
THE INFLUENCE OF RELIGIOUS GROUPS ON LGBT POLICIES IN THAILAND AND INDONESIA FROM A HUMAN RIGHTS PERSPECTIVE

Nurhayati^{1*}, Khoirunnisa²

Universitas 17 Agustus 1945 Jakarta

Jl. Sunter Permai Raya, Sunter Agung Podomoro Jakarta Utara 14356, Indonesia

Email: nurhyatti@gmail.com¹

ARTICLE INFO

Article history:

Received:

16 February 2025

Revised:

7 Mei 2025

Accepted:

8 Mei 2025

Kata Kunci:

LGBT;
Kelompok Religius; Hak
Asasi Manusia;
Kebijakan Publik;
Thailand; Indonesia

Keywords:

LGBT;
Religious Groups;
Human Rights, Public
Policy; Thailand;
Indonesia

Abstrak

Penelitian ini meneliti pengaruh kelompok religius terhadap kebijakan LGBT di Thailand dan Indonesia dari perspektif hak asasi manusia, dengan fokus pada perbedaan implementasi kebijakan yang dipengaruhi oleh nilai-nilai keagamaan di kedua negara. Penelitian ini menggunakan pendekatan kualitatif dengan metode deskriptif-analitis. Data dikumpulkan melalui studi literatur yang mencakup jurnal akademik, dokumen hukum, dan laporan organisasi internasional. Hasil penelitian menunjukkan bahwa di Thailand, penekanan Buddhisme pada toleransi telah menghasilkan kebijakan yang relatif inklusif terhadap komunitas LGBT, meskipun diskriminasi struktural masih terjadi dalam beberapa aspek. Sebaliknya, di Indonesia, pengaruh kelompok Islam konservatif lebih dominan, menghasilkan kebijakan yang lebih restriktif terhadap komunitas LGBT dengan tekanan sosial dan politik yang signifikan. Penelitian ini juga menemukan bahwa prinsip-prinsip hak asasi manusia belum sepenuhnya terintegrasi dalam kebijakan LGBT di kedua negara, meskipun Thailand cenderung lebih terbuka terhadap perubahan. Dengan demikian, penelitian ini berkontribusi dalam memahami dinamika antara norma sosial, nilai-nilai religius konservatif, dan prinsip hak asasi manusia serta implikasinya terhadap pembentukan kebijakan terkait LGBT di dua negara dengan latar belakang budaya yang sangat berbeda.

Abstract

This research examines the influence of religious groups on LGBT policies in Thailand and Indonesia from a human rights perspective, focusing on the differences in policy implementation influenced by religious values in the two countries. This research uses a qualitative approach with descriptive-analytical methods. Data was collected through a literature study that included academic journals, legal documents, and international organization reports. The results show that in Thailand, Buddhism's emphasis on tolerance has led to relatively inclusive policies towards the LGBT community, although structural discrimination remains in some aspects. In contrast, in Indonesia, the influence of conservative Islamic groups is dominant, resulting in more restrictive policies towards the LGBT community, with significant social and political pressure. The research also found that human rights principles have not been fully integrated into LGBT policies in either country, although Thailand tends to be more open to change. As such, this research contributes to understanding the dynamics between social norms, conservative religious values, and human rights principles and the implications for LGBT-related policy formation in two countries with very different cultural backgrounds.

INTRODUCTION

LGBT (Lesbian, Gay, Bisexual, and Transgender) policies have become an integral part of human rights discussions at the global level. International bodies such as the United Nations (UN) recognize LGBT rights as part of human rights that must be protected. On March 7, 2012, UN Secretary General Ban Ki-moon, at a meeting of the UN Human Rights Council in Geneva, Switzerland, emphasized that every state must protect the rights of minorities, including the LGBT community (United Nations, 2012).

At the regional level, particularly in Southeast Asia, LGBT issues face complex and often controversial challenges. Policies related to LGBT rights in the region are diverse, with countries differing in their acceptance and recognition of such rights. Cultural backgrounds and the influence of religious groups heavily influence this dynamic. Thailand and Indonesia are two interesting examples of acceptance and recognition of LGBT rights at the national level. Both countries have different characteristics in terms of religiosity, politics, and socio-culture, which influence policies and attitudes towards the LGBT community.

