Analysis of the Impact of Narcotics Abuse on Work Productivity in the Company

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Abstract: Narcotics abuse is an act that is threatened with punishment in the form of imprisonment, fines, death, and rehabilitation. Of course, the legal consequences of criminal acts in the workplace are limited to the perpetrators, and the workplace may also be affected. So in this study, the authors are interested in analyzing whether the occurrence of narcotics abuse in the work environment can affect the work productivity of labor workers. This study analyzes the legal consequences to workers, laborers, and companies when committing narcotics abuse in the work environment. The method used in this study is a qualitative method with a normative juridical approach. This study concludes that it is found that narcotics abuse in the work environment can interfere with the work productivity of workers/laborers because, in the investigation process, the police will install a police line in the company environment so that it will disrupt the production process.

Keywords: Drugs, Workers, Crime, Productivity

Introduction

Narcotics are no stranger to society. Narcotics are drugs that, in specific doses, may dull the senses, reduce pain, and induce sleep, but excessive doses may cause fainting, coma, convulsions, or even death (Anonymous, n.d.). Narcotics consumers may include various groups, ranging from young to old, students, entrepreneurs to workers. The reasons for abusing narcotics are various; some do it because of friends, money, or psychological needs.

Productivity is a measure of the use of resources in an organization which is usually expressed as a ratio of the output achieved with the resources used (Handoko, 2001, p. 218). Productivity is influenced by many factors, some related to the workforce or other factors. These factors include enthusiasm, work discipline, salary, and bonuses. Good productivity will be achieved if the employees have high morale and good work discipline in carrying out their duties and obligations (Labudo, 2013). High productivity can provide distinct employee benefits, such as salary increases, promotion, and skills. Work Productivity is affected by many things, such as motivation, stress, incentives, work environment, training, and work discipline (Roni Faslah, 2013). One of the potentials to lower work productivity from outside influences is narcotics. Narcotics abuse in the workplace may occur; the perpetrator can be one or more laborers, which may affect the overall work productivity of the entire labor force.

Work productivity shows employee competence in achieving results (*output*). Therefore, the level of work productivity of each employee can be different. The goal of productivity is to increase laborers' output. The study of economics refers to the number of goods or services produced within a certain period by the company, community, or government, either for direct consumption or further production (Deardorff, n.d.). Drug abuse affects the employees' motivation and work discipline, resulting in an output decrease.

Narcotics abuse in Indonesian law has a broad meaning: trading, possessing, owning, and consuming narcotics (Law No. 35 about Narcotic, 2009). Narcotics abuse by labor workers can be interpreted as improper use of narcotics outside the supervision of a doctor, trading, possessing, or controlling narcotics illegally. This means that if it is found that there are laborers who misuse narcotics within the company, and police investigators begin to investigate it, what would happen next is that the police will put a police line around the vicinity of the company and designate it as the crime scene. Drug abuse can affect productivity in the company, thus raising concerns that it will affect the company's production targets, which means that production would become inefficient and the company would lose money. Based on the statement above, the authors are interested in researching how the negative impact of narcotics abuse on the productivity of laborers at a company.

Method

The method used for this research is the Normative Juridical Legal Research Method. Namely, the approach used in this research is normative juridical or doctrinal legal research, which is legal research that uses secondary data sources—done by emphasizing and adhering to the juridical aspects. Normative legal research is library research, namely research on secondary data. Secondary data has a scope that includes books to official documents issued by the government(Soerjono Soekanto, 2001).

Results and Discussion

Narcotics are substances, either plant or non-plant, synthetic or semi-synthetic, capable of causing decreased or loss of consciousness and pain and may cause dependence (Undang-Undang No. 35 about Narkotic, 2009, v. 1 (1)). Narcotics are classified into 3 (three) groups, such as (Waluyo, 2007, p. 48):

- 1. 1st class Narcotics: very high potential to cause *addiction/* dependence, cannot be used for therapy (treatment). Examples: heroin, cocaine, and marijuana; a) 1st Class narcotics are prohibited from being used for therapy; b) 1st class narcotics may be used for developing new medicine and for diagnostic and laboratory reagents after obtaining a permit from the local authority;
- 2. 2nd class Narcotics: the high potential to cause addiction, may be used for therapy as a last resort, but the primary purpose of its use is more for scientific development; examples: morphine, pethidine, and methadone;
- 3. 3rd class Narcotics: 3rd Class narcotics have medicinal properties, are widely used in therapy and for scientific development purposes, and have mild potential to cause addiction. Example: codeine.

