

Implementation of Legal Protection for Child Victims of Serious Abuse: Study of Decision Number 297/PID.B/2023/PN JKT.SEL

¹M. Arif Fazillah, ²Rahul Ardian Fikri, ³Fitria Ramadhani Siregar

^{1,2,3}Panca Budi Development University

¹mariffazillah2000@gmail.com, ²rahulardian@dosen.pancabudi.ac.id,

³Fitriaramadhani09@gmail.com

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Abstract

This study discusses the legal protection of children as victims of criminal acts of severe abuse through a case study of the Decision of the South Jakarta Regional Court No. 297/PID.B/2023/PN JKT.SiEL. Children as a vulnerable group have special rights guaranteed by national and international law. This study aims to analyze how the implementation of legal protection for child victims of severe abuse in the criminal justice process, and to assess the extent to which the judge's decision reflects the principles of justice and child protection. The method used is normative juridical with a case study approach to court decisions. The results of the analysis show that although there are law enforcement efforts against perpetrators, protection for child victims is not yet fully optimal, especially in the aspects of psychological recovery and guarantees of non-repetition. This study recommends the need to strengthen child assistance mechanisms in legal processes and increase synergy between child protection institutions.

Keywords: Abuse, Children, Crime, Law, Protection

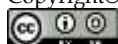
Abstrak

Studi ini membahas perlindungan hukum anak sebagai korban tindak pidana kekerasan berat melalui studi kasus Putusan Pengadilan Negeri Jakarta Selatan No. 297/PID.B/2023/PN JKT.SiEL. Anak sebagai kelompok rentan memiliki hak khusus yang dijamin oleh hukum nasional dan internasional. Studi ini bertujuan untuk menganalisis bagaimana implementasi perlindungan hukum bagi anak korban kekerasan berat dalam proses peradilan pidana, dan untuk menilai sejauh mana putusan hakim mencerminkan prinsip-prinsip keadilan dan perlindungan anak. Metode yang digunakan adalah yuridis normatif dengan pendekatan studi kasus terhadap putusan pengadilan. Hasil analisis menunjukkan bahwa meskipun ada upaya penegakan hukum terhadap pelaku, perlindungan bagi anak korban belum sepenuhnya optimal, terutama dalam aspek pemulihan psikologis dan jaminan tidak terulangnya perbuatan tersebut. Studi ini merekomendasikan perlunya penguatan mekanisme bantuan anak dalam proses hukum dan peningkatan sinergi antar lembaga perlindungan anak.

Kata kunci: Anak, Kekerasan, Kejahatan, Hukum, Perlindungan

Introduction

Children are an integral part of the future survival of the nation and state. Therefore, children must receive maximum protection, both from their families, communities, and the state. In a legal context, protecting children is not only a moral responsibility but also a constitutional obligation, as stipulated in Article 28B paragraph (2) The 1945 Constitution of



the Republic of Indonesia states that every child has the right to survive, grow and develop and has the right to protection from violence and discrimination.

However, the reality on the ground still shows a high rate of violence against children, including cases of severe abuse that are often carried out by people close to the victim. Abuse against children not only results in physical injuries, but also has long-term psychological impacts. Therefore, the state must be present through legal instruments to provide protection and ensure justice for children as victims of criminal acts.

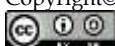
One of the cases that became a priority was the case of severe child abuse which was decided by the South Jakarta Regional Court with the case number N0.297/PID.B/2023/PN JKT.SEL. This case is important to analyze because it involves a victim who is still a minor, and tests the extent to which Indonesian criminal law is able to provide effective protection for child victims of violence. One case that has captured public attention is the severe abuse of a child named Crystallinio David Ozora, which was carried out by Mario Dandy Satriyo. This incident occurred in February 2023 and was later tried in the Nio case. 297/Pid.B/2023/PN Jkt.Sel at the South Jakarta Regional Court. The victim in this case suffered serious injuries and cognitive impairment due to the abuse carried out in a sadistic and planned manner. The court sentenced the defendant to 12 years in prison and ordered the victim to pay restitution of Rp 25 billion. This decision marks one of the forms of application of legal protection for child victims of violent crimes, as regulated in Law Number 35 of 2014 concerning Child Protection and provisions in the Criminal Code (KUHP) and Law Number 31 of 2014 concerning Protection of Witnesses and Victims.