In comparing the two countries, human rights are important for balancing religious influence and protecting minority rights. However, their application faces different challenges in each country. In Thailand, while there is resistance from certain religious groups, their influence is not as strong as in Indonesia, where conservative Islamic groups have a significant influence in shaping LGBT-related public policies. This explains why social acceptance and legal recognition of LGBT in Thailand is more advanced, while in Indonesia, public policies are often shaped by strict interpretations of Islam (Khoir, 2020)

Previous research related to LGBT issues in Indonesia and Thailand has addressed various perspectives, although most have not explored the direct role of religious groups in influencing policy. First, research related to a comparative exploration of the LGBT legal systems in Thailand and Indonesia in terms of positive law, highlighting how Indonesia uses Article 292 of the Criminal Code to restrict LGBT activities while Thailand has higher tolerance in the social context, although it does not fully recognize LGBT rights legally (Aulia & Rahmaningsih, 2022). Second, research that focuses on the role of social and cultural norms in shaping more LGBT-friendly social constructs in Thailand, including the abolition of homosexuality as a mental disorder in 2002 by the Thai Ministry of Health (Andi Norman Nyila Amanda, 2020). Furthermore, research on LGBT discrimination in Indonesia is often driven by interrelated political and religious pressures. It focuses more on the dynamics of discrimination in Indonesia without providing an in-depth comparison with the situation in Thailand (Wilkinson et al., 2017).

These studies collectively provide a strong understanding of the different legal systems, levels of social acceptance, and discrimination against LGBT people in Indonesia and Thailand. However, there is still a gap in studies that specifically address the influence of religious actors on LGBT policies, especially in the context of a comparison between the two countries. This leaves room for researchers to analyze the influence of religious groups on LGBT policies in Thailand and Indonesia using a human rights perspective. The main focus of this research is to identify differences in the implementation of LGBT policies influenced by religious values in the two countries and explore how human rights principles play a role in shaping approaches to this issue. By exploring the strategic role of religious groups, this research makes a novel contribution to understanding the dynamics between conservative religious values and the implementation of human rights in Indonesia and Thailand.

RESEARCH METHODS

This research uses a qualitative method with a descriptive-analytical approach to analyze the influence of religious groups on LGBT policies in Thailand and Indonesia. Data was collected through a literature study of academic journals, reports of international organizations such as the UN and Amnesty International, and legal documents from both countries (Jubaidi, 2023).

The analysis was done thematically to compare the role of religious groups in shaping LGBT policies in Indonesia and Thailand. In Indonesia, religious groups tend to reject LGBT with religious narratives without considering human rights principles, while in Thailand, the more inclusive teachings of Buddhism allow for a balance between traditional values and social acceptance.

Data validation was done through triangulation by comparing multiple sources to ensure accuracy. The research also followed ethical principles by using only open sources that have undergone academic assessment, ensuring objectivity and accountability of the analysis.

RESULT AND DISCUSSION

The Influence of Religious Groups on LGBT Policies in Thailand and Indonesia

Thailand and Indonesia have contrasting views on LGBT issues, reflecting their cultural, social, and political differences. Thailand is known for its relatively tolerant stance, with high LGBT visibility in popular culture, tourism, and legislative efforts, such as legally recognizing same-sex partnerships (Hidayah et al., 2024). In contrast, Indonesia maintains a more conservative attitude, where the LGBT community faces social stigma,

discrimination, and even repressive legal actions. These differences illustrate how cultural and political factors shape societal and governmental responses to human rights issues (Sipahutar et al., 2023).

Religious influence plays a crucial role in shaping LGBT policies in both countries. This research employs the theory of Religious Influence on Public Policy to analyze religion's impact on policymaking and Secularization Theory to compare the role of religion in Thailand and Indonesia (Sule, 2023). In Thailand, Theravada Buddhism emphasizes compassion, social harmony, and respect for individuals, leading to a more open attitude toward diverse sexual orientations. However, despite general tolerance, structural discrimination persists, with some conservative Buddhist groups opposing LGBT rights, especially in public representation and policymaking. While international pressure and human rights values have some influence, conservative groups continue to resist broader legal recognition for LGBT individuals (Triycono, 2016).

Conversely, conservative Islamic influence mainly through the Indonesian Ulema Council (MUI) is dominant in Indonesia. MUI actively rejects LGBT identities based on Islamic teachings and moral values. Intersectionality Theory helps explain how religion, culture, and politics reinforce resistance to LGBT rights. Nevertheless, progressive groups such as the Liberal Islamic Network (JIL) advocate for inclusivity within Islam (Usman, 2018).

The Bounded Rationality approach in policymaking theory helps explain how religious groups make decisions influenced by limited information and moral priorities. In Thailand, Buddhist values allow for adaptation to social acceptance despite persistent structural discrimination. In Indonesia, religious narratives often frame opposition to LGBT issues without considering human rights principles, leading to more restrictive policies (Harahap, 2016).

Furthermore, this research highlights the interplay between religion, culture, and politics in shaping LGBT policies. While Thailand's secularized environment enables greater openness, Indonesia's deeply embedded religious values continue to influence policy decisions. Religious groups in both countries impact LGBT policies through political advocacy, social pressure, and collaboration with governments (Sule, 2023). Secularization Theory posits that modernization generally reduces religious influence in public affairs. However, resistance to secularization remains in Indonesia, where conservative religious groups continue to exert significant influence over public policy (Flatt, 2023).

