

Social Protection Governance for Migrant Workers in Southeast Asia: A Systematic Review of Policy Design, Benefit Portability, and Access Gaps

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Abstract: Migrant workers across Southeast Asia's south-south migration corridors remain structurally exposed to social protection gaps, intensified by the COVID-19 pandemic. This systematic review, following PRISMA 2020 and a Population–Concept–Context framework, synthesizes 15 empirical studies on the design, cross-border portability, and accessibility of migrant worker social protection schemes. Findings show that scheme design remains predominantly national and bilateral, constrained by ASEAN's non-binding instruments; portability is the exception rather than the rule, undermined even in nominally portable schemes by administrative incompatibilities, with undocumented status the most severe barrier. The design–access gap is structural, arising from asymmetric institutional capacity between sending and receiving states.

Keywords: *migrant worker social protection; benefit portability; ASEAN migration governance; policy–access gap; systematic literature review*

I. Introduction

International labor migration significantly contributes to global economies while simultaneously exposing migrant workers to various vulnerabilities, particularly in social protection and welfare access. Migrants often face challenges such as limited legal and physical access to social protection systems, which can exacerbate their precarious situations in host countries (Sabates-Wheeler & Macauslan, 2007). The COVID-19 pandemic highlighted these vulnerabilities, revealing that many migrant workers, who are essential to various sectors, often lack job security, legal knowledge, and social networks, making them particularly susceptible to economic downturns (Lange et al., 2020). Additionally, while remittances sent home can enhance resilience and reduce poverty, the structural vulnerabilities created by labor market polarization and inadequate social security frameworks often outweigh these benefits (Julca, 2011; Hanechko et al., 2024). Efforts to bridge the social protection gap through international agreements have been made, yet disparities remain, necessitating innovative approaches to ensure equitable access to social rights for migrants (Cronert & Palme, 2025).

Southeast Asia's migration system is characterized by significant intra-ASEAN mobility and extensive labor outmigration, which pose challenges to existing social protection frameworks. The region has seen a rise in south-south labor migration, with ASEAN serving as a critical case study for understanding these dynamics and their

implications for sustainable development goals (Pholphirul, 2019). Despite commitments to enhance migrant worker rights, progress has been hindered by conflicting national interests and a lack of institutional capacity, reflecting deeper societal conflicts among various stakeholders (Bal et al., 2018). Furthermore, the health of migrant workers is increasingly recognized as vital for regional integration, necessitating a coordinated approach to health governance that includes diverse stakeholders (Nodzinski et al., 2016). The interplay of migration with security and stability further complicates the landscape, as states must adopt a multidimensional perspective on security that encompasses labor flows and their socio-economic impacts (Hernandez & Tigno, 1995).

Social protection governance is increasingly recognized as a vital aspect of migration governance, particularly as it influences migrants' access to welfare rights through complex multi-level regulatory frameworks. The interplay between immigration and social protection is multifaceted; for instance, while some studies indicate that immigration can strain welfare systems in the short term, others suggest that it may enhance policy generosity over time, particularly in areas like unemployment benefits and pensions (Römer, 2022). Furthermore, the transnational nature of migrants' social protection strategies highlights the importance of state regulations and civil society in shaping access to benefits, which can vary significantly based on legal status and the specific context of host countries (Faist et al., 2015; Espinoza et al., 2021). Additionally, the establishment of bilateral and multilateral social security agreements has emerged as a crucial mechanism for ensuring the portability of benefits, thereby addressing gaps in social protection for migrants (Cronert & Palme, 2025). Overall, understanding these dynamics is essential for effective migration governance and the equitable provision of social protection rights (Sabates-Wheeler & Macauslan, 2007).

The COVID-19 pandemic exposed and intensified pre-existing inequalities in migrant workers' access to health insurance, employment protection, and income security, revealing substantial discrepancies between formal policy commitments and actual service accessibility. An expanding body of empirical research has examined migrant social protection from diverse disciplinary perspectives, including labour law, public health, development studies, and migration governance, producing important yet fragmented evidence concerning policy design and implementation. Existing systematic reviews have substantially advanced understanding of migrant social protection by documenting global patterns of benefit portability and migrant health inequities, while regional empirical studies have provided valuable insights into specific governance challenges within individual Southeast Asian countries. However, previous scholarship remains limited by the absence of an up-to-date and integrative synthesis that systematically connects policy design, multi-level governance arrangements, benefit portability mechanisms, and actual access outcomes across Southeast Asia's principal migration corridors, thereby leaving significant contextual, theoretical, and evidentiary gaps in current knowledge.

