

## Comparison of Immigration Laws between Singapore and Indonesia related to Passports (Legal Comparative Study)

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### Abstract

They are based on the Henley Global Passport Ranking Index; Indonesia's passport is 68th with 76 country visa-free visits. Meanwhile, Singapore's passport is in 1st place with 193 countries' visa-free visits. Singapore has its passport regulations, while Indonesia still has ministerial regulations; with that difference, there's a hypothesis that regulations can affect passport strength. The purpose of this research is to find and analyze the differences between the Singapore Constitution and Indonesia Constitution-related passports and to find and analyze the reasons for the weaknesses of the Indonesia Passport compared to the Singapore Passport. The Author uses juridical normative as the research method. The countries' constitutions are the same, but the weak regulations of Indonesia affect the right of mobility, thus leading to the implication of limited access to certain countries. The five main reasons for Indonesia's weak passport are the number of free-visa visits to countries, diplomatic relations, the country's economy and state welfare, crime rate, and reciprocity factor.

### Keywords

Comparative; Immigration Constitutions; Passport



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## INTRODUCTION

Indonesian passports are regulated in Law Number 6 of 2011 concerning Immigration; Article 1 number 1 states that Immigration is a matter of traffic of people entering or leaving Indonesian territory and its supervision to maintain the upholding of state sovereignty. Next, it is explained in Article 1 number 3, which states that the function of Immigration is part of the affairs of the state government in providing Immigration services, law enforcement, state security, and facilitators of community welfare development (Maharani and Sari, 2021).

Indonesian citizens or citizens who want to travel abroad need a Travel Document of the Republic of Indonesia, consisting of a passport and a Laksana Travel Document.

The immigration office makes passports; in addition to having a function as the holder's identity, passport holders also receive protection from Indonesian citizens and legal certainty even though they are abroad. One of the advantages of having a passport as an Indonesian citizen is the validity period of the Indonesian passport, which has now been extended from the original five years to 10 years; based on data from the web *Henley Passport Index*, the Indonesian passport has a list of 76 visa-free countries (Ghasemaghaei & Turel, 2021). Passport issuance is one of the important public services provided by the immigration office. However, passport services still need to address some obstacles, such as long queues and convoluted procedures (Agustin & Tarigan, 2022; Judijanto et al., 2022). Efforts to provide the best passport services have been carried out through efforts to add hardware and software to the server of the Directorate General of Immigration (Nearby, 2017).

According to the web *Henley Passport Index Global Passport Ranking 2023*, each country has a passport position order based on the number of visa-free countries obtained by passport holders; the order is based on data from the *International Air Transport Authority (IATA)*. Of the total 199 passport countries on the list, Indonesian passports are number 68, with 76 visa-free countries. Singapore is in first place, with 193 visa-free countries, and Japan is in second place, with 190 visa-free countries. A visa is a permit (approval) for entry in the form of a stamp and a paraphrase affixed by the representative official concerned with the applicant's passport (Handayani & Nur, 2019).

As the first holder of the country with the strongest passport, Singapore is a country that adheres to the *common law* a written law related to passports, namely *the Passport Act 2007 (Act 33 of 2007)* Where, which discusses various rules and requirements for documents related to immigration and passports, followed by regulations in the form of *2008 Revised Edition Passport Act (Chapter 220)* which previously existed *1985 Revised Edition Passport Act (Chapter 220)* which contains legal procedures related to passports and their issuance (Adhicandra et al., 2024; Pasuni, 2018).

The purpose of this study is to find out and analyze the differences between Singapore Law and Indonesian Law related to passports, as well as to find out and analyze the causes of the weakness of Indonesian passports compared to Singapore. The research will be conducted using a literature study based on written data obtained related to an overview of passports in Indonesia, an overview of passports in Singapore, an overview of visas, Indonesian passport regulations, and the *Singapore Passport Act*. Hopefully, this study will provide benefits, become a reference for future similar

research, and provide an overview of the differences in passport laws in Indonesia and Singapore.

