

CHAPTER II

THE GISBH CASE AND PATTERNS OF CHILD AND LABOR RIGHTS VIOLATIONS IN MALAYSIA

This chapter provides key empirical and contextual elements relevant to this research, focusing on the human rights violations associated with GISBH and Malaysia’s broader child and labor rights landscape. The chapter begins with a profile of GISBH, followed by an examination of reported violations related to child and labor rights within its operations. Drawing from documented cases between 2011 and 2024, including the findings from the 2024 “Op Global” operation, the discussion highlights patterns of abuse and exploitation within the organization. The analysis is then situated within the broader context of human rights issues in Malaysia, demonstrating that such violations are not isolated but reflect wider patterns affecting vulnerable groups. Finally, the chapter outlines Malaysia’s legal and policy commitments to child and labor rights at both the domestic and international levels. Taken together, this chapter provides the empirical and contextual foundation for the subsequent analysis of norm internalization in Malaysia, particularly in understanding how human rights standards are recognized and practiced.

2.1. Organizational Profile of GISBH

2.1.1. History and Development of GISBH

Global Ikhwan Services and Business Holdings (GISBH) emerged from the transformation of Al Arqam (also known as Darul Arqam), a religious movement established by Ashaari Muhammad in 1968. Initially, Darul Arqam began as a small religious study group in Kuala Lumpur, consisting of a limited number of followers

engaged in Islamic teachings and discussions. Over time, however, the movement expanded significantly into a grassroots Islamic revivalist movement that sought to implement Islam as a comprehensive way of life, encompassing not only religious practices but also social and economic organization (Horstmann, 2006). Its growth was particularly evident following the establishment of a communal Islamic settlement in Sungai Penchala in 1973 and the development of economic initiatives in 1977, which enabled the movement to evolve into a relatively self-sustaining socio-economic system (Hamid, 2010). Through the integration of businesses, educational institutions, and communal living arrangements, Darul Arqam attracted a substantial following, including members of the educated middle class, and developed into a large-scale and structured organization (Horstmann, 2006).

Despite its rapid expansion, Darul Arqam was officially banned by the Malaysian government in 1994 due to its controversial and deviationist teachings, as well as concerns over its growing socio-economic influence and centralized leadership structure. Beyond doctrinal issues, the movement's capacity to establish a cohesive internal system characterized by strong authority, ideological discipline, and distinct social practices contributed to perceptions of it as a potential challenge to state authority (Nasution, 2001). Darul Arqam's repression reflected broader state concerns over the movement's ability to operate as a self-contained community with significant influence over its members' daily lives and socio-economic activities (Horstmann, 2006).

Following the ban, former members regrouped under Ruffaqa Corporation in 1997 in an effort to sustain their religious ideology through alternative channels,

particularly through business and educational activities (Hamid, 2010). This phase marked a strategic transformation in which the movement adapted to state restrictions by embedding its religious principles within economic initiatives, allowing it to continue operating in a less confrontational manner. Ruffaqa has been widely regarded as a continuation of Darul Arqam, preserving its organizational foundations and business interests despite formal institutional changes (Hamid, 2015). Continued pressure from authorities led to further restructuring in 2008 under Global Ikhwan Sendirian Berhad (GISB), which later evolved into Global Ikhwan Services and Business Holdings (GISBH) in 2010. Operating as a holding company, GISBH integrates religious values with diverse economic activities, enabling expansion across multiple sectors while maintaining a formal corporate identity. This transformation reflects a broader process in which former members of Darul Arqam reconfigured themselves into business-oriented entities as a means of sustaining their movement under state scrutiny (Hamid, 2015).

This historical trajectory demonstrates that GISBH is not merely a conventional business entity, but rather represents the institutional continuation of Darul Arqam's ideological foundations under a corporate structure. Despite successive changes in name and legal form, the persistence of its leadership patterns, internal belief systems, and socio-economic organization indicates a clear continuity between the original movement and its contemporary manifestation. Such adaptation reflects a strategic effort to preserve influence and organizational cohesion while navigating regulatory constraints, enabling the movement to maintain its presence and expand its activities without direct confrontation with state authorities.

