



An Analysis of Ferienjob Practices in Germany: Modus Operandi, Legal Actions, Prevention, and Global Comparisons

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Shinto Bina Gunawan Silitonga^{1*}, Kadek Ari Bayuna², Bhaskara Ardhy Anugerah Nasution³

¹International Relation Division, Indonesian National Police, Berlin, Germany
Email: author: *shintosilitonga@gmail.com

²Indonesian National Police, Jakarta, Indonesia
Email: kadekari2019@gmail.com

³Criminology and Criminal Justice, University of Leeds, Leeds, United Kingdom
Email: pngg5864@leeds.ac.uk

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Abstract

The Ferienjob program in Germany which was started as an opportunity for students to find work and earn an income during vacations has of late come under criticism and allegations of being justifications for more nefarious endeavors such as human trafficking and labor slavery. In the light of this background, this article examines the factors that facilitated the exploitation of over 1,000 Indonesian and Uzbek students engaged in the Ferienjob scheme arguing about weaknesses in the host and the students' home countries' labor protection systems. Even though there are labor laws in Germany like the *Employengesetz* which forbids the exploitation of minor employees and the *Mindestlohngesetz* which ensures at least a guaranteed pay for every employee's work, exploited labor has not died down and students remain to be in low wage and unsafe working conditions due to the contracts that they deal with. The research includes questions regarding the qualitative methodology that reflects both primary data collected through the interviews and secondary data obtained from government documents and legislations. The key study findings include the use of false claims in this particular case to lure in students, the stealing of the student's money via placement fees, and the lack of proper legal care for foreign employees. The article further examines the responses issued by Indonesia and Germany in the court trying to show that it is extremely hard to bring the offending parties to book and to coordinate the protection of labor laws. As a final point the study provides the suggestions of how the preventive measures could be improved including enhanced regulations for recruitment firms, an improvement in the control of international agencies, and improvement of university partnerships.

Keywords: Ferienjob, human trafficking, legal action, preventive measure, labor law

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INTRODUCTION

The Ferienjob in Germany was initially devised to be a legitimate avenue for students to earn relevant work experience and earn an extra buck during academic breaks. It's supposed to fill temporary labor shortages in key sectors such as logistics, agriculture, and the hospitality industry. Recent scandals, however, have blown this program as a mask for unscrupulous practices, including human trafficking. This has shown the systemic weaknesses of labour protection frameworks, both in Germany and their



countries of origin, for over 1,000 Indonesian students, plus students from other countries such as Uzbekistan. The crisis thus signals that reassessment of legal protection and deeper international cooperation are urgently called for (Alfani 2024).

The law provides the legal framework through the *Jugendarbeitsschutzgesetz*-Youth Employment Protection Act and the *Mindestlohngesetz*-Minimum Wage Law-as a guarantee of equal treatment and observance of labor standards. Still, loopholes in enforcement and unfair practices have enabled comprehensive manipulation and exploitation. Cases from Indonesia and Uzbekistan expose how socio-economic vulnerability, linguistic limitations, and the malpractice of agencies are interlinked with international labor exploitation. In some instances, victims, including Uzbek students, ended up homeless at train stations in Germany. The lack of proactive action from their government further aggravated the situation, as the Uzbek embassy in Berlin reportedly failed to provide adequate support or intervention (Bruhn, 2023).

While *Ferienjobs* offer temporary employment opportunities that can prove helpful to many students, they are also fraught with a great deal of risk: underpay, hazardous environments, and even exploitation. Although labor laws exist in Germany concerning such jobs, like *Beschäftigungsverordnung* (Employment Ordinance) and *Mindestlohngesetz*, for instance, their enforcement mechanisms are not nearly as well developed, particularly where foreign workers are concerned. Including students, these workers are highly vulnerable because of limited awareness about their rights and poor support locally. This legal environment leaves some room for malpractice to take place, which adds to the risks of temporary cross-border employment (Buse, 2024; Ornek et al., 2022). The Indonesian and Uzbek students' scandal shows systematic failure in recruitment and oversight mechanisms. The students were promised to make significant wages, academic credits, and cultural exchange. In reality they found themselves in the midst of exploitative conditions, long working hours, inadequate wages, and poor living conditions that characterized by overcrowding and unsanitary conditions. Contracts were often in German, ambiguous, or even misleading, taking advantage of the students' low proficiency in the language and the law. This situation corresponds to the internationally accepted indicators of human trafficking: coercion, deceit, and exploitation throughout the recruitment and employment process (Nurfajriana, 2024).