## **METHOD**

This study uses normative research methods. The main characteristics of normative juridical law research in conducting legal studies are: The main source is legal material, not social data or facts, because, in normative law research, the studied is legal material that contains normative rules (Kelsen, 2019). The source of data was obtained with secondary data consisting of primary legal materials, which include laws and regulations, in this case Law No.6/2011, Government Regulation No.28/2019, Permenkumham No.8/2014, Permenkumham No.18/2022, *Passport Act 2007 (Act 33 of 2007)*, and *2020 Revised Edition Passport Act 2007*; Secondary legal materials are legal materials obtained indirectly including literature such as journals, books and other laws and regulations that support this research (Hasan, 2022). In terms of its nature, this research is descriptive, with a Legislative Approach and a Comparative Approach. As with "Comparative Religion," it is translated into Indonesian with "Comparative Religion." Some experts translate "Comparative Education" into Indonesian with "Comparative Education." However, the two terms show the same meaning: comparative studies (comparative studies). The comparative elements of the law of related/similar legal orders according to their nature are very acceptable because they are very helpful to obtain clarity to find out how in countries with state structuring systems (*Constitution*), levels of development and comparable socio-economic conditions.

## **FINDINGS AND DISCUSSION**

### **Findings**

#### **3.1 Singapore and Indonesia Legal Arrangements Related to Passports**

##### **a. Singapore's legal system and its influence**

Based on its history, Singapore was under British colonization, and the British adhered to the legal system *Anglo Saxon*. Legal system *Anglo-Saxon* has historical roots in the United Kingdom, which makes court decisions its legal basis, where when a judge decides a case, the decision is not only binding on the litigants but also applies generally to similar cases (Madaninabawi & Hafidz, 2021). The Common Law system is based on jurisprudence, namely the decisions of previous judges, which then become the basis for the decisions of subsequent judges (Asfahani et al., 2023; Loim et al., 2023). The highest source of law is a societal custom developed in court or has become a court decision (Simanullang & Iftitah, 2017).

There is a hierarchy of courts in Singapore, and these judge-made legal decisions are found in both the High Court of Singapore, the District Court, and the *Magistrate Court* of Singapore. Singapore and other countries that adhere to *the Anglo-Saxon* legal system usually still have written laws or *statutes* to limit the creation of laws that judges mostly make.

b. Indonesia's legal system and its influence

While Indonesia has historically been under the rule of the Netherlands and Japan, both countries adhere to the legal system of *civil law*. This legal system acquires binding force because the form of the law is written and is systematic, complete, and complete in codification (Arianti, 2019). The characteristic of the Civil Law system is that it has a codification or legal record that maintains the law as a basis or means for judges to act and enforce the legal system recorded in the law (Lestari, 2018). Existing laws bind the nature of judges; the legal system in Indonesia is famous for the phrase "There is no law but law." The sources of law in Civil Law usually include laws, jurisprudence, and customs that do not contradict the law.

c. Old Singapore passport laws and regulations are still in force.

The first passport and travel document legislation created after Singapore's independence was the *Passport Act 1970 Chapter 220 (Act 51 of 1970)*, issued in 1970. Then, a revised version of the law was issued in 1985, namely *the 1985 Revised Edition Passport Act Chapter 220*, followed by the second revision, namely *the 2008 Revised Edition Passport Act Chapter 220*, which is still in effect today. In 2007, Singapore made another additional passport and travel documents law, *the Passport Act 2007 (Act 33 of 2007)*. Then, it was updated to *the 2020 Revised Edition Passport Act 2007*; in this revision, the average articles regulated are similar to *the 2008 Revised Edition Passport Act Chapter 220* with renumbering and correcting punctuation, adding new articles, and word replacement. The Singapore government also publishes *gazette notifications* and amendments, *which* are official announcements or news issued by the government or the country through newspapers or official *websites*.

