



Educational Barriers for Children? A Study of Fulfillment to the Rights of Education for Undocumented Indonesian Children in Malaysia

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Abstract. Indonesia and Malaysia, as neighboring countries, share deep historical, economic, and social ties, leading to significant migration flows between them. However, alongside legal migration, a considerable number of undocumented Indonesian migrants reside in Malaysia, often accompanied by their children, who are born without proper documentation. These undocumented children face severe barriers to education, as Malaysia's legal framework, influenced by its reservation to Article 28 of the CRC, restricts access based on nationality and legal status. Despite both states being parties to the CRC, which mandates equal educational rights for all children without discrimination, Malaysia's policies continue to exclude undocumented children from formal education. This study examines Malaysia's legal stance, its contradiction with CRC obligations, and the impact on Indonesian children. Malaysia, as the host state, must take greater responsibility by ensuring non-discriminatory access to education and aligning its legal framework with its international commitments. The withdrawal of Malaysia's reservation to Article 28 CRC and potential constitutional amendments are necessary steps toward fulfilling the right to education for all children within its territory.

Keywords: Educational Rights, ICCPR, International Law, Transnational Issue.

1. INTRODUCTION

In 2024, the members of the United Nations through the Universal Periodic Review on Malaysia urged Malaysia to develop their national legislation to provide better education for numerous undocumented children under their jurisdiction. The members also urge Malaysia to provide best effort in ensuring that access for education was given indiscriminately for every child subject to their jurisdiction, avoiding vulnerability for such children at their young age before entering the society.

Education is a fundamental part of human rights, particularly for children. A proper education is essential in order for a child to develop their knowledge and capacity to be able to continue living in the society. On the other hand, lack of access to education would likely result in the upcoming risk for those children to be vulnerable as they are unable to have proper capacity or to be independent. This has been emphasized by the United Nations through the Universal Declaration of Human Rights that stipulated that everyone shall have the right to education. This idea aligned with the opinion of UNESCO which highlighted that education are crucial to increase an individual income, productivity, entrepreneurial skills, and innovation, preparing them to live properly in society. Furthermore, to ensure proper education for childrens, the international community also established the International Convention on

the Rights of Child (“CRC”), which mandates for equal access for education among all children subject to state jurisdiction as part of their human rights.

However, although presently both the Republic of Indonesia and the Kingdom of Malaysia are state parties to the CRC, there are numerous Indonesian children who do not have proper education access in Malaysia. This occurred due to the fact that Malaysia has consistently reserved the implementation of Article 28 of the CRC which obliged equal access to education. Under this reservation which served as an exclusion clause toward international obligation, Malaysia limiting their obligation to grant access to education exclusively covered children who had formal citizenship registered under proper documentation, thereby excluding children with documentation issues during their birth.

As one of the primary destinations for Indonesian migrant labor, Malaysia hosted 88,991 Indonesian migrant workers in 2017, 90,671 in 2018, and 79,663 in 2019. Given the geographic proximity between the two countries, the influx of migrant workers to Malaysia includes not only documented but also undocumented individuals. The consistently high number of Indonesian migrant workers sent to Malaysia each year across nearly all regions of Peninsular Malaysia correlates with a rise in undocumented migration. This number is not only covered for legal migrants but also an unpredictable huge number of illegal migrants who have moved to Malaysia without complying with the existing legal and migration procedure. The children born from those undocumented parents further become undocumented children which grow up having no clear identity document and further unable to access proper education in Malaysia. These undocumented children often face significant challenges in accessing this right due to their irregular legal status. In fact, in Malaysia, thousands of Indonesian children live as undocumented children, facing barriers that hinder their access to formal education which is essential for their development and well-being. Consequently, the issue of limited educational access for the children of Indonesian migrant workers becomes increasingly complex and multifaceted.

