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Legal Protection of Female Workers with Invisible Disabilities in Indonesia Based on Feminist Legal Theory Through the Analysis of Labor Law and Constitutional Court Decision No. 130/PUU-XXIII/2025

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Abstract

Female workers with invisible disabilities face potential disadvantages when gendered employment expectations intersect with fluctuating functional limitations and disability-related stigma. This study examines Indonesian employment protections and the legal implications of Constitutional Court Decision Number 130/PUU-XXIII/2025 through Feminist Legal Theory. A normative juridical design employed statutory, conceptual, and case approaches to analyze constitutional guarantees, manpower legislation, disability law, and the Court's conditional interpretation. An unpublished YRPAD community position statement provided contextual material without constituting representative empirical evidence. The analysis identifies protections against discrimination, entitlements to reasonable accommodation, and corresponding employer obligations under existing legislation. The Court's decision permits recognition of persons with certain chronic illnesses within the physical disability category following voluntary medical assessment, without automatically classifying all chronic illnesses or invisible conditions as disabilities. The interpretation expands potential access to established protections but does not independently establish workplace procedures for disclosure, confidentiality, or accommodation. Feminist and intersectional analysis indicates that formally neutral performance standards may disadvantage workers with fluctuating conditions, especially where gendered expectations shape employment assessments. Effective protection requires individualized adjustments, confidential requests, accessible complaints, and accountable enforcement. This study contributes a gender-responsive interpretation linking constitutional recognition to substantive employment equality while acknowledging the limits of documentary analysis.

Keywords: *Constitutional Court, Female Workers, Feminist Legal Theory, Invisible Disabilities, Reasonable Accommodation.*

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INTRODUCTION

The legal protection of female workers with invisible disabilities presents a distinct problem of substantive equality within Indonesian employment relations, where the recognition of individual rights does not necessarily eliminate institutional barriers to their exercise. Conditions involving chronic pain, fluctuating functional limitations, or other impairments that are not immediately observable may affect workplace participation while remaining difficult for employers to recognize without voluntary disclosure. Article 27(2), Article 28D(2), Article 28H(2), and Article 28I(2) of the 1945 Constitution establish constitutional grounds for employment, fair treatment, differentiated measures to achieve equality, and protection against discrimination. Within ordinary employment relations, the antidiscrimination guarantees of Articles 5 and 6 of Law Number 13 of 2003 require examination of how apparently uniform standards operate for workers facing different forms of disadvantage. Indonesian legal scholarship concerning discrimination against female workers identifies a continuing need to assess the effectiveness of employment protection beyond the formal formulation of statutory guarantees (Darmawan & Hamzah, 2024). Research on the careers of women with disabilities demonstrates that gender and disability can interact with workplace structures, producing barriers inadequately captured by isolated categories of disadvantage (Chan & Hutchings, 2023). Evidence on women's employment in Indonesia similarly links disability with household responsibilities and

socioeconomic conditions, indicating that employment inequality cannot be attributed to disability status alone (Sari et al., 2026).

The literature on invisible disability increasingly treats workplace exclusion as a consequence of organizational expectations, disclosure conditions, and the uneven implementation of accommodation rather than as a direct consequence of medical impairment. Qualitative research on disclosure shows that employees may conceal invisible disabilities until disclosure becomes necessary, particularly where expectations of the ideal worker influence perceptions of competence and productivity (Mastrella et al., 2026). A critical case study of women working from home further identifies flexibility as both a potentially useful accommodation and a strategy for meeting organizational expectations without openly disclosing an impairment (Millmark et al., 2025). Research on endometriosis-inclusive workplace policies demonstrates that employer support may remain inconsistent even when managers acknowledge the importance of formal policies and reasonable adjustments (Howe et al., 2025). These findings point to a shared institutional problem: workers are frequently expected to justify individual adjustments within practices designed around a presumed continuously available and fully able employee. Intersectional reviews of women's disability-related careers further distinguish barriers associated with gender, workplace organization, and social position from obstacles that can be addressed through individualized accommodation alone (Chan & Hutchings, 2023).

Indonesian legal scholarship has developed important analyses of employment equality and disability rights, but the relationship between conditional recognition of invisible disability and gender-sensitive employment protection requires more precise examination. Constitutional Court Decision Number 130/PUU-XXIII/2025, pronounced on 2 March 2026, conditionally reinterpreted the Explanation of Article 4(1)(a) of Law Number 8 of 2016 to include persons with other chronic illnesses within physical disability following assessment by medical personnel undertaken voluntarily. A study specifically addressing that decision considers its implications for the recognition of invisible disabilities in Indonesian law, establishing the relevance of legal classification without resolving every question arising within employment relationships (Dwiprigitaningtias et al., 2026). Indonesian research on color-vision deficiency and workplace discrimination separately examines failures to provide reasonable accommodation, indicating that recognition and implementation raise distinct legal issues (Ardini et al., 2026). An intersectional reconstruction of protections for women with disabilities in outsourcing relationships further demonstrates why rules addressing gender, disability, and employment arrangements in separate legal categories may leave overlapping disadvantages insufficiently addressed (Nurhayati et al., 2026). Feminist socio-legal analysis of legal invisibilisation also shows how exclusion and differentiation within legal frameworks can obscure forms of disadvantage, although that research concerns migrant care work rather than invisible disability (Sagmeister, 2026). The specific gap addressed here concerns the combined interpretation of the Court's conditional recognition, Indonesian employment obligations, and the gendered consequences of requesting accommodation for conditions that may not be outwardly apparent.

The unresolved relationship between recognition and enforceable workplace protection has practical consequences for employees who must decide whether disclosing a chronic condition is necessary to obtain an adjustment. A medical assessment permitted by the Constitutional Court's interpretation should not be conflated with unrestricted employer access to a worker's health information or an automatic requirement to disclose a diagnosis. Workplace research indicates that concealment may be a rational response to anticipated evaluations of productivity, creating tension between seeking support and avoiding stigmatization (Mastrella et al., 2026). Employer-focused research on endometriosis highlights the need for organizational procedures, consistent policy application, and practical flexibility rather than relying exclusively on workers to negotiate individual exceptions (Howe et al., 2025). Indonesian legal analysis of reasonable accommodation and discriminatory treatment in employment provides a domestic basis for scrutinizing whether general statutory guarantees produce accessible obligations for employers (Ardini et al., 2026). Without clarity concerning accommodation requests, confidentiality, complaint mechanisms, and protection from adverse employment action, the expansion of legal recognition may remain disconnected from the material conditions in which female employees exercise their rights (Darmawan & Hamzah, 2024).