This historical development makes GISBH a crisis case for analyzing the limits of linear norm internalization. GISBH's transformation from a religious movement into a corporate holding structure created a form of religious-organizational opacity, in which spiritual authority, internal hierarchy, welfare provision, and business operations overlapped within the same institutional space. As a result, the organization did not operate as a conventional company that could be easily monitored through ordinary labor or welfare regulatory mechanisms. Instead, its Islamic organizational identity and strategic corporate rebranding allowed certain practices to remain partially shielded from external scrutiny. This makes GISBH an exemplary case of Malaysia's difficulty to reach norm internalization because international child and labor rights norms had to penetrate not only formal legal structures, but also an internally cohesive community with its own authority system and normative justifications.

2.1.2. Organizational Structure and Business Sectors of GISBH

Since its final rebranding in 2010, GISBH has operated as a diversified holding company with activities spanning multiple sectors, reflecting a highly integrated organizational structure that combines economic, social, and institutional functions. Rather than functioning as a conventional business entity focused solely on profit generation, GISBH presents itself as an organization aimed at developing an "Islamic way of life" that encompasses various aspects of daily living (GISBH, 2022). This orientation is reflected in its structured expansion across numerous sectors and departments, forming a comprehensive system that integrates business operations with social and community-based activities.

In terms of its economic and commercial operations, GISBH is involved in a wide range of business sectors, including retail, food and beverage services, manufacturing, agriculture, and travel and tourism. The diversification of these sectors not only allows GISBH to expand its economic reach but also enables it to establish a broad presence in everyday consumer markets, reinforcing its visibility and influence within society. However, beyond its commercial activities, GISBH also operates across social and institutional sectors, particularly in the areas of education, welfare, and community development. The following Figure 2.1 presents an overview of GISBH’s subsidiaries and sectors, both in business and welfare.

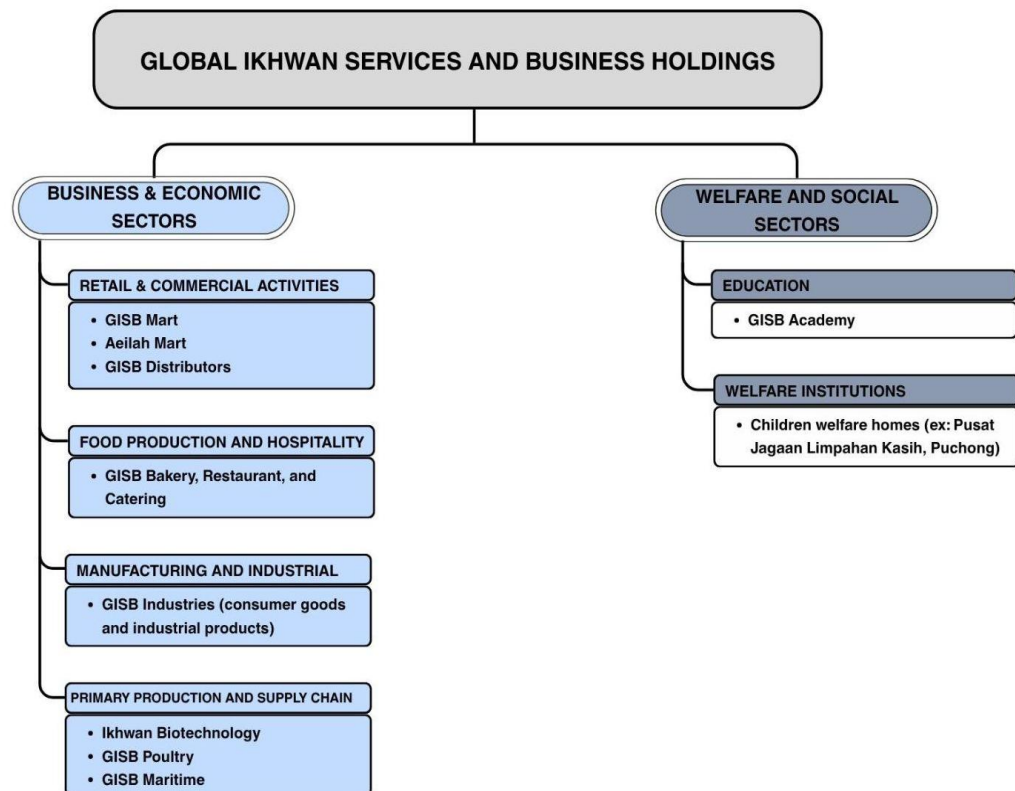


Figure 2. 1. GIBH Subsidiaries and Sectors

Source: Created by author from GISBH (2022).