The literature on social protection for labour migrants has advanced along two largely separate tracks that this systematic review seeks to bridge. On one track, global reviews of benefit portability have established that entitlement transferability is structurally uneven, with North–South migration corridors enjoying the most robust coordination mechanisms while South–South corridors—where most intra-ASEAN and Southeast Asian outbound migration falls—remain marked by limited bilateral coordination and unresolved evidentiary gaps regarding actual (as opposed to nominal) access (Taha et al., 2015). The only region-specific synthesis to date, a scoping review of universal health coverage inclusion across five ASEAN member states, found that all five countries extend some coverage to migrants but continue to face substantial implementation challenges, with the Philippines' portable-but-limited scheme and Indonesia's underdeveloped compulsory migrant insurance illustrating persistent design–implementation gaps (Guinto et al., 2015); however, this review is now a decade old and confined to the health-insurance domain alone. More recent systematic reviews have expanded methodological rigor but not regional specificity: a systematic review of structural determinants of labour migrant health equity (Evagora-Campbell et al., 2022) and a systematic review and meta-analysis of workplace mortality and its social determinants among migrant workers (Lau et al., 2024) both synthesize evidence at a global scale, without disaggregating the governance mechanisms—national scheme design, bilateral agreements, regional instruments—that structure portability outcomes in any single migration corridor. On a second, largely disconnected track, a fast-growing body of single-country and single-corridor empirical studies has emerged from

Indonesia specifically: doctrinal-empirical analysis has identified inequitable contribution distribution and insufficient transparency in Indonesia's most recent migrant social security regulation, Permenaker No. 4/2023 (Podungge & Prasetyoningsih, 2025); empirical juridical fieldwork among Indonesian migrant workers in Hong Kong found that 67.7% remain unenrolled in the BPJS Employment scheme because conflicting regulatory signals lead workers to rely on employer-provided insurance instead (Shalihah & Alviah, 2023); a qualitative-interpretive comparative study of Indonesia and Malaysia found that Indonesia's decentralized enforcement and Malaysia's centralized, pro-employer governance produce structurally different but equally incomplete protection outcomes, while its own Scopus search identified only 57 relevant documents published over nearly two decades (Kurniati & Abdillah, 2025); and a normative-juridical comparison of ASEAN and European Union frameworks attributed regional policy stagnation to the absence of binding minimum standards, weak enforcement mechanisms, and member states' resistance to supranational authority (Agusmidah et al., 2025).

Read together, this literature reveals three specific, interlocking gaps rather than a single generic absence of research. First, a contextual gap: the only dedicated Southeast Asia-wide review is outdated and restricted to health insurance, leaving employment-related social insurance and pension schemes entirely outside any systematic regional synthesis. Second, an integrative-construct gap: the global systematic reviews that meet current methodological standards (Evagora-Campbell et al., 2022; Lau et al., 2024) are not designed to connect macro-level governance choices—national legal design, bilateral MOUs, regional instruments (Agusmidah et al., 2025)—to the micro-level portability and enrollment outcomes documented in country case studies (Podungge & Prasetyoningsih, 2025; Shalihah & Alviah, 2023), leaving the causal pathway between policy design and lived (non-)access largely implicit rather than systematically synthesized. Third, an evidentiary-fragmentation gap: the empirical base itself remains scattered across single-country studies, disciplinary silos (law, health policy, development studies), and heterogeneous methods, without any synthesis that consolidates this evidence through a transparent, PRISMA-consistent selection and appraisal process. This systematic review addresses these gaps by offering the first up-to-date, methodologically systematic synthesis of empirical evidence on social protection governance for migrant workers across Southeast Asia's principal migration corridors—spanning employment-related social insurance, health insurance, and pension schemes rather than health coverage alone, and explicitly mapping how national policy design and bilateral/regional governance mechanisms interact to produce differential benefit portability.

Accordingly, this systematic review aims to synthesize empirical evidence on social protection governance for migrant workers in Southeast Asia by examining the design of social protection schemes, the mechanisms and barriers of benefit portability, and the factors underlying implementation gaps before and after the COVID-19 pandemic.

II. Methods

2.1 Review Design

This study employed a systematic literature review (SLR) design to synthesize empirical evidence concerning social protection governance for migrant workers in Southeast Asia, with particular attention to policy design, benefit portability, and service accessibility in the post-pandemic context. The review was guided by the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) framework to ensure methodological transparency, reproducibility, and rigor throughout the review process.

The review adopted a Population–Concept–Context (PCC) framework to formulate the research questions. The population comprised migrant workers, including labour migrants and overseas workers originating from or working within Southeast Asian countries. The concept focused on social protection governance, encompassing employment-related social security, health insurance, pension arrangements, legal protection mechanisms, and benefit portability across borders. The contextual focus was Southeast Asia and ASEAN migration corridors, particularly in relation to changing governance arrangements following the COVID-19 pandemic.

Accordingly, this review addressed three principal research questions: (1) how social protection schemes for migrant workers are designed through national policies and regional or bilateral governance mechanisms; (2) the extent to which social protection benefits are portable across countries and the mechanisms facilitating or constraining such portability; and (3) the factors contributing to the gap between formal policy design and migrants' actual access to social protection services before and after the COVID-19 pandemic.

2.2 Search Strategy

A comprehensive literature search was conducted in the Scopus database, which was selected because of its extensive coverage of high-quality international journals across multidisciplinary fields, including migration studies, labour studies, social policy, public health, and legal studies. The search strategy combined keywords related to migrant workers and social protection issues using Boolean operators.

The search terms included combinations of: (“migrant worker*” OR “migrant labour” OR “migrant labor” OR “labour migrant*” OR “labor migrant*” OR “overseas Filipino worker*” OR OFW OR “Indonesian migrant worker*”) AND (“social protection” OR “legal protection” OR “labour rights” OR “labor rights” OR “decent work” OR “social remittances”). To ensure that only primary empirical studies were included, review-based publications were excluded through the following operator: NOT (“systematic review” OR “systematic literature review” OR “bibliometric” OR “meta-analysis”).