The state reservation from Malaysia has caused problematic issues for undocumented children in Malaysia who have yet to clear citizenship status to have access to education, especially from Indonesia following a high number of migration. As the current international law aims to provide education for all people and all children in particular indiscriminately. The case of the education barrier for undocumented children raised a question on state responsibility in ensuring proper human rights for children and whether such reservation is allowed under international law. Despite having no clue about their current citizenship status, these undocumented children become the victim of their parents' mistake and deprived from their

access to education, which constitutes a huge issue for Indonesia due to the state commitment in ensuring access to education for all its citizens. The embassy of the Republic of Indonesia throughout their Education and Cultural attache further elaborated that this would likely become a loophole for those undocumented children in vulnerable status to become illegal migrants as well without skills and capacity to become independent without proper education even having in mind there is exist a risk for them to become stateless. Thus, raised the international attention through the response from the CRC committee which has addressed this issue in Malaysia.

Following this legal issue, this study aims to provide a legal analysis by examining the current applicable international law and both state responsibility from Malaysia and Indonesia in giving access of education for such children, in effort to provide solution for better legal frameworks to provide education for undocumented indonesian children in malaysia, ensuring a complete fulfillment on the rights of child.

2. RESEARCH METHOD

The present research study employs a normative juridical method by analyzing the legal issues concerning undocumented Indonesian children residing under Malaysian jurisdiction. The research is conducted through a comprehensive literature review and doctrinal analysis, focusing on the applicable legal frameworks, including the national laws of Indonesia and Malaysia, as well as the obligations of states under public international law namely the Universal Declaration of Human Rights, the International Convention on the Rights of Child, and Vienna Convention on the Law of Treaties. Particular attention is given to the principles of state responsibility and the implementation of international human rights instruments, especially those related to the right to education and the protection of children regardless of their legal status.

3. DISCUSSION

International Frameworks on Educational Rights for Child

The current legal frameworks of public international law has been developed to guarantee adequate access to education for all children, primarily through the implementation of the Universal Declaration of Human Rights (“UDHR”) as the core idea and further strengthened by the Convention on the Rights of the Child (“CRC”) as a binding instrument among states. All together aims to protect human rights, particularly children's rights within the jurisdiction of state parties.

1) Universal Declaration of Human Rights

The UDHR serves as the cornerstone for establishing various international human rights conventions. Under Article 26, the UDHR mandates that "Everyone has the right to education" which employs a moral obligation for all states to ensure access to education for all people. In terms of children, the present article also emphasizes that such education shall be free and compulsory in elementary school and fundamental stages in a compulsory manner. This article brought out moral responsibilities for states internationally to ensure that persons in the elementary stage which refer to children shall be protected in terms of education by the contracting states, directed to full development of human personality and in respect of human rights and freedoms.

Completing this idea, the UDHR also stipulated under Article 7 that "All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination." which strengthen the idea that the implementation of the rights under the UDHR shall be in regard to no discrimination manner. Regardless of the status from UDHR as a non binding instrument, the idea itself considered as fundamental principle under international law which has strong influence among states, proven by the use of such idea in domestic jurisdiction and further led to the enactment of the International Convention on the Rights of Child, in effort to protect human rights universally.

In the case of undocumented Indonesian children in Malaysia, the deprivation of such education may constitute a non compliance and contradiction whereas there occurred a discrimination in aspects of education due to the nationality status, yet unable to fully achieve the purpose of UDHR in promoting education, as part of human rights for all.

The International Convention on the Rights of Child

The CRC is a binding international instrument specialized in providing basic human needs for children. Among others, this convention also stipulates that education as a fundamental right for children and shall be considered as part of human rights, therefore demands all contracting state parties to ensure the progress to provide this right under their jurisdiction. This has been stipulated under Article 28(1)(a) that "States Parties recognize the right of the child to education, and with a view to achieving this right progressively and on the basis of equal opportunity, they shall, in particular: Make primary education compulsory and available free to all"

This article provides an obligation to all contracting parties to progressively provide access to education on the basis of equal opportunity, meaning that there shall be no discrimination on its application. Further, on the paragraph 3, the same article affirmed

that the implementation on school shall be follow the same spirit to provide access to equal education as it stated that “States Parties shall take all appropriate measures to ensure that school discipline is administered in a manner consistent with the child's human dignity and in conformity with the present Convention.”

Meaning of ‘*in conformity with the present convention*’ should be seen in a manner to provide all the rights of a child, including access to education in equal and non discriminatory principle. This has been explicitly agreed by state parties on the preamble of CRC and further on Article 2 (1) that says “States Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status.” The present article 2 established a binding obligation for member states to apply the right covered by the CRC in a non discriminatory manner, without any means of distinction for every people under their territorial jurisdiction.

