



Legal Protection of Heirs' Death-Benefit Rights in Unresolved Unilateral Termination Disputes

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Abstract

Background: Death benefits are intended to protect surviving heirs when a participant in employment-related social security dies. A legal problem arises when an employer ceases making contributions and BPJS Ketenagakerjaan records a worker as inactive while a termination dispute remains unresolved, because administrative deactivation may affect the heirs' access to JKM benefits.

Objective: This research examines legal gaps, implementation obstacles, institutional responsibilities, and available remedies affecting heirs' entitlement to death benefits when BPJS participation is deactivated during an unresolved termination dispute.

Methods: The study employs normative-empirical legal research using a live case study. Empirical data were obtained through interviews and a focus group discussion (FGD) involving BPJS Ketenagakerjaan, the Manpower Office, Apindo, SPN, a labor-law academic, and the affected heir. Legal materials concerning termination, BPJS participation, JKM, and industrial-relations dispute settlement were analyzed qualitatively as the normative benchmark against which the case evidence was assessed.

Results: BPJS Ketenagakerjaan treated the worker's inactive administrative status, resulting from the employer's cessation of contributions, as the basis for denying the principal JKM claim, while the Manpower Office and other informants considered the termination to remain unresolved. The regulatory review identifies ambiguity in verifying employer-initiated deactivation during a contested termination and demonstrates that industrial-relations disputes and BPJS benefit disputes are subject to different legal mechanisms.

Conclusion: Administrative deactivation should not automatically be treated as determinative of substantive JKM entitlement without examining the worker's legal status and statutory eligibility at the time of death. Clear rules on verification and inter-institutional coordination are needed while preserving the distinct responsibilities of the employer, BPJS Ketenagakerjaan, and the manpower authorities.

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INTRODUCTION

Employment social security is a constitutional component of worker protection because

it is intended to preserve income security when risks such as work accidents, termination, or death occur (Azani, 2025; Utami, 2022). In this study, the central legal problem is more specific: an heir was unable to obtain the principal Death Benefit Program (*Jaminan Kematian* or JKM) benefits after the employer stopped making contributions and the worker's BPJS Ketenagakerjaan participation became administratively inactive while a termination dispute was still unresolved. State presence in this context therefore means more than a formal commitment to social protection; it requires enforceable legal rules, lawful administration, and effective remedies that prevent an unresolved employment dispute from arbitrarily defeating social-security protection (Mahy, 2021).

The mandate of Article 28H paragraph (3) of the 1945 Constitution of the Republic of Indonesia states that "Every person has the right to social security that enables the complete development of oneself as a dignified human being." Article 34 paragraph (2) clearly states that "The state develops a social security system for all Indonesian people and empowers the weak and underprivileged in accordance with human dignity." Its implementation is through Law No. 40 of 2004 concerning the National Social Security System, which gave rise to Law No. 24 of 2011 concerning the Social Security Administering Body (*Badan Penyelenggara Jaminan Sosial* or BPJS), namely BPJS Ketenagakerjaan (Employment BPJS) and BPJS Kesehatan (Health BPJS). BPJS Ketenagakerjaan administers programs for Work Accident Insurance (*Jaminan Kecelakaan Kerja* or JKK), Death Benefit Program (*Jaminan Kematian* or JKM), Old-Age Security (*Jaminan Hari Tua* or JHT), Pension Security (*Jaminan Pensiun* or JP), and Unemployment Insurance (*Jaminan Kehilangan Pekerjaan* or JKP), the latter of which was established through Government Regulation No. 37 of 2021 concerning Unemployment Insurance.

BPJS Ketenagakerjaan is a public legal entity responsible for administering employment social-security programs, including JKM. Although the financial sustainability of JKM remains relevant to program governance Sukmayasa et al. (2026), it is analytically distinct from the legal question examined here. A valid claim must be assessed according to the participant's legal status, contribution obligations, benefit requirements, and applicable dispute-resolution rules; program-level financial conditions cannot independently justify refusing an individual heir's statutory benefit.

