

VICTIM-CENTERED CRIMINAL POLICY IN ADDRESSING SEXUAL VIOLENCE IN ISLAMIC BOARDING SCHOOLS: ANALYSIS OF DECISION NUMBER 242/PID.SUS/2024/PN MKD

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Abstract

Sexual violence in Islamic boarding schools presents distinctive challenges because perpetrators may exploit institutional authority, religious legitimacy, and victims' dependence to facilitate repeated abuse and suppress disclosure. This study examines the judicial application of Indonesia's Law Number 12 of 2022 on Sexual Violence Crimes in Decision Number 242/Pid.Sus/2024/PN Mkd and evaluates whether the judgment reflects a victim-centered criminal policy. This doctrinal legal research employs statutory, case, and conceptual approaches. Legal materials are analyzed through grammatical, systematic, and teleological interpretation using four indicators: accuracy of offense construction, recognition of power relations, proportionality of sentencing, and fulfillment of victims' rights. The study finds that applying Article 6(c) in conjunction with Article 15(1) recognizes the abuse of religious and institutional authority, the vulnerability and dependence of female students, repeated conduct, and multiple victims. The sentence and restitution order demonstrate an emerging victim-oriented approach. Nevertheless, the judgment alone does not establish whether restitution and psychological and social recovery were effectively implemented. The study proposes an integrated criminal policy combining judicial accountability, victim recovery, institutional complaint mechanisms, and state supervision of Islamic boarding schools.

Keywords: criminal policy; Islamic boarding school; power relations; sexual violence; victim protection

INTRODUCTION

Sexual violence is not merely conduct contrary to morality; it constitutes a violation of bodily integrity, sexual autonomy, human dignity, personal security, and the right to education. Its consequences may include physical injury, psychological trauma, disruption of education, social stigma, and loss of trust in institutions. Indonesia responded to longstanding regulatory fragmentation by enacting Law Number 12 of 2022 on Sexual Violence Crimes (the TPKS Law). The statute combines criminalization with procedural protection and rights to handling, protection, and recovery, thereby shifting the legal response from an offender-centered model toward a more comprehensive victim-oriented framework (Government of Indonesia, 2022; Nurisman, 2022).

Educational institutions present particular risks when authority is highly hierarchical. Students may depend on educators for assessment, accommodation, discipline, religious guidance, and access to future opportunities. In residential religious education, these relationships can become more complex because institutional authority may overlap with spiritual legitimacy and everyday control over students' lives. Such inequality does not imply that Islamic boarding schools are inherently unsafe. Rather, it demonstrates why abuse can remain concealed when an individual exploits trust, obedience, and limited external supervision. Fuadi et al. (2024) identify unequal power relations, restricted reporting channels, and insufficient institutional monitoring as important factors in preventing and responding to sexual violence in pesantren.

Available reporting data reinforce the urgency of examining this institutional context carefully. Komnas Perempuan recorded 97 complaints of sexual violence in educational settings during 2020–2024. Seventeen complaints, or 17.52%, concerned Islamic boarding schools or Islamic religious educational institutions. Sexual violence represented 83.62% of reported gender-based violence in educational settings, while teachers, lecturers, ustadz, and caregivers were among the reported perpetrators (Komnas Perempuan, 2025). These figures describe

documented complaints rather than prevalence and must therefore be read as minimum indications. Underreporting remains likely because victims may experience threats, loyalty pressures, stigma, fear of damaging an institution's reputation, and dependence on the perpetrator or institution (Komnas Perempuan, 2026).

Decision Number 242/Pid.Sus/2024/PN Mkd provides a significant case for evaluating the judicial application of the TPKS Law. The defendant was a leader, caregiver, and educator in an Islamic boarding school in Magelang. The decision recorded sexual conduct against four female students over an extended period. The victims were santri dalem, meaning that they studied in the institution while also assisting in the defendant's household. According to the findings summarized in the judgment, the defendant invoked religious obedience and demanded absolute compliance, including claims that disobedience could cause students to lose knowledge or become mentally disturbed. The District Court applied Article 6(c) in conjunction with Article 15(1)(b), (c), and (e), sentenced the defendant to fifteen years' imprisonment, and ordered restitution of approximately IDR 240 million for the four victims (Mungkid District Court, 2025; Directorate General of General Courts, 2025).

The case is important because Article 6(c) does not require the court to understand coercion only as physical force. It addresses sexual conduct produced through abuse of position, authority, trust, influence, vulnerability, inequality, or dependence. Consequently, the quality of judicial reasoning depends on whether the court can translate institutional and spiritual authority into legally relevant power relations. Merely citing the TPKS Law does not by itself prove that criminal policy has succeeded. The decision must also be evaluated for its construction of the offense, treatment of aggravating circumstances, proportionality of punishment, restitution, and attention to victims' rights.