These findings provide a clearer understanding of how religious groups shape policies affecting the LGBT community in Thailand and Indonesia. Analyzing these dynamics, this research contributes to broader discussions on Southeast Asia's intersection of religious values, political decision-making, and human rights advocacy.

Thailand: Buddhist-Based Tolerance and Social Support

Thailand, as a predominantly Buddhist country, offers interesting dynamics in terms of the influence of religious groups on LGBT policies, especially when analyzed from a human rights perspective. Buddhism in the Theravada tradition emphasizes the values of compassion, tolerance, and social harmony, which creates a social space more inclusive of gender diversity and sexual orientation (Andi, 2022).

Social acceptance of the LGBT community in Thailand is seen in a culture that has historically shown permissiveness towards non-conventional gender expression, such as the 'kathoei' or transvestite community. While there is relatively high social acceptance, this is not always matched by legal policies that protect LGBT rights. Thailand is more open to sexual diversity in everyday life, but legal aspects and protections remain a challenge. Social life in Thailand allows for more unrestrained gender expression, although protection of LGBT rights through legal policies is still limited (Newman et al., 2021).

In addition, the Boys Love (BL) and Girls Love (GL) genres have become part of Thailand's soft power, increasingly attracting global attention. Many agencies in Thailand are actively producing and promoting the BL and GL series, given their market potential and cultural impact. These series not only depict same-sex romantic relationships but also involve various gender expressions, including the employment of transgender people in the production of films, series, and television shows. This phenomenon demonstrates Thailand's inclusive attitude towards gender and sexual diversity. Thailand is known to be more tolerant of the LGBT community compared to many other Asian countries, and entertainment media such as films and series are becoming practical tools of cultural diplomacy, introducing and popularizing LGBT issues more openly on the international scene (A. F. Hidayat, 2020).

A significant step was taken on September 25, 2024, when Thailand passed a same-sex marriage law published in the Royal Gazette after approval from King Maha Vajiralongkorn. This law makes Thailand the first country in Southeast Asia to recognize same-sex marriage and will come into effect officially in January 2025. This legalization is an important milestone in the struggle for LGBT rights in the region, reflecting the synergy between existing social acceptance and legal recognition of LGBT rights (Whitaker, 2024).

Factors such as the encouragement of the advocacy community, Buddhist values that support tolerance, and international pressure contributed to this move. The Buddhist community in Thailand plays a normative role in supporting social harmony without putting dogmatic pressure on the issue of sexual orientation. Religious figures such as Monk Phra Shine Waradhammo even assert that discrimination against LGBT people is against

Buddhist teachings, demonstrating how religious values can support social acceptance of gender diversity. With strong cultural, religious, and advocacy influences, Thailand is a regional pioneer in protecting LGBT rights (Chandran, 2020).

However, the journey towards legal recognition of LGBT rights in Thailand has not been easy. Challenges such as structural discrimination, social stigma, and legal injustice remain significant. For example, transgender individuals are often restricted in employment, cannot change their gender on official documents, and face difficulties accessing health services that are sensitive to their needs. In addition, bullying in schools creates an unsafe environment for the LGBT community. While Buddhism provides a basis for social tolerance, conservative interpretations by some groups can lead to resistance to LGBT rights (Waller, 2023).

This step was also due to changing social perceptions supported by transnational advocacy campaigns and collaborations. International advocacy networks such as UNDP and OHCHR worked with domestic actors in Thailand to push for more inclusive policies, ultimately contributing to the passage of the same-sex marriage law. Despite resistance from conservative groups, international pressure and increased domestic awareness have helped overcome traditional barriers (Tyas, 2019).

From a human rights perspective, this endorsement reflects the successful integration of traditional religious values with modern principles. The Buddhist community has been instrumental in creating a more inclusive social atmosphere, although challenges such as discrimination against transgender people still need to be addressed. This policy shows that religious values and human rights can go hand in hand, creating a precedent for other countries in the Southeast Asian region (Khoirunnisa & Jubaidi, 2023).

Overall, Thailand's journey in recognizing same-sex marriage illustrates the synergy between the influence of religious groups, transnational advocacy, and social change in shaping inclusive policies. Thailand solidifies its position as a pioneer in LGBT rights in Southeast Asia while inspiring other countries to follow suit and create a more just and equal society.

Indonesia: The Role of Religious Groups in LGBT Policy Dynamics

Sexual behavior that is considered deviant is still a taboo issue in Indonesia, where moral, ethical, and religious values play a significant role in shaping people's views. This makes accepting the LGBT community a complex challenge (Ali & Sahlepi, 2021). Nevertheless, since the 1980s, various LGBT communities have emerged, such as Gaya Nusantara, Arus Pelangi, and Ardhanary Institute, to fight for their rights as sexual minorities. In 2006, these efforts reached an important milestone through the Yogyakarta Principles, an international guideline affirming the protection of human rights for individuals with diverse sexual orientations and gender identities. Despite aiming to create a more inclusive legal framework, the existence of these communities and principles has faced strong resistance from society, including from academics, religious leaders, and traditional leaders (Yansyah & Rahayu, 2018).