The factual background began with a transfer dispute involving five workers. Their refusal of the transfer was treated by the employer as a basis for termination, and the dispute proceeded to a bipartite settlement process. This background is relevant only insofar as the unresolved termination status preceded the employer's cessation of BPJS Ketenagakerjaan contributions and the administrative deactivation of the workers' participation (Pakpahan & Efi Yulistyowati, 2026).

The relevant legal issue is not the general classification of termination, but whether the employment relationship had been lawfully terminated before the worker died and whether an employer could cease JKM contributions while that termination remained disputed. Death ends the personal employment relationship, but it does not by itself erase accrued or statutory rights that may pass to entitled heirs; the existence and scope of JKM entitlement must therefore be assessed against the applicable social-security rules and the worker's legal status at the time of death.

The empirical case concerns five SPN members whose employment was unilaterally terminated in January 2024 after they refused a transfer. The five-worker dispute provides the collective factual context, while the principal unit of analysis is the deceased worker whose JKM participation was deactivated during the unresolved dispute and whose heir subsequently encountered a rejected death-benefit claim.

Under manpower law, managerial authority over transfers does not remove the requirement that a disputed termination be processed through the applicable industrial-relations dispute-resolution mechanism. The transfer dispute therefore serves as the trigger for the termination conflict, not as the central object of this study. The research focuses on the legal consequences that followed: cessation of contributions, administrative deactivation, and the resulting dispute over the heir's JKM entitlement (Pakpahan & Efi Yulistyowati, 2026).

During the bipartite settlement process, one of the workers died in April 2024. The employer had already stopped making BPJS Ketenagakerjaan contributions, causing the worker's

participation to appear inactive. BPJS Ketenagakerjaan then relied on that inactive status in refusing the principal JKM claim. This sequence creates the central legal conflict: whether an employer-initiated administrative deactivation, undertaken before the termination dispute was legally final, could lawfully determine or extinguish the heir's substantive entitlement.

Previous studies have discussed unilateral termination, worker protection, JKM implementation, and heirs' insurance claims separately (Sundari et al., 2023; Wicaksana & Hoesin, 2022). However, they do not directly resolve the intersection examined in this live case: employer-initiated contribution cessation during an unresolved termination dispute, BPJS administrative deactivation, the legal status of the deceased worker at the time of death, and the institutional route available to the heir. This study therefore addresses that normative-empirical gap. It asks: what legal gaps and implementation obstacles affect the heir's JKM entitlement, what responsibilities attach to the employer and BPJS Ketenagakerjaan, and what remedy is available when termination status and social-security eligibility are disputed?

METHOD

This study used normative-empirical legal research through a live case study. The normative component examined the legal rules governing termination, employer contribution obligations, BPJS participation, JKM benefits, and dispute resolution. The empirical component examined how those rules operated in the investigated case, particularly the employer's cessation of contributions, BPJS Ketenagakerjaan's treatment of inactive participation, and the heir's attempt to obtain JKM benefits. The two components were integrated by using the legal materials as the normative benchmark against which the interview and case evidence were evaluated.

The research locations were the BPJS Ketenagakerjaan Office in Medan City, the Manpower Office of North Sumatra Province, and the UPH Medan Campus Library. Informants were selected purposively based on their direct competence or involvement in the relevant legal and administrative issues: BPJS Ketenagakerjaan officials responsible for JKM claims and complaints; a provincial manpower supervisory officer; the Secretary of Apindo North Sumatra; the Chair of DPD SPN North Sumatra; a USU labor-law academic who chaired P3HKL; and the deceased worker's wife, as the affected heir. Their evidence was used not merely to describe the applicable procedures, but also to identify competing institutional interpretations concerning contribution cessation, participation deactivation, employer responsibility, supervision, and claim rejection.