Despite this, the implementation of legal protection in judicial practice often faces challenges, particularly in the aspect of victim restitution through restitution mechanisms. The lack of clarity in the rules for implementing restitution, weak oversight, and the absence of an effective system to guarantee the actual fulfillment of victims' rights are crucial issues that require critical analysis. Therefore, this paper aims to analyze the extent to which legal protection for child victims of severe abuse is implemented through the decision of the South Jakarta Regional Court No. 297/Pid.B/2023/PN Jkt.Sel, as well as to evaluate the effectiveness and shortcomings in the application of restitution as part of the restoration of victims' rights.

Methods Research

This research is a normative legal research with a case approach (case approach). The normative legal approach is used to examine applicable legal norms related to the protection of child victims of severe abuse. The case approach is used to analyze the decision of the NIO court. 297/PID.B/2023/PN JKT.SEL as a case study. The approach used in this research is: Statutory Approach (Statutie Approach) This research will examine various real legislation regulations, such as: Law Number 35 of 2014 concerning Child Protection (Amendment to Law Number 23 of 2002), Criminal Code (KUHP), Law Number 35 of 2014 concerning Child Protection. 11 of 2012 concerning the Juvenile Criminal Justice System, Case Approach (Case Approach). This elite researcher will conduct an analysis of the Decision of the South Jakarta Regional Court No. 297/PID.B/2023/PN JKT.SEL related to the case.

Sources and Types of Legal Materials used in this elite research include: Primary Legal Material, namely the Decision of the South Jakarta Regional Court No. 297/PID.B/2023/PN JKT.SEL covers applicable laws and regulations. Secondary legal materials cover relevant literature, books, legal journals, scientific articles, and other scientific writings with relevant research topics. Secondary legal materials include legal dictionaries, legal encyclopedias, and other supporting sources. The technique of collecting legal materials is carried out through



library research to obtain primary, secondary, and secondary legal materials. The search is conducted through official court decisions and statutory regulations from credible sources. The legal material analysis technique that has been collected will be analyzed using qualitative descriptive methods, namely by describing the contents of legal regulations, legal principles, and relevant court decisions to then draw conclusions to answer the research problem formulation.

Results and Discussion

The research questions in this study are: first, what is the legal protection provided to child victims of severe abuse as regulated by Indonesian laws and regulations Second, to what extent is restitution effective in these cases as part of restoring the rights of child victims of abuse. The defendant, Mario Dandy Satriyo, was found guilty of committing severe abuse against a child named David Ozora. This act is qualified as a violation of Article 355 paragraph (1) in conjunction with Article 56 of the Criminal Code and the Child Protection Law (Article 76 C in conjunction with Article 80) and Article 354/353 of the Criminal Code. It all started when the ex-partner of the defendant, Mario Dandy, contacted him again and told him that witness Agnes had met with the victim, David Ozora, and they had sexual intercourse.

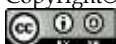
This angered the defendant, Mario Dandy, and he contacted the victim, David Ozora, but she said she only had sex and did not do anything like what was alleged. Then, the defendant, Mario Dandy, to make sure again by contacting his ex and making sure that it was indeed the victim David Ozora who had sexual intercourse with the witness Agnes and the former defendant said that the victim David Ozora had told the former defendant Mario Dandy that he had had sexual intercourse with her, then the defendant Mario Dandy contacted the witness Agnes and asked about this, but the witness Agnes was just silent and crying, so the defendant Mario Dandy also provided a detailed account of the alleged abuse incident.