However, in Indonesia, conservative Islamic groups play a dominant role in influencing anti-LGBT policies, with an aggressive approach through fatwas, social campaigns, and political support. The Indonesian Ulema Council (MUI), as the central religious authority, issued Fatwa No. 57 of 2014 on Lesbian, Gay, Sodomy, and Molestation, which states that LGBT behavior is

MUI's fatwa has become one of the moral foundations that influence the formation of various policies at the local and national levels. This influence has been seen since the implementation of the Qanun Jinayat in Aceh, which came into effect in 2015 (Qanun Jinayat, 2014). This regulation criminalizes same-sex relations and prescribes punishments of flogging or imprisonment, reflecting how local interpretations of Islamic law influence anti-LGBT policies in the region (Mulyono G, 2020). Furthermore, in January 2016, the Ministry of Research, Technology, and Higher Education (Kemenristekdikti) banned the activities of LGBT groups on campus under the pretext of maintaining morality and social norms. A similar policy was also issued in February 2016 by the Indonesian Broadcasting Commission (KPI) through a circular letter prohibiting the broadcast of men with feminine behavior in broadcast media (Faridah et al., 2023).

At the local level, the influence of conservative Islamic groups continues. In November 2018, the DPRD of Pariaman City in West Sumatra passed Pariaman City Regional Regulation (Perda) No. 10/2018 on Public Order and Peace, which in Article 24 and Article 25 prohibits LGBT activities and stipulates fines for violators (A. R. L. Hidayat, 2021). A similar policy was implemented in July 2023, when the Regent of Garut, West Java, issued Regent Regulation No. 47 of 2023 on Anti-Maksiat, which also banned LGBT activities in the region (Ghani, 2023). These policies show how the influence of religious groups, particularly conservative Islam, has been the primary basis for shaping regulations that reject the existence of LGBT communities in various parts of Indonesia.

While the influence of conservative Islam often takes center stage, this overemphasis often masks the internal complexities of Indonesian society, including progressive efforts to promote dialogue on tolerance. Not all religious groups are anti-LGBT. Some progressive Christian communities under the PGI (Persekutuan Gereja-gereja di Indonesia) have opened discussion spaces to support marginalized groups, including LGBT.

Pastor Meilanny Risamasu, for example, emphasizes the importance of the church being a safe and inclusive place for all. Meanwhile, Pastor Stephen Suleeman argues that resistance to LGBT is often due to a lack of understanding of modern theology and psychology among church leaders. This example reflects a spectrum of inhomogeneous views within religious communities in Indonesia (Riski, 2020).

On the other hand, some Islamic religious organizations also play an active role in encouraging dialogue on tolerance and social diversity. Nahdlatul Ulama (NU) explicitly supports inclusivity through its autonomous bodies, such as GP Ansor, and has held several public discussions to promote social harmony without discrimination (Yudhi, 2023). In addition, Gusdurian-like networks have also consistently built narratives that support human rights and inclusive dialogue. Gusdurian emphasizes the importance of pluralism, tolerance, and respect for the rights of all groups, including LGBT. They actively open spaces for dialog across religions and cultures to create mutual understanding and tackle discrimination. By promoting a contextual and humanist understanding of religion, Gusdurian seeks to create an inclusive society and educate to reject violence against marginalized groups, including LGBT (Muarrikh, 2024)

With the progressive efforts of various religious communities, Indonesian society exhibits complex internal dynamics, demonstrating the importance of tolerance dialogue to create social harmony amidst diversity. While the influence of conservative Islam often gets more attention, these progressive initiatives show that there is room for building tolerance and inclusivity. The individual experiences of the LGBT community in Indonesia, on the other hand, reflect the real impact of discriminatory policies and social stigma. A transgender man from Yogyakarta, for example, recounted how he was expelled from his job after his identity became known, while a gay man in Bandung was forced to move to another city due to social exclusion and intimidation by his neighbors (Knight, 2016). These experiences show the immense pressure that LGBT communities face in their daily lives. The impact of these discriminatory policies is also seen in various aspects of life, such as access to employment, education, and healthcare. Policies such as the ban on LGBT groups on campus or KPI rules prohibiting the airing of LGBT content only exacerbate marginalization and reduce the opportunity for this community to participate in society fully (Winurini, 2016).

In addition to religious influences, political, economic, and cultural factors also play an important role in policies towards LGBT people in Indonesia. Politically, LGBT issues are often used as a mobilization tool to attract support from conservative groups. On the economic side, the marginalization of the LGBT community limits their access to formal employment, pushing them into the more vulnerable informal sector. On the cultural side, nationalist narratives are often used to deny the existence of LGBT people because they are "not in line with Indonesia's indigenous culture." Overall, anti-LGBT policies in Indonesia reflect a complex interplay between religious influences, political dynamics, and the socio-cultural context (Dhamayanti, 2023). While challenges remain, progressive efforts by religious communities and advocacy organizations provide hope for creating more inclusive spaces for dialogue, which can ultimately reduce discrimination and strengthen human rights protections (Khoirunnisa, 2023).