The figure above illustrates the organizational composition of GISBH's economic and welfare sectors, highlighting the range of its business activities and social functions.

On the economic side, GISBH operates across several commercial domains, including retail and distribution, food production and hospitality, manufacturing and industrial activities, as well as primary production and supply chain operations. These sectors are represented through various business units such as supermarkets, restaurants, industrial production, and agricultural activities, reflecting the organization's diversified economic base. In parallel, the welfare and social sectors demonstrate GISBH's involvement in education and social care, particularly through institutions such as educational academies and children's welfare homes. The inclusion of these sectors indicates that the organization's activities extend beyond commercial operations into areas that shape social and community life.

In addition to its sectoral diversification, GISBH has demonstrated significant organizational scale and geographical expansion. According to its official company profile (GISBH, 2022), the organization operates across 438 premises and extends its activities beyond Malaysia into multiple countries, reflecting its capacity to develop a broad and transnational presence. The distribution of GISBH's international presence is illustrated in the Table 2.1 below.

Table 2. 1. GISBH International expansion

Region	Countries
Southeast Asia	Malaysia, Indonesia, Thailand, Singapore, Brunei
South Asia and Middle East	Bangladesh, Saudi Arabia, UAE, Jordan
Europe	United Kingdom, Germany, France, Turkey
Africa	Egypt, South Africa

Source: Created by author from GISBH (2022).

Table 2.1 shows that GISBH’s presence spans several countries, indicating that the organization has extended its activities beyond a local or national scope. This geographical spread reflects not only the expansion of its business operations, but also the ability to establish institutional and organizational networks across different contexts. Additionally, one notable example of GISBH’s international expansion is its participation in global business events, particularly within the halal industry. Such engagements reflect the organization’s efforts to extend its activities beyond domestic markets and establish a presence within international networks.



Figure 2. 2. GISBH Participation in Sarajevo Halal Fair

Source: GISBH Official Facebook Page, 2019

As shown in the figure above, GISBH participated in the Sarajevo Halal Fair in Bosnia, an international exhibition that brings together businesses operating within the halal sector. Participation in such events indicates the organization's attempt to engage with broader global markets and enhance its visibility at the international level. This involvement demonstrates that GISBH's activities are not confined to Malaysia, but extend into transnational economic spaces.

In summary, GISBH's wide sectoral involvement and international expansion show how far its activities extend into different parts of the society. However, alongside its rapid development, various human rights violations, especially regarding child and labor, have taken place, which will be analyzed in the following sections.

2.2. Child Rights Violations in GISBH

Despite its legal status as a business holdings that operates in the economical sector, welfare initiatives have long been a component of GISBH's activities,

predating its final rebranding. According to Hamid (2010), during its earlier formations under Rufaqa and GISB, the organization established religious schools and welfare homes aimed at providing education and care for orphans, children of members, and underprivileged youth. Primary examples of welfare initiatives under Rufaqa and GISB are At-Tahalli's Secondary School and Rumah Anak-Anak Kesayanganku (RAK). This continuity positioned GISBH as a trusted actor in child welfare and education. However, investigations in recent years have uncovered that welfare institutions under GISBH became sites of systemic child rights abuse within the organization, a pattern that persisted for years before eventually being discovered too late.

In September 2024, the pattern of abuse within GISBH's welfare institutions was finally brought out to light through "Op Global," a large-scale police investigation targeting facilities linked to the organization. Raids were conducted on 20 welfare homes across Selangor and Negeri Sembilan, rescuing 402 children aged between one and seventeen years old (CNA 2024). After the rescue, physical abuse signs were found on the children, it was even revealed that some children were sexually abused, including sodomy. Further investigations also uncovered that many of these children were not orphans as officially claimed but were offsprings of GISBH members, however, they were registered as orphans to solicit donations for the welfare homes. Following these findings, Nasiruddin Mohd Ali—the executive chairman of GISBH—and other 21 members of the organization were charged with organized crime offenses (Reuters, 2024).

