



Quo Vadis: Pancasila Industrial Relations in Modern Slavery (A Case Study of the Oriental Circus Indonesia)

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Abstract: The alleged slavery case involving the Oriental Circus Indonesia reveals long-standing exploitation and human rights violations, including violence, forced labor, and the deprivation of victims' identities from childhood. Although the OCI denies the allegations, this case demonstrates that modern slavery persists and contradicts the principles of Pancasila industrial relations, which uphold human dignity. This study aims to examine the gap between legal norms and practice, while also opening up new research opportunities related to modern slavery from an industrial relations perspective in Indonesia. This research method is normative-empirical and descriptive-analytical. This study found that modern slavery in Indonesia is a growing phenomenon due to unequal relations between workers and employers and weak protection and supervision. Although Pancasila Industrial Relations emphasizes human dignity and justice in employment relations, without effective implementation, exploitative practices leading to slavery still have the potential to occur. Modern slavery in Indonesia still occurs despite being contrary to Pancasila Industrial Relations, as reflected in the Oriental Circus Indonesia case, which demonstrates the unequal relations, a la Karl Marx. Its persistence is fueled by poverty, low education, weak supervision, and the difficulty of proving, thus reflecting normative, structural, and cultural failures.

Keywords: Pancasila Industrial Relations; Modern Slavery; Oriental Circus Indonesia.

1. Introduction

News of alleged slavery by the Oriental Circus Indonesia (OCI), affiliated with Taman Safari, shocked the public. These allegations of slavery stemmed from testimony from former OCI circus workers to the Ministry of Human Rights alleging human rights violations. During a hearing with Deputy Minister of Human Rights Mugiyanto, these former workers alleged abuse and alleged slavery during their time as OCI circus performers (DetikNews, 2025). The practice of slavery and human rights violations is suspected to have occurred decades ago. The complaint of this case to Komnas HAM turned out to have been complained about since 1997. At that time there was indeed a human rights violation in the form of a violation of the child's right to know the origin of family identity which is a basic human right (N. Dewi, 2025). From the information of former players, it is known that they have been taken and trained by OCI since they were toddlers, and have never known their origin and true identity and have not even been given access to education. Even one of the former circus performers has been separated since childhood from his mother, who is also known to be an OCI circus performer (Rizky L Pratama, 2025). Not only that, while working as a circus performer since childhood, the former worker often received exploitation ranging from not being paid, forced to perform while pregnant, physical torture such as violence, stun to vital organs, forced to eat animal feces, this torture occurred in a secret bunker in a house located in a safari park (N. Dewi, 2025).

Tony Sumampau, co-founder of OCI, as well as one of the founders of the safari park, stated that he would take legal steps against this alleged slaver. (Nabiila Azzahra,

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2025) The OCI denies all allegations of exploitation, slavery, and violence, while the Indonesian safari park refuses to be linked to the case.

The re-emergence of this case shocked the public because it turned out that there is still a practice of slavery in modern times, in a country that upholds human rights. The alleged slavery that occurred in the OCI is reminiscent of slavery in the past, where slaves were exploited, made into commodities, unable to get a decent life, and unable to fight for their rights as dignified human beings due to limited insight and very weak bargaining positions.

Modern slavery is a condition where a person treats others as his property, so that the person's freedom is deprived and then exploited for the benefit of the person who practices slavery, and then at any time can be employed and disposed of as goods (Nugraha, 2015). The existence of modern slavery is contrary to the ideals of Indonesian labor law, with the principle of industrial relations, namely the fulfillment of the rights of workers, so that there is no exploitation and violation of human rights (Arliman, 2017). Pancasila's industrial relations combine humanity, social, and work productivity so that workers are not considered as mere production factors, but as human beings with all their dignity and dignity (Rochadi et al., 2018) (S et al., 2023). Modern slavery is a practice that is contrary to the philosophy of Pancasila industrial relations, which is also regulated in laws and regulations in the field of employment. Therefore, this study aims to examine where the philosophy of Pancasila industrial relations has gone in Indonesia today, so that modern slavery still occurs.