The present research adopts Feminist Legal Theory to evaluate how formally neutral employment norms may operate differently for women whose disabilities are episodic, concealed, or

otherwise not readily observable. Existing legal analysis of Decision Number 130/PUU-XXIII/2025 concentrates on the recognition of invisible disability, whereas the inquiry developed here concerns the consequences of that recognition for employer duties and the legal position of female employees (Dwiprigitaningtias et al., 2026). Scholarship reconstructing protections for disabled women in outsourcing relations offers an important account of intersectional vulnerability but addresses a particular employment arrangement rather than the interaction between invisible conditions, voluntary medical assessment, and accommodation under the Court's interpretation (Nurhayati et al., 2026). Feminist analysis of legally produced invisibility supplies a complementary critical lens for examining whether classification rules and differentiated protections leave experiences of disadvantage outside effective legal remedies, without equating invisible work with invisible impairment (Sagmeister, 2026). The research therefore distinguishes its gap, namely the insufficiently integrated analysis of disability recognition and substantive workplace equality for women, from its proposed contribution, an interpretation joining constitutional disability jurisprudence with employment protections and gender-responsive legal reasoning. Evidence that disability, household responsibilities, and socioeconomic circumstances intersect in Indonesian women's employment further supports examining legal duties against the actual distribution of workplace constraints (Sari et al., 2026). Its novelty lies in specifying how legal recognition, consent to medical assessment, reasonable accommodation, confidentiality, and protection from discrimination should be evaluated together rather than as unrelated questions of status and employment regulation.

This study aims to examine the adequacy of Indonesian labor legislation in protecting female workers with invisible disabilities through a critical application of Feminist Legal Theory. It assesses the relationship between constitutional equality guarantees, general employment protections, and disability-specific entitlements relevant to access to work, fair treatment, and reasonable accommodation. The analysis further examines the legal implications of Constitutional Court Decision Number 130/PUU-XXIII/2025, particularly its conditional recognition of certain chronic illnesses and the voluntary character of medical assessment. Attention is directed to the legal consequences of disclosure, the safeguarding of medical confidentiality, discriminatory employment practices, and the allocation of responsibilities between workers and employers. The theoretical contribution consists of integrating substantive equality and intersectional disadvantage into the interpretation of employment protections for conditions whose effects are not necessarily visible. The practical contribution is to identify points requiring clearer legal interpretation and implementation so that disability recognition can be connected to accessible accommodation, effective remedies, and equitable employment conditions without presuming that the decision automatically recognizes every invisible condition as a disability.

RESEARCH METHODS

This research employed a normative juridical method using statutory, conceptual, and case approaches to examine the legal protection of female workers with invisible disabilities within the Indonesian legal system. The statutory approach examined the 1945 Constitution of the Republic of Indonesia, Law Number 13 of 2003 concerning Manpower and its amendments, Law Number 8 of 2016 concerning Persons with Disabilities, Law Number 19 of 2011 concerning the ratification of the Convention on the Rights of Persons with Disabilities, and Law Number 6 of 2023 concerning Job Creation, with particular attention to employment equality, nondiscrimination, reasonable accommodation, and protection against disability-based dismissal. These instruments were examined as interconnected sources of legal obligations and individual entitlements, reflecting the distinction between formal employment guarantees and the effective protection of persons with disabilities (Arliman S. et al., 2024). The conceptual approach applied Feminist Legal Theory, intersectionality, substantive equality, and vulnerability theory to assess how formally neutral employment provisions may reproduce structural disadvantages arising from the interaction between gender and disability (Nurhayati et al., 2026). The case approach examined Constitutional Court Decision Number 130/PUU-XXIII/2025, particularly its conditional interpretation of the Explanation of Article 4 paragraph (1) letter a of Law Number 8 of 2016 concerning the recognition of certain chronic illnesses and the voluntary character of medical assessment (Dwiprigitaningtias et al., 2026). The unit of analysis consisted of legal provisions, constitutional interpretations, judicial reasoning, and relevant legal

doctrines concerning the recognition of invisible disabilities and the corresponding protection of female workers in employment relationships.

The research utilized primary legal materials consisting of constitutional provisions, employment and disability legislation, relevant international legal instruments, and Constitutional Court Decision Number 130/PUU-XXIII/2025, while secondary legal materials included academic publications addressing feminist jurisprudence, workplace discrimination, disability rights, and substantive equality. Secondary legal scholarship was examined to identify how legal classifications and institutional practices may produce exclusion despite the formal availability of equality protections (Sagmeister, 2026). The legal materials were analyzed qualitatively through systematic interpretation, which examined the relationship between constitutional guarantees, employment legislation, disability-specific protections, and employers' obligations to provide reasonable accommodation (Ardini et al., 2026). Conceptual interpretation applied Feminist Legal Theory and intersectionality to assess whether existing legal norms adequately address the combined disadvantages associated with gender, disability, and unequal employment relationships (Chan & Hutchings, 2023). Purposive interpretation evaluated the constitutional implications of the Court's conditional recognition of chronic illness, particularly concerning nondiscriminatory treatment, medical confidentiality, voluntary disclosure, employment security, and access to reasonable accommodation without presuming that every invisible medical condition automatically qualifies as a disability. As a normative legal inquiry based on documentary materials, the research did not involve interviews, surveys, or statistical measurement, and its conclusions were confined to the coherence, adequacy, and interpretive implications of the examined legal framework rather than empirical claims concerning the prevalence of workplace discrimination.

RESULTS AND DISCUSSION

Employment Protection and Reasonable Accommodation for Female Workers with Invisible Disabilities

The legal protection of female workers with invisible disabilities in Indonesia derives from constitutional guarantees of employment, equality, human dignity, and freedom from discriminatory treatment. Article 27 paragraph (2) of the 1945 Constitution recognizes the right of every citizen to work and obtain a livelihood consistent with human dignity, establishing employment as a constitutionally protected interest rather than an exclusively contractual relationship. Article 28D paragraph (2) guarantees the right to work and receive fair and proper remuneration and treatment, while Article 28I paragraph (2) prohibits discriminatory treatment on any grounds and recognizes protection against such discrimination. Article 28H paragraph (2) further recognizes the right to special facilities and treatment for obtaining equal opportunities and benefits, providing a constitutional foundation for measures addressing unequal conditions of participation. Indonesian scholarship examining the employment rights of persons with disabilities emphasizes that formal constitutional recognition must be connected to enforceable employment guarantees and institutional responsibilities capable of addressing disability-related barriers (Arliman S. et al., 2024). The protection of female workers consequently requires an interpretation of constitutional equality that considers differences in functional capacity and workplace vulnerability, particularly where formally uniform employment standards may conceal discriminatory consequences associated with gender and health conditions (Darmawan & Hamzah, 2024).

