



# Juridical Analysis of the Crime of Beating Resulting in Death by a Minor Perpetrator: Study of Decision No.1/ Pid.Sus-Anak/2024/PN Mme

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**Abstract:** Children, as individuals in their developmental stages, have the right to legal protection, including when facing the criminal justice system. However, the involvement of children as perpetrators of criminal acts raises specific issues, as seen in Decision No. 1/Pid.Sus-Anak/2024/PN Mme related to a case of assault that resulted in death. This research focuses on the judge's considerations in imposing sentences and the extent to which the principle of restorative justice is applied in accordance with the Child Criminal Justice System Law. In this study, the method used is normative legal research with a statutory approach, and conceptual approach. This study analyzes Decision No. 1/Pid.Sus-Anak/2024/PN Mme by examining relevant positive norms and data obtained through library research, which is analyzed qualitatively. The research results show that the judge placed more emphasis on proving the elements of the crime according to Article 170 paragraph (2) sub-paragraph 3 of the Criminal Code without optimizing the restorative justice approach. Although age and reconciliation factors are considered, the diversion process is not implemented thoroughly, resulting in juvenile sentencing not reflecting the restorative principles mandated by the SPPA Law. Law enforcement needs to strengthen the rehabilitative approach by optimally utilizing litmas and psychosocial analysis, as well as prioritizing non-custodial sanctions. The implementation of restorative justice must be internalized through diversion and penal mediation with the support of cross-institutional collaboration and adequate legal infrastructure.

**Keywords:** Assault, Child of the perpetrator, Criminal offense, Decision No. 1/Pid.Sus-Anak/2024/Pn Mme

## 1. Introduction

Children are individuals who are in the phase of physical, mental, and emotional growth and development, thus having special needs for protection and guidance. Their dependence on adults, emotional immaturity, and high learning ability make children subjects of the law who require a special approach within the criminal justice system (Ayu Ratih Indra Kusumawati et al., 2022). Children also play a strategic role as the next generation of the nation and agents of social change, so legal protection for children is an indispensable effort in the development of national law. Protection of children has become a global concern, as reflected in the Convention on the Rights of the Child (CRC) adopted by the UN General Assembly on November 20, 1989, and ratified by Indonesia through Presidential Decree No. 36 of 1990. This convention affirms the principles of non-discrimination, the right to life, growth and development, as well as protection from violence and exploitation.

Children's rights are also constitutionally guaranteed through Article 28B paragraph (2) of the 1945 Constitution of the Republic of Indonesia, and specifically regulated in Law Number 23 of 2002 jo. Law Number 35 of 2014 concerning Child Protection. In practice, children are not only potential victims but also perpetrators in various forms of criminal acts. Data from the Indonesian Child Protection Commission (KPAI) in 2024 recorded 2,057 child-related complaints, of which 67% involved the fulfillment of rights

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and 33% were related to special protection. From the data, there are 29 reports regarding children as perpetrators of criminal acts, indicating that children's involvement in legal conflicts is a phenomenon that requires serious attention (KPAI, 2025).

In response, Indonesia established a special legal system through Law Number 11 of 2012 on the Juvenile Criminal Justice System (UU SPPA), which adopts the principle of restorative justice as the main approach. This system emphasizes the restoration of circumstances, rehabilitation, and protection of the child's future, as well as balancing the interests of both the perpetrator and the victim (Mubarok, 2022). However, its implementation in practice still faces challenges, especially in serious cases such as assault crimes that result in death. One of the actual cases that reflects this complexity is Decision No. 1/Pid.sus-Anak/2024/PN Mme, which involves a case of assault by a minor resulting in the victim's death. This verdict has drawn public attention because it sentenced the juvenile offender to six years in prison, which subsequently triggered public reaction in the form of demonstrations. This case has drawn attention not only because it tests the boundary between law enforcement and child protection but also questions the extent to which the principle of restorative justice can be applied fairly without neglecting the rights of the victim (Aquinaldo, 2024).

