



Comparative Experiences of Indonesian Migrant Workers under Korea's EPS and Japan's TITP

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Abstract. This paper compares the experiences of Indonesian migrant workers under South Korea's Employment Permit System (EPS) and Japan's Technical Intern Training Program (TITP). Although EPS formally recognizes migrants as employees and TITP classifies them as trainees, both systems restrict mobility and reinforce precarious labor conditions. Drawing on four semi-structured interviews, the study applies Strong Structuration Theory to examine how external structures (laws, recruitment systems) and internal dispositions (expectations, obligations) shape worker agency. Findings show that while EPS reduces recruitment costs through a government-to-government model, bureaucratic barriers and employer consent still limit effective job mobility. TITP, by contrast, involves higher recruitment debt and dependency on supervising organizations, with training goals largely unmet. Across both regimes, workers navigated constraints through endurance, peer support, and selective resistance, but often resorted to compliant silence as a culturally shaped adaptation strategy.

Keywords: Indonesian migrant workers, Employment Permit System, Technical Intern Training Program, Strong Structuration Theory, Labor migration governance.

1 Introduction

This study analyzes the structural constraints embedded in two major guestworker programs: South Korea's Employment Permit System (EPS) and Japan's Technical Intern Training Program (TITP). Both systems address labor shortages in low-skilled sectors but operate under distinct legal frameworks and institutional logics. EPS recognizes workers as employees, providing access to basic labor protections and limited job mobility. In contrast, TITP classifies migrants as trainees, excluding them from full labor rights and restricting their ability to change employers. Despite these distinctions, both programs limit long-term settlement and reinforce a segmented labor regime.

Existing scholarship situates both EPS and TITP within broader guestworker regimes, in which states import labor on a temporary basis while restricting settlement and long-term integration (Surak, 2018; Ruhs & Martin, 2017). Such systems reproduce dual labor markets (Piore, 1979) by channeling migrants into low-status, insecure jobs

that domestic workers avoid, reinforcing what migration scholars describe as labor segmentation. The legal classification of migrants—as “employees” under EPS or “trainees” under TITP—creates differentiated rights frameworks, producing varying degrees of protection and precarity. Yet across these regimes, debt-financed recruitment, employer dependency, and language barriers consistently structure migrant vulnerability (Standing, 2011; Anderson & Ruhs, 2010).

Migration governance in East Asia is primarily bilateral. Both Japan and South Korea negotiate labor agreements directly with sending countries, including Indonesia. In contrast to the European Union’s regional framework for labor mobility, East Asia lacks multilateral structures for migrant protection. Domestic policies in the region reflect national economic interests and demographic priorities. This study extends policy-level analyses of EPS and TITP by focusing on migrant perspectives and providing a comparative qualitative analysis of how Indonesian workers navigate the constraints of each system.

1.1 Research Purpose

Most research on EPS and TITP has focused on policy design, recruitment procedures, and bilateral agreements, with limited attention to the lived experiences of migrants. This study shifts the analytical focus to worker perspectives. Using Strong Structuration Theory (Stones, 2005), the analysis examines how external structures, internal structures, and agency interact to shape outcomes. This framework reveals how Indonesian workers respond to constraints as active agents negotiating their working and living conditions, rather than as passive recipients of policy.

This research compares how legal and institutional designs in EPS and TITP influence Indonesian migrant workers’ agency and mobility in practice. By centering migrant perspectives, the study seeks to demonstrate how policies are experienced, resisted, and adapted at the ground level. The research addresses the following questions:

1. How do Indonesian migrant workers navigate structural constraints under Korea’s EPS and Japan’s TITP?
2. In what ways do differences in legal and institutional frameworks shape their experiences of agency?

By addressing these questions, the paper contributes to comparative migration studies in East Asia, where temporary migration programs are expanding yet remain undertheorized in terms of how institutional design interacts with worker agency. The findings offer conceptual and empirical insights into how guestworker regimes function as both distinct national systems and as convergent regional logics of labor control.

2 Methods

This research draws on 4 semi-structured interviews with Indonesian male migrant workers: two employed under Korea’s EPS and two under Japan’s TITP. Respondents were selected using snowball sampling to ensure variation in age and work sectors, including manufacturing, construction, and fisheries. The choice of snowball sampling

was driven by accessibility constraints and the reliance on community gatekeepers to recruit participants, which is a common approach in migrant worker studies. This method can introduce biases by limiting the sample to specific networks, but it also facilitates trust-building and access within hard-to-reach populations. Interviews were conducted in Indonesian and transcribed for thematic analysis. A limitation of this study is its all-male sample, a product of snowball sampling, which constrained diversity and limited gender analysis.