Lack of transparency and accountability in the mechanisms of German oversight-even in instances of the *Bundesagentur für Arbeit*-mean that fraud agencies pass for legal, hoodwinking workers. Inspections are infrequent and sometimes too limited in scope to be truly effective at detecting abuses. Indonesia's framework on labor protection is also incomplete, while the mechanisms for monitoring and protecting outbound workers remain highly limited. Bilateral agreements between Germany and Indonesia are more about facilitating labor migration rather than protecting workers' rights. In the case of Uzbekistan, there have been reports of very little intervention by its government or embassy to help its victimized students, which further worsens their situation (Bruhn, 2023).

Addressing these issues calls for an integrated approach. This study identifies how such exploitative practices are occurring in the forms of deceptive recruitment, contractual ambiguities, and unsafe working conditions. The report points to systemic weaknesses in Germany's labor protection framework and insufficient oversight by both Indonesia and Uzbekistan of their outbound workers. The research further assesses the extent to which such practices would constitute human trafficking under the indicators as defined in national and international legal frameworks. Objectives of this study, therefore, will be to comprehensively analyze the German Ferienjob system, analyze the modus operandi of the exploiting practices, the effectiveness of the legal actions against abuses, prevention strategies that have been implemented by authorities, and the identification of best practices from international contexts to avert further exploitation.

METHOD

This research is conducted qualitatively, using a descriptive-analytical approach, based on primary and secondary data. The research will concentrate on the analysis of the exploitation of the Ferienjob program, its modus operandi of fraud practices, legal responses, and prevention strategies. The primary data were provided through interviews that the authors conducted with several affected students. Key findings from these interviews include: 1) Some victims were forced to stay at the Indonesian Embassy or the police attaché's office in Berlin after being terminated from their jobs, with some remaining there for up to three weeks before returning to Indonesia; 2) Contracts provided by victims were examined, revealing exploitative clauses written in German. These contracts were collected directly from victims who stayed with the authors; 3) Additional evidence, like transfer receipts, agency requirements, and other documentation, was also analyzed in order to understand the mechanisms of fraud.

Secondary data were obtained from references through the internet and materials that had been published, such as government publications, legal documents, academic journals, reports of international organizations, and newswires from reputable news agencies. Reports from various advocacy groups and official agencies, together with the Report on the Results of the Investigation from Bareskrim, gave valuable insight into the regulatory and legal environment. A comparative analysis of policies in countries like Canada, Australia, and Uzbekistan looked at systemic weaknesses and best practices. Data analysis was done through content analysis, with the focus being the identification of patterns, themes, and gaps in the regulatory frameworks of Germany and Indonesia. Triangulation of primary data from interviews with secondary data was done to ensure reliability and validity.

RESULTS AND DISCUSSION

Modus Operandi of Ferienjob Fraud

The Ferienjob fraud that has affected Indonesian students shows a carefully organized exploitative scheme, which relies on the hopes of young people for an international experience.



Fraudulent agents advertise, sometimes in collaboration with universities, to entice students into their trap. These advertisements had falsely promised that going to the Ferienjob would provide them with academic credit under Indonesia's Kampus Merdeka program. This association with a recognized government program lent the scheme an appearance of credibility and also further convincing students of its legitimacy (Alfani, 2024). Fraudulent agents strategically leveraged formal agreements (MoUs) with Indonesian universities, creating an appearance of legitimacy that enabled them to conduct extensive promotional activities. These agreements facilitated the recruitment and departure of students, with universities being very active in logistics and even arranging third-party financial loans to cover students' placement fees. Most importantly, universities materially benefited from these arrangements, including financial benefits accruing from this arrangement, and opportunities to send supervisors or lecturers to Germany under the agents' sponsorship.

Another critical element of the scheme was that a placement fee in the average amount of €350 (approximately IDR 5.7 million), sometimes up to IDR 50 million, needed to be paid for students taking part in third-party loans of the scheme (Letter to all participants of the airline loan fund program Working Holiday Germany, 2023). This is purportedly the money required for covering all processes concerning visas, flights, and administrative purposes. However, on arrival in Germany, students found conditions that were very different from what was promised. They had to work in hazardous conditions, were put to work immediately under harsh conditions, and were asked to pay as much as €17 to €20 per day for accommodation. This amount was directly deducted from their wages, leaving them no room for negotiation, and students were not allowed to look elsewhere for accommodation.