Although existing literature on child law and juvenile justice in Indonesia has extensively discussed the normative aspects of restorative justice and child protection, few studies have specifically examined how court decisions in serious offenses reflect inconsistencies between legal ideals and judicial practice. Most research tends to generalize the success or failure of the SPPA Law without delving into the detailed reasoning behind punitive verdicts against children. This study attempts to fill that gap by critically analyzing a concrete judicial decision that appears to prioritize retributive justice over restorative principles. Through an in-depth assessment of Decision No. 1/Pid.Sus-Anak/2024/PN Mme, this research contributes to the discourse on how Indonesian courts navigate the tension between enforcing criminal liability and fulfilling the mandate of child protection law.

Based on the above description, this research aims to analyze the judge's considerations in Decision No. 1/Pid.sus-Anak/2024/PN Mme regarding the sentencing of a child as the perpetrator of a mob attack that resulted in death, and to examine the application of the restorative justice principle as regulated in Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA), without neglecting the aspect of justice for the victim. The issues examined in this research are focused on two main aspects: first, how the judge's considerations in imposing penalties on child offenders in the case; and second, how the principle of restorative justice is implemented in the process and decision of the case in question. This study is important to provide a deeper understanding of the effectiveness of the implementation of the SPPA Law in real cases, particularly in cases involving children as perpetrators of serious crimes, while also identifying the extent to which the juvenile justice system can balance the protection of children and the fulfillment of victims' rights.

## 2. Materials and Methods

Research methods are generally understood as scientific techniques used to collect information for specific purposes and benefits. (Ramdhan, 2021). This research uses a normative juridical method aimed at analyzing law as a norm that lives within the system of legislation, legal doctrine, legal theory, and related literature. Additionally, normative research is also known as doctrinal research, which aims to understand law from the internal perspective of positive law in order to examine the structure, principles, and foundations that form the legal framework. This method was chosen because it is relevant for examining the application of law to child offenders as stated in Decision No. 1/Pid.sus-Anak/2024/PN Mme, with a focus on reviewing the consistency between the

judge's considerations and the principles of restorative justice within the juvenile criminal justice system.

In its implementation, this research applies several approaches. First, the legislative approach is used to examine relevant legal norms, such as the Child Criminal Justice System Law (Law No. 11 of 2012), the Criminal Code (KUHP), the Criminal Procedure Code (KUHAP), and the technical provisions from the Supreme Court regarding the application of restorative justice principles. Peter Mahmud Marzuki emphasizes that researchers using the legislative approach method must understand the hierarchy of regulations and the principles that serve as guidelines (Marzuki, 2011). Additionally, a conceptual approach is also used in this research to understand the theoretical and philosophical foundations of restorative justice, by examining the concepts and legal doctrines that have developed, thereby providing a conceptual basis for assessing the appropriateness of decisions in line with the objectives of juvenile criminal law in Indonesia. This approach is based on legal theories, views, and doctrines that have evolved over time and provides a framework for research, analysis, and understanding of the legal issues being studied (Muhaimin, 2020).

The data source in this research is secondary data consisting of primary, secondary, and tertiary legal materials. Primary legal materials include the 1945 Constitution of the Republic of Indonesia; Law No. 23 of 2002 on Child Protection; Law No. 35 of 2014 as an amendment to the previous law; Law No. 11 of 2012 on the Juvenile Criminal Justice System; and Decision No. 1/Pid.sus-Anak/2024/PN Mme. Secondary legal materials include legal books, scientific journals, legal articles, and expert opinions relevant to SPPA, juvenile criminal responsibility, and the concept of restorative justice. Meanwhile, tertiary legal materials consist of dictionaries, legal encyclopedias, as well as official documents and reports from state institutions such as the Supreme Court and the Indonesian Child Protection Commission (KPAI), which provide empirical data and context regarding the handling of cases involving children in conflict with the law.

Data collection is conducted through library research, by reviewing legal literature and official documents relevant to the research object. According to Muhammad Ramahdhan in his book titled "Research Methods," research conducted through library studies discusses several theories that are reviewed (Ramdhan, 2021). Legal books, scientific journals, court rulings, and other supporting documents are the main references in building legal arguments. In the analysis stage, the obtained data is analyzed qualitatively, namely by providing interpretations of the legal substance and legal facts contained in the decisions and applicable norms. Qualitative analysis in this research does not use a quantitative or statistical approach, but rather relies on a deep understanding of the legal context and juridical reasoning that is structured logically and systematically. This approach allows researchers to deeply examine how the principles of restorative justice are applied in cases of children involved in mobbing, as well as to identify the extent to which judicial decisions reflect fair and recovery-oriented child protection principles.

