

Research Article

The Relevance of Indonesia's Ratification of the International Convention Against the Taking of Hostages

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Abstract

Hostage-taking cases involving Indonesian citizens, both domestically and abroad, remain a persistent challenge for the Indonesian government in ensuring citizen protection and safeguarding national sovereignty. Although previous studies have examined diplomatic approaches such as total diplomacy and the duty of care principle, limited research has examined how media discourse shapes public perception of policy urgency regarding the ratification of the International Convention Against the Taking of Hostages (ICATH). This study aims to explore dominant media narratives, frames, and thematic patterns that shape public discourse on ICATH ratification. A qualitative research design was employed using thematic coding within an inductive–deductive framework. Data were collected from 100 national online news articles published between 2011–2025. The analysis followed three coding stages: open coding, axial coding, and selective coding. Findings show contrasting media tendencies. Independent media emphasise regulatory weaknesses, legal gaps, and the urgency of strengthening international legal commitments, while state-affiliated media highlight diplomatic engagement, crisis management, and government responsiveness. The study argues that Indonesian media play an active role in shaping policy legitimacy by reinforcing issue framings rather than merely reporting events. Ratification is a strategic imperative to align public expectations, strengthen protection, and reinforce Indonesia's global role in cooperation.

Keywords: Hostages, Human Rights Protection, International Law, Ratification Convention, Transnational Law

INTRODUCTION

The protection of citizens is an essential obligation of every sovereign country. State obligation is to protect its citizens from various threats. This obligation applies not only within the country's territory, but also to citizens abroad. The relationship between the state and its citizens is strengthened by international law, which requires a state to participate in efforts to protect their citizens. Law Number 39 of 1999 concerning Human Rights Chapter V Article 71, which states that the government is obliged and responsible to respect, protect, enforce, and advance human rights as regulated in laws, regulations, and international law on human rights (Devi et al., 2019). Law Number 12 of 2006 concerning Citizenship of the Republic of Indonesia upholds explicitly the principle of protection and requires a state to protect Indonesian citizens both at home and abroad (Sekarwangi, 2019). In

an increasingly connected global world, the mobility of citizens across countries is growing rapidly, both for work, education, tourism, and business. Along with the increase in the number of Indonesian citizens abroad, economic dynamics such as rising in foreign exchange flows are also associated with an increase social and legal problems faced by Indonesian citizens (Surwandono & Nugroho, 2023). One of the serious threats faced by Indonesian citizens abroad is hostage-taking cases.

Although previous studies have examined the handling of hostage cases involving Indonesian citizens abroad, they predominantly focus on operational and tactical approaches, particularly on the effectiveness of Total Diplomacy involving state and non-state actors such as religious leaders, NGOs, and the Sukma Foundation (Made et al., 2016), or on the role of Trilateral Maritime Cooperation (Indomalphi) in regional maritime security (Pangaribuan et al., 2022). In contrast, academic discourse on the ratification of international conventions in Indonesia has primarily centred on human rights instruments, such as the Rome Statute or the International Convention for the Protection of All Persons from Enforced Disappearance (ICPPED). Consequently, limited attention has been given to examining the role of public and media discourse in shaping the urgency of Indonesia's ratification of the International Convention Against the Taking of Hostages. This gap highlights the lack of studies analysing the role of normative pressure and public-driven agenda-setting in shaping Indonesia's legal commitments to hostage protection frameworks. Given the recurring hostage incidents and their increasing complexity, further research is needed to understand how ICATH ratification can serve as a strategic legal foundation to strengthen Indonesia's Duty of Care obligations and enhance its diplomatic leverage in ensuring the protection of its citizens abroad.

Hostage-taking incidents involving Indonesian citizens abroad have become a recurring and complex challenge that demands substantial governmental attention and resources. The protection of Indonesian nationals overseas remains an ongoing policy and diplomatic concern, particularly in cases involving non-state actors and transnational armed groups. As one of Southeast Asia's largest labour-sending countries, Indonesia has 2,862,495 documented citizens abroad and an estimated 1,870,060 undocumented or overstaying individuals, increasing their exposure to legal and security risks beyond national jurisdiction (Susilaningtias, 2021). This condition amplifies their vulnerability to transnational crimes, including hostage-taking. One prominent case occurred in 2016, when 14 Indonesian crew members were abducted by the Abu Sayyaf Group (ASG) in the Sulu Sea (Pratikasari & Muryantini, 2017). Similar incidents continued in subsequent years, including the abduction of five Indonesian fishermen in Malaysian waters in 2020 (Christy et al., 2016). These cases demonstrate ASG's evolving operational strategy, shifting toward kidnapping-for-ransom to finance weapons procurement and sustain their terror activities (Joshua & Sidik, 2021). The repetitive nature of these incidents has consistently required prolonged diplomatic negotiations and complex multi-state security coordination, reflecting structural challenges in Indonesia's mechanisms for overseas citizen protection.

There have been several hostage takings of Indonesian citizens in several regions outside Indonesia, as well as the taking of hostages of foreign nationals in Indonesian territory in the last 18 years. This shows that there are serious problems in governance to minimise hostage taking incidents in front of the Indonesian state and those that occur in Indonesian territory.

Table 1 Hostages Cases

No.	Case	Year	Total
1.	Metro TV Journalist Hostage Taking in Iraq	2005	2 people
2.	Indonesian Crew in Somali Waters	2012	4 people
3.	Piracy of the Ark Tze Ship in the Waters of the Republic of Congo	2018	3 people
4.	Hostage taking of Susi Air Pilot by KKB	2023	1 person

Source: Data Proceed

Even in the context of Southeast Asia, the hostage taking of Indonesian citizens by the Abu Sayyaf Group in the Philippines also shows an alarming trend. In fact, in the Panga thousands study, at least 30 Indonesian citizens have been victims of hostage-taking, and with a huge total ransom. This condition reflects that there is a serious problem with the risk of hostage-taking.

Table 2 The Abu Sayyaf Hostage Incident

Years	Ship Names	Amounts	Ransom
2005	Bongaya 91	3	7,5
2016	Tugboat Brahma 12 & Tongang Annand 12	10	14,2
2016	Henry & Tongkang Christy	4	56
2016	Charles 001 & Roby 152	7	59
2016	Pukat Tunda	3	55,5
2016	Fishers	2	14
2017	Fishers	3	na
2018	Fishers	2	14,4
2029	Fishers	3	8,3
2020	Fishers	5	10,14

Source: (Pangaribuan et al., 2022)

Hostage-taking is not just a criminal matter, but a problem that intersects national security, diplomacy and international law. The complexity of hostage-taking incidents abroad, such as the case of the crew members in the waters of the Southern Philippines, is compounded by the involvement of multiple, overlapping legal authorities. Multiple countries may simultaneously assert jurisdiction, creating legal and diplomatic friction (Devi et al., 2019). In the face of these various hostage threats, the Government of Indonesia has a responsibility to protect its citizens. Addressing hostage-taking cases abroad is often complex, involving multiple jurisdictions that apply simultaneously and may conflict with one another.

Jurisdictional friction can arise when a country has successfully arrested and prosecuted perpetrators under universal jurisdiction, while flag states also assert extra-territorial jurisdiction. In handling hostage cases, some previous studies have shown that diplomacy is an effective way to put forward, instead of military deployment, because hostage-taking occurs on the territory of other countries and can affect the credibility of the country (Raisha et al., 2024). The Indonesian government has responded through various measures, such as diplomatic negotiations, trilateral military cooperation (Indonesia-Malaysia-Philippines), and regulatory instruments. However, hostage-taking incidents continue to recur, exposing weaknesses in coordination, legal frameworks, and prevention mechanisms. Therefore, evaluating existing policies is crucial to assessing their effectiveness and identifying areas for improvement.