The trial proceeded openly, with the court considering witnesses and expert testimony, including medical, psychological, and legal aspects. The expert confirmed the strong legal basis for the conviction of child abuse as stipulated in the Child Protection Law and the Criminal Code. The objective (physical action) and subjective (malicious intent) elements of the abuse were proven.

In addition, David Ozora suffered physical injuries in the following ways:

1. A laceration on his right temple, measuring 1.5 cm x 0.5 cm.
2. A laceration on his right cheek, measuring 6 cm x 5 cm.
3. A bruise on his right cheek, measuring 6 cm x 5 cm.
4. A 2 cm object injury to his lower lip.

David Ozora suffered severe brain trauma caused by the brain twisting, which severed nerves. This resulted in a brain tumor and the inability to perceive anything. Doctor also explained that the cause of the brain spinning was due to a very severe trauma to the back of the neck, that the total was 56 days, that his weight dropped from 60 kg to 49 kg, he couldn't wake up, didn't know what happened (amnesia), and was unconscious for almost 2 weeks. As stated in the Visum regulation number: 001/MR/II/MPH/2023 dated February 27, 2023. That furthermore based on the results of the CT Scan examination, it was found that David Ozora's brain was swollen and there were bruises due to a hard impact, no bleeding was found in the brain but this was dangerous for David Ozora because it could result in permanent disabilities as stated by Neurologist Dr. Yeremia Tatang that number Letter: 046 / EiOM / DIR / MHKN / V / 2023 dated 11 May 2023 which was made and signed by dr. Desy Sugesty Muktiyani, MARS as Director of Mayapada Kuningan Hospital, regarding: Response



to the letter requesting assistance in explaining the condition and requesting David Ozora's medical records, in essence stating that the patient is experiencing amnesia, so that the patient cannot remember the events that happened to him in connection with the alleged crime of violence.

The actions of Defendant Mario Dandy constitute a crime regulated and punishable by Article 355 paragraph (1) of the Criminal Code in conjunction with Article 55 paragraph (1) section 1 of the Criminal Code. As per the primary indictment, the elements are:

1. Serious assault;
2. Committed with prior planning;
3. Committing, Ordering, or Participating in Committing

Considering, that furthermore in his/her demands, the Public Prosecutor has requested that the Defendant be burdened with paying restitution according to the calculations of the LPSK (Witness and Victim Protection Agency) along with the attached evidence as follows; Charge the Defendant Mario Dandy, Witness Shane Lukas Rotua Pangondian Lumbantoruan alias Shane, and the Child of Witness AGH (each in a separate case file) together in a balanced manner with the adjust the role and level of fault that resulted in the emergence of losses to pay restitution to the Child of the victim Crystalino David Ozora Als Wareng in the amount of Rp 120,388,911,030.00 (one hundred twenty billion three hundred and eighty eight million Nine hundred and eleven thousand and thirty rupiah) with the provision that if the Defendant is unable to pay, it will be replaced with a prison sentence of 7 (seven) years.

That the Defendant's Legal Counsel rejects the LPSK Restitution Calculation because it was not made based on applicable laws and regulations, where the loss suffered as a result of the crime is Rp. 118,104,480,000,- (one hundred and eighty billion and one hundred and four million and four hundred and eighty thousand rupiah). The calculation is based on and refers to the projected medical recovery costs to be paid by Mayapada Hospital, which amounts to Rp 2,187,120,000.00 per month multiplied by the 54-year life expectancy of the Jakarta Province in 2022, which is 71 years minus 17 years (the victim's age). This calculation is certainly unacceptable.

Considering, that, after considering the calculation of restitution as calculated by the Witness and Victim Protection Agency (LPSK) in LPSK Letter No. R-1307/5.1 HSPP/LPSK/04/2023 dated April 4, 2023, the amount is Rp. 120,388,911,030.00 (one hundred twenty billion three hundred eighty eight million nine hundred eleven thousand thirty rupiah) based on:

1. Compensation for Loss of Property;
2. Reimbursement for Medical and/or Psychological Treatment Costs;
3. Compensation for Suffering as a Result of a Criminal Act.