Previous studies have examined the implementation of the TPKS Law, unequal power relations in pesantren, institutional prevention, and restitution for victims (Fuadi et al., 2024; Madyana & Faozi, 2023; Winarno et al., 2025; Yosaliza et al., 2025). However, limited research has examined how a court translates spiritual and institutional authority into the elements of Article 6(c) and whether a resulting judgment simultaneously advances punishment, restitution, and victim recovery. This study fills that gap by using four evaluative dimensions: legal accuracy, recognition of power relations, sentencing proportionality, and fulfillment of victims' rights. It asks: (1) how did the court construct and apply the elements of power-based sexual violence under Article 6(c) in conjunction with Article 15(1) of the TPKS Law; and (2) to what extent did the judgment reflect a victim-centered criminal policy through proportional punishment, restitution, protection, and recovery?

LITERATURE REVIEW

Criminal Policy and the Judicial Application Stage

Criminal policy is the rational organization of social responses to crime. Within Indonesian criminal-law scholarship, it is commonly divided into formulation, application, and execution. Formulation concerns legislative choices about prohibited conduct and sanctions; application concerns the work of investigators, prosecutors, and courts in applying those rules to concrete cases; and execution concerns the implementation of a final sentence (Arief, 2010; Kenedi, 2017). The stages are interdependent. A progressive statute may fail if law-enforcement institutions interpret it narrowly, while a well-reasoned judgment may remain ineffective when restitution, protection, or recovery is not executed.

Because the primary material in this study is a court judgment, the analysis is limited to the judicial component of the application stage. A judgment can reveal the indictment, evidence summarized by the court, proven facts, legal elements, defenses, sentencing considerations, and operative orders. It cannot independently establish every action taken by investigators, the quality of victim assistance outside court, or post-judgment recovery. This limitation is methodologically important: conclusions about implementation must not exceed what the judgment and verified supporting documents demonstrate.

Victim-Centered Criminal Justice

A victim-centered approach treats victims as rights holders rather than merely sources of evidence. It requires accessible reporting, safety, confidentiality, respectful participation, protection against retaliation and revictimization, compensation for losses, and physical, psychological, and social recovery. The TPKS Law reflects this approach by regulating handling, protection, and recovery and by recognizing restitution as compensation for losses arising from sexual violence. Articles 66–70 organize victims' rights, while Article 16 requires judges to determine restitution for sexual violence offenses punishable by four years or more, subject to the statutory scheme (Government of Indonesia, 2022). Restitution must be distinguished from a criminal fine. A fine is a penal payment to the state; restitution is directed to victims to compensate legally recognized losses. Indonesian scholarship has emphasized that restitution can contribute to recovery but may be undermined by inconsistent calculation and

enforcement (Madyana & Faozi, 2023; Yosaliza et al., 2025). The Supreme Court’s Regulation Number 1 of 2022 supplies procedural guidance for restitution applications. A victim-centered analysis must therefore examine not only whether restitution appears in the operative order, but also its calculation, enforceability, and relationship to broader recovery.

Power Relations in Islamic Boarding Schools

Power relations in pesantren can operate through institutional position, educational dependence, residential control, gender and age inequality, and spiritual authority. Spiritual authority is especially relevant when obedience to a religious figure is presented as a condition for receiving knowledge, blessing, or personal safety. In such situations, apparent compliance cannot automatically be treated as free consent. It may result from fear, manipulation, dependency, or a belief that refusing the authority will produce spiritual or educational consequences.

Research on pesantren has identified the importance of external oversight, accessible complaint mechanisms, gender-sensitive education, and institutional rules that prevent the concentration of unchecked authority (Fuadi et al., 2024; Winarno et al., 2025). Komnas Perempuan similarly identifies patronage, institutional reputation, a culture of silence, and spiritualized obedience as factors that obstruct disclosure and access to justice (Komnas Perempuan, 2025, 2026). These findings support an analysis that connects individual criminal responsibility with institutional prevention without stigmatizing religious education as a whole.