The concept of ratification of international conventions by Indonesia is not a direct method to free hostages, but rather part of the state's efforts to build a strong legal framework, both at the national and international levels, to prevent threats, protect the rights of citizens, and uphold justice against serious crimes that may be faced by Indonesian citizens wherever they are, one of which is hostage-taking. Indonesia has incorporated the obligations of ratified conventions into various national regulations, established institutions. It has sought to strengthen existing regulations, such as the Law on the Protection of Witnesses and Victims to guarantee the rights of victims of terrorism crimes (Triyana et al., 2024). The Indonesian government has adopted the obligation to protect Indonesian citizens within the framework of the Duty of Care (DoC). It has incorporated obligations from ratified conventions into domestic instruments, including Law Number 31 of 2014 concerning Amendments to Law Number 13 of 2006 concerning Protection of Witnesses and Victims (PSK Law), which expands support for victims of terrorism-related crimes by guaranteeing victims' rights to compensation/restitution and rehabilitation assistance (Susilaningtias, 2021).

The protection of Indonesian citizens, including those who are victims of hostage-taking, is also seen within the framework of the "*Duty of Care*" (DoC) idea, which emphasizes the state's responsibility for human security beyond its jurisdiction. Indonesia has adopted the DoC structure in the protecting of Indonesian citizens, although its implementation is still artificial and not yet simultaneous. Increasing the policy level from the basis of the Regulation of the Minister of Foreign Affairs to the Law as well as improving the quality and quantity of Indonesian citizen protection infrastructure, is considered necessary to expand the scope of protection and make it more responsive. Involving private institutions and recruiting local staff at Indonesian representatives abroad as "*intermediaries of care*" is also considered to improve the quality of protection (Surwandono & Nugroho, 2023).

Although efforts to address and legal frameworks are in place, challenges still arise. Hostage cases still occur, and the implementation of regulations sometimes encounters obstacles, such as incomplete provisions, fragmented service systems, inadequate orientation of law enforcement officials, and a lack of public access to victims' rights (Susilaningtias, 2021). A more detailed and coordinated mechanism

is needed among related institutions such as the Ministry of Foreign Affairs, the Witness and Victim Protection Agency (LPSK), and the National Counterterrorism Agency (BNPT) to ensure the rights of Indonesian citizens who are victims abroad. In addition, the lack of public data and information, especially related to sensitive security issues, can hinder in-depth analysis of handling efforts. Media framing also shapes public perception of these cases (Susilaningtias, 2021).

This research examines the ratification of international conventions, which essentially prioritise human rights treaties such as the Rome Statute and ICPPED, while limited attention is given to the International Convention Against the Taking of Hostages (ICATH) despite repeated hostage incidents involving Indonesian citizens abroad. This indicates a research gap in understanding how media and public discourse shape policy urgency towards ICATH ratification. This study aims to analyse media narratives, framing, and agenda-setting dynamics, while also examining policy responses in hostage management, including diplomatic negotiations, multilateral cooperation, and the implementation of the Duty of Care. Using a qualitative design, this study analysed 100 national online news articles published between 2011-2025 employing inductive-deductive thematic coding across open-ended, axial, and selective stages. The findings reveal contrasting media patterns: independent media emphasise regulatory weaknesses and the urgency of legal action, while state-affiliated media emphasise diplomatic engagement and crisis response. This study advances policy insights for a hostage protection framework in Indonesia.

METHOD

This study employed a qualitative design with thematic content analysis to examine how media narratives construct policy urgency surrounding Indonesia's ratification of the 1983 International Convention Against the Taking of Hostages (ICATH). Rather than prioritising keyword frequency, the study applied interpretive thematic coding to identify recurring frames, dominant narratives, and discursive patterns within media coverage. A total of 100 online news articles published between 2011 and 2025 were purposively collected from state-owned, private, and international media outlets to ensure viewpoint diversity and reduce sampling bias. The dataset was retrieved using Google News Archive and official media platforms, employing predetermined search queries, including: "Indonesian hostages," "Indonesian hostages abroad," "Abu Sayyaf Indonesian hostages," "Susi Air hostages," and "Indonesian hostage cases."

Microsoft Excel was utilised as the primary tool for data organisation and qualitative coding. Each article was tabulated based on structured analytical attributes, including publication year, media affiliation, narrative tone, dominant frame, problem articulation, and policy stance. The analytical process followed a three-stage coding model: (1) open coding to generate initial labels and extract key segments; (2) axial coding to cluster codes into thematic categories such as legal vulnerability, diplomatic strategy, state accountability, media framing of rescue operations, and ratification urgency; and (3) selective coding to formulate core

narratives on the strategic significance of ICATH ratification. To strengthen analytical validity, iterative code verification was performed through cross-category comparison, pattern consolidation, and audit tracing using Excel memos. This methodological approach enabled a transparent and systematic interpretation of media discourse, providing a robust basis for understanding how public-facing narratives shape Indonesia's policy direction on hostage protection.

The research case's timeframe of 2005–2025 was chosen to capture policy developments following the intensification of Indonesian diplomacy in the hostage situation following the 2005 Iraqi journalist incident. This narrower 20-year period balances historical scope with manageability, allowing the research to identify major policy shifts while avoiding dilution from overly broad data. Each collected news item was then grouped based on several key variables, namely year of publication, media affiliation (government, national private, international), news intensity (low, medium, high), and relevance to the issue of ratification of the international convention on hostage-taking. This grouping process aims to systematically organise the data systematically so that it can be analysed qualitatively simultaneously.

The analysis was carried out using the cross-tabulation technique to see the pattern of relationships between these variables. For example, the relationship between media affiliation and the tendency to raise the urgency ratifying of the convention, or between the intensity of news coverage and increased public pressure on the government. In addition, thematic readings were carried out on the narratives that emerged, such as weak state protection, diplomacy to rescue Indonesian citizens, and the unpreparedness of international law in dealing with hostage cases. The validity of the data is strengthened through triangulation of sources, by comparing news from various media with official government documents, such as the statement of the Ministry of Affair's Statement and the minutes of the House of Representatives of the Republic of Indonesia regarding ratification. By analysing systematic patterns in media coverage, this study will answer the research questions of how effective Indonesia's current policy is in handling hostage cases, and how ratification of the Hostage Convention can strengthen Indonesia's ability to protect its citizens and state sovereignty.

ANALYTICAL FRAMEWORK

This study applies a structured analytical framework anchored in three interrelated concepts: Duty of Care (DoC), Human Security within a cosmopolitan perspective, and Total Diplomacy, integrated with International Legal Obligations. These concepts provide the analytical basis for evaluating Indonesia's hostage diplomacy and contextualising the strategic significance of ratifying the 1983 International Convention Against the Taking of Hostages (ICATH) as a non-ransom-based protection instrument that reinforces state legitimacy and citizen security (Surwandono & Nugroho, 2023). The Duty of Care (DoC) is a normative principle affirming the state's responsibility to protect its citizens beyond territorial borders (Nina Græger, 2020). Rooted in the legal–moral bond between sovereignty and citizenship, this obligation is reinforced by both domestic and international legal

norms. DoC reflects a cosmopolitan orientation that extends state protection beyond jurisdictional boundaries, aligning closely with Human Security, which shifts the security referent from state-centric defence toward individual well-being, emphasising freedom from fear, transnational risk prevention, and harm mitigation (Surwandono & Nugroho, 2023).