This idea was further supported by the General Commentaries of CRC No. 06 on by the Human Rights Committee which elaborated that State obligations under the Convention apply to each child within the State’s territory and to all children subject to its jurisdiction. These State obligations cannot be arbitrarily and unilaterally curtailed either by excluding zones or areas from a State’s territory or by defining particular zones or areas as not, or only partly, under the jurisdiction of the State. Moreover, State obligations under the Convention apply within the borders of a State, including with respect to those children who come under the State’s jurisdiction while attempting to enter the country’s territory. Therefore, the enjoyment of rights stipulated in the Convention is not limited to children who are citizens of a State party and must therefore, if not explicitly stated otherwise in the Convention, also be available to all children - including asylum-seeking, refugee and migrant children, irrespective of their nationality, immigration status or statelessness.“ This comment by the United Nations has clarified that all state parties must ensure the applicability of CRC provision to all children subject to their jurisdiction without any distinction nor discrimination. As both Malaysia and Indonesia are parties to the CRC, both states bear the same obligation to ensure that every child under their jurisdiction shall have access to education. Therefore, the act to exclude a certain number of children due to their nationality status that deprive them from education shall be deemed as an act of discrimination, contrary to the present article, and can be considered as a violation to CRC as part of International Law.

The National Law of Malaysia on Education and Their Compliance Under International Law

The Kingdom of Malaysia (“Malaysia”) notably became a State Party to the Convention on the Rights of the Child (“CRC”) on February 11, 1995, thereby recognizing education as a fundamental right for all children. This accession should, in principle, guarantee educational rights to all children within Malaysian jurisdiction, irrespective of their social status or citizenship. However, there remains a challenge for Malaysia to fully comply with the goals of the CRC in granting education for all children in non-discriminatory manner, particularly all the undocumented children.

a) Reservation to CRC : Conflict Between Constitutional Mandates and International Obligation

The accession of Malaysia to CRC comes with specific and substantial reservations that significantly constrained the treaty's domestic implementation as follow : “The government declared that "The Government of Malaysia accepts the provisions of the Convention on the Rights of the Child but expresses reservations with respect to articles 2, 7, 14, 28 paragraph 1(a) and 37 of the Convention and declares that the said provisions shall be applicable only if they are in conformity with the Constitution." The present reservation established a limitation in commitment that Malaysia would only provide the right to education, namely under Article 28 only if their national constitution allows such action. However, at the present time, the Federal Constitution of Malaysia under Article 12 concerning the rights in respect of education specifically addresses educational rights but contains a critical limitation that restricts these rights to children with proper documentation with nationality status only.

The Article 12 stated that “Without prejudice to the generality of Article 8, there shall be no discrimination against any *citizen* on the grounds only of religion, race, descent or place of birth” Yet seems equal to providing education for all children, the current provision accompanied with the clause of “any citizen” which provides education exclusively limited to children that have nationality status while excluding the rest of childrens who are yet unable to attain such status of nationality. For instance, those undocumented children who are born from migrant parents who are also undocumented to the informal migration were unable to access the right to education simply due to their parents' condition.

This reservation creates a constitutional supremacy clause that effectively nullifies Malaysia's obligations under Article 28 of the CRC, which guarantees children's right to education. The reservation mechanism allows Malaysia to avoid implementing non-discriminatory educational policies that would conflict with Article 12 of the Federal

Constitution, causing discrimination based on the status of nationality. As a result, children such as undocumented children or even stateless children have been deprived from their right to education based on the reservation supported by Malaysian constitutional law.

b) The impact for Indonesian Children born in Malaysia

The conflict on Malaysian Federal Constitution and their international obligation under CRC has caused significant impact for Indonesian children in Malaysia, in particular those without proper documentation or identity status. According to the World Bank, Malaysia hosted between 1.2 and 3.5 million undocumented migrants between 2018 and 2020, alongside 1.4 to 2 million documented migrants, totaling 2.6 to 5.5 million migrants. Indonesians constitute a substantial portion of this population, particularly in Sabah, where they work in plantations, construction, and domestic sectors.