Coding was guided by Strong Structuration Theory, which emphasizes the interplay between external structures (e.g., legal restrictions, recruitment procedures), internal structures (e.g., worker knowledge, motivations), and agency. This study follows the analytical flow below:

1. **External Structures:** These are the objective conditions influencing action, such as institutional policies, legal frameworks, and systemic constraints.
2. **Internal Structures:** These refer to the agents' internal dispositions, including their knowledge, beliefs, and perceptions shaped by past experiences and socialization.
3. **Active Agency:** This component focuses on the agents' actions and decisions, highlighting how they draw upon internal structures to navigate external constraints.
4. **Outcomes:** These are the results of the interaction between agency and structure, which can reinforce or transform existing structures.

Key themes included recruitment and debt, job mobility constraints, language and cultural adaptation, and responses to employer control and supervision. A thematic analysis was conducted using a combination of deductive and inductive coding strategies. Deductive codes were derived from the core elements of Strong Structuration Theory, focusing on the interplay between external structures, internal structures, and agentic responses. Inductive codes were developed to capture emerging patterns specific to the migration context, such as debt obligations, sectoral mismatch, and recruitment practices. MAXQDA software was used to facilitate data organization and interpretation.

3 Results

3.1 Structural Differences and Shared Vulnerabilities

EPS and TITP differ in their formal design yet converge in producing constrained migrant agency. EPS recognizes migrants as *employees* under Korean labor law, granting access to minimum wage, union participation, and limited job changes (Seol & Skrentny, 2009). By contrast, TITP classifies migrants as *trainees*, excluding them from full labor protections and placing them under the supervision of the Organization for Technical Intern Training (OTIT) and *Kumiai* (supervising organizations) (Surak, 2018). Recruitment also diverges: EPS relies on a government-to-government (G2G)

channel that reduces brokerage costs, while TITP depends on private sending organizations, often creating high recruitment fees and debt (Surak, 2023; Lindquist et al., 2012). Despite these institutional contrasts, both systems ultimately restrict settlement, tie workers to employers, and reinforce their concentration in precarious sectors.

Interviews reveal that legal provisions for job mobility rarely translate into practice. Under EPS, workers may change jobs up to three times within their contract, but each transfer requires employer consent, creating dependency and bureaucratic delays (Kim, 2015). TITP participants, meanwhile, are contractually bound to a single employer unless misconduct is proven. Even then, mobility depends heavily on the support of *Kumiai* (supervising organizations), whose responsiveness varies widely (Shipper, 2008). These experiences align with scholarship on employer-bound visas, which highlights how control over mobility entrenches employer power and limits bargaining ability (Valiani, 2012; Ruhs & Martin, 2017).

The cost of migration emerged as a decisive factor shaping worker vulnerability. EPS participants reported comparatively lower fees due to the G2G recruitment model, while TITP participants paid significantly higher sums to private brokers, often relying on loans. One respondent described entering Japan with debt equivalent to nearly one year's wages. This financial burden discouraged job change, even under exploitative conditions, echoing findings on the role of migration infrastructure and brokerage in Asia (Xiang & Lindquist, 2014; Lindquist et al., 2012). Debt, therefore, functioned as a structural constraint, compelling workers to endure hardship rather than risk unemployment.

Expectations of training under TITP were also unmet. TITP is officially justified as a skills transfer program, yet participants consistently described their experiences as indistinguishable from standard low-wage employment. Rather than receiving training, workers reported intensive productivity demands and limited opportunities to acquire transferable skills. These findings reflect critiques of TITP as "labor migration in disguise" (Shipper, 2008). By contrast, EPS does not carry a training mandate, but its promise of formal labor rights often failed to protect workers from excessive hours and managerial control, consistent with studies of migrant precarity across East Asia (Chung et al., 2024).

3.2 Agency, Coping, and Cultural Patterns

Despite systemic constraints, workers employed varied strategies of agency to navigate challenges. Some relied on endurance and informal peer support, others attempted legal transfers, while a few considered undocumented status when conditions became intolerable. One EPS worker described persisting in a sectoral mismatch because "at least I could still send money home, even if the work was too heavy." These strategies illustrate the recursive interplay of external structures (laws, recruitment systems), internal structures (expectations, obligations), and agency (resistance, adaptation), as theorized in Strong Structuration Theory (Stones, 2005). While individual trajectories diverged, both EPS and TITP constrained workers within a limited repertoire of coping strategies, confirming broader patterns of precarity under temporary migration regimes (Standing, 2011).