In hostage crises involving non-state armed groups, DoC transcends conventional consular assistance by incorporating legal readiness, diplomatic contingency, and multilateral coordination. Nina & Wrenn develop a comprehensive and systematic logic for the Duty of Care (DoC) paradigm. This encompasses the mechanisms by which the state protects its citizens, as well as the types of protection available, in both normal and crises. This ensures that individuals and communities continue to receive state protection, even when they are abroad (Surwandono & Nugroho, 2023).

At the operational level, Total Diplomacy functions as the strategic instrument through which DoC is enacted. Defined as a multi-actor, cross-sectoral diplomatic approach, Total Diplomacy integrates state institutions (e.g., foreign affairs, military, intelligence) with non-state intermediaries, civil society, and international partners to achieve citizen protection outcomes. Indonesia's engagement in the 2016 Abu Sayyaf hostage cases illustrates this model, where negotiations emphasised non-coercive engagement, non-state facilitation, and a strict No-Ransom policy, supported by informal mediation networks (Susilaningtias, 2021). Total Diplomacy therefore bridges normative foundations (DoC and Human Security) with institutional empowerment through international law. Within this framework, ratifying the 1983 International Convention Against the Taking of Hostages (ICATH) becomes a critical structural enabler. ICATH provides Indonesia with legal legitimacy, cooperative jurisdictional pathways, and diplomatic authority to coordinate intelligence exchange, crisis negotiation, and cross-border legal action without reliance on ransom-based mechanisms (Devi et al., 2019).

This principle is seen as a cosmopolitan idea in the context of human security. These state obligations arise from the fundamental relationship between the state and its citizens which is strengthened by the norms of international and domestic law, grounded in the attributes of sovereignty and nationality (Sekarwangi, 2019). For countries with a significant number of citizens abroad such as migrant workers, diaspora, or those in crises, the diplomacy of protecting Indonesian citizens demands serious attention given the volume and complexity of the issues at hand. In this context, the state has an obligation to provide an adequate legal basis (superstructure) and an effective policy implementation instrument (infrastructure) to guarantee such protection (Surwandono & Nugroho, 2023).

The implementation of *the Duty of Care* by a country can adopt various models, such as the *Social Contract model* which includes the establishment of diplomatic and representative relations abroad as well as the ratification of international conventions, the *Intermediaries of Care* model which involves or funds private entities or professional individuals to provide protection and the *Extension of Care* model that mobilizes official diplomats, police, or military for action in other

countries in emergencies (Surwandono & Nugroho, 2023). Furthermore, the state's obligations under the DoC do not end after the release of the hostages but extend to the provision of protection and post-release assistance for victims. This assistance includes medical, psychological, and psychosocial rehabilitation to help the victim's condition recover. In addition, the state is also responsible for seeking compensation or restitution for victims in accordance with the applicable legal framework (Susilaningtias, 2021). Fulfilling these DoC obligations requires policy breakthroughs to build a more solid, responsive, and comprehensive protection superstructure and infrastructure. Duty of Care (DoC) refers to a state's obligation to protect its citizens abroad through preventive measures, crisis management, and post-crisis rehabilitation. The DoC frames hostage protection as a fundamental state responsibility that cannot be compromised by ad hoc or informal practices such as ransom.

Meanwhile, a country's ratification of international conventions by a country plays a fundamental role as a legal framework governing the state's obligations in protecting citizens and handling transnational crimes such as hostage-taking. Conventions such as the 1983 International Convention Against Hostage Taking or the 1949 Geneva Convention define crimes, establish state obligations to provide protection, and facilitate cooperation between states in law enforcement or humanitarian assistance (Istikharoh, 2017). For example, the 1983 Hostage Taking Convention specifically requires the country where the scene is to secure the territory and facilitate the release of hostages. The ratification of this convention strengthens the domestic legal foundation and the state's position in international cooperation such as through the exchange of intelligence or diplomatic information in support of liberation efforts and post-liberation handling. But the operational measures of liberation are more often carried out through negotiation tactics, diplomacy, or security operations tailored to the situation on a case-by-case basis. Ratification of the 1983 Hostage Convention provides a legal basis for criminalising hostage-taking, ensuring the prosecution or extradition of perpetrators, and enabling stronger cooperation with other countries. This legal framework enhances Indonesia's legitimacy and bargaining power, while also closing existing policy gaps.

Ratification of an international convention or agreement is a legal act in which a country formally declares its willingness to be bound by an international treaty (Chandra, 2024). In Indonesia, this process is regulated by Law Number 24 of 2000 concerning International Agreements defines ratification and its forms, accession, acceptance, and approval. Ratification through legislation is required for important issues such as politics, peace, defence, national security, territorial change, state sovereignty, human rights, the environment, the establishment of new legal rules, and foreign loans/grants (Latifah, 2014). As a country that adheres to dualism, the enactment of international agreements into Indonesia's national legal system requires their domestication into national laws and regulations, and the ratification law itself binds Indonesia internationally, as national law (Ashri, 2023). Ratification can also be achieved through accession for countries that are not signatories to the treaties. The act of binding oneself to an international treaty is based on the

fundamental principle of *pacta sunt servanda*, which obliges the state party to implement it in good faith (Latifah, 2014).

The ratification of international conventions serves as a framework for international law that defines crimes (chemical crimes, terrorism, gross human rights violations, enforced disappearances), establishes states obligations to provide protection, and facilitates cooperation between countries (Susilaningtias, 2021). Concrete examples include Indonesia's ratification of the Chemical Weapons Convention (KSK) through Law No. 6 of 1998, which created an obligation to prohibit chemical weapons-related activities, facilitate annihilation, and establish a National Chemical Weapons Authority as a liaison with the OPCW (Triyana et al., 2024). The CSF strengthens national capacity, facilitates economic cooperation through the chemical industry, and contributes to global security. The ratification of the Convention for the Protection of migrant workers (1990 Convention) binds Indonesia to guarantee the rights of migrant workers in accordance with the, however challenges arise when the destination country has not ratified the convention. Ratification also serves as the legal basis for *a country's Duty of Care* towards its citizens abroad which is realised through the establishment of diplomatic relations and the appointment of representatives abroad (Surwandono & Nugroho, 2023). For example, the 1949 Geneva Convention, which Indonesia acceded to through Law No. 59 of 1958, regulates the Protection of civilians in armed conflict.

As *law-making treaties*, the ratification of human rights treaties or those related to serious crimes require adjustments and updates to national laws. The discourse of ratification of the Rome Statute and the Convention against Enforced Disappearances (ICPPED) in Indonesia highlights this need (Ashri, 2023). Although Indonesian national law already recognises several principles such as crimes against humanity in Law No. 26/2000, the right not to be forcibly eliminated in Law No. 39/1999, and the principle of command accountability, there is often a gap in norms or inadequacies compared to international standards (Ahmad, 2000). The ratification of the ICPPED is argued to be important to break the chain of impunity and provide a stronger legal basis for citizen protection efforts, including in the persuasion of other countries to protect Indonesian citizens from enforced disappearance. Although post-ratification legal reform can be time-consuming, the convention can encourage the development of national law in related areas (Triyana et al., 2024).

The ratification of international conventions related to hostage taking or transnational crimes involving hostages can be narrated in three main aspects. First, ratification is a legal act that binds countries to comply with the treaties's provisions (Chandra, 2024). In the context of hostage-taking, conventions such as the 1983 International Convention Against the Taking of Hostage set specific obligations on the state of the party, such as the country where the incident occurred, to secure territory and facilitate the release of hostages (Istikharoh, 2017). The example of the Abu Sayyaf hostage case in 2016 shows that the Philippines, as a country that has ratified the 1983 Hostage Convention, is legally obliged to take action related to Indonesian hostages, including intelligence operations and facilitating their return.