### **3. Results and Discussion**

#### ***3.1. Overview and Analysis of Criminal Elements in Decision No.***

##### ***1/Pid.Sus-Child/2024/PN Mme***

Protection of children in conflict with the law is an inseparable part of the national legal system that places the best interests of the child as the main principle. Children who are not yet psychologically and socially mature cannot be equated with adults in the criminal justice process. Therefore, Law No. 11 of 2012 concerning the Juvenile Criminal Justice System emphasizes the importance of a restorative justice approach and diversion mechanisms, which aim to protect children from the negative impacts of the formal justice system (Rahayuningsih et al., 2025). However, in practice, there are still many cases that do not fully reflect these protection principles. Obstacles such as the lack of

understanding among law enforcement officers and the limited support of child legal infrastructure become barriers to its implementation (PA et al., 2023). The Maumere District Court Decision No. 1/Pid.Sus-Anak/2024/PN Mme serves as a case example that reflects the issue.

This case involves three children, each aged 17, 15, and another child who is also still considered a minor. They committed violence together against an adult man on January 28, 2024, around 02:30 WITA in Sikka Regency. The form of violence included beating, kicking, and hitting with a motorcycle, which caused the victim serious injuries and death. The visum et repertum indicates severe head injuries, lacerations, bruises, and bleeding from the victim's ears, nose, and mouth. The children were charged with violating Article 170 paragraph (2) subparagraph 3 of the Criminal Code, and the legal process was carried out in accordance with the provisions of Law No. 11 of 2012 concerning the Juvenile Justice System. All three were accompanied by legal counsel, community advisors (PK Bapas), and their parents. After considering the evidence, medical examination, and community report, the panel of judges sentenced each child to 6 years in prison. The detention period was fully deducted from the imposed sentence, as stipulated in Article 32 paragraph (1) of the SPPA Law. The evidence in the form of a motorcycle was declared to be used in another case, and each child was charged a court fee of Rp5,000.

This decision shows that the juvenile justice system applies the principle of formal protection through legal and social assistance, but still imposes severe criminal sanctions due to the fatality of the children's actions. This approach reflects a balance between the principle of restorative justice and the need for retributive justice in cases that have serious impacts (Saragih et al., 2023). This decision also demonstrates the fulfillment of all elements in Article 170 paragraph (2) point 3 of the Criminal Code. The element of "intentionally" is fulfilled because the minors committed acts of beating, kicking, and even crashing with a motorcycle consciously, gradually, and in an organized manner, without any indication of spontaneity or self-defense (Zarzani et al., 2024). The element of "jointly" is also proven because the violence was committed by more than one person, in the same time, place, and intent (Istiqomah et al., 2022). According to Sudarto, this element does not require a detailed plan; it is sufficient to prove the existence of a shared awareness to harm the victim (Sudarto, 1990). Next, the element of "using violence against a person" is proven through actual actions that cause physical suffering, injuries, and severe physical effects. Meanwhile, the element of "causing death" is proven through a post-mortem examination report that shows serious trauma to the neck and brainstem, resulting in the victim's suffocation (Putu Kayla Yunita Dewi et al., 2022). The panel of judges stated that this element is proven factually and normatively. Therefore, based on the trial facts and the judge's legal considerations, the actions of the Children are legally and convincingly proven to meet all the elements of Article 170 paragraph (2) point 3 of the Criminal Code.

### ***3.2. Legal and Non-Legal Analysis of Judicial Considerations in Imposing Sentences in Decision No. 1/Pid.Sus-Anak/2024/PN Mme.***

The Maumere District Court Decision Number 1/Pid.Sus-Child/2024/PN Mme is the final result of the examination process of a juvenile case accused of jointly committing violence against another person resulting in death, as regulated in Article 170 paragraph (2) sub-paragraph 3 of the Criminal Code. In this decision, the panel of judges sentenced each child to 6 (six) years in prison. Although the sentencing appears to be in accordance with the elements of the charged article from a legal standpoint, further analysis is needed regarding the judges' normative and substantive considerations on the objectives of sentencing and the principles of restorative justice as stipulated in Law No. 11 of 2012 on the Juvenile Criminal Justice System (UU SPPA).