Considering, that after carefully examining the basis for calculating the amount of LPSK's calculations, it was discovered that several items should not be included in the amount of restitution, including the Compensation for Loss of Wealth for transportation and consumption, specifically consumption is calculated at Rp. 30,000 x 3 meals x 3 people (father, mother and child) = Rp. 270,000/day x 41 days = Rp. 11,070,000,- even though it is reasonable to calculate 1 meal at Rp. 30,000,- it is not appropriate if David's child is also included in the calculation, isn't the child being cared for so that it should be Rp. 180,000,- x 2 people (mother and father) = Rp. 180,000,- x 41 days = Rp. 7,380,000,- (seven million three hundred and eighty thousand rupiah).

Considering, that regarding the reduced income of parents, it is certainly not appropriate to include it in the compensation related to the loss of David's wealth, it is true that David experienced such a state of injury, but it cannot be used as a reason for his parents to lose their



income, likewise the details of the accommodation that includes the down payment and the deposit of the house certainly whether or not there is an event related to David, the down payment and the deposit of the house are still needed. Considering, that from the projected cost of medical recovery from Mayapada Hospital is Rp. Rp. 182,260,000.00 per month multiplied by 12 months (1 year) it becomes Rp. 2,187,120,000.00, where the LPSK continues because the life expectancy of DKI Jakarta residents is 71 years, then considering the victim's child's age is 17 years, the number 54 (fifty four) is found which comes from subtracting 71 (seventy one) life expectancy minus 17 (David's age); then Rp. 2,187,120,000.00, multiplied by 54 (five hundred and four) so that it is obtained Rp. 118,104,480,000.00. (one hundred eighteen billion one hundred and four million four hundred and eighty thousand rupiah) the value of Compensation for Suffering as a Result of a Criminal Act. Considering that the Majelis has agreed with the Law Advisory Team, it is clear that the calculation that has been made cannot be accepted, because the calculation of compensation for suffering as a result of a criminal act cannot be just calculated from the projection of medical recovery costs from the Maya Hospital during the month of the examination and directly multiplied by 54 (fifty four) which were deducted from deductions. 71 (seventy one) The life expectancy is reduced by 17 (David), because it is not possible that the need for care costs for the victim's child can be guaranteed to be the same amount as 54 (five hundred four) years ahead.

Considering, that for that reason, the Council will determine the amount of compensation for loss of wealth that is deemed appropriate and proper for David to receive. Considering, that therefore, the amount of David's right to receive compensation for loss of wealth for 1 year 2022 is:

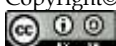
- a) Compensation for loss of wealth; Payment for Home, Home, Office and Home JS Luwansa Rp. 9,108,900,-
- b) Reimbursement of Medical and/or Psychological Treatment Costs; Action Steam cell ell Rp. 425,045,000,-
- c) Compensate for losses due to suffering as a result of a criminal act. Guaranteed care and recovery of the victim's child Rp. 12,000,000,000,- Guarantee for the maintenance of life needs Rp. 12,000,000,000,-
- d) Other losses suffered by the victim as a result of the crime, including basic transportation costs, attorney fees, or other costs related to the legal proceedings. Transportation Rp. 6,818,000,- Indemnity Rp. 7,380,000,- Indemnity Rp. 700,000,000,-

Total damages Rp. 25,140,161,900,- (twenty-five billion one hundred forty million one hundred sixty-one nine hundred rupiah).

Considering, that the next step is to consider whether the amount of the rent that is David's right can be replaced with imprisonment if it is not paid as stated in the General Provisions. Considering, that as it is known, restitution is compensation for losses given to the victim or victim or the victim or the victim or the victim or the victim or the victim or victim of the crime number 1. In 2022, the victims' rights will be covered by 3 things;

- a) compensate losses for loss of wealth and/or income;
- b) Compensation for losses, both material and immaterial, resulting from suffering directly related to the crime;
- c) Compensation for medical and/or psychiatric care costs; and/or other losses suffered by the victim as a result of the crime, including basic transportation costs, attorney fees, or other costs related to the legal process.