Within statutory employment regulation, Articles 5 and 6 of Law Number 13 of 2003 concerning Manpower establish complementary guarantees of equal employment opportunities and equal treatment without discrimination. Article 5 concerns equality in access to employment, whereas Article 6 addresses the treatment that workers must receive from employers after an employment relationship has been established. These provisions must be interpreted alongside the applicable amendments to Indonesian manpower legislation, including Law Number 6 of 2023, without treating general prohibitions against discrimination as substitutes for disability-specific employment protections. Article 11 of Law Number 8 of 2016 concerning Persons with Disabilities provides more detailed rights, including nondiscriminatory access to employment, equal remuneration for equivalent responsibilities, reasonable accommodation, appropriate placement, career development, and protection against dismissal based on disability. Article 11 letter d expressly recognizes the right not to be dismissed because of disability, indicating that employment security forms part of the statutory protection afforded to workers who meet the relevant legal requirements. Indonesia's ratification of the

Convention on the Rights of Persons with Disabilities through Law Number 19 of 2011 reinforces the significance of equal employment opportunities and disability-inclusive working conditions within the national legal framework (Dirkareshza et al., 2024). Comparative research on disability and employment legislation demonstrates that the recognition of employment rights must be distinguished from the institutional mechanisms through which those rights become accessible and enforceable (Pinilla-Roncancio & Rodríguez Caicedo, 2022).

The unpublished community position statement of YRPAD identifies medical disclosure during recruitment as a potential source of vulnerability for individuals living with autoimmune conditions that may produce disabilities not immediately apparent to employers (YRPAD, n.d.). Its observations concern the possibility that applicants may be evaluated through assumptions about productivity, attendance, professional competence, and future medical needs rather than through the actual requirements of the position. These concerns are particularly relevant to conditions involving fluctuating symptoms because functional limitations may not be observable during interviews or routine pre-employment assessments. A prospective worker may face competing considerations between withholding sensitive medical information to avoid unfavorable treatment and disclosing relevant limitations to obtain appropriate employment adjustments. Research on disclosure decisions among workers living with chronic health conditions demonstrates that communication with supervisors and colleagues involves distinct considerations concerning support, anticipated consequences, and workplace relationships (Woticky et al., 2025). Qualitative evidence concerning invisible disabilities further identifies tensions between disclosure and organizational expectations of the ideal worker, supporting the need to examine recruitment practices through the interaction of disability-related stigma and unequal employment power (Mastrella et al., 2026).

Medical confidentiality and reasonable accommodation create an additional legal tension when employees require adjustments that cannot be adequately explained without communicating aspects of their health conditions. An accommodation request may require sufficient information about functional limitations to permit an employer to evaluate suitable adjustments, but this practical requirement does not justify unrestricted disclosure of an employee's medical history. From a substantive equality standpoint, employment procedures should distinguish information necessary to determine work-related accommodation from information unrelated to the performance of essential professional responsibilities. The YRPAD community statement identifies hesitation surrounding medical disclosure as a potential obstacle to requesting workplace adjustments, although it does not establish the frequency or distribution of such experiences among its members (YRPAD, n.d.). Organizational research on invisible disabilities similarly emphasizes that disclosure involves distinctive challenges because employees must evaluate the potential benefits of institutional support against the possibility of negative reactions and stigmatization (Santuzzi et al., 2014). A critical study involving women with invisible disabilities working from home identifies the pressure to maintain ideal-worker expectations as a factor influencing how workers manage health-related limitations and workplace visibility (Millmark et al., 2025). These findings support a legal interpretation in which confidentiality safeguards, voluntary communication, and individualized assessment constitute relevant considerations for operationalizing reasonable accommodation without imposing unnecessary medical disclosure.

The obligation to provide reasonable accommodation is expressly regulated under Article 50 paragraph (1) of Law Number 8 of 2016, which requires employers to provide reasonable accommodation and accessible facilities for workers with disabilities. Article 50 paragraph (2) requires employers to establish complaint mechanisms concerning unfulfilled disability rights, while paragraph (3) assigns central and regional governments responsibilities for disseminating information about accommodation and accessibility. Article 50 paragraph (4) establishes administrative sanctions for employers who fail to provide reasonable accommodation and accessible facilities, including written warnings, suspension of operational activities, freezing of business permits, and revocation of business permits. These provisions establish identifiable employer obligations and regulatory consequences, although their availability to workers with chronic illnesses requires consideration of the applicable legal definition of disability and the constitutional interpretation governing recognition. Indonesian legal research concerning employment discrimination against individuals with color-vision deficiencies demonstrates the importance of examining reasonable accommodation as a concrete employment obligation rather than an optional expression of organizational support (Ardini et al., 2026). Comparative analysis of disability employment protection further identifies the distinction between

legal recognition and effective enforcement as a central problem in ensuring that statutory rights produce meaningful workplace protection (Ginting & Abduh, 2026).

The fluctuating character of certain autoimmune and other chronic conditions requires particular attention because functional capacity may vary between periods of relative stability and episodes involving pain, fatigue, mobility limitations, or medical treatment. The YRPAD statement identifies these variations as relevant to working arrangements, medical leave, and the interpretation of employee attendance or professional reliability, without presenting them as quantified findings about its members (YRPAD, n.d.). Article 48 of Law Number 8 of 2016 recognizes employment-related measures that include flexible workplaces, rest periods, flexible working schedules, assistance with occupational tasks, and special permission or leave for medical treatment. These statutory measures provide a basis for examining whether established working arrangements can be adjusted to address recognized disability-related barriers while preserving legitimate professional requirements and organizational responsibilities. Reasonable accommodation should consequently be assessed according to the individual's functional needs and the requirements of the position rather than through an assumption that every worker with a particular diagnosis requires identical adjustments. Research on endometriosis-inclusive employment policies illustrates the importance of employer preparedness, organizational awareness, and practical adjustments when responding to chronic conditions that can affect workplace participation (Howe et al., 2025). Recent research concerning endometriosis and employment also supports closer attention to conditions whose work-related consequences are not consistently visible, while avoiding the assumption that medical diagnosis alone establishes entitlement to a particular accommodation (Sercekman & Ayaz, 2026).

Employment security and career development present related questions concerning the legal distinction between legitimate performance assessment and treatment that disadvantages workers because of disability-related conditions. Article 11 of Law Number 8 of 2016 guarantees fair and dignified placement, opportunities for career advancement, and protection against dismissal based on disability, establishing safeguards that extend beyond initial recruitment. Evaluating these guarantees requires attention to whether attendance standards, promotion criteria, and performance assessments distinguish essential job requirements from limitations that may be addressed through reasonable accommodation. A systematic review of the careers of women with disabilities identifies organizational barriers and human resource management practices as relevant factors shaping employment opportunities and professional advancement (Chan & Hutchings, 2025). Indonesian scholarship concerning barriers to the right to work for persons with disabilities further supports examining the accessibility of legal protections throughout employment relationships rather than restricting analysis to formal recruitment eligibility (Rohanawati et al., 2023). Evidence concerning blind professional women in Indonesia offers a distinct comparison showing the importance of institutional and individual resources in career development, although the circumstances of visible disabilities cannot be assumed to represent the experiences of workers whose conditions remain concealed (Firmanda, 2025).