A culturally specific form of agency emerged: compliant silence. Silent Endurance often responded to exploitation or hardship not through resistance, but through

silent endurance. It is a choice shaped by structural vulnerability and cultural norms of acquiescence. This “silence” serves as a protective adaptation, preserving fragile institutional standing and minimizing conflict with supervisors. Such behavior echoes Rustam’s (2023) analysis of Indonesian technical interns in Japan, who navigate coercive conditions through silence, a strategy that reflects both resilience and deeply constrained mobility.

While individual cases of dissatisfaction and poor treatment were reported in both systems, the research design does not allow for generalization regarding the prevalence of abuse in one system over another, especially given the use of snowball sampling. However, it is evident that both systems impose institutional barriers that affect worker autonomy and well-being. Taken together, the findings demonstrate both divergence in institutional design and convergence in lived outcomes. EPS provides more formal rights, yet in practice, workers remain employer-dependent and mobility-constrained. TITP’s *trainee* framing exacerbates vulnerability, but the end result—restricted agency, debt-driven endurance, and reliance on supervisors—mirrors EPS outcomes. This supports comparative migration scholarship arguing that East Asia’s guestworker regimes differ in legal form but converge in function: supplying temporary labor while curtailing integration and autonomy (Surak, 2018; Martin, 2021).

4 Discussion

The comparative findings underscore that while EPS and TITP differ in legal classification and administrative structure, they converge in function: both systems supply temporary labor while constraining migrant agency and limiting integration. By applying Strong Structuration Theory, the study highlights how agency is exercised within and against structural constraints. Migrants drew on their internal structures—such as expectations of remittances, familial obligations, and personal resilience—to navigate external structures of law, bureaucracy, and recruitment. The resulting practices of endurance, informal peer support, and selective resistance illustrate Strong Structuration Theory’s insight into the recursive relationship between structure and action (Stones, 2005). At the same time, labor segmentation theory provides an explanation for why such agency remains bounded: migrants’ structural location in low-status sectors limits the possibilities for transformation, regardless of institutional differences (Reich et al., 1973; Peck, 1996).

This analysis highlights the significant role of migration infrastructure in shaping worker vulnerability. Debt incurred through TITP recruitment increases dependency and limits workers’ capacity to act. Even under EPS, where recruitment fees are lower, employer consent requirements reinforce employer power and discourage mobility. These findings indicate that legal status alone does not ensure protection. Instead, the interaction of law, recruitment practices, and workplace structures collectively generates precarity.

The comparative approach, therefore, contributes to migration scholarship by showing how different legal regimes can produce parallel constraints. EPS is often presented as more protective than TITP, yet from the worker’s perspective, both systems generate dependency and vulnerability, albeit through distinct mechanisms. This convergence

highlights the importance of examining migration governance not only at the policy level but also through the lived experiences of migrants themselves.

The theoretical contribution of this study lies in demonstrating how Strong Structuration Theory can illuminate the lived dimensions of policy implementation. By focusing on how workers navigate and internalize external structures, the study highlights the recursive relationship between policy, structure, and action. It contributes to ongoing debates in migration studies by shifting attention from system design alone to how such designs are negotiated and resisted at the ground level. This research adds to the literature on labor migration and governance by highlighting how policy architecture produces parallel forms of precarity, even across divergent legal classifications. The findings suggest the need for greater attention to how guestworker regimes regulate agency and limit access to structural change.

This analysis does not aim to identify a superior framework but rather to explore how distinct institutional settings condition worker agency. EPS's relatively more inclusive legal framework does not necessarily translate into substantive mobility, while TITP's employer-driven model reinforces tighter control mechanisms. Across both systems, debt, isolation, and language barriers emerge as reinforcing structures that shape everyday labor experiences.

Future research should expand the scope of inquiry by including female migrant workers, who may face gender-specific challenges in recruitment, workplace adaptation, and coping strategies. Larger samples and cross-sectoral analysis would also strengthen generalizability. Nevertheless, even with a small dataset, this study demonstrates the value of integrating migrant perspectives into comparative analyses of East Asian guestworker regimes.

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