d. Old laws and regulations related to Indonesian passports and those that are still in force

Indonesia does not have laws specifically made to regulate passports, but articles related to passports are regulated in several regulations and laws. Disharmony between law and regulation and other regulations at the same or different levels will cause complex problems (Ristanti, 2015). In implementing the State Constitutional System of the Republic of Indonesia, laws and regulations are part of the National Legal System. Indonesian laws that discuss passports include Law of the Republic of Indonesia

Number 6 of 2011 concerning Immigration (Law No.6/2011), previously there was Law Number 9 of 1992 concerning Immigration, and Law Number 37 of 2009 concerning the Stipulation of Government Regulations instead of Law Number 3 of 2009 concerning amendments to Law No.9/1992 concerning Immigration into Law (Mandagie, 2020).

The cost of making a passport is regulated in the Attachment to Government Regulation Number 28 of 2019 concerning Types and Tariffs on Types of Non-Tax State Revenue Applicable to the Ministry of Law and Human Rights (PP No.28/2019). Then, the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 8 of 2014 concerning Ordinary Passports and Travel Documents in the Manner of Passports (Permenkumham No.8/2014) which discusses in more detail related to passport law, with one amendment, namely the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 18 of 2022 concerning Amendments to the Regulation of the Minister of Law and Human Rights of the Republic of Indonesia Number 8 of 2014 concerning Ordinary Passports and Travel Documents in the Manner of Passports (Permenkumham No.18/2022).

### ***3.2 Differences in Legal Arrangements between Singapore and Indonesia regarding Passports***

In this discussion, the author compares the articles in Singapore's legislation with those in Indonesian legislation related to passports.

a. Rules and procedures in applying for passport issuance;

1) Rules and procedures for applying for the issuance of a Singapore passport.

Singapore regulates it in the *2020 Revised Edition Passport Act 2007*, but complete information can be seen through the official ICA website, which is at [www.ica.gov.sg](http://www.ica.gov.sg). The requirements for a passport application to be approved are according to *the 2020 Revised Edition Passport Act 2007* Article 6, which states that the passport application must be in the form of an approved form, accompanied by the applicant's details such as personal identification and other documents, and with a specified fee. Immigration officers must also ensure that the person applying for a diplomatic or official passport is the correct Singaporean citizen traveling diplomatically or officially. A passport can be issued based on the purpose of making a diplomatic passport or an official passport or based on other conditions if the immigration officer wishes to do so in a particular case. Before the passport is issued, the immigration officer may ask the applicant to provide a security deposit or deposit.

Then the requirement to apply for a passport for children under 16 years old is that the child must have a guardian or companion who is responsible for the child; the child must also get permission from the guardian or companion under the approval of *the Director-General of Social Welfare*, or by a court order authorizing the child to travel internationally (Aswanto and Wilma Silalahi, 2021). Then, fill out the personal data form *Online* or *offline*. This form can be downloaded on the ICA Passport Registration website, and then send the completed form with a photo to the ICA office building or *Online* using Singpass and MyICA accounts; the application process is *Online*, which also makes it easier for Singaporean citizens who are outside the territory of Singapore.

b. Procedures and making a passport in Indonesia

This is regulated in Permenkumham No.8/2014 and its addition, namely Permenkumham No.18/2022. Indonesia has two types of passports, namely electronic and non-electronic passports; applications for both passports can be made in Indonesian territory or outside Indonesian territory, and passports are issued using the Immigration Management Information System. Passport applications can also be made manually and electronically; passports are made for different purposes and types, so the requirements differ. Indonesian citizens who are in the territory of Indonesia who want to have an ordinary passport can do so by filling out a data application and attaching a complete document consisting of A valid identity card, Family card, Birth certificate, marriage certificate, marriage book, diploma, or baptismal certificate; Indonesian citizenship letter for foreigners who obtain Indonesian citizenship through citizenship or submission of a statement to choose citizenship by the provisions of laws and regulations; Letter of determination of name change from the authorized official for those who have changed their name; and old ordinary passport for those who already have an ordinary passport.