The interaction between constitutional equality, general labor protections, and disability-specific employment rights establishes a normative basis for protecting female workers with invisible disabilities, but the operation of these guarantees depends on legally relevant recognition and the accessibility of employer obligations. The YRPAD community statement identifies concerns involving recruitment, disclosure, accommodation, medical leave, professional evaluation, and employment security, providing contextual material for legal analysis rather than independently verified evidence of discriminatory conduct (YRPAD, n.d.). Because the statement does not contain gender-disaggregated findings or documented employment outcomes, its observations cannot establish that female community members experience particular discriminatory practices more frequently than other members. Legal scholarship concerning disabled women in employment relations nevertheless demonstrates the relevance of examining overlapping vulnerabilities that may remain insufficiently addressed when labor protections treat gender and disability as separate legal categories (Nurhayati et al., 2026). Research on Indonesian women's employment similarly identifies relationships among disability, household responsibilities, and socioeconomic conditions that require attention when assessing formal and substantive equality (Sari et al., 2026). Feminist analysis of legal invisibilisation provides an additional basis for questioning whether legal classifications and institutional procedures adequately recognize experiences that do not correspond to dominant expectations of a protected legal subject (Sagmeister, 2026). The unresolved issue concerns how workers with qualifying chronic

conditions may obtain legal recognition and exercise these employment protections without being subjected to compulsory identification or unnecessary medical disclosure, making the constitutional interpretation established through Decision Number 130/PUU-XXIII/2025 central to the subsequent analysis.

Constitutional Recognition of Invisible Disabilities Following Decision No. 130/PUU-XXIII/2025

Constitutional Court Decision Number 130/PUU-XXIII/2025, pronounced on 2 March 2026, introduced a significant development in the constitutional interpretation of disability recognition under Indonesian law. The proceedings concerned the constitutionality of the Explanation of Article 4 paragraph (1) letter a of Law Number 8 of 2016 concerning Persons with Disabilities, particularly its treatment of physical disabilities and the legal position of individuals living with chronic illnesses. The Constitutional Court partially granted the petition and declared the disputed explanation conditionally unconstitutional unless interpreted to include persons with other chronic illnesses following assessment by medical personnel undertaken voluntarily. This interpretation expanded the possible scope of physical disability recognition without amending the principal statutory definition of disability or creating an independent category automatically applicable to every chronic medical condition. Its legal significance arises from the relationship between medical classification, functional limitations, and the accessibility of rights established under disability legislation. Research specifically examining Decision Number 130/PUU-XXIII/2025 identifies the recognition of invisible disabilities as an important development in Indonesian legal protection, particularly where existing classifications have inadequately reflected certain chronic conditions (Dwiprigitaningtias et al., 2026). The judgment consequently provides a foundation for assessing whether individuals whose disabilities are not immediately observable can obtain existing legal protections without being subjected to classifications based exclusively on visible physical characteristics.

The constitutional dispute originated from the interpretation of a statutory explanation that described physical disability through examples associated primarily with impaired movement, including amputation, paralysis, paraplegia, cerebral palsy, the consequences of stroke or leprosy, and short stature. Although the original formulation employed the expression *antara lain*, indicating that the examples were not necessarily exhaustive, its application raised questions concerning the position of chronic illnesses that produce serious functional limitations without consistently visible physical manifestations. The petitioners relied on constitutional protections under Article 28C paragraph (2), Article 28D paragraph (1), Article 28H paragraph (2), and Article 28I paragraph (2) of the 1945 Constitution to challenge the alleged exclusion of their conditions from disability-related protection. These provisions concern collective advancement in exercising rights, legal certainty and equal treatment, special facilities and treatment for achieving equality, and protection against discrimination. The relevant constitutional issue was not whether every medical diagnosis should constitute a disability, but whether the existing explanation could be applied without excluding individuals whose long-term functional limitations warranted recognition under the governing statutory definition. Feminist legal scholarship concerning institutional exclusion demonstrates the importance of examining how legal classifications and apparently neutral distinctions may render particular experiences insufficiently recognized within established systems of protection (Sagmeister, 2026).

The conditional interpretation established by the Court requires a distinction between the existence of a chronic illness, its functional consequences, and the legal recognition of disability. Article 1 number 1 of Law Number 8 of 2016 defines persons with disabilities through long-term physical, intellectual, mental, or sensory limitations that may interact with environmental barriers and restrict full and effective participation on an equal basis. Constitutional Court Decision Number 130/PUU-XXIII/2025 must be interpreted alongside this definition rather than as a replacement for its substantive requirements. Medical assessment provides a means of evaluating whether a particular chronic condition produces limitations relevant to disability recognition, including circumstances involving recurring symptoms, fluctuating capacity, and long-term effects on daily activities. The Court expressly preserved the voluntary character of assessment, distinguishing the availability of legal recognition from compulsory attribution of disability status. Research on employment-related disclosure of invisible disabilities illustrates why recognition cannot be separated from individual autonomy, as workers may anticipate negative professional judgments when communicating impairments that are not outwardly apparent (Mastrella et al., 2026). The resulting legal construction makes disability recognition available

to qualifying individuals while preserving the distinction between a medically established condition and a legal status that an individual may voluntarily seek.

The voluntary nature of medical assessment constitutes an important element of the Court's interpretation because the decision concerns both access to legal protection and the autonomy of individuals living with chronic conditions. Disability recognition is accordingly positioned as a right that eligible persons may pursue rather than a status that must be imposed on everyone whose medical circumstances could satisfy the applicable criteria. This distinction is particularly consequential in employment relationships, where medical information may influence recruitment decisions, professional evaluations, workplace adjustments, and perceptions of occupational reliability. An employee seeking reasonable accommodation may need to communicate relevant functional limitations, but the legal purpose of such communication should be distinguished from indiscriminate disclosure of a complete medical history. Research concerning employers' responses to endometriosis demonstrates that workplace support depends on organizational understanding and accommodation practices rather than solely on the employee's willingness to disclose a medical diagnosis (Howe et al., 2025). The relationship between constitutional recognition, statutory employment rights, and the obligations of employers is presented in Table 1 to clarify the distinction between the legal basis of protection and the issues requiring further interpretation.