This indicates that ratification creates a legal bond that can facilitate the host state's response to hostage-taking incidents on its territory. In addition, ratification of relevant conventions such as the 1949 Geneva Convention ensures that protection under the convention applies only to citizens of the States Party.

Second, ratification effectiveness achieved through the establishment of a national legal framework and mechanisms to implement and facilitate international cooperation. As a country adhering to legal dualism, Indonesia must transform domesticated or domestication of the provisions of international agreements into national laws and regulations. However, the process can vary and take time (Triyana et al., 2024). Ratification of the convention could fill a national legal gap and provide a clearer legal basis for state action, as argued in the case of the urgency of ratifying ILO Convention 188 for fishery workers. Third, ratification strengthens national capacity and becomes an important foundation for bilateral and multilateral cooperation between countries (Susilaningtias, 2021). This includes the exchange of intelligence information, technical assistance, or joint actions that support citizen protection efforts and the handling of transnational crimes such as hostage-taking. Ratification of related conventions can also provide a legal basis to persuade other countries to protect to Indonesian citizens.

Overall, this demonstrates that Indonesia has a strong constitutional and international obligation to protect its citizens wherever they are from the threat of hostage-taking. Indonesia's response through total diplomacy involving non-state actors proved effective in freeing hostages. The ratification of the anti-hostage convention will strengthen Indonesia's legal basis for carrying out this obligation, especially in cross-border context. Such a convention has the potential to enhance international cooperation in the prevention, prosecution and release of very crucial hostages. Considering that hostage taking often involves groups operating in the territory of other countries. Various prevention efforts through regional cooperation have also been carried out. However, the challenges in protecting Indonesian citizens abroad still require strengthening the legal framework, inter-institutional coordination, and a comprehensive strategy. Because to face the challenges in protecting hostage victims, the effectiveness of hostage management must be really considered.

The ratification of international conventions can demonstrate that the recognition and application of global legal instruments are the key to handling hostage cases in a more structured and coordinated manner. The effectiveness of hostage management through ratification of the convention depends heavily on consistent implementation of the law and coordination among relevant agencies. Countries that have ratified conventions but lack robust law enforcement mechanisms often struggle to address hostage cases effectively. Therefore, ratification must involve strengthening the judicial system, increasing the capacity of security forces, and monitoring the country's compliance with the convention's provisions. The ratification of the convention can make it easier for a country to eradicate hostages taking crime and also open up opportunities for cross-border cooperation in handling cases that often involve perpetrators and victims from

various jurisdictions. Therefore, ratification of the convention is an important first step, but it must be followed by great efforts and synergy between countries so that hostage management can run effectively and provide maximum protection for victims.

This framework explicitly guided the research methodology. The media analysis categories were derived directly from the framework: references to the Duty of Care, mentions of international law or ratification, descriptions of diplomatic strategies, and evaluations of outcomes. This ensured that data interpretation was not only descriptive but also systematically grounded in a theoretical framework, thereby answering the primary research question of: how can Indonesia decisively address hostage-taking? However, the effectiveness of ratification of the convention in hostage-taking cases is not absolute. It depends heavily on the specific context of the incident and other non-legal factors. In addition, the parties' political will, differences in legal systems, and conflicting national interests can affect the extent to which the conventions' provisions are implemented. Although conventions provide a legal framework and obligations, the operational success of liberation is often determined by diplomatic strategies, negotiation tactics, the capabilities of the actors involved, and practical cooperation on the ground.

RESULT AND ANALYSIS

This section analyses hostage-taking cases involving Indonesian citizens (2005–2025) with the explicit aim of demonstrating why ratification of the 1983 Hostage-Taking Convention is essential for Indonesia to fulfil its Duty of Care and confront hostage-taking firmly, without relying on ransom payments. The analysis integrates case evidence, Duty of Care as the core normative lens, and International Legal Obligations as the legal foundation, and draws on media framing theory to show how public discourse shapes legitimacy and urgency for reform. Based on the hostage taking incident of Indonesian citizens carried out by the Abu Sayyaf, the largest most significant number of victims in one incident was in the 2016 case that befell the Tugboat Brahma 12 & Barge Annand 12, with a total of 10 victims. The case began on March 26, 2016, when the Indonesian-flagged tugboat Brahma 12 and barge Anand 12 were hijacked by the Abu Sayyaf group while sailing from the Puting River, South Kalimantan, to Batangas, Southern Philippines. A total of 10 Indonesian citizens who were crew members of the ship became hostages (Pangaribuan et al., 2022).

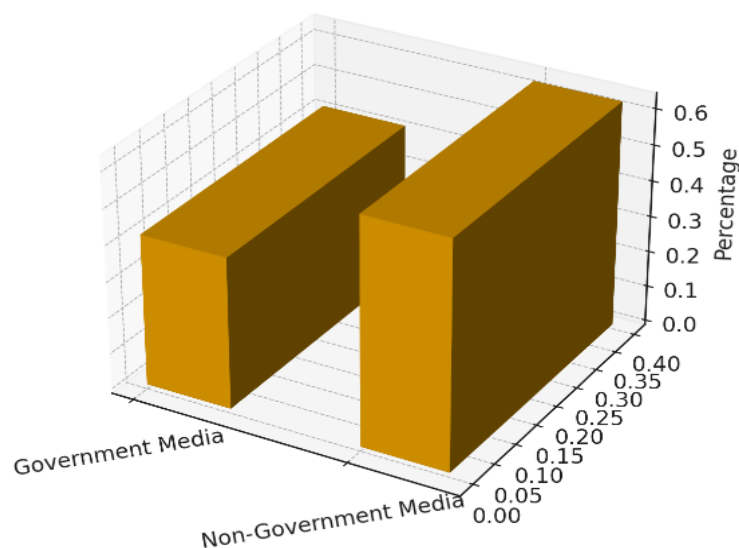
In this incident, the Abu Sayyaf group asked for ransom from the Indonesian government, the company, and the victim's family. Another source noted the ransom amount demanded for the Brahma 12 & Annand 12 cases was 14.2 billion Rupiah. These hostage-taking incidents mainly occurred when the Abu Sayyaf group approached the ship with firearms, rendering the victims unable to resist. The location of the incident in the waters of the Southern Philippines is a vulnerable area for Indonesia (Joshua & Sidik, 2021). In handling the case of the hostage taking of 10 Indonesian crew members by the Abu Sayyaf group in Philippine territory, Indonesia decided not to involve the armed forces directly. It relied on the

involvement of non-state actors. The goal is to enable the release of more quickly without lengthy bureaucratic procedures. The Sukma Foundation, which was established with a focus on humanitarian activities, then sent a team of negotiators. Humanitarian approaches are prioritised, one of which is because of the similarity of the religious and cultural backgrounds of the people of the Southern Philippines with Indonesia (Joshua & Sidik, 2021).

Media Reporting Related to Hostage Taking by Government and Non-Government Media

In hostage situations, media coverage plays a crucial role in shaping public perception, and the approaches taken by state and non-state media often reflect differing ideologies and priorities in constructing and conveying the reality of the event. These differences are particularly evident in how they define the problem, diagnose the causes, make moral judgments, and recommend solutions. These differences ultimately shape public perception and create a "dual reality" for society, one factual and the other media-constructed, influencing policy responses. (Karim & Alamsyah, 2018).