Specific estimates for undocumented Indonesian children are scarce. A 2016 statement by Malaysia's former Home Minister suggested approximately 290,000 stateless children under 18 resided in the country, encompassing children of Indonesian, Filipino, and other migrant backgrounds. In Sabah alone, a province area in Malaysia, non-governmental organizations such as the Asia Foundation estimated at least 50,000 stateless children in 2016, many of whom are of Indonesian descent. Academic research further indicates that "tens or perhaps hundreds of thousands" of Indonesian migrant children live in Malaysia, with a significant subset lacking documentation due to barriers such as the cost of consular registration or parents' irregular status. Based on these figures, a conservative estimate suggests 50,000 to 300,000 undocumented Indonesian children reside in Malaysia, with the higher end reflecting potential underreporting and the concentration in Sabah. These children often live in informal settlements or plantation housing, rendering them invisible to state mechanisms and complicating data collection efforts. Although both Indonesian and Malaysian Government both has provided effort to overcome this issue through the establishment of *sanggar bimbingan* as an informal education center for children with identity and documentation issues, such as undocumented childrens. The present study argues that such the current effort remains insufficient to fully ensure state' compliance to educate all childrens due to the capacity issue.

Despite these achievements, the scale of *Sanggar Bimbingan* and CLCs remains inadequate to address the educational needs of the estimated 50,000–300,000 undocumented Indonesian children across Malaysia. In Peninsular Malaysia, only three informal *Sanggar Bimbingan* centers operate, with limited capacity and basic syllabi compared to formal schools. In Sabah, while CLCs are more prevalent, they serve only a fraction of the population. In 2006, a survey by the Indonesian Consulate identified 24,199 children, but only 7,000 were enrolled

in such centers. The non-formal status of these centers further limits their impact, as they lack standardized curricula and accreditation recognized by Malaysia, hindering students' progression to secondary education or integration into the Malaysian labor market. Moreover, these centers often face resource constraints, including inadequate facilities and reliance on untrained teachers or temporary volunteer programs, which affects educational quality.

c) Consistency with International Law on Education

Malaysia's exclusion of undocumented children reflects inconsistencies with the purposes of the public international law under the Convention on the Rights of the Child (CRC) that may constitute a breach of state obligation under international law.

The Vienna Convention on the Law of Treaties (VCLT) under the Article 19 stipulated that "A State may, when signing, ratifying, accepting, approving or acceding to a treaty, formulate a reservation unless: ... (c) In cases not failing under subparagraphs (a) and (b), the reservation is incompatible with the object and purpose of the treaty." This provision does not allow any existence of reservation contrary to the object and purposes of the impugned treaty. Recognizing the purposes of the CRC is to ensure full implementation on the rights of children for all child without no discrimination as drafted under Article 2 that "States Parties shall respect and ensure the rights set forth in the present Convention to each child within their jurisdiction without discrimination of any kind, irrespective of the child's or his or her parent's or legal guardian's race, colour, sex, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status." which prohibit any form of discrimination, further supported with active obligation to protect the child against such discrimination under Article 2(2) that "States Parties shall take all appropriate measures to ensure that the child is protected against all forms of discrimination or punishment on the basis of the status, activities, expressed opinions, or beliefs of the child's parents, legal guardians, or family members." All together clearly which promote equality and non-discrimination, thus prohibit the implementation of CRC with discriminatory manner. By excluding undocumented children, particularly those of Indonesian origin, from public schools, Malaysia's policy contravenes the CRC's purposes which emphasizes preparing children for an individual life in society through equality and non-discrimination. Upon these matters, the Committee and other state parties urged Malaysia to withdraw its reservation to Article 28, a recommendation reiterated in subsequent reviews.

d) Study Comparison with Best Practices of States

The present issue could be addressed properly by the government of Malaysia through a legal reform on their national legislation, as proven by best practices of states including France, Sweden, and Thailand, ensuring full implementation of the international law.

First, France's education system is among the most inclusive globally, as mandated by Article L.131-1 of the French Education Code, which requires compulsory education for all children aged 3–16, irrespective of legal status. Schools are legally prohibited from refusing enrollment based on immigration status, ensuring undocumented children, including those of migrant origins, have equal access to free education. This policy aligns with CRC Article 28 and the European Convention on Human Rights, demonstrating a commitment to non-discrimination. Malaysia could adopt a similar legislative mandate to remove documentation barriers, enabling undocumented Indonesian children to enroll in public schools without fear of exclusion.