Table 1. Normative Relationship Between Constitutional Recognition and Employment Protection for Workers with Invisible Disabilities

Legal Instrument	Relevant Provision	Normative Protection	Issue Requiring Legal Interpretation
1945 Constitution	Articles 28D(2) and 28I(2)	Fair employment treatment and freedom from discrimination	Substantive equality for workers with non-apparent impairments
Law No. 13/2003 concerning Manpower	Articles 5 and 6	Equal employment opportunities and treatment	Application of nondiscrimination guarantees in employment relationships
Law No. 8/2016 concerning Persons with Disabilities	Article 11	Employment rights of persons with disabilities	Application to eligible workers with chronic conditions
Law No. 8/2016 concerning Persons with Disabilities	Article 50	Reasonable accommodation, accessible facilities, complaint mechanisms, and administrative sanctions	Fulfilment of employer obligations
Constitutional Court Decision No. 130/PUU-XXIII/2025	Conditional interpretation of the Explanation of Article 4(1)(a)	Recognition of certain chronic illnesses through voluntary medical assessment	Relationship between legal recognition, individual autonomy, and employment protection

Table 1 demonstrates that the constitutional interpretation established by the Court operates within an exing framework of employment and disability protections rather than creating an independent system of labor rights. Articles 5 and 6 of Law Number 13 of 2003 regulate equal access to employment and nondiscriminatory treatment, while Article 11 of Law Number 8 of 2016 establishes specific employment rights for persons with disabilities. Article 50 paragraph (1) of Law Number 8 of 2016 obliges employers to provide reasonable accommodation and accessible facilities, whereas paragraph (2) requires complaint mechanisms concerning the nonfulfillment of disability rights. Article 50 paragraph (3) assigns responsibilities to central and regional governments concerning dissemination of information on accommodation and accessibility, and paragraph (4) establishes administrative sanctions for employers who fail to provide the required accommodation and facilities. These provisions must be read in conjunction with Article 48, which identifies possible employment adjustments including flexible workplaces, rest periods, flexible schedules, assistance with occupational tasks, and special leave for treatment. Indonesian legal scholarship on failures to provide reasonable

accommodation demonstrates the relevance of examining disability protection through identifiable employer obligations rather than treating equal treatment as an abstract statutory commitment (Ardini et al., 2026). Comparative analysis of disability employment protection similarly highlights the distinction between formal recognition and effective enforcement, supporting the need to clarify how recognized entitlements can be exercised within actual employment relationships (Ginting & Abduh, 2026).

The interaction between general employment legislation and disability-specific protections raises further questions concerning the procedures through which workers with qualifying chronic conditions may request adjustments or challenge discriminatory treatment. Law Number 13 of 2003, as amended through the applicable employment legislation, provides general nondiscrimination guarantees but does not itself prescribe the voluntary medical assessment contemplated by Constitutional Court Decision Number 130/PUU-XXIII/2025. The judgment also does not independently establish a detailed workplace procedure governing the collection, retention, or disclosure of medical information when an employee seeks disability-related accommodation. These matters require interpretation of existing legal obligations while distinguishing medical assessment for recognition from an employer's evaluation of reasonable workplace adjustments. Research addressing legal barriers to employment for persons with disabilities demonstrates the significance of examining procedural access and institutional implementation alongside the substantive existence of employment rights (Rohanawati et al., 2023). The principal normative issue is whether workers who qualify for disability-related protection can access the corresponding employment guarantees without encountering unnecessary disclosure requirements, inconsistent assessment practices, or restrictions unrelated to essential occupational responsibilities.

The relationship between constitutional recognition and practical employment protection becomes particularly significant for female workers whose chronic conditions interact with gender-related expectations concerning attendance, productivity, and professional availability. Recognition of a condition through voluntary assessment may clarify eligibility for disability-related protection, but it does not independently eliminate institutional practices that disadvantage workers requiring flexible arrangements or periodic medical treatment. Research on Indonesian women's employment identifies relationships among disability, household responsibilities, and socioeconomic circumstances, supporting the relevance of analyzing employment protection through overlapping rather than isolated forms of disadvantage (Sari et al., 2026). Studies of the careers of women with disabilities likewise demonstrate that organizational structures and gender-related inequalities may influence employment opportunities even where formal protections are available (Chan & Hutchings, 2023). The YRPAD community statement identifies limited awareness of invisible disabilities and difficulties surrounding recognition as concerns relevant to individuals living with autoimmune conditions, although its observations do not constitute gender-disaggregated evidence of workplace discrimination (YRPAD, n.d.). From a normative standpoint, these concerns justify examining whether procedures for recognition and accommodation remain accessible to individuals experiencing fluctuating functional limitations while preserving their autonomy over medical assessment. The Court's interpretation consequently requires evaluation not only of eligibility for disability status but also of how employers and public institutions apply existing obligations without reproducing disadvantage through apparently neutral administrative requirements.

Constitutional Court Decision Number 130/PUU-XXIII/2025 establishes an interpretive basis for recognizing certain chronic illnesses within the category of physical disabilities while retaining voluntary medical assessment as a condition of the recognition contemplated by its ruling. The decision does not automatically classify all autoimmune conditions, chronic illnesses, or other invisible impairments as disabilities, nor does it independently resolve the procedural requirements of employment accommodation or medical confidentiality. Its significance for female workers lies in the potential application of existing employment and disability protections to qualifying individuals whose functional limitations were previously insufficiently reflected in conventional understandings of physical disability. Feminist legal analysis concerning exclusion and differentiation provides a basis for examining whether the expansion of recognized legal categories is accompanied by procedures capable of preventing the continued invisibility of affected individuals within institutional decision-making (Sagmeister, 2026). The normative findings remain limited to statutory interpretation and constitutional reasoning, as the available documentary materials do not establish the prevalence of discrimination or

demonstrate the practical effectiveness of the judgment in particular workplaces. These unresolved institutional questions provide the basis for examining Feminist Legal Theory, intersectional discrimination, and the responsibilities of employers and public authorities in strengthening substantive employment protection.

Feminist Legal Theory, Intersectional Discrimination, and Institutional Reform in Employment Protection

Feminist Legal Theory provides a critical foundation for evaluating whether the Indonesian employment protection framework adequately addresses the structural disadvantages experienced by female workers with invisible disabilities. The principal juridical concern arises when formally neutral employment standards presume that workers possess comparable physical capacities, uninterrupted availability, and equal bargaining positions, despite differences in their health conditions and social responsibilities. Article 28H paragraph (2) of the 1945 Constitution provides a constitutional basis for differentiated measures directed toward achieving equality, allowing employment protections to be interpreted beyond the requirement of identical treatment. Feminist legal scholarship demonstrates that exclusion and differentiation within legal frameworks may preserve inequalities even when affected individuals receive formal legal recognition (Sagmeister, 2026). Research concerning women with disabilities similarly identifies the interaction of gender, disability, organizational practices, and social expectations as a source of disadvantage that cannot be adequately understood through separate analytical categories (Chan & Hutchings, 2023). Indonesian scholarship on disabled women in employment relationships further supports an intersectional interpretation of labor protection, particularly where legal provisions addressing individual characteristics separately may fail to capture their combined consequences (Nurhayati et al., 2026).