Comparison of Religious Groups in Influencing Policy in Thailand and Indonesia

The influence of religious groups on LGBT policies in Thailand and Indonesia shows different dynamics, influenced by the dominant religious teachings and how religion is positioned in the politics and culture of each country.

In Thailand, Theravada Buddhism is the foundation for a more tolerant society towards gender and sexual orientation diversity. Buddhism's values of compassion, social harmony, and individual respect provide space for social acceptance of the LGBT community (Newman et al., 2021). Buddhist religious groups generally do not have strong dogmatic pressures regarding sexual orientation. As a result, the role of religion in determining public policy is relatively weak, allowing human rights values and international pressure to play a greater role. For example, despite resistance from conservative Buddhist groups, Thailand managed to become the first country in Southeast Asia to pass a same-sex marriage law. Support from progressive religious figures, such as Monk Phra Shine Waradhammo, demonstrates how religious teachings can support inclusivity without creating stigma or discrimination (Moersidin, 2024).

In contrast, in Indonesia, the influence of conservative Islamic groups is influential in shaping public policy, especially on LGBT issues. The Indonesian Ulema Council (MUI) and other conservative Islamic groups often use aggressive approaches through fatwas, social campaigns, and political pressure to reject the existence of the LGBT community. Fatwa No. 57/2014 issued by the MUI has become the moral basis for discriminatory policies, such as the Qanun Jinayat in Aceh, local regulations banning LGBT activities, and national policies, such as the ban on LGBT activities on campus by Kemenristekdikti. The approach often combines religious, cultural, and nationalist narratives to strengthen resistance to LGBT rights (Ilahi & Fithry, 2024).

However, both countries also have progressive groups working to create inclusive narratives. In Thailand, Buddhist values support transnational advocacy campaigns for LGBT rights. In Indonesia, although conservative Islamic groups dominate, communities such as the Gusdurian Network, GP Ansor, and progressive Christian

organizations seek to open spaces for dialogue on tolerance and inclusivity. These progressive efforts show that religious influence is not entirely homogeneous but reflects a diverse spectrum of views in society (Salaeh, 2021).

Therefore, this comparison shows that the influence of religious groups on LGBT policies is strongly influenced by how religious teachings are interpreted and applied in the political and cultural context. Thailand, with its Buddhist values of tolerance, tends to be more open despite facing structural discrimination. Meanwhile, Indonesia, under the influence of conservative Islam, shows more excellent resistance to recognizing LGBT rights, although there is hope from progressives who support inclusivity.

Human Rights Perspective

From a human rights perspective, discriminatory policies against the LGBT community in Thailand and Indonesia have a significant impact on their daily lives, particularly in access to healthcare, education, and employment. Although both countries have different approaches to LGBT rights, they still face significant challenges in protecting the LGBT community from structural and social discrimination (Putri, 2022).

In Thailand, while Buddhism supports the value of social tolerance, structural discrimination against LGBT people remains a significant problem. Transgender individuals, for example, often face difficulties in accessing health services appropriate to their needs, such as medical treatment or hormone therapy, due to the stigma attached to their gender identity. In addition, discrimination in employment is also an issue, with LGBT individuals often limited in career opportunities, especially for transgender people, who are often unable to change their gender on official documents. Even in education, despite greater social acceptance of the LGBT community, bullying of LGBT students in schools is still common. While there have been steps forward with the passage of same-sex marriage laws, these legal policies have not been fully implemented to protect the rights of LGBT individuals in all sectors of life (Waller, 2023).

In Indonesia, human rights have been regulated in legislation, but their implementation faces challenges, especially regarding LGBT issues, which are often seen as contradicting cultural and religious values (Rohman Hidayad, 2022). Public sentiment towards LGBT on social media, including anti-LGBT campaigns, tends to be more neutral than positive or negative. Analysis using the Naïve Bayes algorithm, a probability-based machine learning method for classifying text data, showed an accuracy of 76.84%, with a precision of 80% and recall of 83.80% (Boediningsih, 2023). These results indicate that public opinion on social media is dominated by attitudes that do not directly support or reject but are still influenced by strong religious values. Religious groups often use Pancasila, particularly the first precept, as a basis for rejecting LGBT legalization by interpreting the norm as prioritizing moral and religious values that are considered contrary to the existence of the LGBT community (Miskari, 2017).

