

CRIMINAL LIABILITY OF STATE OFFICIALS IN HUMAN TRAFFICKING CASES TO CAMBODIA AND EFFORTS TO REPATRIATE VICTIMS

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Abstract

Human trafficking to Cambodia constitutes a transnational crime involving cross-border criminal networks and, in several cases, state officials who abuse their authority. This situation creates significant challenges for law enforcement and the legal protection of victims, particularly during the repatriation process. This study aims to analyze the criminal liability of state officials involved in human trafficking to Cambodia and to examine the effectiveness of legal protection in the implementation of victim repatriation. This research employs a normative juridical method with a descriptive qualitative approach using statutory and case approaches. The findings indicate that the criminal liability of state officials is regulated under Law Number 21 of 2007 on the Eradication of the Crime of Human Trafficking and is further strengthened by Law Number 1 of 2023 concerning the Indonesian Criminal Code. However, its implementation remains ineffective because law enforcement has not fully addressed the involvement of intellectual actors and state officials participating in these crimes. Furthermore, the repatriation process continues to face challenges, including limited inter-agency coordination, inadequate diplomatic capacity, and the suboptimal fulfillment of victims' rights. Therefore, strengthening law enforcement and improving the victim repatriation mechanism are necessary to ensure more effective legal protection for victims.

Keywords: *Criminal Liability, State Officials, Human Trafficking, Victim Repatriation.*

INTRODUCTION

Human trafficking (TPPO) is a form of transnational crime that remains a serious problem because it threatens human rights and degrades human dignity. In the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol), which complements the United Nations Convention against Transnational Organized Crime (UNTOC), human trafficking is categorized as a transnational organized crime that provides enormous economic benefits for perpetrators, on par with the illicit drug trade and arms smuggling.¹ The development of the modus operandi of TIP has undergone significant changes after the Covid-19 pandemic, as rising unemployment and economic pressures have driven many people to seek work abroad through unsafe channels.² This situation is exploited by human trafficking networks by offering high-paying jobs that ultimately lead to the exploitation of victims. In recent years, Southeast Asia, particularly Cambodia, Myanmar, and Laos, has developed into a hub for syndicates operating scam compounds, complexes used to coerce victims into online scams and illegal digital-based gambling activities. The United Nations estimates that more than 100,000 people are forced to work in these complexes for billions of US dollars annually, making Cambodia one of the centers of human trafficking under the guise of labor placement in Southeast Asia.³ Indonesia is one of the countries of origin heavily impacted by the practice of human trafficking (TPPO) to Cambodia. This situation is inseparable from the high number of productive-age residents who

¹ Pribadi, W. (2025). Reconstruction of the regulation of suspect determination in Criminal Procedure Law in Indonesia (Doctoral dissertation, Sultan Agung Islamic University, Semarang). Pp. IV-V.

² United Nations Office on Drugs. (2024). Global report on trafficking in persons 2024. Stylus Publishing, LLC. Pg. 7-12.

³ Callista, N., Sawitri, A., Roshanti, RA, Rahmawati, P., Loso, L., & Noor, GV (2025). The Urgency of Handling Human Trafficking Crimes in Cambodia According to International Law Review. Journal of Law, Public Administration and State, 2(3), 01-11. Pp. 1-2.

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have not been fully absorbed by the national labor market. Data from the Central Statistics Agency shows that the Open Unemployment Rate in August 2024 still reached 4.91%, or around 7.47 million people, while in February 2025 the number of unemployed was recorded at around 7.28 million people.⁴ This situation encourages some people to seek employment opportunities abroad, including through unofficial channels, making them more vulnerable to being targeted by human trafficking syndicates offering jobs with the lure of high salaries. This vulnerability is reflected in data from the Ministry of Foreign Affairs, which recorded approximately 7,600 cases of Indonesian citizens related to online scams abroad during the 2020–2025 period, with Cambodia being the most common destination country, with more than 4,300 cases, followed by Myanmar with around 1,100 cases. Of these, 1,508 cases have been identified as meeting the elements of human trafficking.⁵ Meanwhile, the Online Information System for the Protection of Women and Children recorded 2,377 victims of human trafficking (TPPO) between 2021 and June 2025, predominantly women and children. This increased risk is also evident in the surge in the number of Indonesian citizens arriving in Cambodia, which rose from around 2,330 in 2020 to more than 19,000 in 2024. This data indicates that increased mobility abroad has not been matched by adequate oversight and protection mechanisms, thus opening up space for the development of human trafficking practices that exploit people's economic vulnerabilities.⁶