Meanwhile, applicants who are outside the territory of Indonesia can apply to the Minister or Immigration Officer appointed to the Representative of the Republic of Indonesia by filling out the data application and attaching the requirements of the local country's resident card, evidence, instructions, or information showing that the applicant resides in the country; and Old ordinary passport (Waham et al., 2023; Widanarti, 2018). The Directorate General of Immigration, in its efforts to maximize services to the community by optimizing the rapid development of technology, issued a new innovation in the form of an online passport application system.

Regarding the creation of a child's passport, an application can be submitted to the Minister or Immigration Officer at the local Immigration Office by filling out the data application and attaching the following requirements: Father's or mother's electronic

identity card; Family card; Birth certificate; a copy of the father's or mother's ordinary passport for those who have; An old ordinary passport for those who already have an ordinary passport; Letter of determination of name change from the authorized official for those who have changed their name; A statement letter from both parents stating that they are responsible for the use of the travel documents of the Republic of Indonesia. The boundary between being an adult and immature can only be seen from the ability to perform legal acts (Pahlevi et al., 2021).

The document completes the requirements and then submits it to the Minister or Immigration Officer at the local Immigration Office. In contrast, diplomatic and official passport applications can be submitted to the Minister of Foreign Affairs. The next mechanism that needs to be carried out to issue an ordinary passport is checking the completeness and validity of the requirements, Paying passport fees, Photograph and fingerprinting, interview, verification, and adjudication. After completing all the mechanisms, the applicant pays the ordinary Passport fee at the perception bank or through a banking payment facility. However, if the applicant does not continue the mechanism within a maximum period of 30 (thirty) days, the application for an ordinary passport application is canceled.

## 2. Passport making costs

### a. Singapore passport-related fees

The nominal cost of making a Singapore passport is contained in *the Passport Act 2007 (Act 33 of 2007)*; the fee is contained in the subject of *the First Schedule* in the law; on the page of the passport application form, the specified fee is listed, the fee is based on the *First Schedule* which contains details of these costs, namely: Passport application by post or deposit box (*deposit box*) made by the officer for passport application, the fee is \$70SGD; Passport application using electronic services (*online*) either from within Singapore or outside Singapore, fee of \$70SGD; If the application is made in any other way, the fee is \$80SGD; Additional fees for replacement of lost, destroyed or damaged passports: a. First reimbursement, a fee of \$50SGD, Second reimbursement onwards, a fee of \$100SGD; Singapore Diplomatic Passport, free of charge; Official Singapore Passport, free of charge.

### b. Fees related to Indonesian passports

According to Article 138 of Law No.6/2011, the application for travel documents is subject to immigration fees regulated by government regulations, and the immigration fee is one of the non-tax state revenues in the field of immigration. So that details of costs related to passports can be found in PP No.28/2019, in article 5 and attachments. In Article 5 Paragraph (1) of Government Regulation No.28/2019, it is stated that the type

of Non-Tax State Revenue derived from immigration services as referred to in Article 1 paragraph (1) letter c in the form of an ordinary passport is subject to a rate of Rp0.00 (zero rupiahs) to Indonesian workers who work abroad for the first time; or Indonesian citizens who are unable to afford and reside outside the territory of Indonesia.

Meanwhile, other details of costs contained in the attachment to Government Regulation Number 28 of 2019 consist of Ordinary Passport 48 Pages per application of Rp 350,000.00; Ordinary Passport 48 Electronic Pages per application IDR 650,000.00; Passport Acceleration Service Completed on the Same Day per application of IDR 1,000,000.00; The Cost of Lost Passport per book is IDR 1,000,000.00; The cost of Damaged Passport per book is IDR 500,000.00.