The issue of modern slavery in Indonesia has been discussed in previous research. The first research was conducted by Yeni Nuraeni and L. Alfies Sihombing with the title "Quo Vadis Indonesia's Positive Law Against Modern Slavery Practices: Notes of Alignment with International Instruments". This research resulted in the finding that the context of modern slavery includes forced labor, human trafficking, and exploitation (Nuraeni & Sihombing, 2023). The weakness in Law No. 21 of 2007 concerning the Eradication of the Crime of Trafficking in Persons causes in law enforcement practice, and the realm of responsibility that is entangled is only the perpetrators who play a role in the field, not those who play a role behind the scenes (Nuraeni & Sihombing, 2023).

The second study by Sylvia Dwi Andini, with the title "Universalism and Cultural Relativism in Human Rights Enforcement Against the Case of Human Cage and Modern Slavery". The study found that Universalism and Cultural Relativism have been in conflict between Western and Eastern states since the emergence of the idea of human natural rights due to differences in terms of culture, race, ethnicity, religion, and the regulatory system of each country. (Andini, 2022). The case of human cages is a form of coercion that can be seen in Law Number 19 of 1999 concerning the Ratification of the ILO Convention on the Elimination of Forced Labor (Andini, 2022).

The third research by Vidya Intani and team is titled "Uncovering the Impact of Modern Slavery on Capital Costs in the G20". This research results in the effect of the disclosure of modern slavery on the cost of equity (Hermawan, 2024). Company who disclose what they know will benefit from lower equity costs and contribute to ethical business practices that increase attractiveness for potential investors, potentially increasing profitability for those companies (Hermawan, 2024).

Based on the description above, no similar research has been found because the case of alleged OCI slavery was only revealed in April 2025. In addition, there has also been no research that examines modern slavery associated with the Pancasila industrial relations, which is the focus of this research. This article examines the issue of modern slavery from its industrial roots, namely the concept of Pancasila industrial relations. It also discusses the challenges of implementing Pancasila-based employment relations, which have allowed slavery to persist, as in the case of OCI.

2. Materials and Methods

This research is a normative legal research that tests a norm or applicable provision (Irwansyah, 2021) This normative or doctrinal law research is very closely related to researching values, norms, and written regulations, so this research is very closely related to libraries (Suteki & Galang Taufani, 2018). So that the data used is literature data by conducting document studies that examine primary, secondary, and tertiary legal materials.

Primary legal materials are any legal materials or provisions that are binding on the problem to be studied.(Soekanto & Mamudji, 2010). Primary legal materials include binding legal materials such as laws and regulations, jurisprudence, or court decisions.

Secondary legal materials are materials that provide explanations of primary legal materials, such as draft laws, research results, or legal expert opinions.(Amiruddin & Asikin, 2018) Secondary legal materials are: books and research results. Tertiary legal materials are materials that provide instructions and explanations for primary and secondary legal materials. Examples of tertiary legal materials are legal dictionaries and encyclopedias.

This research uses a conceptual approach (*Conceptual Approach*) and a case approach (*Case Approach*) (Marzuki, 2010). The conceptual approach was chosen because it is the right approach to be used to build legal concepts, especially in this case, related to Pancasila industrial relations. Then, the case approach was chosen because this study will conduct a case study on the alleged slavery carried out by Oriental Circus Indonesia for decades. The nature of this research is an analytical descriptive study that aims to describe how the industrial relationship of Pancasila is associated with modern slavery that still occurs in Indonesia, especially in the case study of slavery of the Oriental Circus Indonesia.

3. Results and Discussion

3.1 What Is The Meaning Of Pancasila Industrial Relations In Relation To The Efforts To Abolish Modern Slavery In Indonesia?

Modern slavery encompasses several actions ranging from workers without legal protection, forced labor, labor exploitation (unearned wages, extreme working hours), to human trafficking (*Human Trafficking*). This phenomenon arises because of the inequality of power relations between workers and employers and weak legal protection (Hamid, 2022)

Slavery itself is not new in Indonesia. The long history of slavery in Indonesia has existed since Indonesia's independence. The slavery system has been going on since the imperial era to colonialism, with the system of slavery, *rodi*, and penal sanctions from those who are economically powerful to those who are economically weak. Efforts to abolish slavery have been carried out for a long time. Since the British colonial era, Governor-Jendral T.S. Raffles has made reforms to the labor system, starting from recording the slaves (this record is still in the Jakarta National Archives). Then, slave owners were taxed and were required to have a slave certificate; slaves had to be free. Raffles, who aspired to abolish slavery, eventually founded the *Java Benevolent Institution*, a humanitarian assembly to abolish slavery and elevate slaves as free and dignified citizens (Tempo, 2020) In the Dutch colonial era, through Van Deventer, a political retribution or political *etische* was applied that encouraged the birth of humane labor regulations (Arliman, 2017)