Only final-stage publications indexed in Scopus were considered eligible, while no restrictions were imposed regarding open-access status. The search process was supplemented through backward reference checking of eligible studies to identify potentially relevant publications not captured during the database search.

2.3 Eligibility Criteria and Study Selection

Table 1. Eligibility Criteria for Study Inclusion

Criteria	Inclusion	Exclusion
Population	Migrant workers as the primary study population	Non-migrant populations
Concept	Social protection, labour rights, social security, health insurance, pension, legal protection	Studies unrelated to social protection
Context	Southeast Asia and ASEAN migration corridors	Studies outside Southeast Asia
Study Type	Empirical qualitative, quantitative, mixed-method, and socio-legal studies	Reviews, commentaries, editorials, theoretical papers
Publication Type	Peer-reviewed journal articles	Conference papers, books, theses, reports

The study selection process followed the PRISMA protocol and consisted of identification, screening, eligibility assessment, and final inclusion stages. After removing duplicate records, titles and abstracts were screened according to predefined eligibility criteria. Subsequently, full-text articles were assessed to determine their relevance to the review objectives.

Studies were included if migrant workers constituted the primary population of interest, if they examined social protection issues, and if they focused on Southeast Asian migration contexts. Only empirical studies employing qualitative, quantitative, mixed-method, or socio-legal approaches were retained. Studies focusing on other migrant categories, non-ASEAN contexts, or lacking empirical evidence were excluded from the review.

2.4 Quality Appraisal

To assess methodological quality and minimize the risk of bias, all included studies were critically appraised using the Joanna Briggs Institute (JBI) critical appraisal tools. Given the expected methodological heterogeneity of migration governance research, different JBI instruments were employed according to the design of each study, including qualitative, cross-sectional, case study, and mixed-method studies.

The appraisal process examined methodological congruence, appropriateness of sampling procedures, data collection methods, analytical rigor, credibility of findings, and transparency of interpretation. Quality assessment was conducted independently, and discrepancies in evaluation were resolved through iterative discussion until consensus was achieved. Studies were not excluded solely on the basis of quality scores; rather, appraisal outcomes were incorporated into the interpretation of findings and the assessment of evidence robustness.

2.5 Data Extraction

Table 2. Data Extraction Framework

Component	Description
Study identification	First author's surname and publication year
Country or migration corridor	Country, region, or ASEAN migration route examined
Research design	Qualitative, quantitative, mixed-method, or socio-legal approach
Migrant population	Type of migrant workers investigated
Social protection scheme	Employment insurance, health insurance, pension, legal protection
Governance mechanism	National, bilateral, regional, or combined governance arrangements
Benefit portability status	Portable, partially portable, or non-portable
Policy design findings	Key findings concerning institutional design and legal frameworks
Portability findings	Mechanisms facilitating or constraining portability
Implementation gaps and recommendations	Access barriers and policy recommendations

A standardized extraction form was developed to systematically collect information from all included studies. The extraction framework included bibliographic information, geographical focus, methodological characteristics, types of migrant populations, forms of social protection schemes, governance arrangements, portability status, major findings related to policy design and access barriers, and authors' recommendations. This extraction process enabled the review to compare findings across countries and migration corridors while facilitating thematic synthesis of governance mechanisms and implementation challenges.

2.6 Data Synthesis and Analysis

A narrative thematic synthesis approach was employed because of the conceptual and methodological heterogeneity among the included studies. The synthesis was conducted separately for each research question before being integrated into a broader analytical framework.

For the first research question, studies were grouped according to governance level (national, bilateral, regional ASEAN, or hybrid arrangements) and types of social protection schemes, including employment-related social insurance, health insurance, pensions, and legal protection mechanisms. Thematic coding was subsequently undertaken to identify recurring patterns concerning institutional design, legal foundations, stakeholder participation, and governance fragmentation.

For the second research question, studies were categorized based on benefit portability status, namely portable, partially portable, or non-portable arrangements. Particular attention was paid to identifying regulatory, administrative, and financial mechanisms that either facilitated or constrained cross-border portability. Comparative analysis across migration corridors was undertaken to identify geographical variations in portability outcomes.

For the third research question, findings concerning implementation gaps were synthesized to examine the relationships between policy design and migrants' actual access to social protection services. This integrative analysis enabled the identification of causal pathways linking governance arrangements, portability barriers, and differential access outcomes. Finally, policy recommendations proposed across the reviewed studies were synthesized to formulate a comprehensive governance framework for strengthening migrant social protection systems in Southeast Asia in the post-pandemic era.