Discriminatory policies against LGBT people have a significant impact on various aspects of social and political life in Indonesia. Banning LGBT activities on campus or airing LGBT content in broadcast media not only exacerbates social stigma but also increases marginalization in employment and education. LGBT communities often face social pressures, such as losing their jobs after their identities are revealed or difficulty accessing education due to ostracization. In social life, they often experience social isolation or domestic violence due to family and community pressure. (Human Rights Watch, 2018)

Furthermore, policies based on conservative religious teachings, such as the MUI Fatwa and Qanun Jinayat in Aceh, create an environment that suppresses the freedom of LGBT individuals and limits their access to legal protections. The existing legal system has not been able to provide equal protection for the LGBT community, exacerbating the injustices they experience in their daily lives. This represents a significant challenge for Indonesia in guaranteeing human rights for all its citizens without discrimination (Rohman Hidayad, 2022).

Overall, in both Thailand and Indonesia, discrimination against LGBT people leads to access difficulties in many aspects of life, creating significant obstacles in achieving their fundamental rights, such as the right to live free from violence, access to equal education and employment, and appropriate health care. Differing views within religious communities, whether Buddhist in Thailand or Muslim in Indonesia, exacerbate these injustices despite efforts by progressive groups to promote inclusivity. Without more inclusive policy changes and consistent implementation of LGBT rights, this community will continue to face significant challenges in gaining genuine human rights protections (Khoirunnisa & Didi Jubaidi, 2023).

CONCLUSION

A comparative analysis of LGBT policies in Thailand and Indonesia shows that religious, social, political, and global factors interact in complex ways to shape each country's approach to the issue. Global influences, such as international human rights advocacy and pressure from global organizations, significantly impact policies in both countries. Thailand, for example, is more open to recognizing LGBT rights due to the influence of international advocacy that aligns with certain local values. Meanwhile, Indonesia shows stronger resistance due to the dominance of conservative religious values interacting with domestic political dynamics.

In addition, transnational pressures such as participation in global human rights forums also play an important role. While both countries are active in such forums, the implementation of international human rights

values at the domestic level is often hampered by local factors, including pressure from religious groups and slow social change. These factors emphasize that successfully implementing LGBT policies requires balancing adapting to global norms and managing internal dynamics.

Thailand has the advantage of creating a more inclusive environment for the LGBT community, although challenges such as discrimination and lack of legal equality remain. In contrast, Indonesia faces more significant challenges, especially in terms of increasing pressure from conservative groups, which makes it difficult for LGBT-related human rights policies to evolve. However, the potential for change remains through education, advocacy, and community engagement.

Future research suggests a more in-depth study of the role of transnational advocacy in influencing LGBT policy change at the local level. In addition, research on the dynamics of changing societal attitudes towards LGBT people in both Thailand and Indonesia could provide a richer understanding of opportunities to promote social inclusion. It can also shed light on how the interaction between global and local pressures can result in significant changes in the context of human rights.

REFERENCES

- Ali, T. M., & Sahlepi, M. A. (2021). Sosialisasi Penyimpangan Seksual Lgbt Dalam Aspek Agama, Ham Dan Hukum Pidana Di Lingkungan Universitas Pembinaan Masyarakat Indonesia. *PKM Maju UDA*, 1(3), 133. <https://doi.org/10.46930/pkmmajuuda.v1i3.886>
- Andi, M. (2022). Aktivisme Transnasional dalam Prakarsa Being LGBT in Asia: Mobilisasi Gerakan dan Pembentukan Identitas Kolektif. *Jurnal Hubungan Internasional*, 15(2), 398–419. <https://doi.org/10.20473/jhi.v15i2.35109>
- Andi Norman Nyila Amanda. (2020). Tinjauan HAM Terhadap Kelompok LGBT di Kawasan Asia Tenggara. *JILS (Journal of International and Local Studies)*, 2(1), 101–110. <https://doi.org/10.56326/jils.v2i1.706>
- Aulia, R., & Rahmaningsih, A. A. (2022). Perbandingan Sistem Hukum Indonesia Dengan Thailand Terkait Lgbt Dalam Perspektif Hukum Positif. *Siyasah Jurnal Hukum Tata Negara*, 2(1), 31–38. <https://doi.org/10.32332/siyasah.v2i1.5117>
- Boediningsih, W. N. P. R. D. (2023). Perkembangan HAM Di Indonesia Dan Problematikanya. *Education : Jurnal Sosial Humaniora Dan Pendidikan*, 3(2), 77–87. <https://doi.org/10.51903/education.v3i2.336>
- Chandran, R. (2020). “LGBT people are also humans”: Thai Buddhist monk backs equality. *Openly*.
- Dhamayanti, F. S. (2023). Pro-Kontra Terhadap Pandangan Mengenai LGBT Berdasarkan Perspektif HAM, Agama, dan Hukum di Indonesia. *IPMHILAW JOURNAL*, 14(2), 569–583. <https://doi.org/10.34005/alrisalah.v14i2.2782>
- Faridah, F., Amir, R. M., & Nurjannah, N. (2023). Dakwah Dan Isu Lesbian, Gay, Biseksual Dan Transgender (LGBT). *Jurnal Khabar: Komunikasi Dan Penyiaran Islam*, 5(1), 15–28. <https://doi.org/10.37092/khabar.v5i1.475>
- Fatwa Majelis Ulama Indonesia. (2014). Fatwa Tentang Lesbian, Gay, Sodomi, Dan Pencabulan. *Himpunan Fatwa MUI*, 1–14.
- Ghani, H. (2023). Bupati Garut Terbitkan Perbup Anti-LGBT, ini isinya. *Detiknews*.
- Harahap, R. D. (2016). LGBT DI INDONESIA : Perspektif Hukum Islam, HAM, Psikologi dan Pendekatan Masalah. *Al-Ahkam*, 26(2), 223. <https://doi.org/10.21580/ahkam.2016.26.2.991>
- Hidayah, S. I. N., Setiawan, R., & Haryono, H. (2024). Konsep Diri Fujoshi Penggemar Boys Love Thailand pada Mahasiswi Fakultas Keguruan. *Edu Sociata (Jurnal Pendidikan Sosiologi)*, 7(1), 706–713. <https://doi.org/10.33627/es.v7i1.2137>
- Hidayat, A. F. (2020). The Impact of Boys ' Love Television Series as a Way of Shaping Thailand ' s LGBT Rights Acceptance. <https://doi.org/10.22146/globalsouth.89451>
- Hidayat, A. R. L. (2021). Penegakan Hukum Lesbian Gay Biseksual dan Transgender (LGBT) Dalam Perspektif Hukum Pidana. *Dinamika*, 193, 1–23.