After Indonesia's independence, as a legal country, all aspects of life are regulated by law, including employment relationships. This is done so that labor rights are fulfilled, and exploitation does not occur. Labor law basically aims to protect and create a sense of security, peace and prosperity by realizing social justice for all people.(Husni, 2015, p. 76)

A balance of positions between workers and employers is the key to a labor relationship that is free from exploitation. However, this is what is difficult to implement. This balance of position is difficult to implement because of the differences in interests that are contrary to each other between the two parties. The interests of entrepreneurs are to make a big profit with small capital. This results in entrepreneurs tending to spend small wages to reduce production costs. This is contrary to the desire of workers who work intending to get the highest wages to meet their living needs (S et al., 2023)

Pancasila industrial relations are a system of employment relations between workers/laborers, employers, and the government based on Pancasila values. (Kususiyanah, 2021) Pancasila industrial relations place humans at the center (*human-centered*), both as a subject and as a goal of industrial development (Siswanto, 1999). This guarantees respect for human dignity. Workers are not mere means of production, but are dignified human beings. Therefore, everything related to slavery must be abolished. This includes forced labor and labor exploitation to support the abolition of modern slavery.

This concept emphasizes social justice according to the fifth precept because it aims to create Balance between the rights and obligations of workers and employers and mutual welfare (Agus, 2023). So the implementation is in the form of fair labor relations, namely decent wages, humane working hours, occupational safety protection, and social security. With a fair labor system, the potential for worker exploitation that leads to slavery can be reduced. In essence, Pancasila Industrial Relations recognizes and believes that workers are not only a factor of production, but as individual human beings with all their dignity and dignity (S et al., 2023).

In terms of the relationship between the parties, Pancasila industrial relations do not completely hand over the relationship between workers and entrepreneurs freely. Pancasila industrial relations require a balance of rights and obligations between workers and employers. Therefore, the government plays the role of regulator and supervisor in the relationship between workers and employers to overcome unbalanced bargaining positions. As a regulator, the government regulates mandatory worker protections to minimize the impact of unbalanced employment relationships.

Through the description above, it can be understood that the principle of humanity that is the life of Pancasila's industrial relations is the antithesis of slavery. The affirmation in this concept that workers are dignified human beings is in direct contradiction to modern slavery, which reduces human beings to means of production.

Slavery itself initially occurred because of an unbalanced relationship where the bargaining position of workers was weaker. This concept is here to balance this weak bargaining position through regulations and supervision related to employment relations. This prevents exploitation by employers due to the weak bargaining position of workers.

Dispute resolution in Pancasila industrial relations is carried out through harmonization and deliberation. Industrial conflicts are resolved through dialogue, not exploitation or domination of one side. (Na'im et al., 2023) Therefore, the settlement of industrial relations disputes in Indonesia starts from bipartite and tripartite dialogue first to get a middle ground. If the problem cannot be resolved, then it can proceed to the litigation stage. The Pancasila industrial relations system is intended to reduce the potential for coercive practices that characterize modern slavery. The reality on the ground doesn't always go as planned. Under the Pancasila industrial relations concept, both workers and employers are positioned as equals, thus fostering a harmonious relationship. However, in practice, workers' low bargaining power, economic hardship, and weak supervision create opportunities for slavery.

3.2 Challenges Faced by Indonesia in Abolishing Modern Slavery (Oriental Circus Indonesia Case Study)

Slavery is still going on in the modern era, even though in Indonesia itself, there is an industrial relationship with Pancasila, which is clearly contrary to the practice of exploitation and slavery. This shows that there is a gap between *das sollen* and the practice in *das sein* in Indonesian labor law. In the last decade, several cases have been revealed that led to slavery, including the case of the Indonesian oriental circus.