The characteristics of victims of human trafficking (TPPO) to Cambodia show significant changes compared to trafficking patterns in previous years. While previously victims were generally low-educated women promised jobs as domestic workers abroad, syndicates now increasingly target young, productive-age individuals, particularly those with technological skills and secondary or tertiary education. Victims are recruited through job offers as customer service representatives, online scam operators, or investment marketing staff, with the promise of high salaries. However, upon arrival in their destination countries, they are forced to engage in online fraud, subject to confiscation of their passports and travel documents, and various forms of physical and psychological abuse.⁷ In some cases, victims have even died as a result of violence, workplace accidents, or health conditions that lacked proper treatment during their exploitation. This phenomenon demonstrates that TIP to Cambodia no longer only targets low-educated groups but has evolved into a crime that exploits the economic vulnerability and high demand for jobs among Indonesia's young generation.⁸ The complexity of this issue is further clarified by the fact that the continued existence of transnational human trafficking syndicates is impossible without access to state administrative and oversight systems.

Numerous cases demonstrate the involvement of certain officials in facilitating victims' departure abroad. One example is the 2023 uncovering of a kidney organ trafficking syndicate to Cambodia by the Jakarta Metropolitan Police's General Criminal Investigation Directorate, which named twelve suspects, including a member of the Indonesian National Police and an officer from the Directorate General of Immigration.⁹ The immigration officer allegedly accepted money to facilitate the victim's immigration clearance, while the police officer allegedly obstructed the investigation by ordering the destruction of evidence. A similar pattern was found in a case in South Sulawesi, where an employee of the Makassar Class I Immigration Office was arrested for allegedly manipulating passport data to facilitate the victim's departure abroad. This series of events demonstrates that the involvement of state officials is no longer incidental but has become a factor strengthening the continuity of transnational human trafficking networks, necessitating stricter and more accountable law enforcement.¹⁰

⁴ Layanto, F & Atman, W. (2025). National Security Threats: Increase in Organ Trafficking Crimes of Indonesian Citizens in Cambodia in 2022-2024. *MERDEKA: Multidisciplinary Scientific Journal*, Vol. 2, No. 6. Pp. 750-751.

⁵ Gultom, SS, & Sularto, RB (2016). The Basic Idea of Balance in Determining Suspect Status as an Object of Pretrial by the Judicial Power in Indonesia. *Law Reform*, 12(1), 101-120. Pp. 103-104.

⁶ Ministry of Foreign Affairs of the Republic of Indonesia. (2025). Performance Report of the Directorate of Protection of Indonesian Citizens in 2024. https://kemlu.go.id/files/repositori/65397/174071018667c1212ae1402_LKJ_Dit_PWNI_2024.pdf. (Accessed on March 8, 2026).

⁷ Davy, D. (2023). Casinos, cyber fraud, and trafficking in persons for forced crime in Southeast Asia: Policy report. Pg. 5-8.

⁸ Frahma, EA (2025). Legal Analysis of the Role of IOM in Supporting Indonesia and Cambodia's Efforts to Combat Human Trafficking. *Al-Zayn: Journal of Social Sciences & Law*, 3(6), 9232-9241. Pp. 75-76.

⁹ Layanto, F & Atman, W. *Op.Cit.* Pg. 752-753.

¹⁰ Sari, LK, Fastika, A., Wilujeng, PS, Agesti, V., & Defita, S. (2025). Comparison of human trafficking laws between Indonesia and Cambodia. *Journal of Critical Legal Studies*, 10(2). Pp. 3-4.