Intersectional discrimination presents a distinct challenge because gender-related employment expectations and disability-related barriers may operate simultaneously rather than through independent mechanisms. A formally identical performance requirement may affect employees differently when health-related limitations interact with unequal caregiving responsibilities, occupational segregation, or restricted access to institutional support. Research examining women's employment in Indonesia identifies relationships among disability, household responsibilities, and socioeconomic conditions, indicating that employment outcomes must be analyzed through multiple dimensions of disadvantage (Sari et al., 2026). Comparative qualitative evidence concerning women with disabilities across seven countries also demonstrates the relevance of employment experiences shaped by gender, disability, and differing institutional arrangements (Abusalha, 2024). These findings are legally relevant when assessing whether the nondiscrimination guarantees of Articles 5 and 6 of Law Number 13 of 2003 sufficiently address employment practices that impose disproportionately burdensome conditions on particular workers. A systematic review concerning the careers of women with disabilities further identifies organizational arrangements and human resource management practices as relevant to professional opportunities, supporting the examination of institutional responsibilities throughout employment relationships (Chan & Hutchings, 2025). An intersectional interpretation does not presume that every woman with an invisible disability encounters discrimination but requires legal analysis capable of identifying disadvantages that would remain obscured if gender and disability were considered exclusively as separate grounds of protection.

The ideal-worker norm illustrates how apparently neutral organizational expectations may create unequal employment conditions without expressly distinguishing workers according to gender or disability. Requirements concerning uninterrupted attendance, continuous productivity, occupational flexibility, and immediate professional availability may become problematic when employers assess workers with fluctuating health conditions against standards that disregard potentially reasonable adjustments. A critical case study of women with invisible disabilities working from home demonstrates how employees may use flexible working arrangements while continuing to experience pressure to satisfy established expectations of the ideal worker (Millmark et al., 2025). Research concerning the workplace consequences of endometriosis also identifies the importance of recognizing health-related limitations that may be neglected within conventional employment arrangements (Sercekman & Ayaz, 2026). Article 48 of Law Number 8 of 2016 concerning Persons with Disabilities recognizes employment-related adjustments, including flexible working schedules, appropriate rest periods, assistance with occupational responsibilities, and special leave for medical treatment, providing a

statutory basis for differentiated treatment where the applicable legal requirements are satisfied. The appropriate legal inquiry concerns whether particular employment standards reflect essential occupational requirements or organizational arrangements capable of reasonable modification without eliminating legitimate professional responsibilities.

The legitimacy attributed to a worker's medical condition constitutes another dimension of inequality where disability-related limitations are not consistently observable through outward physical characteristics. The unpublished YRPAD community statement identifies the possibility that individuals living with autoimmune conditions may encounter skepticism concerning the seriousness of their symptoms, particularly when their functional capacities fluctuate between periods of stability and episodes of illness (YRPAD, n.d.). Such skepticism may influence the perceived credibility of accommodation requests when employers rely on visible impairment as an informal indicator of whether disability-related support is justified. Research concerning disclosure decisions among workers with chronic health conditions identifies differences between informing supervisors and colleagues, demonstrating that medical disclosure involves relationships, anticipated responses, and workplace considerations extending beyond individual preference (Woticky et al., 2025). Qualitative research on invisible disabilities further examines the tension between claiming disability-related recognition and maintaining an identity compatible with organizational expectations of professional competence (Mastrella et al., 2026). Constitutional Court Decision Number 130/PUU-XXIII/2025 is relevant to these concerns because its conditional interpretation permits the recognition of certain chronic illnesses through voluntary medical assessment rather than treating the visible manifestation of impairment as the exclusive basis for recognition. The resulting normative distinction requires employers and responsible institutions to separate legally relevant functional limitations from assumptions about the credibility of illness, while preserving the individual's autonomy concerning medical assessment and avoiding the presumption that every chronic condition automatically satisfies the statutory definition of disability.

The relationship between employment protection and institutional accountability becomes especially significant when female workers with invisible disabilities seek accommodation or challenge decisions that may constitute discriminatory treatment. Article 11 of Law Number 8 of 2016 guarantees employment-related rights for persons with disabilities, while Article 50 establishes duties concerning reasonable accommodation, accessible facilities, complaint mechanisms, and administrative consequences for specified employer noncompliance. These provisions establish a normative distinction between the existence of an individual entitlement and the institutional arrangements required to make that entitlement accessible, particularly where workers may hesitate to disclose sensitive medical information or question unfavorable employment decisions. Indonesian legal research examining discrimination against workers with color-vision deficiencies identifies the failure to provide reasonable accommodation as a substantive legal concern rather than merely an organizational management issue (Ardini et al., 2026). Comparative legal scholarship concerning Indonesia and Malaysia similarly emphasizes the importance of examining the relationship between disability recognition and enforcement mechanisms in assessing the effectiveness of employment protection (Ginting & Abduh, 2026). A gender-responsive interpretation should consequently examine whether accommodation requests, complaints, employment evaluations, and potential dismissal decisions can be reviewed through accessible procedures that distinguish legitimate occupational considerations from disability-related prejudice and intersecting forms of disadvantage.

Community-based advocacy provides a complementary perspective on the relationship between formal legal protection, disability awareness, and the institutional conditions affecting access to employment rights. The unpublished YRPAD position statement describes educational media, webinars, community discussions, public awareness activities, and disability-awareness lanyards as initiatives intended to improve recognition of autoimmune conditions and disabilities that may not be immediately visible (YRPAD, n.d.). These initiatives are relevant to the legal analysis because limited understanding of fluctuating functional limitations may affect whether workers recognize potential entitlements and whether employers understand the purpose of individualized accommodation. The statement nevertheless does not provide systematic employment data, verified incidents of employer discrimination, or findings disaggregated by gender, limiting its evidentiary role to the concerns and advocacy positions expressed by the community. Comparative research on the employment experiences of women with disabilities indicates that institutional conditions and the availability of support are

significant considerations in understanding employment participation, although findings from different jurisdictions cannot establish the circumstances of YRPAD members (Abusalha, 2024). Article 50 paragraph (3) of Law Number 8 of 2016 assigns central and regional governments responsibilities for disseminating information concerning reasonable accommodation and accessibility, establishing a statutory basis for public information activities that may be supported by disability advocacy organizations. Community initiatives can facilitate awareness and legal literacy, but they do not replace employers' accommodation obligations, public authorities' regulatory responsibilities, or the legal procedures through which eligible individuals seek protection against discriminatory treatment.

