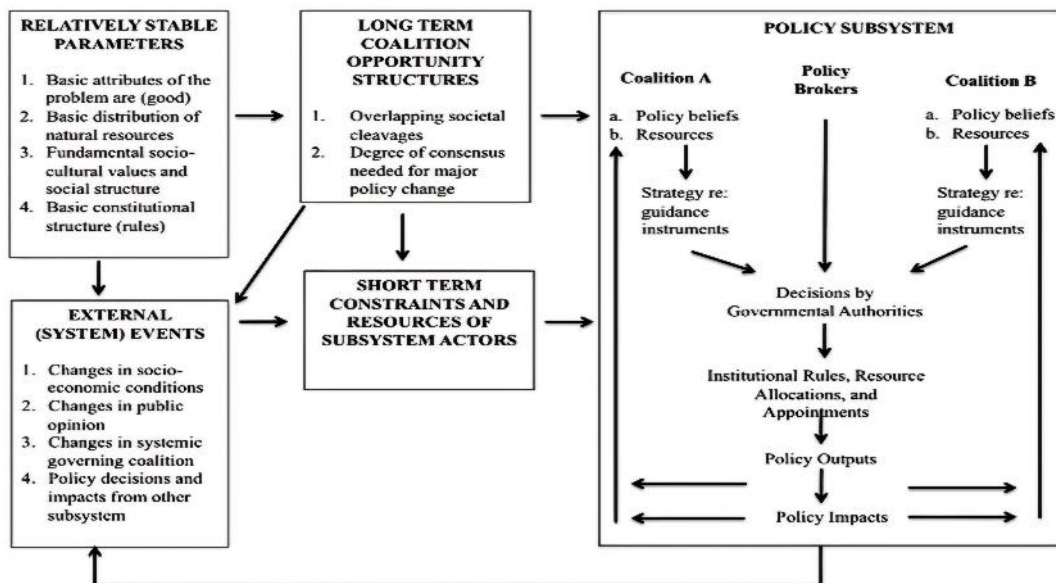

Figure 1. Advocacy Coalition Framework Flow Diagram (Sabatier & Weible, 2007b)

ACF examines public policy formulation within designated 'policy subsystems,' delineated by geographical and substantive attributes; these subsystems are seen as arenas of competitive interactions among various advocacy coalitions (Czapiewski, 2013; Nohrstedt & Heinmiller, 2024a). Each coalition comprises many individual and collective governmental and non-governmental entities, representing diverse institutional affiliations and governmental tiers but united by a shared views system and coordinated activities (Jenkins-Smith & Sabatier, 1994b; Sabatier, 1998a; Sabatier & Weible, 2007c; Sotirov & Memmler, 2012b). ACFs can be regarded as political organizations insofar as they participate as collective entities in the policy process; this premise arises from the fact that ACFs transcend mere descriptive intuition,

serving as a foundation for collective action among actors who share policy beliefs and aspire to have those beliefs incorporated into policy programs (Nohrstedt & Heinmiller, 2024b; Zafonte & Sabatier, 1998). The interest groups analyzed in the above studies have certainly aligned beliefs about policies to address human trafficking, take the lead in making recommendations, and articulate the issues or preferences of the constituents they represent through the establishment or removal of policies. This also boosts the government's capacity to assess programs of work, increase stakeholder engagement, and design more effective policies for more holistic outcomes.

Constructively, the ACF has led to the ratification of new policies that are relevant and tailored to the challenges found on the ground. Significantly, this contribution plays a vital role in the prevalence graph of human trafficking cases in Indonesia and Thailand. The analysis in Figure 2 below shows the government's improvement with respect to efforts that have approached the general standards set out in the Trafficking Victims Protection Act (TVPA), where in 2021-2022, the level of both countries fluctuated until it ended at position 2 in 2023 and almost reached a perfect position compared to the previous decades. This output also provides the final clue that the ACF plays its urgency explicitly towards the process of handling human trafficking cases in Indonesia and Thailand.
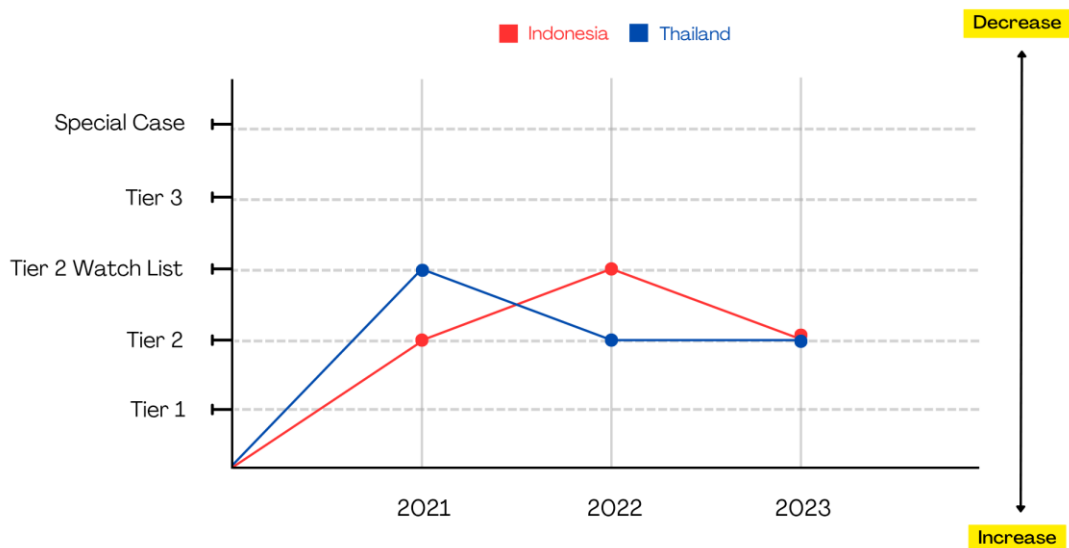

Figure 2. Human Trafficking Tier Placements of Indonesia and Thailand
(Processed by the author from; State, 2021, 2022, 2023b)

4. Conclusion

After a series of in-depth discussions, this study can conclude that the Indonesian and Thai government policies in handling human trafficking cases have shown significant improvement during 2021-2023. However, each of them still faces substantial challenges. This study highlights the efforts of the two countries that tend to use different characteristics and approaches, even though they are in the same region and face similar challenges. Indonesia focuses on the protection of migrant workers in response to the high number of human trafficking cases supplied through such networks. At the same time, Thailand is more oriented towards addressing sexual exploitation as it has been the primary catalyst of this case in Thailand for an extended period.

The Advocacy Coalition Framework (ACF) analysis reveals the strategic role of interest groups, including NGOs, international organizations, and law enforcement agencies, in

influencing every policy formulation and implementation technicality. In the Trafficking in Persons (TIP) report, both countries achieved Tier 2 placement by 2023, demonstrating substantial efforts to meet the minimum standards of the Trafficking Victims Protection Act (TVPA). This achievement is an indicator of success and reflects increased government accountability through more responsive and evidence-based policy initiatives.

The study confirms that while both countries have made progress, challenges in cross-sectoral coordination, strengthening regulations, and increasing the capacity of relevant institutions should continue to be a priority focus of attention. Moreover, the position of the two countries still tends to fluctuate in the 2021-2022 period. Therefore, through these strategic steps, including strengthening the legal framework and a more integrated evidence-based approach, efforts towards more effective and sustainable policies will likely be achieved.

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