Such homes were not independent charities but integrated parts of GISBH's wider religious-economic framework, allowing the organization to manage them under a guise of legitimacy, although the investigation proved the operation was driven to solicit donations. The scale and severity of the findings from Op Global underscored that the child abuse were not isolated incidents, but deeply embedded within GISBH's operational scheme, and it only surfaced after years of unaddressed violations.

The circumstances of this case relate closely to key human rights standards under the Convention on the Rights of the Child (CRC), particularly Article 19(1):

“States Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child.”

In the context of violations inside GISBH's welfare homes, this obligation underscores the importance of state's preventive oversight to ensure that privately owned care institutions remain accountable. Then, the misadministration of children as orphans for GISBH's welfare homes financial gains further corresponds with Article 20(1):

“A child temporarily or permanently deprived of his or her family environment, or in whose own best interests cannot be allowed to remain in that environment, shall be entitled to special protection and assistance provided by the State.”

Therefore, Malaysia's ratification of CRC in 1955 signifies its formal recognition of these obligations, however, the prolonged unaddressed violence in GISBH's welfare homes demonstrates persisting challenges in effectively implementing international standards into every layer of community.

Furthermore, at the domestic level, Malaysia has established several legal frameworks that should have prevented such abuse. The Child Act 2001 (Act 611) (2006) provides explicit explanation and prohibitions against neglect, abuse and unlawful custody of the child. Relevant prohibitions include:

1) Section 17(1) - Meaning of child in need of care and protection

(1) "A child is in need of care and protection if—

(a) The child has been or there is a substantial risk that the child will be physically injured or emotionally injured or sexually abused by his parent or guardian or a member of his extended family."

This section defines when the state must intervene to protect a child. In GISBH's case, the children placed in its welfare homes faced ongoing risk of injury and exploitation without effective and suitable supervision, fulfilling the definition of children in need of care and protection.

2) Section 31(1) — Ill-treatment, neglect, abandonment or exposure of children

(1) "Any person who, being a person having the care of a child—

(a) abuses, neglects, abandons or exposes the child in a manner likely to cause him physical or emotional injury or causes or permits him to be so abused, neglected, abandoned or exposed; or

(b) sexually abuses the child or causes or permits him to be so abused, commits an offence and shall on conviction be liable to a fine not exceeding twenty thousand ringgit or to imprisonment for a term not exceeding ten years or to both.”

Then, section 31 directly relates to the abuses uncovered in Op Global, where those children were considered in need of care and protection, as they were physically and sexually mistreated by their guardians inside the welfare homes. It clearly criminalizes all forms of child abuse—meaning all parties that allow or fail to prevent such acts are legally accountable. Taken together, these legal instruments demonstrate that Malaysia already possesses a comprehensive framework to protect children and regulate welfare institutions. The newly discovered violations inside GISBH’s welfare premises therefore highlights an implementation gap, not by lack of legislation but a failure of fully internalized enforcement.

In the aftermath of prolonged overlooked failures, the Malaysian government has made efforts to restore accountability and strengthen institutional enforcement. The national response of Op Global led by the Malaysian police marked a significant turning point in Malaysia’s enforcement approach. Although the response came only after years of unreported abuse, it reflects a renewed commitment to uphold child protection laws and ensure justice for victims. Following the revelation of abuses through Op Global, the Malaysian government has taken steps to provide rehabilitation and suitable care for the children. For instance, one month after the raid, approximately 424 children linked to the welfare homes underwent rehabilitation programs provided by the Selangor government taskforce. Selangor Women’s Development and Social Welfare Committee chairman Anfaal Ansari also stated that

the program was conducted in four aspects, education, mental health, welfare, and legal (Bernama, 2024d).