### 3. Validity or validity period of the passport

#### a. Validity or validity period of Singapore passport

Article 8 2020 Revised Edition Passport Act 2007 explained that every Singapore ordinary passport issued before or after 1 April 2005 is valid for at most 6 (six) years. Then, diplomatic and official passports are valid according to the period specified in the passport. The Minister is also authorized in certain situations to shorten the validity period of a person's ordinary passport; the Minister may at one time extend the validity period of all ordinary passports through an announcement *Gazette*. This is written in Paragraphs (3) and (4). So, on May 10, 2021, the ICA announced the extension of the validity period of passports to 10 (10) years; this rule takes effect from October 1, 2021 (Pasuni, 2018). The rule of passport validity for 10 (ten) years is only applied to Singaporeans aged 16 (sixteen) years and above, while passports for children aged 16 (sixteen) years and below it is still valid for 5 (five) years only because the facial features of children change rapidly along with their growth.

#### b. Validity or validity period of Indonesian passport

Indonesian ordinary passports also have a maximum validity period of 10 (10) years; this passport is only given to Indonesian citizens who are 17 (seventeen) years old or married; this rule was issued in 2022, while the validity period of a child with dual citizenship must not exceed the age limit of the child to declare their choice of citizenship. "(1) The validity period of an ordinary passport is a maximum of 10 (ten) years from the date of issuance. (2) An ordinary passport with a maximum validity period of 10 (ten) years is only given to Indonesian citizens who have reached the age of 17 (seventeen) years or are married." Meanwhile, for the passport of children under 17 (seventeen) years, the validity period is a maximum of 5 (five) years due to rapid changes in the child's face.

### 4. Violations of laws related to passports and their legal sanctions



a. About Singapore's articles that regulate violations of laws related to passports and its legal sanctions.

In the Singapore Law *2020 Revised Edition Passport Act 2007*, precisely Article 29 Paragraph (1) Letter c and in the next paragraph, namely Paragraph (2), it is explained that a person is obliged to submit his travel document to the authorized officer if the document is suspicious, it is a fake Singapore passport or a fake Singapore travel document. If the forged documents are not submitted, the perpetrator will be fined not more than SGD 5,000.

The legal provisions for passport offenders are also found in Articles 36 to 48 of the *2020 Revised Edition Passport Act 2007*, Article 36 Paragraph (1) concerning forgery of Singapore passports, if a person makes a fake Singapore passport or a fake Singapore travel document, makes a copy of the document with his knowledge which is a fake Singapore passport or a fake Singapore travel document. With the intention or purpose of obtaining benefits for him or others, harming others, or affecting the performance of public work. The perpetrator will be fined an amount not exceeding SGD 10,000;

Paragraph (2), if a person knowingly uses a fake Singapore passport or a fake Singapore travel document or uses a copy of a document which is a fake Singapore passport or a fake Singapore travel document. With the intention or purpose of obtaining benefits for him or others, harming others, or affecting the performance of public work. The perpetrator will be fined an amount not exceeding SGD 10,000.

Article 37, if a person with his knowledge possesses or has control over a fake Singapore passport or a fake Singapore travel document. The perpetrator will be fined not more than SGD 10,000. Article 39 Paragraph (1), any person who makes or provides false or misleading information relating to a Singapore passport application, an application for ratification or extension of a Singapore passport, and a report of the loss, theft, or destruction of a Singapore passport. The perpetrator will be fined not more than SGD 10,000.

Article 40 Paragraph (1), if a person provides a false or misleading document to a person, and the document is related to a Singapore passport application. The perpetrator will then be fined not more than SGD 10,000. Paragraph (3), if a person provides a passport issued in his name for use by another person, the perpetrator will be fined an amount not exceeding SGD 5,000. Article 42 Paragraph (1), if a person trades a Singapore passport, he will be fined an amount not exceeding SGD 10,000. Article 44 states that if a person buys a Singapore passport, offers to buy a Singapore passport, or obtains a Singapore passport with a threat, then the person will be fined an amount not exceeding SGD 10,000. Article 45 Paragraph (1), if a person has a Singapore passport

issued in his name and the person learns that the passport is lost, stolen, or destroyed but fails to immediately report it to the competent officer within 14 (fourteen) days after the person first learns that their passport is lost, stolen or destroyed. The person will be fined a fine of not more than SGD 3,000.