Narcotics have three characteristics that distinguish them from other drugs or substances: habitual, addictive, and tolerant(Bnn, n.d.).

Habitual

Habitual is the traits of narcotics that make the consumer always remember, seek, and *longing* for narcotics. This characteristic causes narcotics users who recover later to relapse *and* use them again. The habitual trait also encourages consumers to always look for and own narcotics. All types of narcotics have habitual properties in varying degrees. The worst habitual trait can be found in heroin. The probability of relapse from heroin is very high, so the consumer is considered very difficult to be cured. Relapse most likely will not happen if the ex-consumer has an active job or hobby (Ariwibowo, n.d.). The habitual trait can only be overcome by a firm determination, supported by firm faith, and the grace of the Most Merciful God.

Addictive

Addictive is the trait of narcotics that makes the consumer want to consume it continuously and cannot stop it. Narcotics are unique because if the consumer suddenly stops consuming them, the body does not become healthy but becomes very sick. Stopping or reducing the number of narcotics consumed will cause a 'withdrawal effect, which is a feeling of excruciating pain. The feeling of comfort will only come after the withdrawal has passed or if the person concerned returns to using narcotics. The pain for each narcotic is different. The most painful and torturous feeling of pain is withdrawal due to withdrawal from heroin. The severity of the pain cannot be relieved by administering any anti-pain medication or any narcotics, except for narcotics that have been or are being used. The withdrawal effect can only be gone when consuming shabu. Withdrawal occurs not only because of the cessation of narcotics use but also because of a reduction in the dose of use. When you are used to a dose of 0.1 grams, then reduced, for example, to 0.05 grams, the person concerned will experience withdrawal (Ariwibowo, n.d.).

Tolerance

Tolerance is the nature of narcotics which makes the body of the consumer more and more integrated with the narcotics and adjusts to the narcotics so that it demands higher doses of use. The dose must be increased to get the same effect as in the past. If the dose is not increased, the narcotics will not react, making the wearer experience withdrawal. If the increase in the dose has exceeded the body's tolerance capacity over time, there will be an extraordinary and deadly pain effect. Such a condition is called an overdose (OD). The pain intensity due to OD is the same as the pain in withdrawal. The signs of OD in each type of narcotics are different (Ariwibowo, n.d.).

The list Impact/consequences of narcotics abuse For the consumer's body, such as (Waluyo, 2007, p. 32): a) Brain function and metabolism are disturbed, starting from memory loss, lack of attention, perception, and feelings; b) Addiction, overdose, organ failure, such as liver, kidneys, lungs, heart, stomach, reproduction and

mental disorders; c) Changes in lifestyle, such as immoral, and antisocial behavior; d) As a result of unsterilized needles, there is a risk of HIV/AIDS, inflammation of the blood vessels, heart, hepatitis B and C, tuberculosis.

Narcotics in Indonesia are regulated in Constitution no. 35 the year 2009 concerning Narcotics, which purpose is to ensure the availability of narcotics for the benefit of health and science, prevent narcotics abuse, and eradicate illicit narcotics trafficking. *Narcotics abuse* is a particular crime regulated outside the Criminal Code, in Constitution Number 35 of 2009 concerning Narcotics. Victims of narcotics crimes reach almost all circles, from the upper class to the lower strata of society (Basuki, 2017). Narcotics are theoretically qualified as an extraordinary crime because the victimization impact is quite significant.

Narcotics abuse can be interpreted as consuming, distributing, buying, and selling narcotics inappropriately, in this case, outside the supervision of a doctor. Narcotics abuse in the workplace is undoubtedly alarming, disrupts order, and affects work discipline. Several factors cause employees to consume narcotics and psychotropic substances: a) antisocial and psychopathic personality of the perpetrator; b) The psychological condition of the perpetrator is unstable and often depressed; c) Unstable family conditions; d) Unclear and misleading association; e) Access to narcotics, both official and unofficial (Mardani, 2008, p. 102).