Chart 1. Framing Through Government and Non-Government Media



Source: Data Proceed

The media, as a result of the journalist's construction of reality, are influenced by the ideologies they adhere to, which in turn shape how they perceive reality and convey information to the public. Government-affiliated media refers to news organisations that are owned, funded, or institutionally controlled by the state or government agencies. Their editorial direction often aligns with official government narratives and national policy interests. Content from these outlets typically emphasises diplomatic achievements, government responsiveness, and crisis management strategies. Because of their institutional mandate, these media tend to

avoid narratives that could be seen as undermining state credibility (Amin & Febrianita, 2024).

Non-government media refers to private, independent, or commercially operating news organisations that are not financially or editorially controlled by the state. These outlets generally exercise greater autonomy in selecting and framing news angles. Content often highlights accountability, legal gaps, public criticism, and policy shortcomings, and may present a wider diversity of perspectives. Non-government media play a crucial role in ensuring the public receives accurate and balanced information, particularly regarding political figures and sensitive issues (Widyaya & Setiawan, 2023). In the case of the hostage taking of the Susi Air Pilot in 2023 by the Papuan Armed Criminal Group (KKB), CNN Indonesia and Tribunnews showed striking framing differences. CNN Indonesia, which according to the Reuters Institute is the most trusted mass media in Indonesia with 66% of respondents, tends to frame the news by highlighting the threat to the safety of hostages and civilians in Papua. This media has consistently criticised the TNI-Polri military strategy in Papua which is considered to endanger the lives of hostages and civilians (Amin & Febrianita, 2024).

Deep *diagnosis cause*, CNN Indonesia explained that the Susi Air pilot's hostage taking was part of the complex conflict dynamics in Papua, with separatist actions by the Armed Criminal Group (KKB) as the primary trigger. The media also criticised the government's inadequate response in to addressing crucial issues such as natural resource management, protection of indigenous peoples' rights, and demands for independence. Dissatisfaction with the government's approach became a broader context of tension and then exacerbated by the option of resolving through military channels by the TNI-Polris. The hostage release efforts in Nduga and the combat alert status established are considered to increase the risk to the safety of civilians and raise concerns about human rights violations and security stability in the region (Amin & Febrianita, 2024).

Deep *moral judgment*, CNN Indonesia denounced the actions of the Papuan KKB as a violation of Human Rights (HAM) and asserted that hostage-taking cannot be justified because it threatens the lives of others. They expressed concern over the "bloodshed in Papua" that could exacerbate the conflict situation and harm the local population. CNN Indonesia primarily frames the Papuan armed criminal group hostage-taking through the paradigm of human rights and human security, emphasising that hostage-taking is an illegal act that endangers civilian lives which was exacerbates conflict escalation. Beyond moral condemnation, this study argues that such framing serves a discursive guiding function by shaping public expectations for non-military crisis management. By repeatedly highlighting the risks of violence and humanitarian impact, CNN constructs negotiation not only as an ethical imperative but also as the most rational policy path in a high-stakes, asymmetrical hostage-taking situation (Amin & Febrianita, 2024).

CNN's recommended solution, dialogue facilitated by religious and traditional leaders, reflects a preference for socially legitimised intermediaries, a key principle in non-state conflict mediation. This study argues that CNN's framing aligns closely

with the operational logic of Total Diplomacy, in which the state does not monopolise hostage-taking but rather carries out through multi-actor collaboration, including civil society, local elites, informal mediators, and non-governmental networks (Amin & Febrianita, 2024). CNN's persistent rejection of large-scale military operations further reinforces the core tenets of Total Diplomacy: non-coercive, cooperative, and cross-sectoral engagement, prioritising persuasion, trust-based negotiation, and community legitimacy over kinetic intervention.

As a *treatment recommendation*, CNN Indonesia has consistently advocated a persuasive approach, negotiation, and peaceful dialogue, often involving traditional and religious leaders to facilitate communication with the hostages. It is important to them that the resolution of the issue be resolved without the active involvement of large-scale military operations, as this is considered to interfere with liberation the mediation process of liberation and risks causing more casualties. This approach demonstrates CNN Indonesia's commitment to safe and sustainable solutions. CNN Indonesia's news framing tends to be more neutral and objective, unaffected by political or economic interests (Amin & Febrianita, 2024).

In contrast, Tribunnews, which faces higher public distrust, tends to highlight other issues in its framing. *Define problem* Tribunnews focuses on the threat posed by the Papuan KKB, which is also seen as a cause of disruption to government and geopolitical stability, mainly because it involves foreign nationals who can attract international attention related to Human Rights (HAM) issues. This incident is even considered a threat to the sovereignty of the Unitary State of the Republic of Indonesia (NKRI), especially after the incident of the death of a TNI member in an effort to search and the potential risk of Papua's release from the Republic of Indonesia. Regarding the *cause* of the diagnosis, Tribunnews has consistently pointed to the root of the problem in the actions of the Papuan KKB seeking to separate from the Republic of Indonesia. Obstacles in handling these hostages are also caused by the Papuan KKB, which is characterized by its large population and mobility, making it difficult to maintain security. The Papuan KKB who attacked the TNI in an effort to free the hostages was also considered the main cause of the escalation of the problem (Amin & Febrianita, 2024).

Deep *moral judgment*, Tribunnews highlighted the efforts of the authorities who continue to conduct search and rescue, showing that the authorities are very concerned about the safety of hostages and the human rights of civilians, even willing to sacrifice their own lives. They also tend to clarify issues circulating outside and justify every action of the Indonesian National Army (TNI), which makes this media seem to be on the government's side. They also highlighted the importance of maintaining state sovereignty and state responsibility in maintaining territorial integrity. As a *treatment recommendation*, Tribunnews recommended continued search efforts without a large-scale military operation, while still supporting a standardised operation to reinforce the persuasive measures taken earlier. They also suggested pursuing persuasion through negotiations among several parties and the Papuan KKB. These differences reflect the interests of stakeholders, newsroom

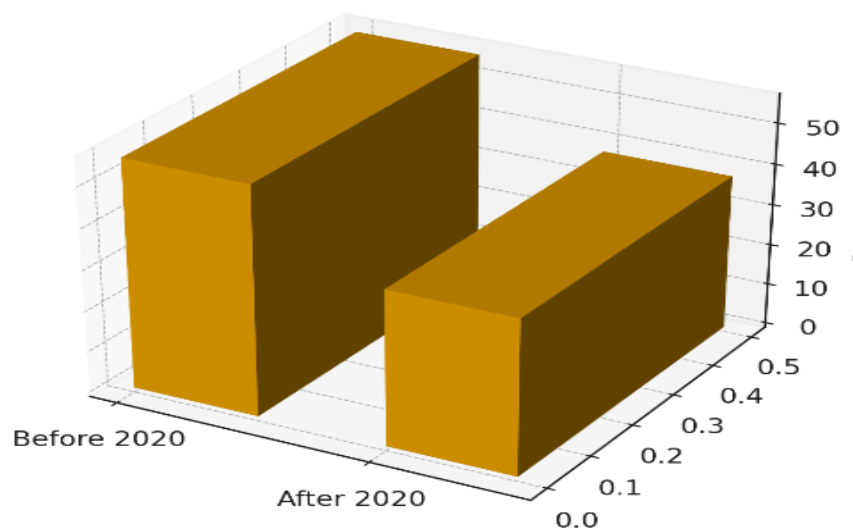
routines, journalist integrity, and the ideology and corporate culture of each media (Amin & Febrianita, 2024).