Additionally, in February 2025, 200 children that underwent the rehabilitation programs have started to be enrolled in national schools. These children were deemed ready for school after passing the learning level assessments by the Ministry of Education and faith evaluations conducted by the Selangor Islamic Religious Council (MAIS) and the Selangor Islamic Religious Department (JAIS). In the effort to give proper introduction to education for those children, MAIS and JAIS provided them school kits, which include primary and secondary school uniforms, alongside RM400 for each child. Then, all children of GISBH, along with their parents and guardians, would remain under monitoring for two years, even after the rehabilitation programs concluded (Bernama, 2025).

In summary, the abuses within GISBH's welfare homes reveal the fragility of Malaysia's child rights protection despite the existence of comprehensive legal instruments. However, the state's corrective measures following the revelation, specifically providing rehabilitation and chance for the children to pursue education, indicate efforts to restore accountability and rebuild institutional trust. However, the fact that these measures emerged only after Op Global shows that child rights enforcement in this case was triggered by crisis visibility rather than routine preventive oversight. This crisis-triggered pattern is theoretically important because it challenges the NLC model's assumption that formal norm adoption and legal incorporation naturally lead toward routine compliance.

A similar enforcement pattern is also reflected in GISBH's labor practices, where compliance gaps persist despite Malaysia's ratification and implementation of international labor standards.

2.3. Labor Rights Violations in GISBH

Beyond the violations related to children, GISBH has also faced scrutiny over its labor practices. As a diversified holdings company spanning multiple sectors, GISBH relies heavily on the participation of its employees and members in daily business operations. However, reports and testimonies suggest that employees experience conditions that are not in accordance with labor standards.

According to Malaysian Inspector-General of Police (IGP) Tan Sri Razarudin Hasan, after the investigation of child violations in GISBH's welfare homes, police have received 10 reports from GISBH former employees, stating that they were not paid any wages during their employment. After further investigation, the incidents were revealed to have happened between 2013 and 2024, with victims aged 14 and 20. It was also revealed that those reports come from GISBH premises in Miri, Sarawak; Rawang, Selangor; and Alor Setar, Kedah. One of the victims claimed that their unpaid wages totals RM209,000, spanning January 2020 until December 2021 (SinarDaily, 2024). Another report further highlights that such practices were linked to GISBH's internal "ma'aj system", a compensation structure in which financial support is distributed based on hierarchical position and personal circumstances rather than fixed wages, a mechanism that has been criticized for enabling unequal distribution and neglect of worker welfare (Amin, 2024).

The ma'aj system is significant not only as an irregular compensation practice, but also as evidence of a competing internal normative framework within GISBH. By distributing financial support based on hierarchy, loyalty, and personal circumstances rather than standardized wages, the system blurred the distinction between employment, membership, and religious devotion. This framing could weaken the legitimacy of formal labor rights norms within the organization because work was not necessarily understood through the language of contract, wage entitlement, and employee protection. Instead, labor could be reframed as service to the community, making international and domestic labor standards harder to internalize within GISBH's organizational space.

Under Malaysian Employment Act 1955 (Act 265), unpaid wage falls under the Section 19(1) regarding time of payment of wages:

"...every employer shall pay to each of his employees not later than the seventh day after the last day of any wage period the wages, less lawful deductions earned by such employee during such wage period."

In addition, according to SinarDaily (2024), Razarudin also classified those reports as forced labor, which falls under Section 90B regarding forced labour:

"Any employer who threatens, deceives or forces an employee to do any activity, service or work and prevents that employee from proceeding beyond the place or area where such activity, service or work is done, commits an offence and shall, on conviction, be liable to a fine not exceeding one hundred thousand ringgit or to imprisonment for a term not exceeding two years or to both."

Moreover, such conditions also stand in contrast with Malaysia's international commitments under the ILO Forced Labour Conventions (No. 29) which obligates the state to suppress all forms of forced and deceptive work.

However, unlike the extensive documentation and legal reports surrounding child violation, reports on GISBH's labor practice remains limited. There is yet a large-scale investigation or prosecution comparable to Op Global. This research believes this is caused by the sensitivity of religious-based labor arrangement, seeing that GISBH is rooted from a religious community. It can be seen through several media outlets that refer to the alleged labor victims as "followers" rather than as employees, a framing that further obscures their legal status and reinforces the organization's narrative that work performed under its network is a form of devotion rather than economic labor. The absence of verifiable data reflects a broader implementation gap, rather than the absence of actual violations within GISBH's business premises. Thus, the labor concerns within GIBSH highlights Malaysia's ongoing challenge in ensuring accountability within non-state and religious economic entities that often remain politically sensitive.