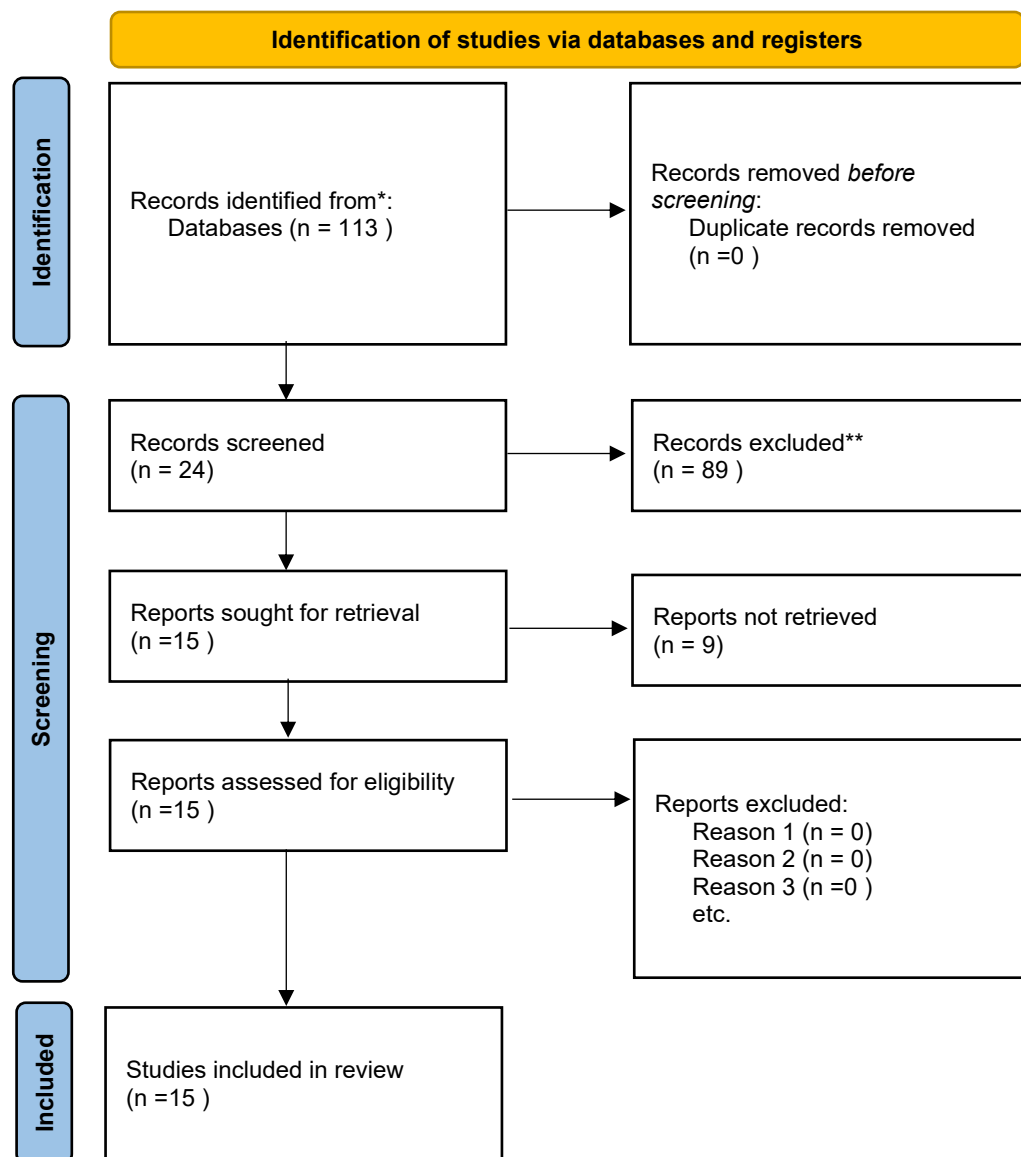
Table 3. Analytical Framework Linking Research Questions, Data Extraction Components, and Synthesis Procedures

Research Question	Extraction Components	Analytical Strategy
RQ1 Policy Design	K1, K2, K3, K5, K6, K8	Thematic governance analysis
RQ2 Benefit Portability	K2, K4, K5, K7, K9	Cross-case comparative synthesis
RQ3 Access Gap	K2, K8, K9, K10	Integrative governance analysis

III. Results

3.1 Study Selection

The Scopus search initially identified 113 records, with no duplicate records requiring removal. Following title-and-abstract screening against the PCC-based eligibility criteria, 89 records were excluded and 24 records advanced toward full-text retrieval; of these, 15 reports were successfully retrieved while 9 could not be accessed. All 15 retrieved reports were subsequently assessed for full-text eligibility and met the inclusion criteria, with no further exclusions at this stage. The final review therefore comprises 15 empirical studies. The complete identification, screening, and inclusion process is presented in the PRISMA 2020 flow diagram (Figure 1).



*Consider, if feasible to do so, reporting the number of records identified from each database or register searched (rather than the total number across all databases/register).

**If automation tools were used, indicate how many records were excluded by a human and how many were excluded by automation tools.

Figure 1. PRISMA 2020 flow diagram of study identification, screening, and inclusion.

3.2 Characteristics of Included Studies

The 15 included studies were exclusively qualitative in design, employing case study, in-depth interview, focus group discussion, participant observation, document analysis, and doctrinal or socio-legal analysis, either singly or in combination; no quantitative or mixed-method study met the eligibility criteria. Geographically, the Indonesia–Malaysia corridor dominated the evidence base (n = 8), followed by Indonesia–Philippines–ASEAN (n = 2) and single studies situated in Indonesia–Hong Kong, Indonesia–United Arab Emirates, and Indonesia

considered independently of a specific destination country. Migrant domestic workers constituted the most frequently examined population, alongside undocumented workers in the palm-oil, construction, and informal service sectors, and, in one study, the children of migrant workers rather than migrants themselves (Kristina & Jumali, 2025). Governance arrangements were predominantly framed at the national–bilateral level ($n = 9$), with a smaller subset extending to regional ASEAN instruments ($n = 4$) and international conventions ($n = 2$). Full study-level characteristics are summarized in Table 4 (see separate Tables file).