In addition to the Susi Air pilot case, the role of the media in the hostage case was also seen in previous incidents. An example is the case of the hostage taking of Metro TV journalists, Meutya Hafid and Budiyo, in Iraq in 2005, which Metro TV itself intensely reported on the development of their hostage employees (Surwandono & Nugroho, 2023). The government is also actively trying to manage information conveyed by the media during the hostage crisis to avoid escalating demands from the hostages. The same thing was done as in the case of the hostage taking of Indonesian citizens by the Abu Sayyaf group, where the Ministry of Foreign Affairs invited the media to discuss related news (Christy et al., 2016). Media reporting influences how audiences interpret the legitimacy of government actions, the urgency of policy decisions, and the moral framing of the actors involved. Through repeated emphasis on specific frames, whether humanitarian, legal, or security-oriented, the media can normalise specific policy preferences and marginalise others. This concludes that the media has a crucial role in disseminating information and shaping public perception of hostage cases. The media does not merely reflect reality; it actively participates in agenda-setting and shapes public expectations about how the government must respond.

The Intensity of News Related to Hostages Before and After 2020

The phenomenon of hostage-taking involving Indonesian citizens abroad is a persistent and complex diplomatic challenge. As the international mobility of Indonesians increases, exposure to security risks in high-conflict areas also rises. However, what intensifies this issue is not only the occurrence of hostage incidents but also the media's construction and amplification of public perception (Surwandono & Nugroho, 2023).

Chart 2. Intensity of News Before and After 2020



Source: Data Proceed

Based on an analysis of 100 news articles processed in Excel through categorisation and coding, the study found a shift in media intensity and narrative structure. As illustrated in the percentage chart, media coverage before 2020 reached 56%, whereas after 2020 it decreased to 38%. This indicates that before 2020, news about hostage cases was more prominent and frequently placed in headline positions. The media framing analysis shows that earlier reports were more emotionally charged, highlighting urgency, humanitarian pressure, and demands for rapid government action. In the period before 2020, several incidents of Indonesian hostage taking have come to the surface with varying intensity of news and responses. One of the most prominent cases was the hostage taking of Metro TV journalists, Meutya Hafid and Budiyanto, in Iraq in 2005 (Tifada, 2022). The 2005 case of journalists Meutya Hafid and Budiyanto in Iraq was a high-profile incident that attracted national and international attention. Metro TV, the station where they worked, attempted to report on the developments of its hostage employees as emotionally intensely as possible. The hostage release marked a milestone in the successful role of individual actors in negotiations, with Gus Dur's legitimacy playing a crucial role in the diplomatic and negotiation process (Mubarok & Kurniawan, 2005). The 2005 case of journalists Meutya Hafid and Budiyanto in Iraq was a high-profile incident that attracted national and international attention. Metro TV, the station where they worked, attempted to report on the developments of its hostage employees as emotionally intensely as possible. The hostage release marked a milestone in the successful role of individual actors in negotiations, with Gus Dur's legitimacy playing a crucial role in the diplomatic and negotiation process (Arisandy, 2016).

However, the most attention-grabbing incident was the case of the hostage taking of Indonesian crew members by the Abu Sayyaf Group (ASG) around the waters of Mindanao, Philippines, which had started in 2002 and continued until 2016 (Pratikasari & Muryantini, 2017). Incidents of hostage taking of Indonesian citizens by the ASG have occurred repeatedly since 2002, with ransom demands as the primary motive. The intensity of reporting for these cases was very high, especially in 2016. These incidents often cost a relatively large number of victims in a single incident and made it a large-scale hostage case that attracted national and international attention (Pangaribuan et al., 2022). In 2016, the hostage taking case of 10 Indonesian crew members from the Brahma 12 tugboat and the barge Anand 12 became the peak of the hostage incident, which was then followed by several other similar cases in the same year (Joshua & Sidik, 2021). The Abu Sayyaf group has consistently demanded ransom money used to fund their criminal operations and activities (Permono, 2013). Reports indicate that incidents of hostage takings by the Abu Sayyaf often occur when the group comes to ships with firearms, making it difficult for victims to resist.

Post-2016, especially after the establishment of the Indomalphi (Indonesia, Malaysia, Philippines) cooperation in 2016 as a long-term prevention effort, reports show a significant decrease in crime incidents in the Sulu Sea, including the taking of Indonesian citizens (Christy et al., 2016). Indomalphi introduced a series of

operational and institutional mechanisms, including joint maritime patrols, a real-time information-sharing system, shared command centres, and coordinated pursuit protocols across territorial waters. These mechanisms marked a shift from unilateral military responses to integrated maritime security governance. Through these processes, suspicious vessel movements are detected earlier, communication between naval forces is accelerated, and interception efforts become more effective before hostage-taking escalates into negotiation or ransom demands (Pangaribuan et al., 2022).

The graph of crime incidents in the Sulu Sea shows a decrease in actual and attempted incidents from their peak in 2016, with only attempted incidents in 2019 and 2020, and no reported crime incidents in 2021. This indicates that the cooperation is successful in reducing hostage incidents in the region (Pangaribuan et al., 2022). Despite this, hostage cases still occur, such as the hostage taking of crew members by the Houthis on the island of Socotra, Yemen, in January 2022, and the Susi Air pilot in 2023. Empirical data supports this mechanism. According to regional maritime security reports, crime incidents in the Sulu Sea peaked in 2016. However, following the implementation of coordinated patrol patterns, the number of both actual and attempted attacks declined steadily, with only attempted incidents recorded in 2019 and 2020 and no confirmed hostage-related crimes in 2021. These findings indicate that the cooperative processes, rather than mere diplomatic agreements, were instrumental in suppressing the operational space of armed groups (Pangaribuan et al., 2022).

Entering 2020 and beyond, the case of Indonesian hostage takings remains a concern. In 2020, five Indonesian fishermen were taken hostage by the Abu Sayyaf group, with one fatality. Then, in January 2022, Indonesian crew members were again taken hostage by the Houthis on the island of Socotra, Yemen (Surwandono & Nugroho, 2023). The most highlighted case in this period was the hostage taking of the Susi Air pilot by the Papuan Armed Criminal Group (KKB) in 2023. This case has become the primary focus of various media outlets because it involves the KKB, which has been labelled a terrorist group by the Coordinating Minister for Political, Legal and Security Affairs, Mahfud MD, since April 2021 (Amin & Febrianita, 2024).

To prevent cases of Indonesian hostage taking in vulnerable areas such as the Sulu Sea, preventive efforts are needed. The Ministry of Transportation once published a Voyage Information prohibiting Indonesian-flagged ships from sailing to the Philippines and Malaysia as a preventive measure (Christy et al., 2016). Long-term prevention efforts include establishing regional development cooperation and promoting economic development in border areas. Military cooperation, such as Indomalphi, also helps reduce crime in the Sulu Sea. After the cooperation of Indomalphi, the hostage taking incidents of Indonesian citizens by the Abu Sayyaf group began to decrease, and in 2021, it was reported that there was no data on Indonesian hostage-taking (Pangaribuan et al., 2022).