In terms of health, the effects of consuming narcotics are varied, such as senses numbness, drowsiness, fainting, coma, or convulsions. This raises concerns that the company's productivity will be affected, resulting in a decrease in discipline, which can seriously disrupt employee productivity. IG Wursanto defines *work discipline* as: "conditions that cause or encourage employees to work and carry out all tasks following established norms and rules (Wursanto, 2001). Work discipline, according to Pandji Anoraga, is defined as "the attitude of employees who always want to follow or comply with all work regulations that the company has determined." (Anoraga, 2004).

Regulations are needed to guide employees in creating discipline in the company. With good discipline, employees' work productivity would increase, which would help in achieving company goals. Employees' discipline is considered to be good if most of the employees obey the existing regulations. Work discipline means living up to the applicable rules, norms, and rules of conduct so that they consciously obey them. This awareness indicates that the element of self-control has been embedded in implementing what he has realized. Thus, it shows high mental attitudes and norms (Roni Faslah, 2013). The same thing was expressed by Widodo and Sunarso, "work discipline greatly affects productivity because, with work discipline, workers can carry out their work following the knowledge they get from training" (Widodo and Sunarso, 2009). In addition to company regulations, other regulations that labor workers must obey are the national constitution. Constitution number 35, the year 2009 has prohibited the abuse of narcotics. Therefore to maintain discipline, workers must have legal awareness.

In Constitution number 35, the year 2009 concerning Narcotics. The definition of *narcotics abuse* regulated in Article 1 number 15 is a person who uses Narcotics without a permit or is against the law. Sanctions for acts of drug abuse depend on the role of the perpetrator. If the perpetrator only consumes narcotics, the sanctions would be light. On the contrary, if the perpetrator produces or sells narcotics, the sanctions would be severe; from this, it can be concluded that the perpetrators of abuse can be categorized into three categories: producers, sellers, and consumers.

The definition of a narcotics addict is according to the Constitution number. 35 the year 2009 Article 1 number 13 is an individual who consumes narcotics and is in a state of addiction. From Article 1, number 13, and number 15, it is clear that there are differences in terms of consumers and abusers/actors. The term consumer contains an element of inadvertency towards his addiction to narcotics, for example, being forced by someone to consume narcotics, while in the term abuser, there is an element of intent in his consumption and addiction to narcotics.

Constitution number. 35 the year 2009 does not explicitly state the term or definition of dealer, the Narcotics Law only mentions the meaning of illicit trafficking of narcotics and Narcotics precursors as stated in Article 1 number 6, namely every activity carried out illegally designated as Narcotics and Narcotics Precursor Crimes.

Narcotics abuse is considered a criminal act. A *criminal act* is an act that is prohibited by law and is accompanied by sanctions for those who violate the prohibition. It can also be said that a criminal act is an act that is prohibited and punishable by criminal law, provided that, in this case, it is remembered that the prohibition is aimed at an act (i.e., a situation or event caused by the behavior of a person), while the punishment is directed at a person who commits the crime. There is a close relationship between prohibitions and punishment, particularly between the criminal act and the person who did it. One cannot be separated from the other (Moeljatno, 1985, p. 84).

Committing a criminal act within the company is undoubtedly punishable. Punishment has a broad meaning: actions by people who have power/authority over individuals or organizations, whether a legal entity or not, violate the applicable regulations. Criminal sanctions are specific actions by the government against

individuals or legal entities that violate criminal law. The subjects of narcotics abuse in the company are employees. According to G. Kartasapoetra, employees are: people who work for companies that comply with work orders and regulations made by employers and, in return, workers will receive wages or other bonuses (G. Kartasapoetra, 1995).

People or organizations with authority will give punishments and sanctions imposed upon employees who commit narcotics abuse. It could be imposed by corporations/employers, police officers, or judges. An employer/corporation is a person or group who runs a company located inside or outside Indonesia (Zulkarnaen, 2016). The police force is a state instrument whose duty is to maintain public order and security, provide shelter, and protect society (Satjipto Raharjo, 2009). The function of the police force is to investigate crimes. According to Article 1 point 8 of the Criminal Procedure Code, judges are stated judicial officials authorized by law to adjudicate. Al. Wisnu Broto explained that judges are "a concretization of law and justice which abstractly describes judges as representatives of God on earth to enforce law and justice (Wisnubroto, 1997).