In this sense, the labor violations within GISBH come to a similar conclusion drawn in child violations: Malaysia's struggles do not lie in the absence of a legitimate legal framework but in the challenges to implement it in domestic schemes, and also how to maintain the sustainability of internalization.

2.4. Patterns of Child Rights and Labor Rights Violations in Malaysia

2.4.1. Child Rights Violations in Malaysia

Despite Malaysia's ratification of the Convention on the Rights of the Child and the existence of the Child Act 2001, cases of child abuse within educational and welfare institutions reveal persistent weaknesses in enforcement and oversight. According to an annual report by the Child Rights Coalition Malaysia (2018), approximately 35,491 children still live in 1,853 registered care centers. However, most care centers such as kinship care, foster care, and institutional care were not licensed. Therefore, it limits the state's legitimacy to monitor its quality. This report also highlights sexual abuse among children, where 1 in 4 girls and 1 in 6 boys experienced sexual abuse. Out of the 688 reported cases of sexual abuse, 96% of the perpetrators are familiar individuals to the victims and families. From this evidence, the report concluded that the lack of justice for sexual abuse victims was caused by the lack of coordination between Malaysian government bodies and the lack of child-sensitive procedures.

Beyond the children under welfare institutions, according to the Jabatan Kebajikan Masyarakat (in Jabatan Perangkaan Malaysia, 2025), there was an increase in the number of children in need of care and protection. In Malaysia, the concept of "children in need of care and protection" is grounded in the Child Act 2001 (Act 611), which refers to children who are exposed to abuse, neglect, abandonment, or other harmful conditions as requiring state intervention. These children may be placed under the supervision of welfare authorities or in designated places of safety to ensure their well-being. The increasing number of such cases is shown in Figure 2.2 below.



Figure 2. 3. Children in need of care and protection in Malaysia (2023-2024)

Source: Created by author from Jabatan Kebajikan Masyarakat (in Jabatan Perangkaan Malaysia, 2025)

Figure 2.3 above illustrates the number of children identified in welfare-related cases over the period of 2023 to 2024. As shown, the number increased from 8,536 children in 2023 to 9,624 children in 2024, representing a rise of approximately 12.7 percent. This increase indicates a growing number of children involved in or affected by such cases within a relatively short period.

The upward trend reflected in the figure suggests that issues related to child welfare and protection remain significant and may be intensifying. This development highlights the continued vulnerability of children and underscores the importance of effective monitoring and intervention mechanisms in addressing such cases. In addition, the numerical data shown in Figure 2.3 are further categorized and presented in detail in Table 2.2 below.

Table 2. 2. Distribution and Ranking of Child Protection Cases by Type in Malaysia in 2024

Legal Category in Child Act 2001	Type of Cases	Number of Cases
Section 17(1)(d)	The parent or guardian is unwilling to provide adequate care, food, or clothing.	2,752
Section 17(1)(a)	Substantial risk that the child will be physically injured or emotionally injured or sexually abused by the parent, guardian, and/or family.	2,673
Section 17(1)(b)	The parent or guardian fails to protect the child from substantial risk of harm or exploitation.	2,073
Section 17(1)(c)	The parent or guardian is unfit to provide supervision and control for the child.	1,374

Source: Created by author from Jabatan Kebajikan Masyarakat in Jabatan Perangkaan Malaysia (2025).

The statistical trends and categorization of cases presented in Table 2.2 demonstrate that child protection issues in Malaysia are not only increasing in number but are also concentrated in specific forms of vulnerability, particularly those related to abuse, neglect, and unsafe environments. However, these figures alone do not fully capture the lived realities behind such classifications. Thus, to better understand how these conditions manifest in practice, it is essential to examine cases that reflect the circumstances under which children become exposed to harm and exploitation.