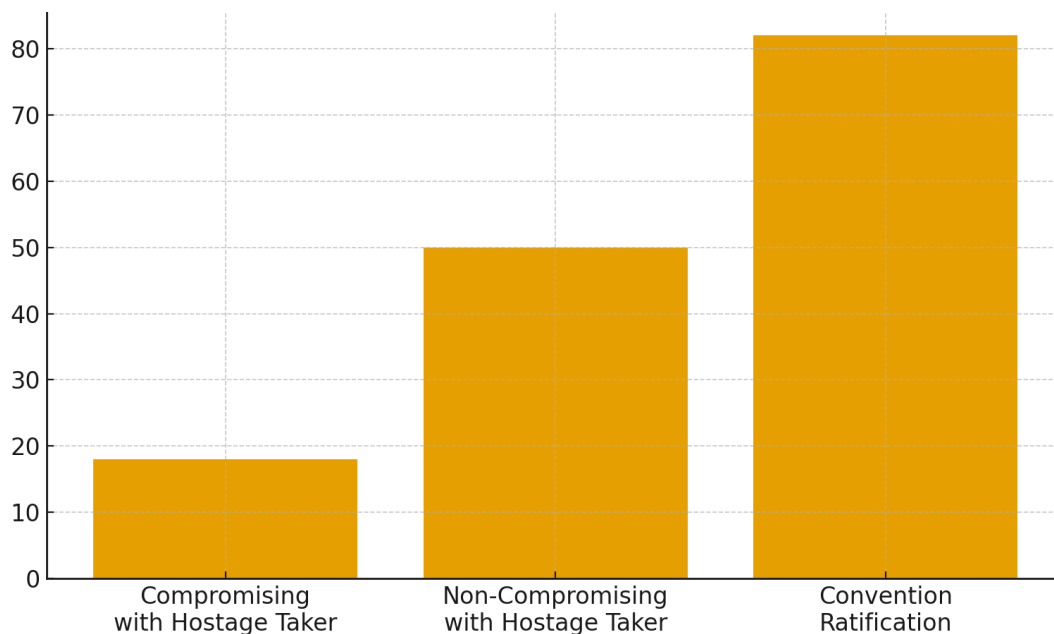
Despite efforts to handle and prevent, the protection of Indonesian citizens abroad still faces challenges. One of them is the difficulty of finding minimal security information in the public domain, which affects the validity of arguments and

analyses in research. In addition, there are dilemmatic cases, such as protecting citizens who are in positions of enemies or committing crimes, including terrorism. One of the sources said that there are more than 6,000 Indonesian citizens abroad who are labelled as terrorists (Surwandono & Nugroho, 2023). In terms of assisting Indonesian citizens who are victims of terrorist crimes abroad, the Witness and Victim Protection Institute (LPSK) is also involved and coordinates with the Ministry of Foreign Affairs. There needs to be a more detailed mechanism for the technical fulfilment of victims' rights, with a joint agreement between the Ministry of Foreign Affairs, LPSK, and the National Counterterrorism Agency (BNPT) (Susilaningtias, 2021). In terms of regulations, it is necessary to raise Indonesian citizen protection policies from being based solely on the Regulation of the Minister of Foreign Affairs to a law, so that resources can be mobilised optimally.

The Importance of the Ratification of the Hostage Convention

In the face of citizen hostage incidents, a country's response does not depend solely on operational capacity. However, it is also heavily influenced by the ratified international legal framework and the chosen approach (Surwandono & Nugroho, 2023). Broadly speaking, there are three main approaches often used: the negotiation and humanitarian approach (*soft power*), the military approach, and ratification of international conventions, which form the legal environment for the two previous approaches.

Chart 3. Percentage of Compromise with Hostage Takers and Convention Ratification



Source: Data Proceed

Handling cases of hostage taking of Indonesian citizens abroad with *soft power* in large-scale incidents is the leading choice in many hostage cases. This total diplomacy is a strategy that integrates the roles of state and non-state actors, as well

as formal and informal networks ranging from government and the private sector to non-governmental organisations (NGOs). The main goal is to prioritise the safety of the hostages (Istikharoh, 2017).

Negotiation and Humanitarian Approach (Soft Power)

The success of the approach through negotiation is evident in many cases. For example, in the case of Meutya Hafid and Budiyanto 2005. The role of the former President of the Republic of Indonesia, K.H. Abdurrahman Wahid, is a concrete example of the success of individual actors in the hostage release negotiations. His success depends on his personal legitimacy factors, interpersonal and intercultural communication skills, and his mastery of the situation and the hostages' characteristics. Gus Dur has a background as the leader of Indonesia's most prominent Islamic organisation, Nahdlatul Ulama, and his experience living in Iraq gives him credibility and influence. He used the issue of brotherhood between Muslims as the basis for negotiations with the Iraqi Mujahideen Army faction, considering the similarity of the Sunni faith with the majority of Muslims in Indonesia. In addition, he took advantage of contacts with community leaders and religious leaders in the Middle East. Gus Dur's humanist and humorous approach, along with his reputation as a peace leader, also helped him build good relations with the hostages (Mubarok & Kurniawan, 2005).

The 2016 Abu Sayyaf Group (ASG) Case. The Indonesian government prioritises negotiation and a humanitarian approach over the use of offensive military force, mainly because incidents occur on the territory of other countries. Total diplomacy succeeds because of trust-building across formal and informal networks. The strategy Indonesia used in rescuing 10 Indonesian citizens is called "Total Diplomacy". This diplomacy involves all parties (Istikharoh, 2017). The liberation effort was carried out through various means, including communication with the Philippine military and lobbying the political elite in Mindanao (Surwandono & Nugroho, 2023) The intermediate level of negotiations involves respected leaders, including a team led by the Indonesian government, headed by Kivlan Zein, a retired Major General (Raisha et al., 2024). The Ministry of Foreign Affairs coordinated with the Ministry of Communication and Information, and invited the media, as the media was considered to play an important role in reporting on the hostage case (Christy et al., 2016). After various efforts, on May 12, 2016, 10 Indonesian crew members were successfully released without any contact with weapons. This success is an example of a country's ability to protect its citizens abroad.

One of the key non-state actors involved is the Sukma Foundation. The Sukma Foundation sent a team of negotiators with a religious and cultural approach, leveraging the similarities in the religious and cultural backgrounds of the people of the Southern Philippines and Indonesia. They managed to gain ASG's trust by providing logistical assistance, such as peyek chips, cigarettes, and the holy book of the Quran. Despite the demand for a ransom of 50 million pesos or about 15 billion Rupiah, however, the Indonesian government has a "*No Ransom Policy*" that refuses

to pay ransom to terrorists or criminals, as it could encourage similar activities in the future and give a bad image (Joshua & Sidik, 2021). In practice, negotiations could involve other “offers,” such as educational scholarships for the children of ASG members in the Southern Philippines, which helped lower the ransom demand to 5 million pesos. The involvement of local communities in the Southern Philippines is also crucial in gaining access and building trust with the ASG. Influential figures such as Nur Misuari, a leader in the Moro group and a former driver of Al-Habsi as the leader of the hostage-takers, were also used to help free the hostages (Made et al., 2016).

Such a case of piracy is a crime involving several jurisdictions of the country that apply simultaneously, and each jurisdiction can clash with the others. In the case of the hijacking of the Ark Tze ship in the waters of Pointe Noire, Republic of Congo, several types of jurisdictions may apply. This includes universal jurisdiction, which can be exercised by any country regardless of the nationality of the victim or the perpetrator, since piracy on the high seas is considered an enemy of humanity, and universal jurisdiction aims to fill a legal vacuum. There is also passive personal jurisdiction, based on the victim's nationality. As well as extra-territorial jurisdiction belonging to the flag of the ship. In the case of Ark Tze, universal jurisdiction is considered paramount because it does not require a relationship of citizenship to counteract piracy (Devi et al., 2019). However, countries related to piracy cases can still exercise personal and extra-territorial jurisdiction. The principle of state accountability is fundamental in international law. Moreover, the last case is the 2023 Susi Air Pilot Hijacking. The handling of this case also involves negotiation/persuasive efforts carried out in conjunction with security forces search operation (Amin & Febrianita, 2024).