Contracts signed by students were exclusively in German and presented in high-pressure circumstances, often late at night or immediately upon arrival. Many students, unfamiliar with the language, were unaware of the exploitative clauses. These contracts often subjected them to unfavorable conditions, making them vulnerable to further manipulation (House of Representatives of the Republic of Indonesia, 2024). Students faced all types of atrocities: students arriving in the airport with no direction as to get to a rural site by taking this train at that time- ending in lost time, missed trains, extra expenses. Many were also directly sent into sub-standard accommodations, and ordered to begin the next morning work, having barely time to take rest, with some without orientation and no welcome programs. The accommodations provided were frequently substandard with overcrowded and unhygienic living conditions. Such treatment not only violated international labor standards but also inflicted severe financial, physical, and emotional distress on the victims (Nurfajriana, 2024; Utami et al., 2024).

The agents in Indonesia acted as if it were something legal, manipulating the collaborations with universities, where much confidence has been instilled. Some of these universities, such as UNJ, received financial benefits referred to as Corporate Social Responsibility payments, where payments are given based on a per student overseas. These funds, though supposed to be used for local community development or to enrich institutional facilities, were misused or transferred for purposes unrelated to

CSR as defined by Indonesian regulations. Moreover, these financial incentives encouraged universities to prioritize profits over student welfare, leading to the initial stages of exploitation under the guise of educational development.

On the German side, supervisory mechanisms like the Federal Employment Agency did not work effectively with regard to controlling the recruitment of foreign workers and their conditions of employment. In court, judicial reviews underlined several violations regarding wage deductions without clear transparency, arbitrary dismissal, and unsafe working conditions. More than 130 students, legally represented in Berlin, now demand restitution.

Moreover, the fraudulent use of CSR funds, added to the systematic promotion of the exploitative practices by universities, underlines a larger failure of the regulatory mechanisms. Weak labor protection both in Indonesia and Germany, along with insufficient cross-border monitoring, has allowed such schemes to persist. In essence, the facilitation by universities of such exploitative arrangements through MoUs and logistical support has fundamentally undermined their duty toward education and protection, making students susceptible to extreme financial, physical, and emotional distress. This scam modus operandi indicates a serious need for reassessment of the regulatory and oversight mechanisms related to international student programs, with a view to closer monitoring of university collaborations, better labor protection for temporary workers, and ethical use of CSR money.

Legal Actions / Repressive Measure

Indonesia and Germany have taken several steps to address the Ferienjob trafficking case, but significant challenges remain in ensuring justice and deterrence. Investigative efforts began with the Indonesian National Police's Criminal Investigation Agency, Bareskrim, initiating an inquiry following a police report on October 30, 2023. This was complemented by regional investigations from the Jambi Regional Police, focusing on recruitment at Universitas Jambi, and the South Sulawesi Regional Police, examining similar activities in campuses across South Sulawesi. By March 2024, Bareskrim named five suspects, two of whom were declared international fugitives through Red Notices issued in May 2024. Meanwhile, the Jambi Police identified four suspects linked to university management in August 2024. However, these investigations have yet to reach the P21 stage, with critical instructions from prosecutors still unmet.

Despite the naming of suspects, there are substantial barriers to progress. Two of the main perpetrators, Enik Rutita (alias Enik Waldkoenig) and Amisulistiani (alias Ami Ensich), remain free in Germany, and efforts to extradite them have been stalled. Investigations into alleged money laundering by these individuals have similarly not moved forward, despite repeated requests from Indonesian authorities to their German counterparts. Corporate accountability also remains lacking. PT CVGEN, one of the key recruiters behind the scheme, operated without any legal registration and was conducted through social media, with no office. PT Sinar Harapan Bangsa Kita (SHB) is a duly registered company but had no license from BP2MI. Neither company has been decisively sanctioned- operational bans or

asset freeze- nor the key personnel, like Ayub Marzuki of PT SHB, questioned.

Administrative policies have also been implemented. The most recent, in October 2024, was the call of Kemendikbudristek for universities to stop the Ferienjob programs. But this has been inconsistently implemented. For instance, while there have been reports that organized crime networks operate across 34 campuses, detailed investigations - such as the one conducted by the Jambi Police - have not been repeated elsewhere. A stalled investigation process in both South Sumatra and North Sumatra shows the weaknesses in consolidated efforts.

So far, the response from Germany has been minimal, where actions have only reached the suspension of visa issuance for Ferienjob-related applications upon the Indonesian Ambassador's initiative. But German authorities have not undertaken serious criminal investigations or executed the extradition requests for the suspects. The repeated appeals by the Indonesian Police Attaché to Germany's Federal Criminal Police Office, the BKA, for investigations into the financial activities of the suspects have also yielded no substantial outcomes. The more-than-one-year-long legal process underlines inefficient coordination in law enforcement. The partial prosecution, taking only a few individuals into consideration and not taking any action about the wide network of 34 universities implicated, does not show the scale of the organized crime.