Article 46 Paragraph (1), if a person still has a Singapore passport even though he is no longer a Singapore citizen, and the person does not surrender his Singapore passport to the competent officer within 24 hours after the person first learns that they are no longer a Singapore citizen, the person may be subject to a fine of not more than \$3,000SGD (Hermanto, 2017).

b. About the Indonesian article that regulates legal violations related to passports and legal sanctions.

Next, the articles of law in Indonesia discuss violations of laws related to passports and their legal sanctions. Articles 120 to 133 of Law of the Republic of Indonesia Number 6 of 2011 concerning Immigration discuss the details of criminal acts and their legal provisions; these articles' descriptions are quite long and detailed. The author will attach one after the other the contents of these articles, namely as follows: Article 120, based on this article, a person is threatened with a fine of at least Rp500,000,000, 00 (five hundred million rupiahs) and a maximum of Rp1,500,000,000.00 (one billion five hundred million rupiahs) if leaving or entering Indonesian territory illegally or using a fake passport.

Article 126, according to this article, if a person makes or uses a fake passport for his own benefit or for the benefit of others, he is threatened with a fine of up to Rp500,000,000.00 (five hundred million rupiah). Article 127, according to this article, if a person keeps a fake passport to be used by him or by another person, he is threatened with a maximum fine of Rp500,000,000.00 (five hundred million rupiah). Article 128, based on this article, if a person unlawfully uses a blank or stamp to certify a passport, can be fined a maximum of Rp500,000,000.00 (five hundred million rupiah).

Article 129, based on this article, if a person deliberately damages the contents of the passport, they can be threatened with a maximum fine of Rp500,000,000.00 (five hundred million rupiah). Article 130, based on this article, states that anyone who uses someone else's passport can be fined a maximum of Rp200,000,000.00 (two hundred million rupiah).

5. The passport holder's data or identity is in the passport.

The comparison of the last article is related to the data or identity of the passport holder in the passport. Passports, apart from being travel documents, are also used as proof of identity when abroad, so passport holder data is the main part of the passport; in issuing passports, the necessary applicant data will be requested so that the passport can be made.

a. The data or identity of the Singapore passport holder in the passport.

In the Singapore passport, the data in the passport is regulated in the *Passport Act 2007 (Act 33 of 2007)* Article 3 and *2020 Revised Edition Passport Act 2007 Part Second Schedule*, which explains that the data or identity of the passport holder in the Singapore passport is in the form of the holder's name, place and date of birth, identity card or birth certificate, address, self-portrait, right and left fingerprints, right and left iris scans, and signatures.

b. The data or identity of the Indonesian passport holder in the passport.

Based on Permenkumham Number 8 of 2014, Indonesian passports contain data or identity of the holder in the form of name, place, and date of birth, parents' names, photographs, fingerprints, and Identity Cards (including signatures and addresses) of the passport holder.

## **Discussion**

Based on the comparison above, the striking difference is in Indonesia, which does not have a special passport law, in contrast to Singapore, which already has a passport law. To make it easier to conclude, the author compiles the discussion in this sub-chapter in the form of a table as follows:

**Table I. Comparison Points**

| No. | Category   | Points of Difference   |
|-----|--|--|
| 1.  | Rules and procedures for applying for passport issuance. | Singapore and Indonesia regulate the registration of passport applications online and <i>offline</i> ; Indonesia can still issue non-electronic ordinary passports, while Singapore only issues electronic passports. Singapore has simpler requirements for submitting a passport application, while Indonesia has various requirements for making a passport with more mechanisms. |
| 2.  | The cost of making a passport.                           | The costs related to Singapore and Indonesian passports are similar, even though Singapore tends to be more expensive.   |

|  |  |
|--|--|
| 3. Validity or validity period of the passport.                          | Singapore and Indonesia have a passport period of 10 years; the age limit for Singaporean children's passports is 15 years, while Indonesia is 16 years.   |
| 4. Violations of the law related to passports and their legal sanctions. | The range of fines received by perpetrators of violations of laws related to Indonesian passports is greater than the fines for violators of laws related to Singapore passports, but Singapore has more articles that regulate matters related to fines for violators of passport laws. |
| 5. The passport holder's data or identity is in the passport.            | Singapore passports contain <i>scans</i> of the holder's eye iris, while Indonesian passports do not. Indonesian passports use documents containing parents' names, while Singapore passports do not.  |

**Source: Data processed by the author 2023**

Based on this, the weakness of Indonesian passports and the strength of Singaporean passports are not affected by existing laws. However, because Indonesia has not yet enacted a special passport regulation, Indonesian passport regulations are weak; one of the legal properties is protective, which in this case is to protect the rights of legal subjects, one of which is freedom of movement or the right to mobility, with the promulgation of passport regulations can also provide convenience and effectiveness for the government in taking care of documents and immigration processes (Bramantyo, 2022; Endah, 2020). The weakness of Indonesian passports has legal implications for holders in the form of limited access to certain countries that affect their mobility rights, as well as when taking care of needs related to passports that still require additional documents that are long-winded. The reason behind the weakness of Indonesian passports compared to Singapore passports refers to several factors; in this discussion, the author will describe 5 (five) main things that can affect the weakness of Indonesian passports.

#### 1. Number of visa-free countries

As is already known, based on *the Henley Passport Index Global Passport Ranking* written on its *website*, of the total 199 passports of the countries on the list, the Indonesian passport occupies the number 68 position with a total of 76 visa-free countries. The Singapore passport occupies the number 1 position with 193 visa-free countries. The strength or weakness of a passport depends on the number of countries that can be visited without a visa by the passport holder. Visa-free services are only provided or mutually provided by one country to another due to good relations between countries; various things affect a country so that it can provide visa-free services to a country.

#### 2. Diplomatic relations

Diplomatic relations or diplomatic relations are relations carried out by one country with another to meet each other's needs. Diplomatic relations between countries can affect the quality of passports; the more diplomatic a country has with other countries, the wider the opportunity for the country to get visa rule relief with other countries and build mutually beneficial agreements related to visa rule relief to visa freedom. Indonesia has bilateral relations with 162 countries (Priceati & Dahavir, 2022), while Singapore has bilateral relations with about 181 countries; it is known that there are currently 193 countries in the world, this makes Singapore referred to as the "*Friend of all, enemy of none*" because Singapore really maintains its diplomatic relations well, apart from Singapore's welfare and economic stability that makes other countries accept positively to have diplomatic relations with Singapore (Marchlewska et al., 2019). This international agreement is very important in making it easier to develop a country's progress even better.

Indonesia itself is still trying to maximize diplomatic relations to be even better; regarding the policy of foreign relations of the Republic of Indonesia in the Decree of the People's Consultative Assembly No.11/MPR/1988 concerning the Outlines of the State Direction, one of which reads as follows:

"In the context of ASEAN cooperation, it is necessary to further improve cooperation in the economic, social, and cultural fields, both between governments and between communities."

"Especially in order to realize the New World Economic Order, it is necessary to show steps, together with other developing countries, to accelerate the realization of international agreements on commodities, eliminate obstacles and restrictions imposed by industrialized countries on the exports of developing countries, and increase economic and technical cooperation between developing countries, in addition to other efforts."

Then, according to the Vienna Convention of April 18, 1961, on diplomatic relations, diplomatic missions aim to improve friendly relations between sending and receiving countries and develop economic, cultural, and intellectual relations.