3.3 RQ1: Design of Social Protection Schemes

Across the included studies, social protection design for migrant workers emerged as a predominantly national undertaking, layered with bilateral instruments and, less consistently, regional ASEAN frameworks. At the national level, Indonesia's principal legal anchors were Law No. 18/2017 on the Protection of Indonesian Migrant Workers (Jaelani, 2025; Farida, 2025; Rahayu et al., 2024) and Permenaker No. 4/2023, which formalized BPJS Ketenagakerjaan coverage for migrant workers on gotong-royong, non-profit, and portability principles (Podungge & Prasetyoningsih, 2025). At the regional level, ASEAN's normative architecture—the 2007 Cebu Declaration and the 2017 ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers—was consistently characterized as non-binding and constrained by the principle of non-intervention, leaving enforcement to individual member states (Agusmidah, 2025; Suyahman, 2025).

A recurring design weakness concerned the mismatch between formal entitlement and sectoral coverage. Domestic work, in particular, was repeatedly excluded or under-specified in national labour law, both in Indonesia and in destination countries such as Malaysia and Singapore (Jaelani, 2025; Suyahman, 2025). Where social insurance schemes existed, their financing design placed the contribution burden predominantly on workers themselves, with limited transparency and overlapping regulation (Podungge & Prasetyoningsih, 2025). In several studies, protection design extended beyond state instruments into informal and community-based arrangements, most notably kinship-based caregiving structures for the children of migrant workers grounded in Madurese *tanèyan lanjhang* tradition (Kristina & Jumali, 2025), and revitalized primordial community networks that functioned as an informal protective layer for domestic workers in Hong Kong (Dadan et al., 2026). Faith-based and pararegulatory approaches were also documented, including a *maqasid*-based employment-*fiqh* education module developed to complement, though not substitute for, formal legal protection in the United Arab Emirates (Chanifah, 2026).

3.4 RQ2: Cross-Border Portability of Social Protection Benefits

Explicit evidence on benefit portability was scarce: only 5 of the 15 studies reported a determinate portability status, while the remaining 10 did not address portability directly or reported it only as an unrealized policy aspiration (Figure 2; Table 5, see separate Tables file). Among the determinate cases, a single scheme—BPJS Ketenagakerjaan under Permenaker No. 4/2023—was characterized as portable in principle, although its implementation was constrained by cross-country differences in health-system administration, difficulties in claiming benefits denominated in Indonesian rupiah, and incomplete integration of public health services between sending and receiving countries (Podungge & Prasetyoningsih, 2025). Health-insurance portability for domestic workers under ILO Convention 189 was described as only partially achieved, hindered by the absence of robust bilateral agreements in several destination countries and by jurisdictional divergence that constrains claims made abroad, such as in Taiwan (Liem et al., 2024). By contrast, three studies reported explicit non-portability, concentrated among undocumented workers: without legal status, workers in Sarawak's palm-oil sector had no formal access to health services or social insurance across borders and instead relied on employer dependency or, in the case of maternal care, return travel to Indonesia to obtain services (Somiah et al., 2025; Santosa et al., 2024). At the regional level, Agusmidah (2025) situated the absence of portability within the wider absence of a binding reciprocity instrument among ASEAN member states.

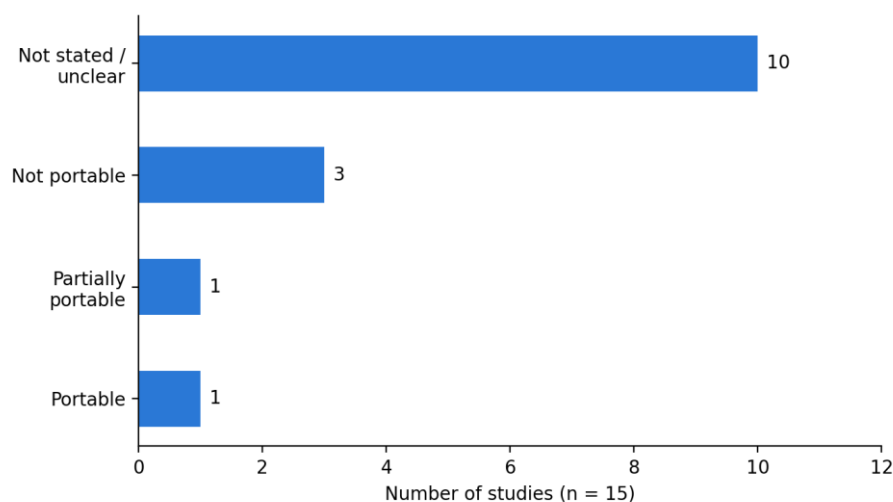


Figure 2. Benefit portability status distribution across included studies (n = 15).

Where mechanisms constraining portability were discussed, they clustered into three interlocking categories. Regulatory barriers were the most prominent, comprising the absence of binding reciprocity or bilateral social-security agreements (Agusmidah, 2025; Liem et al., 2024), memoranda of understanding rendered practically non-binding by divergent legal traditions—common law versus civil law—between Indonesia and destination states (Farida, 2025), and weak regional enforcement mechanisms such as AICHR (Suyahman, 2025). Administrative-technical barriers included fragmented inter-agency coordination (Jaelani, 2025), incompatible health-administration systems and currency-denominated claims processes (Podungge & Prasetyoningsih, 2025), and the absence of effective dispute-resolution mechanisms (Harahap et al., 2024). Status- and documentation-based barriers were the most severe in effect, as undocumented status foreclosed access to any cross-border benefit altogether, compounded by employers' withholding of identity documents and workers' limited awareness of formal complaint channels in destination countries (Chanifah, 2026; Somiah et al., 2025; Harahap et al., 2024).