Normatively, the judge's consideration has assessed the fulfillment of the elements in Article 170 of the Criminal Code. The element of "together" is fulfilled because the three

children collectively beat the victim, as confirmed by witness statements and other evidence. The elements of "violence" and "causing death" are also proven through the *visum et repertum*, which explains the severe injuries on the victim's body that resulted in death. Therefore, legally, the elements of the offense in that article have been fulfilled, and the judge determined that there are no mitigating or exonerating circumstances that could absolve the perpetrators from criminal liability. However, in the context of juvenile sentencing, judges should not only assess the formal legality aspect but also consider the characteristics of sentencing within the juvenile justice system. The SPPA Law advocates for a restorative justice approach that prioritizes rehabilitation, education, and social reintegration, rather than mere punishment. The provisions of Article 5 paragraph (1) of the SPPA Law clearly state that the juvenile criminal justice system is implemented through a restorative justice approach. Unfortunately, in the verdict and the considerations of the decision, there is no evidence of any diversion efforts or other considerations that demonstrate the application of restorative justice principles.

The judge imposed a prison sentence without considering alternative sanctions allowed under Articles 71 to 83 of the SPPA Law, such as return to parents, vocational training, rehabilitation at LPKA, or community service (Capera, 2021). This decision also does not show any consideration of the results of the social investigation or recommendations from the community supervisor. In fact, in the practice of juvenile justice, the existence of a social report from Bapas is an important basis for considering the child's character and background before a sentence is imposed. No description of the child's family conditions, social environment, or education was found in the verdict. This shows that the rehabilitative and educational approach, which is characteristic of juvenile sentencing, was not included in the judges' considerations (Iskandar et al., 2024). From the perspective of restorative justice itself, there seems to be no effort to bring the Child together with the victim or the victim's family to build a fair resolution for all parties involved. The decision does not mention any penal mediation, reconciliation, or apology facilitated by the judiciary, whereas in Article 1, paragraph 6 of the SPPA Law, restorative justice is defined as the resolution of criminal cases involving the perpetrator, victim, perpetrator's/victim's family, and other parties to jointly seek a fair resolution. In fact, the term "restorative" is not mentioned at all in the judgment text.

The juvenile criminal justice system ideally should not only emphasize deterrence through imprisonment but also prioritize rehabilitative and restorative approaches, as mandated in Articles 3 and 4 of Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA). Therefore, every consideration by the judge should reflect sensitivity to these non-legal factors, so that the judicial process does not only function as an instrument of punishment but also as a means of recovery and social reintegration for the child. The non-legal analysis of this decision also shows the lack of psychological and social approaches in understanding the child's background. Punishment of children should consider psychological aspects, given that children are in a stage of emotional and cognitive development that is not yet stable (Sunanti, 2020). However, in this ruling, the judge did not consider the factors of the child's psychological development, such as maturity level, peer pressure, or mental condition due to fear and ignorance of the law. However, children are not yet fully psychologically mature and are easily influenced by their environment, so considerations for sentencing should take this psychological aspect into account (Irawati, 2021).

Furthermore, the social aspects of the child are not discussed at all in the considerations. every process of imposing a sentence on a child ideally considers the social diagnosis from authorized parties such as Community Supervisors (PK Bapas), to ensure that the sentencing is carried out proportionally and contextually. In this case, the judge did not evaluate the child's mental or psychological condition, either during the examination process or in the imposition of the sentence. It is not explained how the children's family background, economic conditions, or the quality of parental supervision were. Children who grow up in an environment permissive of violence or

without parental supervision have a higher risk of engaging in criminal activities. (Dwi Fransiska et al., 2024). By ignoring this, the judge fails to demonstrate that the sentencing takes into account the social context accompanying the actions of the Children.

The last aspect is institutional, as the absence of diversion or non-litigation resolution indicates weak coordination among juvenile criminal justice actors. The SPPA Law mandates coordination between investigators, public prosecutors, judges, community advisors, and child social workers. The absence of the diversion process from the investigation stage indicates that the principle of restorative justice has not yet been institutionalized in the juvenile criminal justice system at the practical level. (Mulyadi, 2014). Thus, although the decision has formally met the criminal elements according to the Criminal Code, from the perspective of child protection, restorative justice, and the principle of proportionality, this decision does not yet reflect the idealism of the Child Protection System Law. A repressive approach still dominates the substance of the judge's considerations without presenting the dimensions of protection, rehabilitation, and holistic recovery for the child.