Primary data were collected through interviews and a focus group discussion (FGD). Secondary legal materials included the 1945 Constitution, Law No. 24 of 2011 concerning BPJS, Law No. 2 of 2004 concerning Industrial Relations Dispute Settlement, Law No. 6 of 2023, Government Regulation No. 35 of 2021, Government Regulation No. 44 of 2015, as most recently amended by Government Regulation No. 49 of 2023, and the implementing regulations governing JKM. The data were analyzed qualitatively and juridically: interview and FGD statements were coded by issue, compared across informants, triangulated with the heir's case chronology, and tested against the governing legal norms. Conflicting institutional views were treated as empirical findings and were not accepted as legal conclusions unless supported by the applicable legal materials.

RESULTS AND DISCUSSION

Results

The interview and FGD evidence shows that BPJS Ketenagakerjaan treated the cessation of employer-paid contributions as resulting in an inactive administrative status and used that status as the basis for refusing the principal JKM claim. This is recorded as BPJS's administrative position, not as a legal conclusion that inactive status automatically extinguishes substantive entitlement. The legal validity of that position must be assessed against the rules governing employer contribution obligations, termination status, and JKM eligibility.

The North Sumatra Manpower Office presented a different interpretation. According to the informant, the termination dispute remained at the *bipartite* stage when the worker died, so the employer should not have treated the employment relationship as conclusively terminated

for purposes of BPJS deactivation. The informant also identified limited supervisory capacity as an implementation constraint. This institutional disagreement is central to the case because it shows that the administrative status recorded by BPJS and the unresolved legal status of the employment relationship were not treated consistently across institutions.

The Secretary of Apindo North Sumatra stated that employers should not immediately terminate BPJS Ketenagakerjaan participation while a termination dispute remains unresolved. This statement is treated as an expert institutional interpretation; its legal force depends on the applicable statutory duties concerning contribution payment and the legal finality of termination.

SPN management argued that participation should not be deactivated while termination remains disputed and proposed that BPJS verify the legal basis for employer-initiated deactivation. The FGD did not establish that current legislation expressly requires such a verification procedure, so this position is treated as a proposed safeguard rather than an existing BPJS duty. Likewise, prior contribution history is relevant evidence, but the study does not assume that contribution history alone establishes JKM entitlement without satisfaction of the applicable statutory eligibility conditions.

The labor-law academic emphasized that BPJS Ketenagakerjaan is a statutory social-security administrator rather than a private insurer. This distinction matters because participation, employer contribution obligations, public-law administration, and remedies are governed by legislation rather than solely by contractual insurance terms. The academic evidence was therefore used to interpret the institutional character of JKM, while the specific entitlement in this case remained subject to the applicable statutory requirements.

The deceased worker's wife reported that BPJS rejected the principal JKM claim because the worker's participation had become inactive after the employer stopped making contributions. With SPN assistance, the family later obtained a child-school benefit of Rp 300,000 per month, while the reported cash benefit and Rp 12,000,000 education-related benefit were not obtained. The case record does not establish all statutory eligibility facts needed to determine why different benefit components produced different outcomes; accordingly, the study treats this inconsistency as a matter requiring legal and administrative clarification rather than assuming a single cause beyond the documented reliance on inactive status.

Discussion

Purpose and Benefits of Employment Social Security

Referring to the opinion of J. Miti et al. (2021), social security is broadly described in their study as a set of interventions carried out by the state to prevent or address conditions of vulnerability and poverty in the socioeconomic sphere of citizens. Social security functions as a basic protection system for society against socioeconomic risks that may arise in the future, one of which is employment social security. The government encourages efforts to increase the number of workers protected by employment social security (Hasiholan & Tjiptoherijanto, 2021).

Social security protects workers and their families against income loss arising from risks including termination and death. In the case under investigation, that general protective purpose becomes a concrete legal question: whether administrative deactivation during an unresolved termination dispute can defeat a surviving heir's access to a benefit designed to address the risk of death. The analysis therefore distinguishes the objective of social security from the separate issue of whether the statutory conditions for JKM entitlement were satisfied at the time of death.