3.5 RQ3: Gaps Between Policy Design and Actual Access

The synthesized evidence points to a consistent implementation gap between the formal design of social protection instruments and migrant workers' lived access to them, evident both before and after the COVID-19 pandemic. This gap was most acute for undocumented and irregular migrant workers, for whom formal entitlements were, in practice, non-existent regardless of nominal coverage (Somiah et al., 2025; Santosa et al., 2024; Rahayu et al., 2024). Language barriers—particularly Cantonese, English, and Mandarin proficiency among Indonesian domestic workers in Hong Kong—and low legal literacy further constrained workers' capacity to exercise the rights formally available to them (Dadan et al., 2026; Podungge & Prasetyoningsih, 2025). At the institutional level, decentralized enforcement in Indonesia combined with centralized, employer-oriented administration in Malaysia was found to produce structurally different yet equally incomplete protection outcomes on either side of the corridor (Harahap et al., 2024). Legal-normative incongruence between Indonesia's national labour regulation and ratified ILO conventions—including Conventions No. 87, 98, and 189—was also identified as a source of implementation ambiguity, compounded by limited judicial familiarity with the public character of international labour law (Mofea, 2024; Liem et al., 2024). Authors' recommendations converged on several policy directions: strengthening village-level implementing regulations (Peraturan Desa) to extend protection from the point of origin (Farida, 2025); upgrading bilateral memoranda of understanding into binding agreements (Farida, 2025; Harahap et al., 2024); accelerating ratification of ILO Convention 189 and passage of Indonesia's long-stalled domestic workers' bill (RUU PPRT) (Liem et al., 2024); and adapting functional elements of the European Union's portability model—regional minimum standards and a dedicated labour-dispute mediation facility—to the ASEAN context (Agusmidah, 2025).

IV. Discussion

4.1 Opening Synthesis: Design, Portability, and Access as a Single Governance Continuum

This review set out to answer three interrelated questions concerning the design of social protection schemes for migrant workers in Southeast Asia, the extent and mechanisms of cross-border benefit portability, and the factors underlying the gap between formal policy design and migrants' actual access to protection. The synthesized evidence indicates that these three questions cannot be meaningfully separated: they describe a single governance continuum rather than three independent policy domains (Cronert & Palme, 2025). A scheme that is formally designed to be portable, such as Indonesia's BPJS Ketenagakerjaan coverage for migrant workers under Permenaker No. 4/2023, nonetheless fails to deliver portability in practice because of downstream administrative and technical constraints (Podungge & Prasetyoningsih, 2025). This finding provides direct empirical support for the conceptual claim advanced by Sabates-Wheeler et al. (2011) that portability is not an inherent property of a scheme's legal architecture but an emergent outcome of the interaction between design, administrative capacity, and the migrant's own legal status. Consistent with Faist et al. (2015), the evidence gathered here shows that access to entitlements is shaped as much by state regulation as by the informal, non-state arrangements that migrants and their families construct to compensate for gaps in formal coverage.

4.2 Interpretation of RQ1: The Architecture of Social Protection Design

The included studies converge on a pattern in which social protection design for Southeast Asian migrant workers is anchored predominantly at the national level, layered with bilateral instruments, and only loosely supplemented by regional ASEAN frameworks (Agusmidah, 2025; Farida, 2025). This pattern is consistent with the broader literature on ASEAN migration governance, which has repeatedly characterized the region's principal normative instruments—the 2007 Cebu Declaration and the 2017 ASEAN Consensus on the Protection and Promotion of the Rights of Migrant Workers—as non-binding and dependent on the voluntary compliance of member states (Bal & Gerard, 2018; Suyahman, 2025). Auethavornpipat (2017) similarly demonstrates that ASEAN's migrant-rights instruments function primarily as vehicles for norm socialization rather than as enforceable legal obligations, a dynamic that reflects the structural logic of the “ASEAN Way,” in which non-intervention and sovereignty preservation are prioritized over supranational enforcement (Bal & Gerard, 2018). Within this architecture, a recurring and consequential design flaw is the systematic exclusion or under-specification of domestic work in national labour law, both in Indonesia and in destination states (Jaelani, 2025). This finding echoes global evidence that domestic workers remain among the categories of labour most frequently exempted from standard employment protections, notwithstanding the existence of ILO Convention 189 on Decent Work for Domestic Workers (Kwak & Wang, 2022).

A further pattern that deserves theoretical attention is the emergence of protection mechanisms that operate entirely outside the state. Where formal design failed to reach vulnerable populations, informal and community-based arrangements filled the resulting vacuum: kinship-based caregiving structures grounded in Madurese *tanèyan lanjhâng* tradition provided psychological and economic support for the children of migrant workers (Kristina & Jumali, 2025), while revitalized primordial community networks functioned as a *de facto* protective layer for Indonesian domestic workers in Hong Kong (Dadan et al., 2026). Such findings resonate with Saksela-Bergholm's (2019) demonstration that remittances and caregiving arrangements constitute a form of informal social protection precisely in contexts where formal welfare systems fail to reach transnational families, and with the broader theorization of migrants' transnational social protection strategies as a necessary complement to, rather than a simple substitute for, state-based entitlement (Faist et al., 2015). Read together, these findings extend the contextual scope of Guinto et al.'s (2015) decade-old scoping review of ASEAN health-coverage inclusion, which was confined to the health-insurance domain alone, by showing that the same pattern of state under-provision and informal compensation recurs across employment, legal, and psychosocial protection domains.