Table 1 Victim-Centered Judicial Criminal Policy Indicators

Dimension	Indicators	Function in this study
Legal accuracy	Appropriate offense, interpretation, and proof of legal elements	Tests the application of Article 6(c)
Power relations	Institutional, educational, residential, spiritual, gender, and age-based power	Assesses the court’s recognition of non-physical coercion
Sentencing proportionality	Repetition, multiple victims, abuse of authority, harm, and aggravation	Evaluates the fifteen-year sentence
Victims’ rights	Protection, restitution, participation, recovery, and non-revictimization	Evaluates the victim-centered quality of the judgment

METHOD

This study is doctrinal legal research using statutory, case, and conceptual approaches. The statutory approach examines Law Number 12 of 2022 on Sexual Violence Crimes, Law Number 18 of 2019 on Islamic Boarding Schools, the applicable child-protection and witness-protection framework, Minister of Religious Affairs Regulation Number 73 of 2022, and Supreme Court Regulation Number 1 of 2022. The case approach centers on Decision Number 242/Pid.Sus/2024/PN Mkd. The conceptual approach employs criminal policy, victim-centered justice, and power-relations perspectives.

The decision was purposively selected because it is an early application of Article 6(c) and Article 15(1) of the TPKS Law to repeated sexual violence committed by a pesantren authority against multiple female students. Units of analysis include the indictment, proven facts, evidence described in the judgment, the construction of Article 6(c), aggravating circumstances under Article 15(1), sentencing considerations, restitution, and references to victims’ rights. Primary legal materials consist of statutes, regulations, and the judgment; secondary materials include journal articles and official reports. Materials are analyzed through grammatical, systematic, and teleological interpretation. The analysis does not independently verify confidential victim-service records or post-judgment recovery and therefore treats such matters as limitations rather than established failures.

RESULTS AND DISCUSSION

Case Characteristics and Judicial Construction

The case involved a defendant who occupied overlapping roles as pesantren leader, caregiver, educator, and religious authority. The four victims were female students who also assisted in the defendant’s household. The court’s factual findings described conduct occurring from December 2022 to March 2024 and repeated more than thirty times in different forms. This temporal pattern is legally and socially important. It indicates not an isolated encounter but repeated access made possible by the defendant’s position and the victims’ continued dependence

within the institution. The reported mode of control was also central. The defendant promoted taqlid-like absolute obedience and connected compliance with religious or spiritual consequences, including losing knowledge or becoming mentally disturbed. The relevant coercion was therefore not limited to physical violence. It operated through a combination of spiritual influence, educational dependence, household access, and institutional hierarchy. The victims' status as santri dalem increased proximity to the defendant while reducing the practical space for refusal and disclosure.

The prosecutor used an alternative indictment, and the court selected the first alternative based on Article 6(c) in conjunction with Article 15(1)(b), (c), and (e) of the TPKS Law. The prosecution sought thirteen years' imprisonment and restitution calculated for each victim: IDR 87,480,000 for ZM, IDR 87,480,000 for HA, IDR 58,601,000 for SU, and IDR 56,904,000 for SK. The court ultimately imposed fifteen years' imprisonment and ordered restitution stated publicly as approximately IDR 240 million. All victim initials are retained only as anonymized identifiers used in public reporting; the article does not disclose identifying personal information (Directorate General of General Courts, 2025).

Table 2 Judicial Construction of the Case

Component	Judicial material	Analytical significance
Defendant's position	Pesantren leader, caregiver, educator, and religious authority	Multiple sources of institutional and spiritual power
Victims	Four female santri dalem	Educational, residential, and relational dependence
Pattern	Repeated conduct over more than one year	Supports repetition and opportunity created by authority
Legal basis	Article 6(c) in conjunction with Article 15(1)(b), (c), and (e)	Power-based sexual violence with aggravating circumstances
Outcome	Fifteen years' imprisonment and restitution	Combines punishment with a compensatory order

Application of Article 6(c) and Recognition of Power Relations

Article 6(c) criminalizes conduct in which a person abuses position, authority, trust, or influence arising from deception or a relationship of circumstances, or exploits another person's vulnerability, inequality, or dependence, to compel or deceptively move that person to engage in or allow intercourse or an indecent act. The provision is especially suitable for sexual violence in hierarchical institutions because it recognizes coercive environments that do not always involve visible force. Its elements must nevertheless be proven specifically rather than inferred solely from the defendant's status.

The first element, 'any person,' was satisfied by the defendant as an individual capable of criminal responsibility. More substantively, the abuse-of-position element was supported by his leadership and educational roles. The court could connect those roles to the victims' expectation that he would provide religious education and care. Authority was not incidental to the offense; it structured access to the victims and amplified the credibility of his commands. The elements concerning vulnerability, inequality, and dependence were reflected in the victims' status as female students residing and working within the defendant's environment. Their dependence was multidimensional: educational because the defendant controlled instruction; residential because the events occurred within the institutional and household sphere; social because disclosure could affect their standing in the community; and spiritual because obedience was framed as a religious necessity. The interaction of these factors is more probative than any single status category.