Sanctions from employers/corporations would be in the form of termination of employment/dismissal. A Ridwan Halim argues that dismissal is a method to terminate the employment relationship between employees and employers for specific reasons (A. Ridwan Halim, 1990). Zaini Asyhade believes that dismissal is the termination of employment relations between employees and employers, which can occur due to the expiration of contracts, disputes, deaths, or other reasons (H. Zainal Asikin, 2004). Dismissal due to a criminal act by the employees is regulated in Government Regulation Number 35 the year 2021, the term which states that Employers can dismiss workers for committing severe violations as regulated in work agreements, company regulations, or Collective Labor Agreement, for example, the worker commits the following acts: Drunk, drinking intoxicating liquor, consuming or distributing narcotics, psychotropic substances, and other addictive substances in workplaces.

The police force was given sanctions by starting an investigation. An investigation is a series of actions by an investigator according to the law to seek and collect evidence of a crime and to find the suspect (Law No. 8 of the Criminal Procedure Code, 1981, Chapter 1 Number 2). The investigation includes other procedures, such as Arrest, detention, search and confiscation; Summons and examinations of suspects or witnesses; other procedures that can be legally accounted for, such as installing a police line at the crime scene (Law No. 8 of the Criminal Procedure Code, 1981, Chapter 7 verse 1). Investigation procedures such as Summons, examinations, arrests, and detentions would certainly cause suffering to employees who abuse narcotics in workplaces.

Sanctions from the judge are in the form of a Principal Punishment. Chapter 10 of the Criminal Code divides crime into two categories: principal punishment and additional punishment, especially for narcotics abusers. The principal punishment will apply, which consists of a) Death. The death penalty is generally imposed upon perpetrators of drug trafficking in large numbers; b) Imprisonment. Imprisonment can be imposed for life or a specific period. The convict is placed in a correctional institution for a particular duration of twenty years (Law No. 1 Criminal Law, 1946, Chapter 12), and during his sentence, he is subject to work obligations; c) Confinement. Confinement has a shorter duration than imprisonment and is generally imposed for perpetrators of light criminal offenses, crimes related to narcotics abuse usually will not get a confinement sentence; d) Fines. Fines are imposed on criminal offenses regulated by law. Based on Chapter 30 Verse (2) of the Criminal Code, if the fine is not paid, it is replaced with Confinement; e) Closure punishment. Closure punishment is regulated in chapter 10 of the Criminal Code. It is based on Chapter 1 of Constitution Number 20, 1946, concerning the Closure Punishment ("Law 20/1946"). Chapter 2 verse (1) of Constitution Number 20, the year 1946, states that for people who committed crimes but whose motivation came from the intention that is a legally valid reason, the judge may impose a Closure Punishment.

Punishment is not only intended as a deterrent and frightening effect but also aims to protect other employees from the destructive influence of the perpetrator's narcotic abuse in the workplace. The forms of formulation of criminal sanctions in Constitution number 35 year 2009 concerning narcotics can be grouped as follows: a) singular form (jail or fine only); b) alternative form (choice between imprisonment or a fine); c) Cumulative form (imprisonment and fines); d) Combination/mixed form (prison or fine).

Criminal sanctions are intended to maintain security and order, and the basis of the execution created debate among experts, which led to three theories, namely: the fundamental theory (vergeldingstheorie); relative Combined (vereningingstheorie) (Marpaung, 2008).The theory theory; Theory Absolute (absolute/vergeldingstheorie). According to this theory, the law must be enforced because crimes harm society; as revenge (vergeliding), the perpetrators must also be harmed. In Relative theory, punishment is given to the people's discontent and to satisfy prevent crime (Marpaung, theory (vereningingstheorie) teaches that punishment is given to maintain the legal order in society, rehabilitate, and deter criminals. By examining the theories above, it can be concluded that the purpose of punishment is; to a) deter criminals, b) make the criminals helpless, and c) Rehabilitate them criminals (Marpaung, 2008, p. 107).

According to Paragraph 1, the Purpose of Sentencing in chapter 51 and 52 of the Criminal Code Bill, the objectives of punishment are: a) enforce norms to prevent crime; b) protect and protect society; c) rehabilitate convicts in prison; d) guiding and educating convicts to become law-abiding people and beneficial for society; f) Resolving conflicts caused by criminal acts, restoring balance, and bringing a sense of security and peace in society; f) Cultivate a sense of remorse and free the guilt of the convict; g) Punishment is not intended to disparage human dignity.