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This series of cases demonstrates that the involvement of state officials in human trafficking crimes can no longer be viewed as individual incidents, but rather reflects a lack of integrity in sectors authorized to oversee border controls and immigration administration. In fact, Article 8 of Law Number 21 of 2007 concerning the Eradication of Human Trafficking Crimes stipulates increased criminal penalties for state officials who abuse their authority, resulting in human trafficking. However, the implementation of these provisions in practice remains suboptimal because law enforcement often focuses solely on perpetrators on the ground without tracing the intellectual actors or broader networks, as highlighted by the Institute for Criminal Justice Reform (ICJR). This situation demonstrates that law enforcement against state officials involved in human trafficking still faces challenges, both in uncovering structural involvement and in providing effective criminal accountability for all parties involved in the criminal network.¹¹

The issue of human trafficking (TPPO) is not only related to criminal liability for perpetrators and state officials involved, but also concerns legal protection for victims after the rescue process, especially in the implementation of repatriation from Cambodia to Indonesia. Data from the Embassy of the Republic of Indonesia in Phnom Penh shows that from January to September 2025 there were 4,030 cases of protection for Indonesian citizens, with 3,323 of these cases related to online scam practices.¹² From a legal perspective, the rights of victims to rehabilitation, repatriation, and social reintegration have been regulated in Articles 51 to 54 of Law Number 21 of 2007 concerning the Eradication of the Crime of Trafficking in Persons and strengthened through Government Regulation Number 9 of 2008 concerning Procedures and Mechanisms for Integrated Services for Witnesses and/or Victims of the Crime of Trafficking in Persons which regulates coordination between institutions in handling victims. These regulations indicate that the state has an obligation to guarantee the protection and recovery of victims comprehensively as part of fulfilling the rights of victims of TPPO.¹³

Despite having an adequate legal basis, the repatriation of human trafficking victims from Cambodia still faces various obstacles, including the limited capacity of Indonesian diplomatic representatives to identify and reach victims, difficult access to scam compound locations, suboptimal coordination with local authorities, as well as financial constraints, loss of identity documents, and the psychological condition of victims due to exploitation. On the other hand, the fulfillment of victims' rights has also not been optimal, especially regarding the provision of restitution.¹⁴ Findings from the Institute for Criminal Justice Reform (ICJR) indicate that the majority of human trafficking cases have not been accompanied by restitution demands by the public prosecutor and only a small portion are granted by the courts. This condition indicates that there is still a gap between the provisions for victim protection in Law Number 21 of 2007, Law Number 18 of 2017 concerning the Protection of Indonesian Migrant Workers, and Law Number 31 of 2014 concerning the Protection of Witnesses and Victims and their implementation in the field, so that the effectiveness of legal protection in the repatriation process still requires strengthening through increased coordination between institutions and more optimal implementation of regulations.¹⁵

Based on the above background, the author is interested in conducting research entitled "Criminal Accountability of State Officials in the Crime of Human Trafficking to Cambodia and Efforts to Repatriate Victims", which is based on the urgency to comprehensively examine the problems of state officials' involvement in the crime of human trafficking, examine normative and institutional obstacles in law enforcement, and evaluate the effectiveness of victim repatriation mechanisms. This research is also directed at answering the demands of enforcing the principle of equality before the law, overcoming the practice of impunity, and strengthening the state's commitment to fulfilling constitutional and international obligations to ensure justice, victim protection, and the integrity of the national legal system.

¹¹ Metro TV. (2023, July 21). Police and immigration officers involved in human trafficking involving kidney sales to Cambodia. <https://www.metrotvnews.com/play/NQAC2921-oknum-polisi-dan-pegawai-imigrasi-terlibat-tpo-penjualan-ginjal-ke-kamboja>. (Accessed on May 6, 2026).

¹² Permana, D., Adi, R., Wulandari, AS, & Hikmatullah, D. (2025). The Role of the Indonesian Government's Responsibility in Providing Legal Protection to Illegal Indonesian Citizens in Cambodia Who Are Victims of Human Trafficking. *JIMU: Multidisciplinary Scientific Journal*, 3(03), 1765-1774. P. 1765.