Workers in Indonesia greatly need social security because it can enable them to focus more fully on performing their work. The social security provided can improve their welfare and positively affect the future well-being of their families if a risk occurs. For example, in the event of a work accident or death, their families can receive financial assistance through social-security programs (Sutrisno, 2020). The concept of social security is closely related to welfare issues, meaning that social security is intended to help individuals, groups, or their families meet their basic needs. Death is an unavoidable event. It can occur both at and outside the workplace, so workers must consider the welfare of the families they leave behind; therefore, the JKM program is highly relevant to their heirs (Khakim Abdul, Ansyori Ahmad, 2021).

Effective social-security protection depends on whether beneficiaries can actually obtain

benefits through lawful and accountable procedures. Recent JKM research identifies implementation and claim-processing challenges, while studies of worker protection emphasize the need for legal certainty in termination disputes (Satvika, 2026). The implementation gap in this study is narrower: an employer stopped making contributions while termination remained disputed, BPJS recorded the participant as inactive, and the heir's principal JKM claim was refused without a clearly demonstrated mechanism for reconciling the employment-status dispute with the social-security record.

Case Study of Transfer Refusal, Unilateral Termination, and Death-Benefit Claim

Transfers are common in employment relationships. However, a lack of clarity regarding the provisions governing transfers and the limits of employer authority in implementing them can create opportunities for abuse by employers to avoid or reduce the fulfillment of workers' rights. In practice, workers may be assigned to work locations far from their residences, forcing them to separate from their families and bear social and economic burdens. This condition becomes increasingly problematic when workers refuse transfers that they consider inconsistent with the conditions or provisions of the employment relationship and that refusal is subsequently treated as defiance of work orders or even used as a basis for treating the worker as having resigned (Liani Putri & Mahyuni, 2023).

The five workers form the collective context of the transfer and termination dispute. The deceased worker constitutes the principal unit of analysis because his death transformed the unresolved employment-status dispute into a concrete JKM entitlement dispute affecting his heir. At the time of his death, the termination matter was still being handled at the *bipartite* stage, while the employer had already stopped making contributions and the worker's BPJS participation had been administratively deactivated.

The death of a worker during an employment relationship has legal consequences, particularly concerning the fulfillment of the heirs' rights. Under applicable manpower and social-security provisions, heirs may be entitled to benefits arising from the death of a worker, including employment-related compensation and BPJS Ketenagakerjaan benefits. The amount of such benefits is determined by the applicable provisions, including, where relevant, the worker's length of service and employment status. Protection of workers' rights and those of their heirs is also strengthened through Law No. 6 of 2023, which regulates various aspects of employment relationships and the fulfillment of rights following termination of employment (Rusli et al., 2025).

Industrial-relations disputes in Indonesia are increasingly becoming an important legal issue because they can affect social and economic stability, thus requiring effective, adaptive, and justice-oriented dispute-resolution mechanisms (Yitawati et al., 2024). The phenomenon of unilateral termination does not involve only individual workers but also business entities and workers' unions, and its potentially destructive impact on family economic security has reached an alarming level, becoming an obstacle to creating legal certainty in the manpower sector (Ayuda et al., 2024). Therefore, termination should be avoided, as mandated by Article 151 paragraph (1) of Law No. 13 of 2003 concerning Manpower.

Regarding transfers, Law No. 13 of 2003 concerning Manpower and other laws and regulations in the manpower sector do not provide sufficiently specific regulation on the implementation of transfers, making it difficult to determine how transfers should be carried out in practice (Wicaksana & Hoesin, 2022). In practice, a transfer may fall within the employer's managerial authority, but it must be carried out properly and reasonably in accordance with applicable legal requirements and principles of humanity. The workers who were transferred from their workplace in Stabat to Nias Island and Sibolga, hundreds of kilometers away, received only Rp 500,000 in transportation expenses, accommodation for three months, and an additional salary of Rp 500,000 per month. Such arrangements were, according to the workers, economically infeasible. The workers refused the transfer because the additional salary of Rp 500,000 would effectively be consumed by accommodation costs at the new workplace after the three-month accommodation period ended. All of the workers were married and had school-aged children. If their families moved to the new workplace, they would require funds for housing rent, school

registration fees, and moving expenses. If their families did not move, their salaries would be insufficient because they would have to finance two households.