The adverse effects of the emergence of narcotics abuse in the company environment would be perceived from several impacts; health impacts, Penal impacts, And civil repercussions. The impact on health that interferes with work productivity is caused by the effects of narcotics, namely the disruption of the brain function of workers, ranging from memory loss, lack of attention and perception, psychological impact, and changes in motivation. The impact from a Penal perspective for the perpetrators themselves can be seen in Chapter 127 of Constitution Number 35, the year 2009, which regulates sanctions against narcotics abuse, stating that every Narcotics Abuse shall be sentenced to imprisonment for the length of time depending on the actions of the perpetrator. If the perpetrator is proven to be a victim of narcotics abuse, he will be subject to mandatory rehabilitation. The status of a suspect, or convict, means that the employees/perpetrators must undergo an inspection at the police station. During the inspection process, if the worker/perpetrator is unable to carry out his/her function at the place where he/she works, the Employer may terminate the worker for committing a serious violation as regulated in the work agreement, company regulations, or collective work agreement (Chapter 52 paragraph (2) Government Regulation No. 35 the year 2021), which means that these laborers are at significant risk of being dismissed, on other legal grounds such as chapter 158 (1) letter c of Constitution Number 13 the year 2003 concerning Manpower which states that Corporation/ employer may terminate employment relations with workers/ employees because the employees have committed grave mistakes such as being drunk, intoxicated, consuming or distributing narcotics, psychotropic substances, and other addictive substances in the workplace. In conclusion, the employee is not only threatened with criminal punishment, but he is also verge of losing his job.

The impact on the company if narcotics abuse happens in their vicinity is the start of investigation efforts by the police within the vicinity of the company. A police line would be installed at the crime scene (TKP), hindering production. A *police line* prohibits anyone from entering the crime scene without the investigator's permission. This police line is coercive and punishable by laws if trespassed without a permit. The function of the police line, in addition to maintaining the integrity of the crime scene, also ensures that any goods or objects at the crime scene that are not directly related to the crime do not move without the permission of the investigator conducting the investigation (Napitupulu, 2016). Sanctions for breaking through the police line are implicitly regulated in Chapter 221, paragraph (1) number 2 of the Criminal Code, namely:whoever after a crime has been committed and with the intent to cover it up, or to hinder or complicate the investigation or prosecution, destroy, eliminate, hide objects which proof the crime was committed or traces of other crimes, or withdraw them from the crime scene carried out by judicial or police officials or by other people, which according to the provisions of the law continuously or temporarily when assigned to carry out police duties.

The police line installation aims to complete the crime scene in the context of Reconstruction. Reconstruction aims to find out the role of each suspect, seek to deepen the information from the suspect, reveal other motives of an event, and provide an overview of the occurrence of a criminal act by re-enacting the suspect committed the crime. Criminal offenses aim to convince the examiner of the truth of the suspect's testimony or witness. Reconstruction can be carried out at the crime scene to clarify the suspect's statement, but it can also be carried out in other places that have been changed to be like the existing crime scene. This is due to anticipating unfavorable conditions at the scene.

Meanwhile, the role of the Reconstruction is to synchronize the statements of the accused and witnesses obtained at the time of examination conducted by investigators so that a clear picture of the incidents of the crime committed is obtained (Flora, 2016). The installation of a police line means that workers cannot enter the work area as long as the police carry out investigations because as long as the police line is installed, workers are prohibited from entering the crime scene environment. This will disrupt the production process, which will affect workers' productivity.

Conclusion

The occurrence of narcotics abuse by labor workers has the risk of reducing work productivity in the company. This happens because there are several impacts experienced by both employers and employees, namely health impacts, criminal impacts, and civil impacts. A labor worker feels the health impact if he consumes narcotics, such as health problems, the criminal impact is felt by labor workers and employers starting from when they fulfill summons to the police, trials, until court decisions, the civil impact is felt by labor

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workers who are threatened with being dismissed as soon as they are identified as a suspect. All of these things, when combined, will result in a decrease in work productivity, especially if a police line is placed in the company environment, which results in the production process being unable to continue. In the future, companies in Indonesia should provide counseling about narcotics and their legal effects as often as possible to their employees within the company so that they are aware of the legal implications of narcotics abuse.