¹³ Nasir, MAH, Amanda, PK, & Akbari, AR (2021). Gaps and Challenges in Law Enforcement of Human Trafficking Crimes: A Case Study of Nunukan Regency, North Kalimantan (Doctoral dissertation, STHI Jentera). Pp. 46-47.

¹⁴ Callista, N., Sawitri, A., Roshanti, RA, Rahmawati, P., Loso, L., & Noor, GV Op.Cit. Pg. 9.

¹⁵ Permana, D., Adi, R., Wulandari, AS, & Hikmatullah, D. *Op.Cit.* P. 1773.

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Previous Research

Several previous studies have shown that studies on the crime of human trafficking (TPPO) to Cambodia have been conducted extensively, but have a different focus from this study. The study by Karina Maulidia Kusuma et al. (2025) entitled Analysis of the Crime of Human Trafficking (TPPO) of Indonesian Citizens in Cambodia: Chronology and Legal Handling focuses on the chronology of the case, the modus operandi of online scams, and legal handling of victims. The study by Didan Permana et al. (2025) entitled The Role of the Indonesian Government's Responsibility in Providing Legal Protection to Illegal Indonesian Citizens in Cambodia Who Are Victims of Human Trafficking emphasizes the government's responsibility in providing legal protection, repatriation, rehabilitation, and international cooperation. Meanwhile, the study by Dicky Laksono, Sohirin, and Devina Yuka Utami (2025) entitled Exploitation of Indonesian Citizens in Cambodia as Online Gambling Administrators and Human Trafficking: A Legal Review of Indonesian Immigration Gaps, examines the weaknesses of the immigration system and regulations exploited in the practice of TPPO. In contrast to these studies, this study specifically analyzes the criminal liability of state officials involved in human trafficking to Cambodia, the challenges of law enforcement, and efforts to repatriate victims as part of legal protection for Indonesian citizens.

RESEARCH METHODS

The type of research used is normative juridical legal research with a descriptive qualitative approach. This research focuses on the analysis of legal norms governing the criminal liability of state officials in the crime of human trafficking (TPPO), particularly those related to the involvement of state officials in the TPPO network to Cambodia and the implementation of victim repatriation. The approaches used include a statute approach and a case approach. The research data is in the form of qualitative data obtained through a literature study of primary, secondary, and tertiary legal materials.¹⁶ Primary legal materials include Law Number 21 of 2007 concerning the Eradication of the Crime of Human Trafficking, Law Number 1 of 2023 concerning the Criminal Code, Law Number 6 of 2011 concerning Immigration, Law Number 18 of 2017 concerning the Protection of Indonesian Migrant Workers, and other relevant laws and regulations. Secondary legal materials consist of books, scientific journals, previous research results, court decisions, and official documents, while tertiary legal materials include legal dictionaries, encyclopedias, and other relevant information sources. All legal materials were analyzed qualitatively using descriptive analytical methods through the review and interpretation of legal provisions and the facts found, resulting in conclusions regarding the criminal liability of state officials and the effectiveness of the repatriation mechanism for human trafficking victims.¹⁷

DISCUSSION

How are State Officials Involved in the Crime of Human Trafficking to Cambodia Accountable?

The involvement of state officials in human trafficking (TPPO) to Cambodia demonstrates that this issue is not solely related to the crime of human trafficking, but also reflects the abuse of authority by officials who are supposed to be carrying out their function of protecting the public.¹⁸ The legal basis for the accountability of state officials is regulated in Article 8 of Law Number 21 of 2007 concerning the Eradication of the Crime of Human Trafficking, which provides for increased criminal penalties for state officials who abuse their authority resulting in TPPO. This provision requires two elements: the perpetrator's status as a state official and the abuse of authority that has a causal relationship with the crime.¹⁹ These elements are reflected in the disclosure of the kidney trafficking case to Cambodia by the Directorate of General Criminal Investigation of the Jakarta Metropolitan Police, where an Immigration officer allegedly received a reward to allow the victim to depart, as well as in the case of an employee of the Class I TPI Makassar Immigration Office who manipulated travel documents to facilitate the victim's departure abroad. However, law enforcement still tends to focus on perpetrators in the field, while the intellectual actors and broader networks have not been fully

¹⁶ Soekanto, S. (2007). Normative legal research: A brief review. P. 15.