Strengthening employment protection for female workers with invisible disabilities requires a clearer operational relationship between constitutional recognition, statutory employer obligations, and accessible procedures for exercising individual rights. Government institutions should clarify the application of Constitutional Court Decision Number 130/PUU-XXIII/2025 to disability recognition and employment protection, particularly by distinguishing voluntary medical assessment from disclosure requirements imposed within employment relationships. Employers should establish documented procedures for receiving accommodation requests, assessing relevant functional limitations, consulting affected workers, determining proportionate adjustments, and protecting medical information from unnecessary disclosure. Research on endometriosis-inclusive workplace policies supports the importance of employer preparedness and organizational procedures that translate awareness of chronic health conditions into practical accommodation measures (Howe et al., 2025). Indonesian scholarship concerning barriers to the enjoyment of employment rights by persons with disabilities further supports the need for accessible institutional mechanisms rather than reliance on formal declarations of equality alone (Rohanawati et al., 2023). Complaint procedures should permit workers to challenge discriminatory treatment and failures to provide reasonable accommodation through processes that address confidentiality, transparency, and protection against retaliatory employment consequences.

The interaction between Feminist Legal Theory, intersectionality, and disability protection demonstrates that the legal significance of invisible disabilities extends beyond the formal classification of individual medical conditions. Feminist scholarship on legal invisibilisation identifies exclusion and differentiation as mechanisms through which legal frameworks may recognize particular activities or subjects while maintaining unequal forms of protection, offering a comparative analytical lens for examining the limits of formal recognition (Sagmeister, 2026). That conceptual comparison does not equate the circumstances of migrant care workers examined in the cited scholarship with the medical conditions of female workers in Indonesia, but it directs attention toward the institutional consequences of legal classification. Constitutional Court Decision Number 130/PUU-XXIII/2025 provides an interpretive basis for recognizing qualifying chronic illnesses, while Articles 11, 48, and 50 of Law Number 8 of 2016 establish employment entitlements and institutional obligations that must be considered in applying the decision. A substantively protective framework requires coherent interpretation of disability recognition, voluntary assessment, reasonable accommodation, medical confidentiality, nondiscriminatory performance evaluation, and accessible complaint mechanisms, with attention to the combined effects of gender and disability-related disadvantage. Because the research relies on statutory materials, constitutional interpretation, academic literature, and an unpublished community position statement, its conclusions do not establish the prevalence of discrimination, the experiences of particular female YRPAD members, or the effectiveness of accommodation procedures in individual workplaces. Its theoretical contribution consists of integrating feminist and intersectional legal reasoning with the constitutional recognition of invisible disabilities, while its practical contribution lies in identifying the statutory duties and institutional procedures necessary to connect formal recognition with the meaningful exercise of employment rights.

CONCLUSION

The legal protection of female workers with invisible disabilities in Indonesia requires an integrated interpretation of constitutional guarantees, labor legislation, disability rights, and Feminist Legal Theory. Articles 5 and 6 of Law Number 13 of 2003 establish nondiscrimination guarantees, while Articles 11, 48, and 50 of Law Number 8 of 2016 regulate employment rights, reasonable accommodation, and corresponding institutional obligations. These provisions establish a normative foundation for substantive employment equality, although their effectiveness depends on accessible

procedures and consistent enforcement. Constitutional Court Decision Number 130/PUU-XXIII/2025 strengthens this framework by conditionally recognizing individuals with certain chronic illnesses within the legal category of physical disabilities through voluntary medical assessment. The decision does not automatically classify every chronic illness or invisible impairment as a disability, nor does it independently regulate workplace disclosure, medical confidentiality, or accommodation procedures. Its employment implications must consequently be interpreted alongside existing statutory protections while preserving individual autonomy and distinguishing medical diagnosis from legally recognized disability. Feminist Legal Theory and intersectionality demonstrate that formally neutral employment standards may reproduce structural disadvantages when gender-related expectations interact with fluctuating functional limitations, workplace stigma, and unequal bargaining positions.

The YRPAD community perspective identifies concerns regarding medical disclosure, reasonable accommodation, employment security, and the legitimacy of invisible illnesses, although these observations do not constitute statistically representative or gender-disaggregated empirical findings. The normative analysis indicates that constitutional recognition alone cannot establish substantive equality without corresponding employer accountability and accessible mechanisms for exercising employment rights. Government institutions should clarify the relationship between voluntary disability assessment, statutory employment protections, and the obligations arising from Constitutional Court Decision Number 130/PUU-XXIII/2025. Employers should establish individualized accommodation procedures, proportionate workplace adjustments, and nondiscriminatory assessments that distinguish essential occupational requirements from disability-related barriers. Institutional protections should also include medical confidentiality safeguards, transparent complaint mechanisms, protection against adverse employment consequences, and cooperation with disability advocacy organizations to strengthen legal awareness. The principal contribution of this research lies in developing a gender-responsive and disability-inclusive interpretation of Indonesian employment law that integrates substantive equality, intersectional discrimination, individual autonomy, and institutional accountability. Further empirical research involving female workers with invisible disabilities, employers, and relevant regulatory institutions is necessary to assess the implementation of these protections and identify practical barriers beyond the scope of normative legal analysis.

REFERENCES

Abusalha, S. (2024). Insights into employment experiences of women with disabilities: A comparative qualitative study across seven countries. *Corvinus Journal of Sociology and Social Policy, 15*(2), 161–201. https://doi.org/10.14267/CJSSP.2024.2.8

Ardini, N. P. A. M., Wacika, M. W., Sudiarawan, K. A., & Hardiyan, S. P. (2026). Disability rights violation: Failure to provide reasonable accommodation and employment discrimination against the colorblind in Indonesia. *Jurnal Pembangunan Hukum Indonesia, 8*(1), 1–24. https://doi.org/10.14710/jphi.v8i1.1-24

Arliman S., L., Ratnawati, E., & Razak, A. A. (2024). Legal guarantees for persons with disabilities to secure decent work: A human rights perspective from Indonesia. *Jurnal Wawasan Yuridika, 8*(2), 94–111. https://doi.org/10.25072/jwy.v8i2.4463

Chan, X. W., & Hutchings, K. (2023). Inequalities, barriers, intersectionality, and facilitators of careers of women with disabilities: Themes and future research agenda from a scoping review. *Frontiers in Psychology, 14*, Article 1104784. https://doi.org/10.3389/fpsyg.2023.1104784

Chan, X. W., & Hutchings, K. (2025). Exploring the careers of women with disabilities: A systematic review and implications for human resource management. *Personnel Review, 54*(5), 1202–1251. https://doi.org/10.1108/PR-01-2024-0086

Constitutional Court of the Republic of Indonesia. (2026). *Decision Number 130/PUU-XXIII/2025 concerning the judicial review of Law Number 8 of 2016 on Persons with Disabilities*.