The exploitation of labor was the beginning of slavery. The main concept of the structure of capitalism that Karl Marx criticized was the exploitation of labor itself. In the capitalist system, the relationship between the bourgeoisie (the owners of capital) and the proletariat is unbalanced. Where workers, even though their working conditions are not ideal, have no choice but to work with capital owners. Marx said exploitation occurs when workers do not receive the full value of the results of their labor; In this case, the owner of the capital takes most of the value as a surplus or excess profit. So, there may be situations where the capital used, including labor costs, is lower than the value of the final profit.

The exploitation of absolute and relative overvalue is of two types. In absolute exploitation, the owners of capital extend their working hours without equal compensation, so they work longer, earning more but without any additional fair wages. In the exploitation of relative value, increasing labor productivity through technology or more efficient production methods increases labor value, so that labor value increases while workers' wages remain low. In both cases, workers still receive lower wages for their longer hours.

In the case of the Indonesian Oriental Circus (OCI), Marx's opinion on exploitation is very relevant to explain how the phenomenon that occurs is the practice of exploitation and slavery that violates human rights. This case has actually been complained about since 1997 to the National Commission on Human Rights. However, at that time, what was highlighted was a violation of human rights in the form of a violation of the child's right to know the origin of family identity, which is a basic human right. These children are deliberately taken and then trained to become circus performers.

From the information of former players, it is known that they have been taken and trained by OCI since they were toddlers, and have never known their origin and true identity and have not even been given access to education. Even one of the former circus performers has been separated since childhood from his mother, who is also known to be an OCI circus performer. (Rizky L Pratama, 2025) Not only that, while working as a circus performer since childhood, the former worker often received exploitation ranging from not being paid, forced to perform while pregnant, physical torture such as violence, stun to vital organs, forced to eat animal feces, this torture occurred in a secret bunker in a house located in a safari park. This confession was again expressed in the report of the former OCI circus performer to the Ministry of Human Rights. Mediation was carried out, and the OCI had offered peace money of 150 million in mediation facilitated by the Governor of West Java on May 5, 2025. This mediation was then rejected by the complainants. In its development, several complainants withdrew the pretrial lawsuit against this case because they were tired and reconciled with the OCI and received compensation. (Arivin, 2025) This case has not been developed since June 2025 until now.

It is in these poor working conditions that workers have no control over their work and the results obtained through performance. The work and results of the show are completely mastered by the circus manager. The lack of access to education and the outside world for circus performers who have been taken from childhood makes workers powerless to access justice.

Modern slavery itself still occurs due to several factors. The first factor is poverty. People living in poverty often lack access to necessities (education, decent work, health). This condition makes them have no bargaining power in the employment relationship. Because of the economic pressure, they become more easily tempted by job offers with

false promises. As a result, they are vulnerable to becoming victims of forced labor, human trafficking, or labor exploitation. In another scenario, high-interest debt and economic entanglement become a gateway to exploitation and slavery. Because they are unable to pay their debts, they are forced to do work that is unreasonable. Several cases related to human trafficking also reveal the beginning of the incident, where, starting from poverty, then tempted by a high-paying job in a certain country, which makes prospective workers desperate to migrate without official documents. Poverty makes one's life choices very limited. This then forces the person concerned to enter and accept an exploitative work system.

Second, low awareness and education. Low levels of education and awareness are important factors that increase the vulnerability of individuals to modern slavery practices, such as *human trafficking*, forced labor, and labor exploitation. In academic studies, these two factors are closely related to the individual's ability to understand rights, make rational decisions, and avoid the risk of exploitation.

The third challenge is weak labor supervision and sanctions. The limited number of supervisors and funding has an impact on the number of undetected violations and the difficulty of early identification of cases of exploitation that lead to slavery (R. Dewi & Tampubolon, 2025)(Nurhayati et al., 2026). In addition, weak coordination between institutions results in a digital system that is not optimal.(Nuraeni et al., 2022) As a result, complaints and case settlements have become more difficult. Even if violations are found, the supervisor is also not authorized to immediately close the company, stop production, and impose repressive sanctions directly.(Hidayah, 2015) In addition, corruption and lack of independence are also the main factors that hinder supervision and the application of sanctions (R. Dewi & Tampubolon, 2025)