¹⁷ Marzuki, M. (2017). *Legal research: Revised edition*. Prenada Media. P. 35.

¹⁸ Sitinjak, AP, Rifai, M., & Gustianti, NA (2025). Organ Trafficking in Cambodia: The Dynamics of Human Trafficking in Transnational Crime. *Wahana Pendidikan Scientific Journal*, 11(11. D), 1-8. Pp. 45-47.

¹⁹ Silvana Febriari. (2023, July 21). Police and immigration officers involved in human trafficking involving kidney sales to Cambodia. Metro TV News. <https://www.metrotvnews.com/play/NQAC2921-oknum-polisi-dan-pegawai-imigrasi-terlibat-tpo-penjualan-ginjal-ke-kamboja>. (Accessed June 15, 2026).

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uncovered.²⁰ The enactment of Law Number 1 of 2023 concerning the Criminal Code does not override the validity of Law Number 21 of 2007 because human trafficking remains subject to the principle of *lex specialis derogat legi generali*. The presence of the National Criminal Code actually strengthens the basis for accountability for state officials who abuse their position or authority in facilitating criminal acts.²¹ If the abuse of authority is carried out to obtain personal gain or receive rewards from a syndicate, the officials concerned can also be held accountable under Law Number 31 of 1999 concerning the Eradication of Criminal Acts of Corruption as amended by Law Number 20 of 2001, specifically Article 11 concerning the acceptance of gifts or promises due to office, and Article 3 if the abuse of authority results in state financial losses. Thus, accountability for state officials can be applied cumulatively in accordance with the elements of the proven crime.²²

Based on various uncovered cases, state officials generally do not act as the main perpetrators, but rather as parties who facilitate syndicate activities through abuse of authority, such as facilitating the issuance of travel documents, passing immigration checks, or providing protection for syndicate activities. This pattern indicates a division of roles between civilian actors as the main executors and officials who provide administrative legitimacy so that criminal acts can proceed unhindered. This involvement is influenced by various factors, including low integrity, economic motives, weak internal oversight, suboptimal coordination between institutions, and a culture of permissiveness towards abuse of authority in public services. Therefore, eradicating human trafficking (TPPO) is not only done through prosecution of perpetrators, but also requires strengthening the oversight system, improving institutional governance, and increasing the integrity of state officials to prevent abuse of authority.²³

Accountability for state officials involved in human trafficking is not limited to criminal liability but also encompasses disciplinary liability and professional codes of ethics. Criminal proceedings are carried out through general courts in accordance with criminal procedure law, while disciplinary and ethical violations are resolved based on each institution's internal regulations. These three forms of accountability are cumulative, so that the imposition of disciplinary sanctions or codes of ethics does not eliminate criminal liability.²⁴ The implementation of this mechanism embodies the principle of equality before the law, which states that any state official who abuses their position must still be held accountable for their actions in accordance with applicable law. Therefore, the enforcement of comprehensive accountability is expected to increase the accountability of state officials, strengthen public trust in law enforcement institutions, and provide a deterrent effect to prevent the involvement of state officials in transnational human trafficking networks.²⁵

How is Legal Protection Provided in Victim Repatriation?

The term repatriation comes from the Latin *repatriare* which means to return to the homeland or country of origin. In Indonesian law, the meaning of repatriation is explained operationally in the Explanation of Article 21 paragraph (1) letter h of Law Number 18 of 2017 concerning the Protection of Indonesian Migrant Workers as repatriation assistance for migrant workers who face certain circumstances in the country of placement. Law Number 6 of 2011 concerning Immigration as last amended by Law Number 63 of 2024 also recognizes repatriation as the basis for issuing a Travel Document in Lieu of a Passport which is different from deportation, because deportation is an administrative action of a

²⁰ Lazarus, L., Hidayat, MR, Aini, Q., & Zahra, RS (2026). Legal Analysis of the Limitations of Law Enforcement Against Transnational Human Trafficking Crimes (Case Study of Human Trafficking in Cambodia). *Indonesian Legal Media (MHI)*, 4(1), 448-457. Pp. 35-36.