Darmawan, R. R., & Hamzah, A. S. (2024). Analisis perlindungan hukum terhadap pekerja wanita dari tindakan diskriminasi berdasarkan Undang-Undang Nomor 13 Tahun 2003 tentang Ketenagakerjaan. *Private Law, 4*(1), 184–193. https://doi.org/10.29303/prlw.v4i1.3924

Dirkareshza, R., Akbar, S. S., & Zaifa, G. A. (2024). Exploring employment rights for individuals with disabilities: A cross-national comparative analysis in the context of fair competition and

Sustainable Development Goals. *Alauddin Law Development Journal, 6*(2), 195–213. https://doi.org/10.24252/aldev.v6i2.46473

Dwiprigitaningtias, I., Yulistiawaty, S., & Iqbal, F. M. (2026). Pengakuan disabilitas tak tampak dalam perspektif hukum Indonesia: Analisis Putusan Mahkamah Konstitusi Nomor 130/PUU-XXIII/2025. *SINERGI: Jurnal Riset Ilmiah, 3*(6), 1891–1909. https://doi.org/10.62335/sinergi.v3i6.2642

Firmanda, T. (2025). Navigating barriers and building strengths: A case study of employment success among blind professional women in Indonesia. *Indonesian Journal of Disability Studies, 12*(2), 233–252. https://doi.org/10.21776/ub.ijds.2025.12.2.3

Ginting, A. Z., & Abduh, R. (2026). From legal recognition to enforcement: Comparative protection of workers with disabilities in Indonesia and Malaysia. *Al-Risalah: Jurnal Ilmu Syariah dan Hukum, 26*(1), 813–827. https://doi.org/10.24252/al-risalah.vi.66119

Howe, D., O'Shea, M., Duffy, S., & Armour, M. (2025). From insight into action: Understanding how employer perspectives shape endometriosis-inclusive workplace policies. *Healthcare, 13*(8), Article 930. https://doi.org/10.3390/healthcare13080930

Mastrella, S. J., Powell, D. M., Bonaccio, S., & O'Doherty, K. C. (2026). Not an ideal worker, not a disabled worker: The experience of disclosing invisible disabilities at work. *Journal of Business and Psychology*. https://doi.org/10.1007/s10869-026-10104-4

Mastrella, S. J., Powell, D. M., Bonaccio, S., & O'Doherty, K. C. (2026). Not an ideal worker, not a disabled worker: The experience of disclosing invisible disabilities at work. *Journal of Business and Psychology*. Advance online publication. https://doi.org/10.1007/s10869-026-10104-4

Millmark, S., Vänje, A., & Palm, K. (2025). Living up to the ideal worker norm: A critical case study about women with invisible disabilities working from home. *Equality, Diversity and Inclusion: An International Journal, 44*(9), 144–158. https://doi.org/10.1108/EDI-10-2024-0499

Nurhayati, T., Fibriani, R., Heradhyaksa, B., & Moenir, H. D. (2026). Beyond single-axis protection: Reconstructing labor law for disabled women in outsourcing relations. *Journal of Law, Politic and Humanities, 6*(5), 4330–4343. https://doi.org/10.38035/jlph.v6i5.3671

Pinilla-Roncancio, M., & Rodríguez Caicedo, N. (2022). Legislation on disability and employment: To what extent are employment rights guaranteed for persons with disabilities? *International Journal of Environmental Research and Public Health, 19*(9), Article 5654. https://doi.org/10.3390/ijerph19095654

Republic of Indonesia. (1945). *The 1945 Constitution of the Republic of Indonesia*.

Republic of Indonesia. (2003). *Law Number 13 of 2003 concerning Manpower*.

Republic of Indonesia. (2011). *Law Number 19 of 2011 concerning the ratification of the Convention on the Rights of Persons with Disabilities*.

Republic of Indonesia. (2016). *Law Number 8 of 2016 concerning Persons with Disabilities*.

Republic of Indonesia. (2023). *Law Number 6 of 2023 concerning the enactment of Government Regulation in Lieu of Law Number 2 of 2022 on Job Creation into law*.

Rohanawati, A. N., Hadi, S., & Rahman, T. (2023). A legal barrier to the enjoyment of the right to work for workers with disabilities. *Jurnal HAM, 14*(2), 155–168. https://doi.org/10.30641/ham.2023.14.155-168

Sagmeister, M. (2026). Legal mechanisms of invisibilisation: Exclusion and differentiation. *Feminist Legal Studies, 34*, 207–226. https://doi.org/10.1007/s10691-025-09594-z

Santuzzi, A. M., Waltz, P. R., Finkelstein, L. M., & Rupp, D. E. (2014). Invisible disabilities: Unique challenges for employees and organizations. *Industrial and Organizational Psychology, 7*(2), 204–219. https://doi.org/10.1111/iops.12134

Sari, P. M., Asengbaramae, R., & Kurniawan, E. (2026). Women's employment status in Indonesia: An intersectionality perspective on disability, household responsibilities, and socioeconomic factors. *An-Nisa' Journal of Gender Studies, 19*(1), 95–110. https://doi.org/10.35719/an-nisa.v19i1.467

Sercekman, M. Y., & Ayaz, O. (2026). "Swallowed by a black hole": The neglected impact of endometriosis in the workplace. *Human Resource Management Journal*. Advance online publication. https://doi.org/10.1111/1748-8583.70056

Teborg, S., Hünefeld, L., & Gerdes, T. S. (2024). Exploring the working conditions of disabled employees: A scoping review. *Journal of Occupational Medicine and Toxicology, 19*, Article 2. https://doi.org/10.1186/s12995-023-00397-z

United Nations. (2006). *Convention on the Rights of Persons with Disabilities*.

Woticky, G., Jetha, A., Tompa, E., & Gignac, M. A. M. (2025). Disclosure decisions of workers living with a chronic health condition causing disability at work: Are decisions to disclose to co-workers and supervisors different? *Journal of Occupational Rehabilitation, 35*(3), 675–687. https://doi.org/10.1007/s10926-024-10235-6

YRPAD. (n.d.). *Perspektif YRPAD terhadap perlindungan pekerja dengan autoimun yang berdampak disabilitas* (Unpublished community position statement).