References

- [1]. A. Ridwan Halim. (1990). Hukum Perburuhan Dalam tanya Jawab (2nd ed.). Galia Indonesia.
- [2]. Anonymous. (n.d.). narcotic. http://www.meriam-webster.com/Dictionary/Narcotic
- [3]. Anoraga, P. (2004). Manajemen Bisnis. Rineka Cipta.
- [4]. Ariwibowo, K. (n.d.). 3 Sifat Jahat Narkoba. http://dedihumas.bnn.go.id/Read/Section/Artikel/2014/01/06/852/3-Sifat-Jahat-Narkoba
- [5]. Basuki. (2017). Penerapan Sanksi Pidana Mati Dalam Menanggulangi Tindak Pidana Narkotika Dihubungkan Dengan Tujuan Pemidanaan. Universitas Islam bandung.
- [6]. Bnn, D. (n.d.). Sifat Jahat Narkoba. Retrieved July 1, 2022, from http://dedihumas.bnn.go.id/Read/Section/Artikel/2014/01/06/852/3-Sifat-Jahat-Narkoba
- [7]. Deardorff, A. (n.d.). Output. http://www-personal.umich.edu/~alandear/glossary/o.html#output
- [8]. Flora, H. S. (2016). Fungsi Rekonstruksi Di Tempat Kejadian Perkara Dalam Rangka Pengungkapan Tindak Pidana. Jurnal Law Pro Justitia, 2(1), 35–51.
- [9]. G. Kartasapoetra. (1995). Hukum Perburuhan di Indonesia (1st ed.). PT, Raja Grafindo Persada.
- [10]. H. Zainal Asikin. (2004). Dasar-dasar Hukum Perburuhan. PT Rajawali Grafindo Persada.
- [11]. Handoko, H. (2001). Manajemen Personalia Dan Sumber Daya Manusia.
- [12]. Labudo, Y. (2013). Disiplin Kerja Dan Kompensasi Pengaruhnya Terhadap Produktivitas Karyawan. Jurnal Emba, 1(3), 55–62.
- [13]. Mardani. (2008). enyalahgunaan Narkoba dalam Perspektif Hukum Islam dan Hukum Pidana Nasional. PT Raja Grafindo.
- [14]. Marpaung, L. (2008). Asas teori Praktik Hukum Pidana. Sinar Grafika.
- [15]. Moeljatno. (1985). Azas-azas Hukum Pidana (3rd ed.). Bina Aksara.
- [16]. Napitupulu, R. (2016). Pertanggungjawaban Hukum Penyidik Atas Hilangnya Barang Dari Tempat Kejadian Perkara Yang Telah Dipasang Police Line.
- [17]. Roni Faslah, M. T. S. (2013). Pengaruh Motivasi Kerja Dan Disiplin Kerja Terhadap Produktivitas Kerja Pada Karyawan Pt. Kabelindo Murni, Tbk. Jurnal Pendidikan Ekonomi Dan Bisnis (Jpeb), 1(2), 40–53.
- [18]. Satjipto Raharjo. (2009). Penegakan Hukum Suatu Tinjauan Sosiolog. GentaPublishing.
- [19]. Soerjono Soekanto, S. M. (2001). Penelitian Hukum Normatif. PT. Raja Grafindo Persada.
- [20]. Undang-undang No. 1 Hukum Pidana, (1946).
- [21]. Undang-undang No. 8 Hukum Acara Pidana, (1981).
- [22]. Undang-undang no. 35 about Narkotic, (2009).
- [23]. Waluyo, M. (2007). Pedoman Pelaksanaan P4gn Melalui Peran Serta Kepala Desa/ Lurah Babinkamtibnas Dan Plkb Di Tingkat Desa/Kelurahan. BNN.
- [24]. Widodo and Sunarso. (2009). Pengaruh Penyuluhan, Motivasi Dan Disiplin Kerja Terhadap Produktivitas Kerja Kelompok Tani. Jurnal Manajemen Sumber Daya Manusia, 3(1), 47–56.
- [25]. Wisnubroto, A. (1997). Hakim dan Peradilan di Indonesia (dalam beberapa aspek kajian). Universitas Atma Jaya Yogyakarta.
- [26]. Wursanto, I. (2001). Manajemen Kepegawaian 2. Kanisius.
- [27]. Zulkarnaen, A. H. (2016). Aspek-aspek hukum pemutusan hubungan kerja didahului pelanggaran hukum pidana oleh pekerja/buruh dalam cita hukum ketenagakerjaan indonesia. Unsur Press.