### ***3.3. Analysis of the Application of Restorative Justice Principles in Decision No. 1/Pid.Sus-Anak/2024/PN MME Based on the SPPA Law regulations***

The application of the restorative justice principle in the aspects of proof and sentencing in Decision No. 1/Pid.Sus-Anak/2024/PN MME shows that the evidentiary process has met the provisions of criminal procedural law by using three main pieces of evidence, namely witness testimony, the results of visum et repertum, and the confessions of the Children. Although technically the elements of Article 170 paragraph (2) subparagraph 3 of the Criminal Code have been proven, this process must still be examined from the perspective of child legal protection and the principle of due process of law, which includes a fair, non-discriminatory legal process and guarantees the accompaniment and rights of the child throughout the judicial process. This principle is part of the minimum protection standards regulated by Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA). Criminal proof by a child must be based on the principle of substantive justice, not merely the fulfillment of formal requirements (Hardi Done, Samaluddin, 2024). Although the evidence in this case has technically met the legal requirements, it still needs to be analyzed whether the process has truly fulfilled the principles of child protection and justice substantively, as emphasized in the modern juvenile justice approach. Judges must ensure that each stage of the proof is conducted objectively and considers the best interests of the child, not merely pursuing legal certainty (Anom, 2025).

In this ruling, the judge indeed included mitigating considerations such as the status of the children as students, their respectful behavior in court, and that they had never been punished before, and imposed a six-year sentence, which is the maximum limit according to Article 81 paragraph (1) of the SPPA Law. However, this still indicates limitations in the explicit application of restorative justice. Although the litmas report is not explicitly detailed in the consideration section, the inclusion of personal aspects in the decision indicates the application of the principle of individualized sentencing, which is an approach to sentencing that takes into account the character, age, and rehabilitation needs of the child as the perpetrator. This approach is important to ensure that the sanctions are not only repressive but also aligned with the goals of rehabilitation and social reintegration that are characteristic of the juvenile justice system.

In substantive terms, this case does not demonstrate the full application of restorative justice, as there are no indications of efforts to resolve it through penal mediation, discussions between the perpetrator and the victim, or dialogical forums as mandated in Articles 8 to 10 of the SPPA Law. In fact, with a criminal threat of no more than seven years and not classified as a serious crime, this case legally qualifies for diversion. Furthermore, the verdict also did not consider alternative forms of punishment such as rehabilitation outside of institutions, supervision, or community service as outlined in

Articles 71 to 83 of the SPPA Law. The lack of understanding among law enforcement officials regarding the concept of restorative justice, as well as the limited infrastructure and community participation, are the main obstacles to the implementation of this principle. As a result, restorative justice in juvenile justice practice has not yet been genuinely accessible and remains at the normative level (Filonia, 2024).

The juridical and systemic implications of this ruling indicate that the juvenile criminal justice system has not fully internalized the principle of restorative justice as the basis for handling juvenile cases. The absence of diversion efforts, alternative forms of punishment, or dialogical approaches throughout the judicial process indicates that the punitive paradigm still dominates judicial practices. However, the philosophy of restorative justice emphasizes the restoration of social relations, not merely the imposition of punitive measures (Mauladi, 2020). The provisions of Article 81 paragraph (1) of the SPPA Law also emphasize that sentencing children should be considered as a last resort (*ultimum remedium*). However, weaknesses in coordination among officials, the lack of penal mediation infrastructure, and the absence of community participation substantially hinder the implementation of this principle (Muhammad Iqbal, 2022). This directly impacts the protection of children's rights and hinders the achievement of rehabilitation and social reintegration goals as outlined in the SPPA Law.