It is only through a comprehensive investigation involving regional police in all the affected provinces that such a network can be demolished and justice delivered to the victims. Speedy legal action against them to ensure timely justice, increasing international cooperation for extradition and transnational crime investigation, and stringent corporate sanctions with monitoring mechanisms in the recruitment sector-all these are the necessary steps that can be taken to strengthen the anti-human trafficking mechanism to safeguard the vulnerable. Diplomatic engagement between the two countries is instrumental in addressing systemic vulnerabilities, particularly in visa issuance and labor migration systems, which traffickers often exploit (Wahyurudhanto, 2019).

Prevention Measures

It requires adaptive regulations, proactive enforcement, and coordinated international cooperation to prevent human trafficking. However, most of the existing measures fall short in addressing the evolving threats such as the Ferienjob scheme. In Indonesia, for example, regulations such as Regulation of the Minister of Manpower and Transmigration (Permenakertrans) Number PER.08/MEN/V/2008, which regulates the procedures for licensing and organizing apprenticeships abroad, are outdated and do not reflect modern recruitment practices. This is in the context of why Kemendikbudristek should take the lead in drafting new policies. Each university should do profiling of work programs, select partner organizations with a selection process, and obtain recommendations from the Indonesian embassy (KBRI) before recommending internships abroad. The students should be taught critical thinking so they can find out about the Ferienjob program and distinguish scams.

Furthermore, universities should check employment contracts so that students' rights do not get

violated. Immigration authorities also play a very important role in observing mass departures that are actually touted as student internships but involve seasonal migrant work under Indonesian Law Number 18/2017 on Migrant Workers. Greater coordination by immigration and law enforcement can ensure early detection of such discrepancies. More strict enforcement against misleading agents is necessary, especially through social media to manipulate students. Law enforcement agencies should develop counter-narratives that use all platforms, including Divisi Humas Polri, to effectively debunk misinformation and to present accurate and accessible information.

Indonesian embassies must be more assertive in the case of recruitment masquerading as internships. For instance, Indonesian embassies identified 147 students victimized through Ferienjob but refused to take action against the agencies. They need to issue formal instructions to visa authorities to pre-emptively stop questionable visas. Written warnings clearly should be given in writing to agents, and international agreements need to be enforced as part of the deterrence for such activities. Mistakes, like acting only after problems have occurred, achieve partial mitigation: for instance, reducing the number of departures from 2,000 to 1,000 instead of completely preventing the exploitation.

In Germany, stronger coordination with international law enforcement is of essence. There is no MLAA between Indonesia and Germany, which obstructs extradition and action on Red Notices issued by INTERPOL, meaning suspects are left free. German authorities must respect the commitments of INTERPOL and create formal mechanisms for police-to-police cooperation, fast-tracking procedures like extradition requests. Furthermore, visa applications for large groups of people who will join the programs such as Ferienjob should be checked in cooperation with Indonesian embassies or related ministries, as done in Vienna. Such verification could help avoid abuses and strengthen transparency in visa issuance. Lastly, the activities of recruiting agencies should be controlled.

Agencies operating without proper registration must face severe consequences, including license revocation and legal action by the Ministry of Law and Human Rights. Agencies that fail to meet legal standards face not only administrative penalties but also criminal charges, which are vigorously pursued by police investigators (Bachtiar, 2022; Dando, 2024). In addition to these enforcement measures, digital forensics teams should collaborate with Kominfo to take down fraudulent online content without delay. Public Information Officers, as mandated by Indonesia's Public Information Disclosure Law (UU 14/2008), should be proactive in the dissemination of warnings to prevent mass victimization.

Global Comparison

The fight against human trafficking, from an international perspective, provides useful lessons for Indonesia through the strategies taken by countries like Canada and Australia. These countries have come up with comprehensive frameworks that govern labor migration, protect workers, and address vulnerabilities that traffickers take advantage of. In Canada, for example, the TFWP mandates key safeguards, such as requiring that employment contracts be provided in workers' native languages. This



would ensure that the workers understand the terms of employment, including wages, hours of work, and procedures for redress (Employment and Social Development Canada, 2023). It also requires employers to pay all recruitment costs, provide proper accommodations, and strictly follow labor rules. Recruitment agencies are licensed and audited to ensure the rules are followed, and violations may include license revocation and public blacklisting.