In 2019, a tahfiz school warden got sentenced for 133 years after 26 counts of sodomizing, molesting, and sexually harassing his victims who were students at Maahad Tahfiz al Quran Ar Raudhah. His sentence was based on the Section 15(e) and 16(a) of the Sexual Offences Against Children Act of 2017. However, Nawawi pleaded not guilty to three additional sodomy charges, which included him showing

pornography contents to minors (Loheswar, 2019). Similar violations were also committed in 2025 by Mohd Khairi Fitri Baharom, a dormitory warden who is also a teacher at a Quranic study centre in Seremban. Khairi was allegedly sentenced to 20 years jail time for 12 counts of sexual assault and sodomy against seven male students (Zulkifli, 2025). Thus, these exemplary cases depict institutional failures in settings meant to be sanctuaries for children. Educational personnel, who should have been guardians, became perpetrators instead, showing that the problem lies not only in individual deviance, but also systemic oversight.

2.4.2. Labor Rights Violations in Malaysia

Just as child sanctuaries became sites of abuse, certain labor sectors in Malaysia reveal a pattern of exploitation, that is forced labor. The practice of forced labor includes unpaid minimum wages, groundless passport withholding, neglecting workers' health and working conditions, high recruitment fees, and forms of indirect employment. Furthermore, existing literature by Lee and Pereira (2023) also indicates that labor exploitation in Malaysia is concentrated in specific sectors, particularly agriculture, construction, manufacturing, and services, all of which rely heavily on migrant labor. According to the International Organization for Migration (2025), as of 2024, there were approximately 5.5 million employed migrant workers in mentioned sectors, including workers who were undocumented. However, Lee and Pereira highlight the vulnerability of the migrant workers sector in Malaysia, in which workers' legal status and employment are closely tied to their employers, thereby limiting their ability to seek compensation or change working conditions.

One primary example of labor exploitation happened in Malaysia's one of the biggest palm oil producers, Felda Global Ventures (FGV). In 2015, the Wall Street Journal (WSJ) released an article about forced labor practiced at FGV's plantation. This was followed by Greenpeace publications in 2017 and 2018 regarding the documented labor rights abuses in its operation (Apical, n.d.). These reports and publications heightened international condemnation towards FGV, culminating in September 2020 when the United States Customs and Border Protection (CBP) issued a Withhold Release Order (WRO) against FGV. The detention order was aimed to detain palm oil and palm oil products produced by FGV and linked subsidiaries and joint ventures. This decision was the result of a year long forced labor investigation, which revealed practices of labor rights violations, including debt bondage, deception, physical and sexual abuse, detention of identity documents, and excessive overtime. These cases collectively indicate that Malaysia's human rights challenges are not isolated but take part in institutional weakness in enforcement among individuals and corporations.

While labor exploitation in Malaysia is most commonly examined in the context of migrant workers within labor-intensive sectors, these patterns reflect broader structural weaknesses that are not confined to employment relations alone. The persistence of forced labor practices highlights limitations in enforcement, monitoring, and institutional accountability, which extend beyond specific sectors. As such, although the GISBH case does not fall strictly within conventional labor exploitation frameworks, it reveals similar underlying dynamics of power imbalance, inadequate oversight, and prolonged institutional neglect. Taken

together, these patterns of child abuse and labor exploitation demonstrate that Malaysia's enforcement gaps extend beyond isolated incidents, creating a systemic environment in which large-scale and prolonged violations, such as those uncovered in the GISBH case, are able to occur.

These broader patterns of child and labor rights violations in Malaysia show that the GISBH case did not emerge in an isolated enforcement vacuum. Instead, it occurred within a wider structural context marked by inconsistent monitoring, complaint-driven labor enforcement, and regulatory weaknesses in welfare and care institutions. This context is important for understanding why Malaysia's formal commitment to international child and labor rights norms has not automatically resulted in full internalization. The NLC model is useful for identifying Malaysia's movement from norm acknowledgement to policy response, but it does not fully explain how reactive enforcement systems can repeatedly delay routine compliance. Therefore, the broader Malaysian context suggests that the obstacle to internalization is not merely the absence of legal norms, but the persistence of enforcement patterns that depend heavily on crisis exposure, public pressure, and individual complaints before state action becomes visible.