#### 4. Conclusions

Decision Number 1/Pid.Sus-Child/2024/PN Mme shows that the elements of the crime as regulated in Article 170 paragraph (2) sub-paragraph 3 of the Criminal Code have been formally fulfilled through valid evidence and trial facts. However, even though the evidentiary aspects have met the standards of criminal procedural law, the judge's considerations in delivering the verdict appear to be more oriented towards a retributive approach rather than prioritizing the rehabilitative principle as mandated in Law Number 11 of 2012 on the Juvenile Criminal Justice System (UU SPPA). The absence of in-depth analysis of the psychosocial conditions of the children and the lack of consideration regarding the need for rehabilitation indicate that child protection has not yet been fully substantively integrated into the decision-making process. Furthermore, the application of the restorative justice principle in this case has not yet been clearly reflected, whether through diversion mechanisms, penal mediation, or in the form of non-custodial alternative punishments as permitted by the SPPA Law. The absence of a dialogical approach involving the perpetrator, victim, and community reflects that the principle of restorative justice remains normative and has not yet been fully internalized in juvenile criminal justice practices. As a result, the legal process being carried out not only loses the opportunity to achieve constructive recovery but also limits the effectiveness of the juvenile criminal justice system in achieving its main objectives, namely rehabilitation and social reintegration comprehensively.

To realize a more integrative and restorative juvenile justice process, concrete opportunities can be identified at each stage of the criminal justice system. At the investigation stage, law enforcement officers can optimize the early implementation of diversion by involving BAPAS officers and conducting comprehensive psychosocial assessments as part of standard procedures. At the prosecution level, the Public Prosecutor's Office can develop guidelines that encourage penal mediation and reconciliation efforts, particularly in cases where the offender is a first-time child perpetrator and the victim's family is open to dialogue. Meanwhile, at the trial stage, judges can actively promote the use of non-custodial sanctions by taking into account *litmas* reports, family support systems, and the child's potential for rehabilitation. These opportunities require institutional synergy and the formulation of technical regulations that reinforce the implementation of restorative justice across all procedural stages.

In the long term, verdicts that fail to internalize the rehabilitative and restorative mandates of the juvenile justice system risk undermining the fundamental purpose of

Law Number 11 of 2012. When punitive logic dominates judicial reasoning in child offender cases, it contributes to a systemic shift away from rehabilitation toward retribution, thereby eroding public trust in the juvenile justice system. Children who are subjected to custodial sentences without adequate restorative intervention may experience social stigma, emotional trauma, and a higher likelihood of recidivism. This not only limits the effectiveness of the system in achieving sustainable behavioral change but also hinders broader societal goals of social reintegration and conflict resolution. Thus, moving forward, it is imperative for legal institutions to not merely acknowledge restorative justice as a normative aspiration, but to institutionalize it as a practical framework embedded in every procedural phase of juvenile adjudication.