The fourth challenge is the development of new modes of crime through technology, which then leads to the phenomenon of trafficking in illegal people and labor. It has been known before that modern slavery itself comes in various forms, namely human trafficking, exploitation of migrant workers, and forced labor in extreme working conditions. The dispatch of migrant labor is often directly related to modern slavery as part of the criminal act of trafficking in persons. This is supported by the culture of people who are still interested in the opportunity to work quickly with a high income.(Nuraeny, 2015)

The final challenge is the difficulty of resolving cases. The influencing factors are the difficulty of proving because the case has been going on for a long time, the social complexity, and the psychological condition of the victim. Slavery usually occurs over a long period of time. In the case of slavery allegedly committed by OCI, even cases have been complained about since 1997, and have not found satisfactory results for the victims. During this period of time, evidence is often lost, such as documents, locations, and witnesses. In addition, the victim can only report after successfully escaping from the perpetrator, which also makes the case difficult to solve.

Social complexity where there is a bargaining position between workers and employers. Where entrepreneurs are more economically dominant, it opens up opportunities for control over the already weak supervisory system. In addition, complaints from workers are also difficult to address because of concerns about losing their source of income. Modern slavery in the form of labor exploitation to human trafficking also often involves corporations or networks of rulers that make it easy for the main perpetrators to escape from the snares of the law.(Kusnadi et al., 2022)

In addition, another inhibiting factor in the settlement of the case is the psychological condition of the victim. The victims in some cases suffered from severe trauma, anxiety, depression, to post traumatic disorder.(Ardina & Pribowo, 2023)(Subardhini et al., n.d.) As a result, it is difficult for the victim to provide consistent and detailed information about the incident. This has the potential to harm the victim at trial.

The case of modern slavery, as allegedly experienced by former OCI players, shows a deviation from the main value of Pancasila industrial relations. These values are divini-

ty in ethical and moral dimensions. Humanitarian values are an important key to anti-exploitation. The value of unity that leads to a balanced and harmonious working relationship. The value of the people is the key to opening dialogue if there is a potential conflict. As well as the value of social justice, which is the basis for the protection of workers in the legal order in Indonesia. Tripartite disharmony between workers, employers, and the government is the failure of the practice of Pancasila industrial relations. Workers have no voice, employers are dominant, and the government is weak in intervening through sanctions and surveillance.

From this case, it can be summarized that there are three main failures in the settlement of modern slavery cases in Indonesia. First, normative failure where the values in Pancasila industrial relations that are accommodated in various regulations fail to be applied. Second, structural failures where labor supervision is weak. Third, cultural failure where exploitation is considered natural and people are often tempted by the lure of fast work and large salaries. The implication of these findings is that the inhibiting factors mentioned above can be used to improve labor regulations, particularly in the area of supervision. Support for victims also requires special attention so that existing cases can be resolved and act as a deterrent to perpetrators.

4. Conclusions

Modern slavery in Indonesia is an old phenomenon that continues to develop in the form of labor exploitation due to the inequality of relations between workers and employers. Although there have been efforts to eliminate it since the colonial period until now, the practice still occurs due to weak protection and supervision. Pancasila Industrial Relations emphasizes that workers are dignified human beings, not just means of production, so it is contrary to slavery. This concept emphasizes the balance of rights and obligations as well as the role of the state in creating fair and humane working relationships. However, without effective implementation, inequality still has the potential to give birth to modern slavery practices. Modern slavery in Indonesia still occurs even though it is normatively contrary to the principles of Pancasila Industrial Relations, showing that there is a gap between law and practice. The case of the Indonesian Oriental Circus illustrates extreme exploitation that is in line with Karl Marx's theory of the inequality of relations between capital owners and workers. Factors such as poverty, low education, weak supervision, and the development of crime modes reinforce the sustainability of modern slavery practices. Case resolution is also hampered by the difficulty of proof, social complexity, and the traumatic psychological condition of the victim. Overall, modern slavery reflects a normative, structural, and cultural failure to realize fair and humane industrial relations. The implication of this finding is that the inhibiting factors above can be used to improve employment regulations, especially in the areas of worker protection and supervision. However, this research is examined from a normative perspective. Further research regarding the resolution of OCI cases could be conducted to gain perspectives from victims, perpetrators, and law enforcement. Empirical studies are needed to gain further insight into this issue.

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