The employer's stated reason for the transfer was the opening of new offices in Nias Island and Sibolga. Following their refusal of the transfer, the workers were terminated on the stated ground that they were deemed to have resigned. Article 151 paragraph (3) of Law No. 13 of 2003 concerning Manpower, as applicable at the relevant stage of the dispute, provided that termination could be carried out only if *bipartite* negotiations failed to reach an agreement and, under the applicable legal framework, after the required determination from the industrial-relations dispute-resolution institution. The Job Creation Law amended Article 151, including paragraphs (2), (3), and (4), by providing that if termination cannot be avoided, the employer must provide written notification of the intention and reasons for termination to the worker and/or workers' union. If the worker rejects the termination, the termination dispute must be resolved through *bipartite* negotiations. If the negotiations fail to reach an agreement, the termination proceeds through the subsequent stages of the industrial-relations dispute-resolution mechanism.

The provisions of the Manpower Law before the Job Creation Law more expressly regulated the legality of termination by requiring a determination from the industrial-relations dispute-resolution institution. Following the Job Creation Law, the termination provisions provided a different procedural framework; however, where a worker rejects termination, the *bipartite* negotiation mechanism remains required. Government Regulation No. 35 of 2021 concerning Fixed-Term Employment Agreements, Outsourcing, Working Time and Rest Periods, and Termination of Employment further regulates termination notification. Article 37 paragraphs (3) and (4) provides for termination notification to be given properly and in writing to the worker within the prescribed period before termination. Article 38 further provides that, where the worker does not reject the termination, the employer must report the termination to the institution responsible for manpower affairs.

Government Regulation No. 35 of 2021 requires termination notification and, where the worker does not reject the termination, employer reporting to the competent manpower institution. These provisions support the Manpower Office's role in administering termination information, but the reviewed rules do not expressly create a general duty for the Manpower Office to validate BPJS deactivation decisions. Accordingly, cross-institutional verification is presented here as a proposed coordination mechanism, not as an existing statutory authority that has already been established.

Where a worker rejects termination, Law No. 2 of 2004 requires the industrial-relations dispute to proceed from *bipartite* settlement to the subsequent statutory mechanisms if an agreement is not reached. The Constitutional Court has further interpreted Article 151 to provide that termination following failed *bipartite* negotiations may occur only after a determination from an industrial-relations dispute-resolution institution has obtained permanent legal force (Constitutional Court Decision No. 168/PUU-XXI/2023). In this case, the dispute was still at the *bipartite* stage when the worker died. The empirical evidence therefore reveals a mismatch between the unresolved legal termination process and the BPJS administrative record, which had already become inactive.

In the current development of manpower-law enforcement, disputes arising from termination are not related only to the end of the employment relationship but are also increasingly complex because of inconsistencies and overlapping administrative information. This condition requires careful examination of various documents, particularly those related to the worker's income and length of service. Therefore, the technical competence of manpower supervisors needs to be strengthened, especially in verifying and validating documents, so that the facts and root causes of disputes can be comprehensively mapped and used as an objective basis for the parties (Satvika, 2026). In this case, BPJS needs to verify and validate the termination documents submitted by the employer concerning its workers. Thus, legal protection for workers needs to be viewed as a tangible manifestation of the state's responsibility to guarantee comprehensive legal certainty. This guarantee should not be oriented solely toward the fulfillment of administrative procedures but should also be directed toward producing a just and

proportional resolution that upholds respect for human dignity and values (Basofi & Fatmawati, 2023).