Secondly, Sweden's Education Act mandates schooling for all children, including undocumented ones, in line with Article 2 of Protocol No. 1 of the European Convention on Human Rights, which states, "No person shall be denied the right to education." Undocumented children also receive equal healthcare access, though fears of deportation may deter service utilization. Sweden's temporary residence permits for vulnerable children further enhance protections. Malaysia could adopt Sweden's rights-based approach by enacting legislation that guarantees education and healthcare for undocumented children, coupled with temporary permits to alleviate immigration concerns.

Third, Thailand's Education for All policy allows undocumented children, particularly from neighboring countries like Myanmar and Cambodia, to access public education, reflecting its CRC commitments. Despite bureaucratic challenges in obtaining nationality, NGOs complement government efforts by providing alternative education and healthcare services. Malaysia could draw on Thailand's model by expanding *Sanggar Bimbingan* and CLCs in collaboration with NGOs and easing documentation requirements for school enrollment.

e) Respond from Indonesia to address undocumented children in Malaysia

Recognizing the severity of educational exclusion affecting children of Indonesian migrant workers, the Indonesian government has mobilized its diplomatic apparatus to develop comprehensive solutions that transcend traditional state boundaries in protecting children's fundamental rights. The Embassy of the Republic of Indonesia in Kuala Lumpur has emerged as the primary institutional mechanism for implementing Indonesia's strategic response to this humanitarian crisis, establishing systematic identification and intervention protocols specifically targeting undocumented children's educational needs.

Indonesia's targeted assessment through the *Atase Pendidikan Kedutaan Besar Republik Indonesia* (Educational Attaché) has revealed alarming educational deficits among undocumented Indonesian children in Malaysia, documenting cases of 10-12-year-old children who lack basic literacy and numeracy competencies. This systematic evaluation has informed Indonesia's policy framework, as articulated by Prof. Dr. Muhammad Firdaus, Head of the Education and Cultural Department at the Indonesian Embassy, who emphasizes Indonesia's position that educational access represents a non-derogable right that must be guaranteed regardless of children's documentation status or territorial location.

Indonesia's pragmatic approach acknowledges that undocumented children often originate from families operating outside legal immigration frameworks, yet maintains that such circumstances intensify rather than diminish Indonesia's obligation to ensure educational provision. The Indonesian Embassy has operationalized this commitment through the establishment of Community Learning Centers (CLC), representing Indonesia's direct intervention to fill educational gaps left by formal systems. Indonesia's comprehensive strategy reflects a preventive approach to social integration, premised on the understanding that educational exclusion perpetuates intergenerational cycles of undocumented status and social marginalization, thereby transforming Indonesia's educational interventions into a mechanism for long-term migration governance and human development.

4. CONCLUSION AND RECOMMENDATION

Despite persisting under Malaysian jurisdiction, the issue of educational access for undocumented Indonesian children in Malaysia has attracted international attention among states, caused due to the state reservation and national legislation in Malaysia which stands only to provide education for documented children only. However, such reservations contravene with the purpose of CRC to provide equal access to education fairly among children without any discrimination. Malaysia's reservation to Article 28, coupled with a restrictive national legal framework, reflects the enduring tension between domestic sovereignty and international human rights obligations. Although community-based learning centers (CLCs) offer a partial remedy, they fall short of fulfilling the comprehensive rights guaranteed under international law.

Responding to this present issue, Malaysia shall be able to construct an adjustment under their current national legislation or withdraw their reservation to fully implement the CRC by providing equal access to education regardless of any differences between them, including their nationality. This could be reflected by the best practices among states,

namely from Germany, Sweden, and Thailand with national legislation supporting equal education under their jurisdiction, including for those undocumented children to fully complied with the currently existing international law instruments.

Cumulatively, Malaysia is encouraged to draw upon these best practices to pursue legal reforms and establish a more inclusive and rights-based education policy framework. Conversely, Indonesia must reinforce its diplomatic engagement to advocate for the protection of its nationals abroad, while also enhancing its regulatory mechanisms to prevent the increasing number of undocumented migrant children. Collectively, these efforts are imperative to ensure equality and protection in education for undocumented children.

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