Military Approach

Although diplomacy is preferred, the military approach remains an option that is considered and prepared. However, offensive military intervention tends to be ruled out as the main option due to the high risk to the safety of the hostages and the potential to damage bilateral relations if an incident occurs on the territory of another country, which can be considered aggression (Raisha et al., 2024). The Philippines, for example, has denied Indonesia's permission for military operations on its territory due to concerns for the safety of its citizens and its credibility. The failure of the Philippine military operation in Basilan that killed 18 Filipino soldiers and 5 ASG members also reinforced this view. There are also several examples of the use of military operations directly or in combination with diplomacy—namely, the 2011 Piracy of MV Sinar Kudus by Somali pirates. The Indonesian government reportedly used military operations as part of its strategy due to the Somali government's lack of active involvement (Istikharoh, 2017). Next, the hijacking of the 2018 Ark Tze ship in the waters of the Republic of Congo. The settlement was achieved through a combination of diplomacy and cooperation with the country where the hostages were found, i.e., Nigeria, which then conducted a military operation to secure their release (Devi et al., 2019). Finally, intelligence operations

carried out by the TNI under the Ministry of Foreign Affairs's coordination remain a supporting effort.

Therefore, military practice is not used as the main option in rescuing hostages. Other efforts to replace the use of military practices include patrols at the border and guards such as 5 warships and 500 TNI Navy troops in Tarakan which are carried out as preventive and security measures (Raisha et al., 2024). Trilateral maritime cooperation such as Indomalphi (Indonesia-Malaysia-Philippines) was also established to prevent repeated hostage-taking incidents in the Sulu Sea, demonstrating success in reducing incidents of maritime crime without resorting to military practices (Pangaribuan et al., 2022).

The Role of Ratification of International Conventions

The ratification of international conventions plays a crucial role as a foundation in efforts to protect citizens in the face of hostage incidents abroad. This legal action is not just a formality, but an integral part of the country's strategy to build a strong legal framework both at the national and international levels to prevent threats, protect citizens' rights, and uphold justice against serious crimes that may be experienced by Indonesian citizens wherever they are. By ratifying an international treaty, a country formally declares its willingness to be bound by the provisions contained in it (Chandra, 2024).

The approach to ratifying the Convention itself is a fundamental step and precedes the two operational approaches above, as it establishes a legal framework that enables a structured response. Ratification of international conventions, such as the 1983 International Convention Against Hostage and the 1949 Geneva Convention, is not a direct means of freeing hostages, but rather serves as a robust legal framework for prevention, protection, and law enforcement (Triyana et al., 2024). Ratification creates legal obligations for state parties, encourages international cooperation in the exchange of information and assistance, and strengthens national capacity to address transnational crime.

Ratification of conventions such as the 1983 International Convention Against Hostage Taking is crucial. The Convention sets out obligations for States Parties, for example, requiring the country where incidents occurred to secure territory and facilitate the release of hostages (Istikharoh, 2017). A stark example can be seen in the case of hostage taking by the Abu Sayyaf group in 2016, where the Philippines, as a country that has ratified the 1983 Hostage Convention, is legally obliged to take action related to Indonesian hostages, including conducting intelligence operations and facilitating their return. This suggests that ratification creates a legal bond that can facilitate the host state's response to hostage-taking incidents on its territory. In addition, the convention can clearly define the crime of hostage-taking, establish states' obligation to provide protection, and facilitate cooperation between countries in law enforcement or humanitarian assistance (Susilaningtias, 2021).

Indonesia has acceded to the 1949 Geneva Convention through Law No. 59 of 1958, which regulates the protection of civilians and war victims in armed conflict (Rachel Cherensya Manitik, 2023). This convention provides a legal basis to protect

Indonesian citizens involved in conflicts, including hostage-taking (Latifah, 2014). Indonesia also ratified the Chemical Weapons Convention (CWC) in 1998. Despite this, its implementation still faces challenges, including overlapping authority, legal ambiguity, and a lack of public understanding. The CWC aims to prevent the threat of chemical terrorism and enhance international cooperation in the peaceful management of chemicals (Triyana et al., 2024). The concept of Duty of Care (DoC) is an important paradigm that emphasises states' responsibility to protect their citizens beyond their jurisdictions, supported by national regulations and ratified international conventions. DoC implementations can adopt *a model social contract, intermediaries of care, and the extension of care* (Surwandono & Nugroho, 2023). The ratification also enhances Indonesia's credibility in the eyes of the international community and opens up wider opportunities for cooperation, including in the exchange of intelligence information and technical assistance. This is a tangible manifestation of Indonesia's constitutional and international obligation to protect its citizens wherever they are.

Diplomacy and negotiation are often the primary operational tactics in hostage release, as Indonesia pursues the “total diplomacy” approach involving state and non-state actors; however, ratification of the convention provides legitimacy and a legal framework for these efforts. The importance of ratification is evident in its ability to clearly define the crime of hostage-taking, establish state obligations to provide protection, and facilitate cooperation between countries in law enforcement or humanitarian assistance. Ratification strengthens national capacities and serves as an important foundation for bilateral and multilateral cooperation among countries, such as the exchange of intelligence information and technical assistance. Ratification can support the implementation of Indonesia's foreign policy to realise global security and order and contribute to efforts to eliminate impunity for serious crimes and to deter perpetrators (Latifah, 2014). Ratification can also encourage the development of national laws to criminalise crimes and update the legal framework to align with international standards (Ashri, 2023).

Despite challenges in domestic implementation, such as overlapping authority, legal ambiguity, resource constraints, and sometimes exaggerated concerns regarding retroactive jurisdiction or sovereignty, the strategic benefits of ratification remain far greater (Triyana et al., 2024). Overall, media framing significantly shapes public expectations and political urgency, underscoring the relevance of framing theory in analysing hostage cases. Indonesia's reliance on all-out diplomacy has demonstrated short-term effectiveness but poses long-term risks without more substantial legal commitments. Ratification of the 1983 Hostage Convention would not only strengthen Indonesia's legal standing internationally but also provide a more sustainable framework for fulfilling its Obligation of Care. Ratification is a tangible manifestation of Indonesia's constitutional and international commitment to protect all its citizens wherever they are (Sekarwangi, 2019). Thus, ratification is not just a formality but an essential step that binds countries to a complex global legal network, strengthens their position, and ensures more comprehensive legal

protection for their citizens amid the threat of transnational crime (Susilaningtias, 2021).

CONCLUSION

This study concludes that ratifying the International Convention Against the Taking of Hostages (ICATH) constitutes an urgent and strategic policy step for Indonesia to strengthen the protection of its citizens abroad. Through qualitative content analysis using open, axial, and selective coding of 100 online media articles, three dominant narrative patterns were identified: (1) a non-compromising stance toward hostage takers (50%), (2) strong public and institutional support for convention ratification (82%), and (3) rejection of ransom-based or transactional diplomacy (18%). These narrative clusters indicate that public discourse increasingly demands structured, law-based, and institutional responses rather than ad hoc military or transactional approaches.

The findings demonstrate two key implications. First, ratification provides a legal foundation for operationalising Total Diplomacy, in which hostage resolution is no longer dominated by the state alone but conducted through coordinated collaboration among government institutions, civil society, religious and traditional intermediaries, and international partners. This multi-actor engagement enhances legitimacy, widens negotiation channels, and reduces escalation risks. Second, the shift in media narratives identified during the coding process reflects the logic of Human Security, which prioritises the protection of individuals above political interests, emphasising safe release, risk prevention, and accountability under international law.

Nevertheless, this study has limitations. Media-based data do not fully capture internal decision-making processes within state institutions. Future research should incorporate interviews with diplomats, policymakers, and former hostage victims to trace how ratification affects real-time diplomatic operations and long-term policy outcomes. In conclusion, the ratification of ICATH does not merely enhance Indonesia's international legal commitment; it institutionalises law-based, multi-actor, and human-security-oriented Total Diplomacy as Indonesia's standard model for hostage crisis management.

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