The respective responsibilities of the institutions must be distinguished. The employer bears the statutory obligation to register workers and, for wage-recipient participants in JKM, to pay the prescribed JKM contributions while that obligation remains legally applicable. BPJS Ketenagakerjaan administers participant data, contributions, claims, complaints, and statutory dispute-resolution mechanisms. The Manpower Office exercises labor-administration and supervisory functions within its legal mandate. The study proposes, as a regulatory reform rather than an existing obligation, a verification protocol among these institutions whenever an employer requests deactivation on the basis of a termination that the worker contests.

Heirs of deceased workers have a number of rights that must be fulfilled, one of which is the right to death benefits. Therefore, adequate legal protection is important throughout the termination process. The absence of effective protection can place workers in a vulnerable position and create opportunities for detrimental actions by employers, particularly with respect to the fulfillment of economic rights and the implementation of fair and legally compliant termination procedures (Padilah et al., 2024). Therefore, the heirs' right to death benefits must be adequately protected and fulfilled in accordance with the applicable statutory requirements.

The statutory JKM benefit structure under Government Regulation No. 44 of 2015, as amended, includes cash benefits and, subject to specified eligibility requirements, education scholarships for eligible children. The regulation was subsequently amended by Government Regulation No. 49 of 2023. However, the case materials available in this study do not establish every fact required to calculate the exact amount legally claimable by this heir, including all contribution-period and child-eligibility requirements. The discussion therefore uses the statutory benefit structure as the legal benchmark and does not treat the full nominal package or scholarship as automatically payable in this individual case.

Although the Death Benefit Program (JKM) plays an important role in providing financial protection and support to the families or heirs of deceased participants, public understanding of its existence, benefits, and application mechanisms remains relatively limited. Some participants do not fully understand the rights and benefits available through the JKM program. This condition ultimately means that the utilization of available facilities and benefit rights has not yet been maximized (Naraswari, 2024). This limitation is clearly reflected in the understanding of the deceased worker's heirs in the case under study.

Obstacles in Claiming Death Benefits

To submit a claim for the Death Benefit Program (JKM) to BPJS Ketenagakerjaan, heirs must fulfill and complete a number of required administrative documents. The completeness of these documents is an important part of the verification and administrative claim-examination process. The documents that need to be prepared include: 1. the BPJS Ketenagakerjaan card of the deceased participant; 2. an E-KTP (electronic identity card), consisting of copies of the participant's identity card and the heir's identity card; 3. a deed or death certificate issued by the authorized institution; 4. a Family Card (*Kartu Keluarga* or KK), consisting of copies of the participant's and heir's Family Cards; 5. a Certificate of Heir issued by an authorized official or institution; 6. a marriage certificate, specifically for an heir who is the spouse of the deceased participant, accompanied by a copy; 7. a reference letter or work certificate from the participant's workplace; 8. a savings-account book, used as a supporting document in the JKM benefit-disbursement process; and 9. a Taxpayer Identification Number (NPWP) if the balance or funds in the account are subject to applicable tax provisions. The completeness of these documents is necessary to facilitate the administrative examination process and minimize obstacles in the disbursement of death benefits to eligible parties.

The heir's limited understanding of claim procedures was an administrative barrier and explains the importance of SPN assistance. It was not, however, the principal structural barrier to the claim. The decisive obstacle documented in the case was BPJS's reliance on inactive participation after the employer stopped making contributions. The analysis therefore distinguishes beneficiary-level administrative difficulties from the legal and institutional problem

created by deactivation during an unresolved termination dispute.

The regulatory review does not support describing the issue simply as a complete legal vacuum. Law No. 24 of 2011, Government Regulation No. 44 of 2015, as amended, and the JKM implementing regulations govern participation, employer contribution obligations, benefits, complaints, and administration. The narrower problem is regulatory and implementation ambiguity: the reviewed provisions do not clearly establish a specific verification procedure for employer-initiated deactivation when the asserted termination is being contested. Nor does administrative inactivity, by itself, establish the legal extinction of substantive entitlement without examination of the governing JKM requirements and the worker's legal status at the time of death.