Considering, that considering the compensation given above, it can be understood that the compensation is not only a real loss that can be given to the victim but also compensation for both material and personal losses, which are caused by suffering that is



directly related to the result of the criminal act. Considering, that even though money is not everything, in the case that befell David, it is unfair if the compensation which is David's right, is replaced with a prison sentence if it is not paid by the Defendant, or replaced with a prison sentence as conveyed by expert DR Jamin Ginting SH.,MH.,MKn., considering that replacing compensation with a prison sentence or a prison sentence will eliminate and close David's right to receive compensation. losses, especially in the civil law field, so the public prosecutor's statement about substituting restitution for imprisonment is inappropriate.

Considering, therefore, that the amount of restitution imposed on the defendant, which is David's right if the defendant is unable to pay, remains with the defendant and does not preclude the possibility that the defendant will be able to settle it at some point. Likewise, for David, this restitution does not preclude the possibility of filing a new civil lawsuit if other costs arise beyond those stipulated in the restitution in question at a later date (see Article 9 letter b of Supreme Court Regulation No. 1 of 2022).

Protective legal protection (prevention) means to prevent the occurrence of acts of violence against children through the provisions of laws and policies which is anticipatory in nature. In this particular case, the importance of preventive protection can be seen in: Law Number 35 of 2014 concerning Child Protection, which requires the state, families, and communities to protect children from violence, discrimination, and abuse; Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (SPPA), which regulates the rights of child victims to receive special treatment and legal assistance; and socialization programs and public education to improve Raising awareness of the dangers of child abuse.

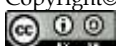
However, this case also demonstrates that preventive protection has not been optimally implemented, as the abuse committed by the defendant occurred blatantly and was recorded, but could not have been prevented in the first place. Reparative Legal Protection (Law Enforcement and Restoration of Victims' Rights) is a form of protection carried out after a crime has occurred, with the aim of punishing the perpetrator and restoring the victim's condition.

In the Nio decision. 297/Pid.B/2023/PN Jkt.Sel, a form of comprehensive protection for children who are victims of abuse including: firstly, providing criminal sanctions to the perpetrator, the defendant was sentenced to 12 years Imprisonment is based on the consideration that the abuse was carried out sadistically, premeditated and caused serious injuries. Next, the panel of judges tried to balance the condition of the victim as a child who was entitled to special protection. Second, restitution, where the judge ordered the defendant to pay Rp 25 billion to the victim as compensation for physical and psychological losses and long-term medical expenses. Third, this restitution complies with Article 7A of Law No. 31 of 2014 concerning Witness and Victim Protection.

Regarding the special consideration of the best interests of the child, the judge explicitly stated that the primary consideration is the protection and rehabilitation of the victim, a child who has been severely affected medically and psychologically. This is an application of the principle of the best interests of the child as stipulated in the Convention on the Rights of the Child, which Indonesia has also ratified.

Although restitution has been stipulated in the verdict, its implementation faces challenges: There is no clear provision regarding the deadline for restitution, there are no strict sanctions for perpetrators who do not pay, and the restitution enforcement mechanism is not yet effective in the field. This indicates that although legal protection is available, its implementation still faces structural and technical obstacles, especially in guaranteeing the rights of victims comprehensively.

Evaluation of Restitution Fulfillment A study from a victimology perspective shows



that the implementation of restitution in this decision is not optimal. There is not an even distribution of physical and mental health recovery, as well as adequate assistance during and after the trial. This means that there is still a gap between the legal certainty of restitution and its implementation in the field. Impact on Law Enforcement, namely a deterrent and preventive effect: The panel of judges imposed strict sanctions according to the severity of the crime, emphasizing that cases of serious child abuse receive serious treatment.