²¹ Aliyah, P., Saputri, AFY, Saputri, AFY, & Hutapea, SA (2025). Legal analysis of the implementation of protection for victims of human trafficking in Cambodia. *Democracy: Journal of Legal, Social and Political Science Research*, 2(2). Pp. 2-3.

²² Zuliah, A., & Amalia, F. (2025). Application of the Adage *Lex Specialis Derogat Legi Generaliss* in Handling Corruption Crimes in Indonesia. *Law Journal*, 5(2), 124-135. Pp. 13-14.

²³ PONGBATTO, ET (2025). *Indonesia–Cambodia Bilateral Cooperation in Combating Human Trafficking from Indonesia* (Doctoral dissertation, Hasanuddin University). Pp. 56-57.

²⁴ Nugroho, OC (2021). State Responsibility in Handling the Crime of Human Trafficking. *De Jure Legal Research Journal*, 18(4), 543. P. 208.

²⁵ Mulya, FP (2023, June 21). National Human Rights Commission: Officials involved in human trafficking must be dealt with firmly. *ANTARA News Jambi*. <https://jambi.antaranews.com/berita/549987/komnas-ham-oknum-aparat-terlibat-tpo-harus-ditindak-tegas>. (Accessed on June 19, 2026).

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coercive nature due to immigration violations.²⁶ In the context of the crime of human trafficking (TPPO), repatriation is not only interpreted as the return of victims to their country of origin, but also becomes part of the protection of victims through rehabilitation and social reintegration as regulated in Article 51 paragraph (1) of Law Number 21 of 2007, so that its implementation must guarantee the rights of victims and prevent re-victimization.²⁷

Protection for Indonesian citizens who are victims of human trafficking abroad has a constitutional basis in Article 28D paragraph (1) of the 1945 Constitution of the Republic of Indonesia which guarantees fair protection and legal certainty. This regulation is strengthened through Law Number 21 of 2007 which provides victims with the right to obtain rehabilitation, repatriation, social reintegration, and restitution, with the implementation mechanism regulated in Government Regulation Number 9 of 2008. In addition, Law Number 18 of 2017 is the basis for protection for Indonesian migrant workers who experience problems abroad through the repatriation mechanism by BP2MI.²⁸ From the international side, Indonesia's commitment is reflected through the ratification of the ASEAN Convention Against Trafficking in Persons, Especially Women and Children (ACTIP) 2015, while for sailors and refugees the regulations refer to the Maritime Labor Convention (MLC) 2006 and Presidential Regulation Number 125 of 2016.²⁹

The repatriation of human trafficking victims is carried out through coordination between various agencies within their respective jurisdictions. The process begins with the Indonesian Embassy or Consulate General, which identifies victims, provides temporary protection, and facilitates repatriation through coordination with the Ministry of Foreign Affairs. After the victims arrive in Indonesia, the Ministry of Social Affairs, the LPSK (Lembaga Penida Negeri), and the BP2MI (Indonesian Migrant Workers Protection Agency) continue their care through rehabilitation, assistance, and social reintegration according to the victims' needs. The effectiveness of this mechanism is evident in the increasing number of Indonesian citizens successfully repatriated, from 798 in 2023 to 3,570 in 2024.³⁰