By 2023, the total number of workers registered with BPJS Ketenagakerjaan had reached approximately 35 million active workers, covering formal workers and some informal workers. According to BPS data, more than 50% of the workforce in Indonesia is in the informal sector. In North Sumatra, based on interviews with the Head of the Medan City BPJS Office, only about 40% of the total workforce were participants in BPJS Ketenagakerjaan.

The development of worker social security has not yet achieved maximum coverage of all workers; obstacles include: 1) Lack of company compliance in registering workers, either because of administrative reasons or a lack of understanding of this obligation. 2) Low awareness and knowledge among workers about BPJS and social-security programs. 3) Financial limitations among informal workers. 4) Procedures perceived as complicated and a registration process that is not yet optimal, particularly obstacles in the registration process and the payment of independent contributions by informal workers, which affect the number of participants. 5) Lack of government incentives or enforcement measures.

The legal analysis supports a narrower reform proposal. For wage-recipient participants, JKM contributions are paid by the employer under the governing JKM regulations. Where an employer seeks deactivation on the basis of termination, the administrative request should be distinguished from the legal finality of the termination itself. A verification safeguard should therefore require documentary evidence of an uncontested or legally final termination before deactivation is treated as determinative of JKM status. If the cessation of contributions is unlawful and causes loss, the employer's responsibility should be examined separately from BPJS's responsibility for claim administration; the precise monetary liability must follow the applicable statutory remedies rather than being presumed from the benefit schedule.

The case involves two legally distinct disputes that may interact. First, disagreement over whether the employment relationship was validly terminated is an industrial-relations dispute governed by Law No. 2 of 2004 and, where unresolved, may proceed through mediation and the Industrial Relations Court. Second, a dispute with BPJS concerning the administration or refusal of social-security benefits follows the complaint and mediation framework under Articles 48–50 of Law No. 24 of 2011 concerning BPJS, with litigation available before the competent District Court where the statutory settlement mechanisms do not resolve the dispute. The unresolved termination status may constitute a preliminary factual and legal issue affecting BPJS eligibility, but the two mechanisms should not be conflated. This jurisdictional separation explains why clearer coordination and an express verification rule are needed.

CONCLUSION

The principal finding is that the heir's difficulty arose from the interaction between an unresolved termination dispute and the employer-initiated cessation of BPJS contributions, which resulted in an inactive administrative status. Limited understanding of claim procedures was a secondary barrier. The regulatory framework already governs termination, JKM contributions, benefit administration, complaints, and dispute settlement, but it does not clearly provide a specific verification mechanism for deactivation based on a contested termination. The evidence therefore supports characterizing the problem as regulatory ambiguity and an implementation gap rather than a complete legal vacuum. The study further finds that industrial-relations and BPJS benefit disputes have different legal pathways. The termination issue falls under Law No. 2 of 2004 and the Industrial Relations Court mechanism, while disputes with BPJS follow the

complaint, mediation, and court framework under Law No. 24 of 2011. The proposed reform is an express verification and coordination mechanism that prevents a contested employer request for deactivation from being treated as conclusive before the termination status is legally settled, while preserving separate responsibility for the employer, BPJS Ketenagakerjaan, and the Manpower Office.

The regulatory framework should expressly require documentary verification when an employer requests deactivation on the basis of a termination that the worker has contested. The mechanism should define the employer's evidentiary duty, BPJS Ketenagakerjaan's claim-administration and verification functions, and the Manpower Office's role in providing legally available termination information without transferring one institution's statutory responsibility to another. The reform should also clarify that industrial-relations disputes and BPJS benefit disputes follow their respective statutory jurisdictions while permitting coordinated factual verification where termination status determines social-security eligibility. Socialization and assistance for heirs should support, but not substitute for, these legal safeguards.

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AUTHOR CONTRIBUTION STATEMENT

All authors jointly contributed to the conceptualization of the study, normative and empirical research design, data collection, legal-material analysis, interpretation of findings, manuscript drafting, revision, and approval of the final manuscript.

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