- Ilahi, I. S., & Fithry, A. (2024). Dinamika Identitas Komunitas Lgbt Di Indonesia Serta Kemungkinan Yang Akan Terjadi Dalam Lingkungan Masyarakat. *Prosiding SNAPP : Sosial Humaniora, Pertanian, Kesehatan dan Teknologi*, 2(1), 226–232. <https://doi.org/10.24929/snapp.v2i1.3142>
- Indonesia: Anti-LGBT Crackdown Fuels Health Crisis. (2018). Human Rights Watch. <https://www.hrw.org/news/2018/07/01/indonesia-anti-lgbt-crackdown-fuels-health-crisis>
- Jubaidi, D. (2023). Alternatif Penyelesaian Sengketa Internasional (Analisis Kasus Pertamina vs Karaha Bodas Company (KBC) dan PT Newmont Nusa Tenggara). *Global Insight Journal*, 08(02), 82–103. <https://doi.org/10.52447/gij.v8i2.7057>
- Khoir, A. B. (2020). LGBT, Muslim, and Heterosexism: The Experiences of Muslim Gay in Indonesia. *Wawasan: Jurnal Ilmiah Agama Dan Sosial Budaya*, 5(1), 1–19. <https://doi.org/10.15575/jw.v5i1.8067>
- Khoirunnisa. (2023). Pemilu dan Politik Identitas: Dilema Antara Kebangsaan dan Keagamaan Khoirunnisa. *Jurnal Polinter : Kajian Politik Dan Hubungan Internasional*, 9(1), 36–54. <https://doi.org/10.52447/polinter.v9i1.6999>
- Khoirunnisa, K., & Jubaidi, D. (2023a). Exploring the Meaning of Faith and Kufr: Perspectives of Islamic Theological Schools. *Pharos Journal of Theology*, 104(104(5)), 1–15. <https://doi.org/10.46222/pharosjot.104.510>
- Khoirunnisa, K., & Jubaidi, D. (2023b). Political Configuration of Law in Law Enforcement in Indonesia. *Ilomata International Journal of Social Science*, 4(4), 560–576. <https://doi.org/10.52728/ijss.v4i4.880>
- Khoirunnisa, K., & Jubaidi, D. (2023c). The Significance Of The Living Law Concept In The New Criminal Code : A Perspective Of Progressive Law. *Journal of Namnbian Studies*, 33, 2424–2448. <https://doi.org/10.59670/jns.v33i.4603>
- Miskari, M. (2017). Wacana Melegalkan LGBT di Indonesia (Studi Analisis LGBT dalam Perspektif Ham dan Pancasila). *Raheema*, 3(1), 44–54. <https://doi.org/10.24260/raheema.v3i1.559>
- Moersidin, M. D. (2024). Disrupsi Global Pernikahan Sesama Jenis Solusi Pendekatan Sosio Hukum Agama di Indonesia. 24, 69–77.
- Muarrikh, F. (2024). Pembacaan Deklarasi Bersama Harmoni untuk Kemanusiaan dan Lingkungan di UIN Gus Dur. *Kampung Gusdurian*.
- Mulyono G, Y. H. (2020). Analisis Fenomena Perilaku Penyimpangan Seksual (LGBT) di Indonesia dalam Pandangan Hukum Asasi Manusia. 62, 6.
- Newman, P. A., Reid, L., Tepjan, S., & Akkakanjanasupar, P. (2021). LGBT+ inclusion and human rights in Thailand: a scoping review of the literature. *BMC Public Health*, 21(1), 1–21. <https://doi.org/10.1186/s12889-021-11798-2>
- Putri, D. W. D. (2022). LGBT dalam Kajian Hak Asasi Manusia di Indonesia. *Ikatan Penulis Mahasiswa Hukum Indonesia Law Journal*, 2(1), 88–100. <https://doi.org/10.15294/ipmhi.v2i1.53739>
- Riski, P. (2020). Perspektif dan Sikap Gereja Terhadap LGBTIQ. VOA. <https://www.voaindonesia.com/a/perspektif-dan-sikap-gereja-terhadap-lgbtqi/5667866.html>
- Rohman Hidayad. (2022). Perlindungan Komunitas Lesbian, Gay, Biseksual dan Transgender (LGBT) di Kampus: Hukum HAM dan Kebebasan Akademik. *Jurist-Diction*, 5(5), 1919–1940. <https://doi.org/10.20473/jd.v5i5.38558>
- Salaeh, F., & Darmawati, D. (2021). Studi Perbandingan Hukum Perkawinan Islam di Indonesia dan Thailand. *QONUN: Jurnal Hukum Islam dan Perundang-undangan*, 5(1), 47–62.
- SIMON, H. A. (1957). THEORIES OF BOUNDED RATIONALITY. *Sociologie Du Travail*, 31(4), 513–518. <https://doi.org/10.3406/sotra.1989.2485>
- Sipahutar, E. S., Warsiman, W., Sipahutar, A., & Purba, I. G. (2023). Penyuluhan hukum tentang larangan Lesbian, Gay, Biseksual, dan Transgender (LGBT) di Indonesia berdasarkan hukum islam dan ham di sekolah Madrasah Aliyah Negeri, Kecamatan Kabanjahe, Kabupaten Karo. *Jurnal Derma Pengabdian Dosen Perguruan Tinggi (Jurnal DEPUTI)*, 3(1), 157–160. <https://doi.org/10.54123/deputi.v3i1.241>