4.3 Interpretation of RQ2: Why Portability Remains the Exception Rather than the Rule

A striking feature of the evidence base is that only five of the fifteen included studies reported a determinate benefit-portability status; the remaining ten either did not address portability directly or discussed it only as an unrealized policy aspiration. This scarcity is itself a substantive finding rather than a limitation to be explained away: it suggests that portability has not yet matured into a standard analytical category within empirical research on Indonesian migrant workers, in contrast to its long-established status as a core construct in the global social-security literature (Sabates-Wheeler et al., 2011; Taha et al., 2015). Among the determinate cases identified in this review, the three categories of constraining mechanism—regulatory, administrative-technical, and status/documentation-based—exhibited a clear hierarchy of severity. Documentation status proved the most determinative: undocumented workers in Sarawak's palm-oil sector had no formal access to health services or social insurance whatsoever, irrespective of how any given scheme was nominally designed, and instead depended on employer discretion or, for maternal care, on return travel to Indonesia (Somiah et al., 2025). By contrast, administrative-technical barriers constrained portability even for workers who were formally covered: incompatible cross-country health-administration systems and currency-denominated claims processes undermined the practical portability of BPJS Ketenagakerjaan, a scheme explicitly designed around the portability principle (Podungge & Prasetyoningsih, 2025).

These region-specific findings provide empirical grounding for the global claim, advanced by Taha et al. (2015), that entitlement transferability is structurally uneven across migration corridors, with South–South corridors—precisely the corridors examined in this review—remaining marked by limited bilateral coordination relative to the more robust mechanisms available in North–North contexts such as the European Union's Regulation (EC) No. 883/2004 coordination system (Verschuere, 2020). Where the EU model relies on binding coordination rules that guarantee the aggregation of contribution periods and the cross-border export of benefits (Verschuere, 2020), the Southeast Asian evidence synthesized here shows portability being negotiated, case by case, through memoranda of understanding that are frequently rendered non-binding in practice by divergent legal traditions between sending and receiving states (Farida, 2025). Health-insurance portability for domestic workers under ILO Convention 189 was similarly found to be only partially achieved, constrained by the absence of robust bilateral agreements and by jurisdictional divergence that limits claims made abroad (Liem et al., 2024)—a pattern consistent with the broader finding that ratification of C189 has proceeded unevenly across labour-sending regions in Asia (Kwak & Wang, 2022).

4.4 Interpretation of RQ3: The Design–Access Gap as a Structural, Not Incidental, Outcome

The evidence synthesized for the first two research questions converges on a third and integrative finding: the gap between formal policy design and migrants' actual access to protection is not an incidental implementation failure but a structural outcome of institutional asymmetry between sending and receiving states. Harahap et al. (2024) illustrate this asymmetry directly, showing that Indonesia's decentralized enforcement of labour regulation and Malaysia's centralized, employer-oriented administrative apparatus jointly produce protection outcomes that are structurally different yet equally incomplete on either side of the corridor. This institutional mismatch is consistent with comparative evidence from East Asia showing that even relatively well-resourced receiving states adopt differentiated regulatory regimes that systematically disadvantage lower-skilled migrant workers relative to their higher-skilled counterparts (Kwak & Wang, 2022). Beyond the macro-institutional level, the reviewed studies identify micro-level mechanisms that translate structural asymmetry into individual-level non-access: language barriers, particularly Cantonese, English, and Mandarin proficiency among Indonesian domestic workers in Hong Kong, and low legal literacy regarding rights and complaint mechanisms substantially constrain workers' capacity to exercise entitlements that are, on paper, already available to them (Dadan et al., 2026; Chanifah, 2026). This multi-level pattern corroborates Chan et al.'s (2024) scoping-review finding that weak governance and poor healthcare access are among the most consistently reported social determinants of migrant domestic worker health and well-being across the Western Pacific region. Legal-normative incongruence compounds this gap further:

Indonesia's national labour regulation remains only partially aligned with ratified ILO conventions, including Conventions No. 87, 98, and 189, a misalignment compounded by limited judicial familiarity with the international character of labour law (Mofea, 2024).

4.5 Theoretical and Conceptual Contribution

Beyond its empirical synthesis, this review makes an explicit conceptual contribution to migration-governance scholarship. The evidence gathered here supports a shift away from treating benefit portability as a static, binary property of a scheme—portable or non-portable—toward a stratified and contingent model in which portability is realized differentially depending on the interaction of policy design, administrative capacity, and individual legal status (Sabates-Wheeler et al., 2011; Podungge & Prasetyoningsih, 2025; Somiah et al., 2025). This reconceptualization responds directly to the integrative-construct gap identified at the outset of this review: whereas prior global systematic reviews meeting current methodological standards, such as those of Evagora-Campbell et al. (2022) and Lau et al. (2024), were not designed to connect macro-level governance choices to micro-level portability and enrollment outcomes, the present synthesis demonstrates empirically that this causal pathway can be traced within a single set of migration corridors when the evidence base is deliberately triangulated across disciplinary silos (Kurniati & Abdillah, 2025).