## References

- (KPAI), K. P. A. I. (2025). *Data Perlindungan Anak Tahun 2024*.
- Anom, S. (2025). Peran Hakim dalam Mewujudkan Due Process of Law Pada Sistem Peradilan Tata Usaha Negara di Indonesia. *Jurnal Konsep Ilmu Hukum*, 5.
- Aquinaldo, A. (2024). *Ibu Kandung Noven Witak Histeris di PN Maumere, Hakim Putuskan 6 Tahun Penjara 3 Tersangka Anak*. Tribunnews Flores.
- Ayu Ratih Indra Kusumawati, Dewi, A. A. S. L., & Suryani, L. P. (2022). Pertanggungjawaban Pidana terhadap Pengeroyokan oleh Anak di Bawah Umur Mengakibatkan Kematian. *Jurnal Interpretasi Hukum*, 3(1), 199–203. <https://doi.org/10.22225/juinhum.3.1.4744.199-203>
- Capera, B. (2021). Keadilan Restoratif Sebagai Paradigma Pemidanaan Di Indonesia. *Jurnal Lex Renaissance*, 6(2), 225–234. <https://doi.org/10.20885/jlr.vol6.iss2.art1>
- Dwi Fransiska, M., Ramadani, A. I., Rato, D., & Setyawan, F. (2024). Peran Psikologi Hukum dalam Permasalahan Anak Berhadapan dengan Hukum. *As-Syar'i: Jurnal Bimbingan & Konseling Keluarga*, 6(3), 1368–1375. <https://doi.org/10.47467/as.v6i3.6515>
- Filonia, fredella B. (2024). Penerapan Restorative Justice terhadap Anak dalam Perspektif Sistem Peradilan Pidana Anak di Indonesia. *Hukum in Concreto*, 98113.
- Hardi Done, Samaluddin, A. W. (2024). TINJAUAN YURIDIS TENTANG PROSES PEMBUKTIAN TINDAK PIDANA OLEH ANAK MENURUT UNDANG-UNDANG NOMOR 11 TAHUN 2012 TENTANG SISTEM PERADILAN PIDANA ANAK (Putusan Nomor 6/Pid.Sus-Anak/2022/PN Psw). *Ilmu Hukum Kanturuna Wodo*, 5(2), 59–73.
- Irawati, E. (2021). PENINGKATAN KAPASITAS DESA BERDASARKAN PADA UNDANG-UNDANG NO. 6 TAHUN 2014 (Sebuah kajian tentang Otonomi Desa). *Jurnal Inovasi Penelitian*, 2(1), 1–13.
- Iskandar, I., Abdullah, F., Amri, U., & Astuti, B. (2024). Sistem Pemidanaan Anak yang Berkonflik dengan Hukum: Ditinjau dari Tujuan Pemidanaan. *Nationally Accredited Journal*, 8(2), 2540–9166.
- Istiqomah, A., Budyatmojo, W., & Setiyanto, B. (2022). Tinjauan Hukum Pidana Terhadap Tindakan Kekerasan Terhadap Orang Atau Barang Yang Dilakukan Secara Bersama-Sama. *Recidive: Jurnal Hukum Pidana Dan Penanggulangan Kejahatan*, 11(2), 107. <https://doi.org/10.20961/recidive.v11i2.67444>
- Marzuki, P. M. (2011). *Penelitian Hukum*. Kencana.
- Mauladi. (2020). *Hak Asasi Manusia, Politik, dan Sistem Peradilan Pidana*. Badan Penerbit UNDIP.
- Mubarok, N. (2022). *SISTEM PERADILAN ANAK* (1st ed.). Insight Mediatama.
- Muhaimin. (2020). *Metode Penelitian Hukum*. Mataram University Press.
- Muhammad Iqbal, R. M. (2022). Evaluasi Penerapan Diversi dalam Sistem Peradilan Pidana Anak. *Hukum Pidana Dan Kriminologi*, 8, 45.
- Mulyadi, L. (2014). *Peradilan Pidana Anak di Indonesia*. Sinar Grafika.



- PA, R. Z., Jamaluddin, J., & Nur, M. (2023). Implementasi Diversi Sistem Peradilan Pidana Anak Dalam Tahap Penuntutan Oleh Jaksa Di Wilayah Kejaksaan Negeri Aceh Selatan. *Suloh: Jurnal Fakultas Hukum Universitas Malikussaleh*, 11(1), 155. <https://doi.org/10.29103/sjp.v11i1.9945>
- Putu Kayla Yunita Dewi, Anak Agung Sagung Laksmi Dewi, & I Made Minggu Widyantara. (2022). Sanksi Pidana terhadap Pelaku Pengeroyokan yang Menyebabkan Kematian (Putusan Nomor 399/Pid.B/2020/PN Dps). *Jurnal Preferensi Hukum*, 3(2), 385–390. <https://doi.org/10.55637/jph.3.2.4948.385-390>
- Rahayuningsih, U., Hikmah, A. N., & Nurcahyati, S. (2025). Pendekatan Restorative Justice dalam Perlindungan Hukum Anak sebagai Pelaku Tindak Pidana : Menyeimbangkan Keadilan dan Pembinaan. *Amandemen: Jurnal Ilmu Pertahanan, Politik Dan Hukum Indonesia*, 2(2), 79–89. <https://journal.appihi.or.id/index.php/Amandemen/article/view/883>
- Ramdhan, M. (2021). *Metode Penelitian*. Cipta Media Nusantara (CMN).
- Saragih, Y. M., Hukum, P. I., & Pancabudi, U. P. (2023). Perlindungan Hukum Terhadap Anak Sebagai Pelaku Tindak Pidana. *Innovative: Journal Of Social Science Research*, 3, 6437–6449.
- Sudarto. (1990). *Hukum dan Hukum Pidana*. Alumni.
- Sunanti, E. (2020). *Psikologi Perkembangan Anak*. Refika Aditama.
- Zarzani, T. R., Diriyanti, S., Sukarwoto, & Chair, A. (2024). Tinjauan Yuridis Terhadap Tindak Pidana Kekerasan Fisik di Lingkungan Pendidikan Tinggi ( Menggunakan System Boarding School ). *Journal Of Social Science Research*, 4, 10134–10147.