Similarly, Australia's Seasonal Worker Program prioritizes worker protection through mandatory translations of employment documents into native languages and fair recruitment practices, including employer-funded recruitment costs process (Australian Government, Department of Education, Skills and Employment, 2021). Compliance is strictly regulated by the Fair Work Ombudsman, which investigates worker complaints and holds employers accountable for their labor practices. Fair Work Ombudsman 2024 Public education campaigns are designed to help workers identify and report exploitation. In addition, bilateral agreements with Pacific Island nations enhance protection through explicit articulation of sending and receiving country rights and obligations, including ethical recruitment, dispute resolution, and postwork support (Department of Foreign Affairs and Trade, 2024). These are some of the strategies that Indonesia can adopt to strengthen its efforts in combating human trafficking and also especially for its migrant workers.

First, the translation of employment contracts into local languages would guarantee that all workers, especially from rural areas with limited formal education, understand their rights and responsibilities. Second, strict regulation and oversight of recruitment agencies, including licensing and periodic auditing, would foster ethical practices in preventing abuses. Agencies that fail to do so must be subjected to substantial penalties, including fines and blacklisting. Thirdly, Indonesia could enter into bilateral agreements with destination countries on mutual accountability and protection, such as standards for ethical recruitment and grievance mechanisms. Additionally, awareness campaigns and educational workshops in schools, universities, and rural areas will arm potential workers with information on trafficking risks, fraudulent job offers, and their legal rights. This would also involve increased coordination between the law enforcement agencies, immigration authorities, and concerned ministries for investigating fraud recruitment cases and prosecution of the traffickers.

CONCLUSION

The Ferienjob fraud that has targeted Indonesian students shows large gaps in international regulatory and oversight frameworks, highlighting vulnerabilities both in recruitment processes and in cross-border labor protections. Fraudulent agents' deceptive practices combined with poor scrutiny from universities and weak enforcement mechanisms in Indonesia and Germany have allowed the systematic exploitation of students. The involvement of universities in misusing CSR funds and being complicit in recruitment logistics points to a far wider ethical failure in the protection of students. Efforts at crackdowns are still few and far between, and even legal actions are stalled by bureaucratic delays, ineffective extradition processes, and insufficient corporate accountability. Preventive measures are

outmoded regulations and uncoordinated enforcement that have only served to increase vulnerability among students to financial, physical, and emotional harm. Drawing from global best practices, such as the mandatory translation of contracts in Canada and Australia, together with the strict regulation of recruitment agencies, both Indonesia and Germany can do more to protect temporary workers. Recommendations include updating regulatory frameworks, improving inter-agency coordination, enforcing stricter penalties for non-compliant entities, and fostering international collaboration to address systemic vulnerabilities. Meeting these challenges is crucial for the realization of justice for the victims and the development of a safer and more transparent structure for international labor migration. This case provides a call to action for governments, academic institutions, and international organizations to prioritize ethical practices and protections for workers in global mobility programs.

SUGGESTION

Approaching problems of human trafficking and labor exploitation, Germany and Indonesia are to consider a series of steps addressing the strengthening of oversight to beef up worker protection. Establishment of bilateral agreements between these countries is the first step to assure adequate levels of regulation for both countries regarding student labor programs, seasonal guest-worker agreements, and other forms of temporary work. Such agreements could outline shared responsibilities, including the vetting of recruitment agencies, ensuring ethical employment practices, and creating mechanisms for dispute resolution. Formal cooperation will enable Germany and Indonesia to close regulatory gaps and reduce vulnerabilities exploited by traffickers.

Second, multilingual legal support services for foreign workers should be established in Germany. Due to language barriers, many victims of trafficking and labor exploitation do not seek help. Accessibility of legal support in multiple languages will definitely empower workers to understand their rights and confidently navigate the legal processes and report violations. This could be implemented in collaboration with government agencies, NGOs, and community organizations to ensure access to comprehensive and culturally sensitive support.

Lastly, both countries must increase the sanctions against those recruitment agencies and employers that fail to comply while enhancing the monitoring mechanisms. For Indonesia, closer audits and requirements for licenses from recruitment agencies will help avert questionable activities and increase transparency. At the same time, Germany could impose tougher penalties on employers who take advantage of foreign workers through public blacklisting and monetary fines. Frequent checks on workplaces and application of modern technologies for monitoring purposes would reinforce compliance and provide a context where the probability of exploitation is reduced systematically.

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