4.6 Practical and Policy Implications

The findings support policy recommendations that are specific to the governance level at which each mechanism operates, rather than generic calls for “stronger protection.” At the regional level, the functional adaptation of selected European Union practices—harmonized minimum standards, a regional labour-dispute mediation facility, and a stronger institutional mandate for existing human-rights mechanisms such as AICHR—offers a pathway for strengthening ASEAN's currently non-binding architecture without requiring a wholesale transfer of EU supranational authority, which would be inconsistent with the ASEAN Way (Agusmidah, 2025; Bal & Gerard, 2018). At the bilateral level, the evidence supports upgrading existing memoranda of understanding into legally binding agreements that explicitly address benefit portability rather than confining themselves to worker-flow procedures (Farida, 2025; Harahap et al., 2024), a step broadly consistent with the EU's own historical trajectory toward the binding coordination regime now codified in Regulation (EC) No. 883/2004 (Verschuere, 2020). At the national level in Indonesia, the findings support accelerating ratification of ILO Convention 189 and passage of the long-stalled domestic workers' bill (RUU PPRT) (Liem et al., 2024), alongside strengthening village-level implementing regulations (Peraturan Desa) as an early point of entry for migrant protection prior to departure (Farida, 2025). Finally, at the level of technical implementation, the evidence points to the need for integrated cross-border health-administration systems and multi-currency claims infrastructure, without which even well-designed, nominally portable schemes such as BPJS Ketenagakerjaan will continue to underperform their own stated objectives (Podungge & Prasetyoningsih, 2025).

4.7 Strengths and Limitations of the Review

This review's principal strengths lie in its explicit Population–Concept–Context framework, its adherence to the PRISMA 2020 reporting protocol, its use of design-specific JBI quality-appraisal instruments suited to a methodologically heterogeneous evidence base, and its treatment of policy design, portability, and access as an explicitly integrated analytical continuum rather than three disconnected literatures. Several limitations, however, warrant explicit acknowledgement. First, the search was confined to a single bibliographic database, Scopus. Second, all fifteen included studies employed qualitative or doctrinal-legal designs, indicating a genuine gap in the empirical evidence base for this topic rather than a limitation of the review methodology itself. Third, explicit portability data were available in only five of the fifteen included studies, which constrains the generalizability of the RQ2 findings. Fourth, pension and old-age benefit schemes were addressed in only two of the fifteen studies,

leaving the evidentiary basis for pension-specific conclusions comparatively thin relative to health insurance and employment-related protection.

4.8 Directions for Future Research

Building on these limitations, three directions for future research follow directly from the evidence synthesized here. First, there is a clear need for quantitative and mixed-method studies that measure portability outcomes directly—for example, enrollment continuity, claims-processing time, and benefit-value retention across borders. Second, longitudinal research tracking the same cohorts of migrant workers before and after the COVID-19 pandemic would allow the pandemic-related shifts implied by several included studies to be tested directly rather than inferred retrospectively (Chan et al., 2024). Third, multi-corridor comparative research examining Indonesia alongside other major Southeast Asian sending countries, such as the Philippines and Vietnam, would help establish whether the ASEAN Way dynamics identified here (Bal & Gerard, 2018; Auethavornpipat, 2017) generalize across the region's principal migration corridors or are instead corridor-specific artifacts of the Indonesia–Malaysia relationship that dominates the current evidence base.

V. Conclusion

This systematic review synthesized empirical evidence from fifteen qualitative and socio-legal studies to examine how social protection schemes for migrant workers in Southeast Asia are designed, the extent to which resulting benefits are portable across borders, and the factors that separate formal policy commitments from migrants' actual access to protection. Three conclusions follow directly from this synthesis. First, social protection design in the region remains overwhelmingly national and bilateral in character, constrained by ASEAN's non-binding regional architecture and by the persistent exclusion of domestic work from mainstream labour-law protections, a pattern that has driven the emergence of informal, community-based protection mechanisms as a functional substitute for state provision. Second, cross-border portability of benefits remains the exception rather than the rule: where portability is achieved even in principle, as in Indonesia's BPJS Ketenagakerjaan scheme, its realization in practice continues to be undermined by administrative and technical incompatibilities between sending and receiving states, while documentation status functions as an even more determinative barrier that forecloses access altogether for undocumented workers. Third, the resulting gap between policy design and lived access is not incidental but structural, produced by the interaction of asymmetric institutional capacity between Indonesia and its principal destination countries with micro-level barriers of language, legal literacy, and documentation.

Taken together, these findings substantiate this review's central conceptual claim: that policy design and benefit portability constitute a single governance continuum rather than separable stages of migration policy, and that treating them as such—both analytically and in policy formulation—is necessary to close the gap between what social protection systems promise and what migrant workers are able to obtain. For ASEAN and its member states, the evidence points toward a pragmatic, incremental strategy: adapting selected functional elements of more binding regional models without requiring a wholesale departure from the ASEAN Way, upgrading bilateral instruments into enforceable agreements, and investing in the administrative infrastructure without which even well-intentioned national reforms, such as Indonesia's Permenaker No. 4/2023, cannot deliver on their portability promise.

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