### 3. Economic quality and welfare of the country

Based on Article 1 of the Indonesian Law on the Implementation of Social Welfare, Social Welfare is a condition for the fulfillment of the material, spiritual, and social needs of citizens to live a decent life and be able to develop themselves, so that they can carry out their social functions.

State revenue through *Foreign Direct Investment* (FDI) or foreign investment as a percentage of a country's GDP, "*FDI has become one of the key factors in driving economic*

*development and industrialization in Indonesia,"* GDP or *Gross Domestic Product* used as an indicator to measure the country's economy, "A country's weight is equal to its gross domestic product (GDP) divided by its group's total GDP" (Sanchez & Gavilanez, 2015). This GDP can be used to see the shifts in economic structure and growth from year to year. Using statistical data from the international web *World Bank*, We can learn about the development of the ups and downs of FDI and GDP from various countries.

In 2022, Indonesia has FDI, a percentage of GDP of 1.6%, which decreased by 0.2% from the previous year. While Singapore has FDI as a percentage of GDP of 30.2%, Singapore also experienced a decrease compared to the previous year of 2.5%. With a fairly high percentage of GDP, Singapore's economy is quite good (Rita Noveriza & Melati, 2022; Rohman et al., 2023). If the community's welfare is good, then the crime rate is low, so the strength of the country's passport is also affected; because of that, countries with strong economies usually have strong passports.

#### 4. Crime rate

Countries with low crime rates increase the confidence of other countries to grant visa freedom to passport holders of that country; it can be clearly distinguished that countries with internal conflicts or countries with high crime rates usually have weak passports so that passport holders of that country must pass further checks by immigration officers upon arrival in the destination country (Artipah et al., 2024; Setiawan, 2019).

By *World Population Review - Crime Rate by Country 2023*, stating that Indonesia's crime rate is 45.93 crime cases per 100,000 population, while Singapore is 27.96 crime cases per 100,000 population (Ningtyas et al., 2017; Purwaningsih, 2022). Factors that affect the occurrence of crime can come from internal factors such as urgent economic factors, employment factors (unemployment or having a job), and welfare level factors, while external factors such as education, association, and environmental influences (Hermawan et al., 2020; Herniati & Kalman, 2020). Conventional crimes such as theft, fraud, robbery, domestic violence, violence against children and women, murder, and crimes of morality are characteristics that reflect economic conditions.

#### 5. Reciprocity factors

Reciprocal factors and freedom of travel in the country affect the strength of the passport; if Foreign Citizens come to visit the country and feel satisfied, safe, and comfortable because of the quality of security, good public facilities, and public transportation, give the impression that the country welcomes foreign visitors well, especially if the country has uniqueness and attraction of visitors and good tourist promotion, Making a country have a popularity that is synonymous with its iconic

places and culture, the demand for visa-free visits is getting higher, and this is where visa agreements between countries can take place.

## CONCLUSION

By comparing the laws of Indonesia and Singapore regarding passports to find out the differences, it can be concluded that there are no major differences regarding the two countries' regulations; both have their own advantages and disadvantages. Like the articles related to fines for violators of passport laws, Singapore has more and more detailed articles, while Indonesia has fewer articles with fines that are mostly more.

The reason for the weakness of the Indonesian passport is that Indonesia has not yet enacted a special passport regulation, so the Indonesian passport regulation is still weak, while one of the legal properties is protective, which in this case is to protect the rights of legal subjects in the form of freedom of movement or the right to mobility. Other things that affect the weakness of Indonesian passports are the number of visa-free countries, Diplomatic relations, The quality of the country's economy and welfare, the crime rate, and reciprocal factors.

With the results of this conclusion, it is recommended for further research to maintain a comparative study and focus more deeply on each article point that may have been missed or not been paid attention to before; I hope that there will be further studies on the comparison of Indonesian regulations with the regulations of Singapore or other countries, to find out the good and bad points of Indonesian regulations and how to improve them.

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