- Sule, B. (2023). The Evolution of Religious Influence on Policy: A Review of Historical and Contemporary Studies. *Religion and Policy Journal*, 1(1), 22–26. <https://doi.org/10.15575/rpj.v1i1.431>
- Triyono, N. (2016). Isu Perkawinan Minoritas di Thailand. *De Jure: Jurnal Hukum Dan Syar'iah*, 8(1), 38–47. <https://doi.org/10.18860/j-fsh.v8i1.3728>
- Tyas, I. K. D. (2019). Upaya Transnational Advocacy Networks dalam Mendorong Legalisasi LGBT Rights di Thailand. *Jurnal Hubungan Internasional*, 8(1). <https://doi.org/10.18196/hi.81145>
- United Nations. (2012). Human Rights Council Holds Panel Discussion on Discrimination and Violence Based on Sexual Orientation And Gender Identity. United Nations Human Rights. <https://www.ohchr.org/en/press-releases/2012/03/human-rights-council-holds-panel-discussion-discrimination-and-violence>
- Usman, M. (2018). Lesbian Gay Biseksual and Transeksual (LGBT) Polemic in Indonesia: A Study of the Opinion of the Indonesian Ulama Council and the Liberal Islam Network (JIL) Polemik LGBT di Indonesia daripada Perspektif Majelis Ulama Indonesia (MUI) dan Jaringan Islam Lib. *Islamiyyat*, 40(2), 123–129.
- Waller, F. (2023). Thailand's problem with transgenders in the workplace – and how to solve it. <https://www.nationthailand.com/business/corporate/40026305>
- Whitaker, J. (2024). Thailand Becomes First Southeast Asian Country to Legalize Same-Sex Unions. *Buddhisdoor Global*. <https://www.buddhisdoor.net/news/thailand-becomes-first-southeast-asian-country-to-legalize-same-sex-unions/>
- Wilkinson, C., Paula, G., Baden, O., & Antony J., L. (2017). LGBT Rights in Southeast Asia: One Step Forward, Two Steps Back? *IAFOR Journal of Asian Studies*, 3(1), 5–17. <https://doi.org/10.22492/ijas.3.1.01>
- Winurini, S. (2016). Memaknai Perilaku LGBT Di Indonesia (Tinjauan Psikologi Abnormal). *Info Singkat Pusat Penelitian Badan Keahlian DPR RI*, 8(5), 9–12.
- Yansyah, R., & Rahayu. (2018). Transgender (Lgbt): Perspektif Ham Dan Agama Dalam Lingkup Hukum Di Indonesia. *Jurnal Law Reform Program Studi Magister Ilmu Hukum*, 14(1), 132–146.