Despite having a sufficient legal basis, the implementation of repatriation of human trafficking victims still faces various obstacles, such as the lack of comprehensive technical regulations regarding voluntary repatriation, weak victim identification processes, and limited provisions regarding the right to repatriation in several national regulations. These conditions indicate the need to formulate implementing regulations based on Article 58 of Law Number 21 of 2007, which regulates technical procedures for repatriation and victim identification standards. Furthermore, it is necessary to increase the capacity of law enforcement officers through a victim-oriented approach and the use of electronic evidence in proving human trafficking cases. Post-repatriation protection also needs to be strengthened through sustainable social reintegration programs and monitoring mechanisms to prevent victims from being re-exploited.³¹ Legal protection for victims in the repatriation process is fundamentally well-founded, both in the 1945 Constitution of the Republic of Indonesia, national laws and regulations, and international legal instruments ratified by Indonesia. However, the effectiveness of its implementation is still affected by the suboptimal harmonization of regulations, coordination between institutions, and institutional capacity to provide protection and recovery for victims. Therefore, strengthening technical

²⁶ Chandra, MB, & Jamaludin, A. (2025). Legal Protection for Victims of Human Trafficking Employed on Online Gambling Sites Abroad. *Lex Generalis Law Journal*, 6(12). Pp. 116-117.

²⁷ Veda, JA, Suhendro, T., Dewayani, A., Resi, AP, & Sancaya, A. (2021). Guidelines for Handling Human Trafficking Crimes. Indonesia: International Organization for Migration (IOM) Indonesia. P. 30.

²⁸ Weriansyah, A., Assyifa, A., Rahmawati, M., Ad'har Nasir, M., Warneri, MR, Ismaya, S., & Praptadina, SB (2023). Legal Review of the Implementation of Law No. 21 of 2007 concerning the Eradication of the Crime of Human Trafficking (UU PTPPO) in Indonesia. *International Organization for Migration (IOM)*. Pp. 40-41.

²⁹ Sari, AM (2024, December 7). The repatriation of Indonesian migrant workers to their homeland in recent weeks. ANTARA News. <https://www.antaranews.com/berita/4518526/pemulangan-pmi-ke-tanah-air-dalam-beberapa-pekan-terakhir>. (Accessed on June 22, 2026).

³⁰ CNBC Indonesia. (2025, March 18). The Indonesian government repatriates 554 Indonesian citizens who were victims of online scams in Myanmar. CNBC Indonesia. <https://www.cnbcindonesia.com/news/20250318133957-4-619591/pemerintah-ri-pulangkan-554-wni-korban-online-scam-di-myanmar>. (Accessed on June 22, 2026).

³¹ Tempo.co. (2025, March 18). Ministry of Foreign Affairs explains the mechanism for repatriating Indonesian citizens who are victims of human trafficking abroad. Tempo. Accessed on June 25, 2026). <https://www.tempo.co/hukum/kemenlu-jekaskan-mekanisme-pemulangan-wni-korban-tpo-di-luar-negeri-9420>.

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regulations, improving coordination, and optimizing protection mechanisms are necessary so that the repatriation process not only focuses on the return of victims but also ensures the restoration of rights and effective social reintegration.³²

CONCLUSION

Based on the analysis and discussion, this study shows that the accountability of state officials involved in the crime of human trafficking (TPPO) to Cambodia has an adequate legal basis through Article 8 of Law Number 21 of 2007 concerning the Eradication of the Crime of Human Trafficking, which is strengthened by Law Number 1 of 2023 concerning the Criminal Code. This accountability can be imposed cumulatively through criminal, disciplinary, and ethical code channels. However, its implementation is still not optimal because law enforcement is more targeted at field actors, while the involvement of intellectual actors and officials who abuse their authority has not been fully revealed. On the other hand, the victim repatriation mechanism has a strong legal basis, both in the 1945 Constitution of the Republic of Indonesia, Law Number 21 of 2007, Law Number 18 of 2017, Government Regulation Number 9 of 2008, and international instruments such as ACTIP 2015 and MLC 2006. However, its implementation still faces various obstacles, including limited capacity of diplomatic representatives, less than optimal victim identification, ineffective inter-agency coordination, and less than optimal fulfillment of restitution and rehabilitation rights. Therefore, eradicating human trafficking to Cambodia requires consistent law enforcement against all parties involved, including state officials, accompanied by strengthening the repatriation mechanism so that the protection and restoration of victims' rights can be implemented more effectively.

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