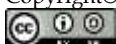
Recommendations for Improvement: Comprehensive implementation of restitution: not only medical, but also psychological & rehabilitation, accompanied by monitoring of implementation by the authorities. And strengthening the involvement of companions: special companions (psychologists, PP-PA, LPSK) are required to accompany victims at every stage of the trial. Also Institutional Coordination: synergy between the court, prosecutor's office, LPSK, social services, and child protection agencies so that restitution and companionship run effectively. And public socialization of decisions: to increase awareness of victims' rights and strengthen the legal system's bias towards children as the most vulnerable party. Make Case Study No. 297 as a benchmark where this decision offers a blueprint for fair law enforcement for child victims of serious abuse: Determination of the crime of serious abuse through articles of the Criminal Code and the Child Law, Restitution and assistance mechanisms should be able to be examples of pro-victim policies, Systemic encouragement is needed so that law enforcement does not stop at the verdict, but continues to real implementation in the victim's life.

In conclusion, the South Jakarta District Court Decision No. 297/Pid.B/2023 fulfills the formal legal requirements for child protection, from the recognition of a serious crime to the decision to restitution. However, the main challenge lies in how restitution and assistance are fully implemented in accordance with the principles of children's rights. Legal protection for child victims in this case has been implemented through the imposition of criminal sanctions and restitution as a form of reparation. However, improvements are needed in the execution of restitution, strengthening implementing regulations, and oversight of the judicial system to ensure the rights of child victims are fully protected.

The underlying reasons why this case occurred are: Jealousy and uncontrolled emotions were the immediate triggers. Mario Dandy displayed arrogant and impulsive behavior, feeling entitled to "punish" the victim. A lack of self-control and empathy exacerbated the violent act. A culture of power and social privilege (child of an official, high economic status) can foster a sense of superiority. Parenting patterns that may lack discipline and foster weak moral character. A lack of instilling the values of responsibility, empathy, and respect for others. The influence of a peer group that supports aggressive behavior and disrespect for the law. Prior to this case, there was a public perception that children of officials often escape justice, leading the perpetrator to feel immune. This case then sparked a major social backlash as the public demanded justice and transparency in law enforcement.

The abuse of David Ozora could have been caused by a combination of personal factors (emotions and ego), social factors (status and environmental influences), and weak moral values and self-control. This case also reflects broader issues, namely the abuse of social privilege, moral degradation among young people, and the challenges of upholding social justice.

This case has been made into a film and will soon be released in December 2025 with the title *Ozora* which will be shown as an inspiring spectacle that presents important learning values for society, especially the young generation of Indonesia, so that they are more familiar with the meaning of empathy, friendship, humanity, kinship and the spirit of never giving up, which will later make the young generation of Indonesia more caring individuals, not



inflating their egos and solving all problems with a calm heart and a peaceful mind.

Conclusion

The South Jakarta District Court's decision No. 297/Pid.B/2023/PN Jkt.Sel against defendant Mario Dandy Satriyo reflects legal protection efforts for children as victims of serious abuse. In this case, the victim, a minor, experienced physical violence that resulted in serious injuries and long-term trauma. The court sentenced the defendant to 12 years in prison and ordered restitution of Rp 25 billion to restore the victim's rights. This demonstrates that Indonesian law, particularly the Child Protection Law and the Criminal Code, provides for the protection and restitution of child victims of serious crimes. However, in practice, legal gaps remain in the restitution implementation mechanism, such as a lack of clarity regarding the payment period, sanctions for non-payment, and the restitution enforcement mechanism. This has the potential to reduce the effectiveness of legal protection for victims. Therefore, although this decision has given hope to victims and the community for justice and child protection, there is a need to strengthen regulations for implementing restitution, as well as more consistent law enforcement that favors victims, especially children who are vulnerable to violence and serious abuse.

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