The coercion or deception element was linked to the defendant's doctrine of absolute obedience and the threatened spiritual or psychological consequences of refusal. This reasoning is important because it avoids equating the absence of physical resistance with consent. In a relationship marked by authority and dependency, submission can be produced through manipulation and fear. A stronger judgment would articulate this distinction expressly: obedience to a religious teacher is not consent to sexual conduct, and compliance generated by abuse of influence cannot be treated as a free and voluntary choice. Article 15(1) permits an additional one-third punishment when specified aggravating circumstances are present. The court relied on paragraphs (b), (c), and (e), reflecting the defendant's professional or educational role, custodial or entrusted relationship, and repeated conduct or multiple victims. The facts supported cumulative seriousness: the offender was expected to protect and educate, the victims were entrusted to the institutional environment, and the conduct was repeated against four persons. These features

explain why the offense was not adequately characterized as ordinary physical sexual harassment detached from its institutional context.

Table 3 Application of Article 6(c) of the TPKS Law

Legal element	Relevant facts	Assessment
Any person	Adult defendant occupying leadership and educational roles	Formally satisfied
Abuse of position, authority, trust, or influence	Pesantren leadership, religious legitimacy, and educational trust	Authority facilitated access and compliance
Vulnerability, inequality, or dependence	Female santri dalem living and studying under the defendant's influence	Dependence was educational, residential, social, and spiritual
Compulsion or deception	Absolute-obedience doctrine and threatened consequences of refusal	Supports non-physical coercion and manipulated compliance
Sexual act	Repeated conduct established through testimony and facts accepted by the court	Must remain connected to evidence for each victim and occurrence

Victim-Centered Assessment of Punishment and Restitution

The fifteen-year sentence must be evaluated through proportionality rather than through severity alone. The base offense under Article 6(c) carries imprisonment of up to twelve years and/or a fine of up to IDR 300 million, while Article 15(1) permits a one-third increase. The sentence therefore remained within the aggravated statutory range. Its justification was supported by repeated conduct, four victims, abuse of educational and religious trust, and harm to the victims' futures. The aggravation expressed more than general condemnation: it reflected the increased culpability of a person who used a protective and educational position as an instrument of abuse. Some sentencing considerations reported in the original draft emphasized damage to the reputation of ulama, students, and pesantren. Institutional reputation may explain broader social harm, but it should not displace the victims as the central subjects of justice. The most persuasive aggravating considerations are the victims' suffering, repeated victimization, abuse of trust, obstruction of free choice, and the likelihood that authority suppressed earlier disclosure. A victim-centered judgment should make these harms more prominent than damage to the image of an institution.

The restitution order was a significant feature of the decision. Restitution is not a criminal fine: it is compensation owed to victims for recognized losses, whereas a fine is paid to the state. By ordering restitution for all four victims, the court acknowledged that sexual violence causes material and immaterial consequences beyond the offense itself. The prosecution's itemized amounts also indicate an attempt to individualize losses instead of treating the victims as a homogeneous group. Nevertheless, an order on paper is not identical to effective recovery. Restitution practice in Indonesia faces questions about calculation, payment, substitute sanctions, seizure of assets, and coordination with the Witness and Victim Protection Agency and prosecutors (Madyana & Faozi, 2023; Yosaliza et al., 2025). Supreme Court research has also cautioned that restitution cannot simply be equated with a fine and automatically replaced by imprisonment when unpaid (Directorate General of General Courts, 2025b). The decision's contribution should therefore be described as recognition of the right to restitution, while actual fulfillment requires verification at the execution stage.

The TPKS Law's victim-centered orientation extends beyond restitution. Articles 66–70 guarantee rights to handling, protection, and recovery. These may include information, legal assistance, medical and psychological services, protection from threats, confidentiality, social rehabilitation, and reintegration. The absence of detailed recovery instructions in the judgment does not prove that the victims received no services; courts do not necessarily administer every component of recovery. It does, however, show that the judgment alone cannot establish whether recovery was continuous, adequately funded, and responsive to each victim's needs. That question requires empirical follow-up with authorized institutions and strict protection of victim confidentiality.

Integrated Criminal Policy for Safe Islamic Boarding Schools

The case demonstrates that individual prosecution is necessary but insufficient. A criminal judgment addresses responsibility after harm has occurred, whereas effective criminal policy also requires prevention and institutional

accountability. Law Number 18 of 2019 recognizes pesantren as institutions performing educational, religious-propagation, and community-empowerment functions. These public-facing functions support an obligation to maintain safe learning environments. Minister of Religious Affairs Regulation Number 73 of 2022 further provides a framework for preventing and responding to sexual violence in educational units under the Ministry of Religious Affairs.

Komnas Perempuan has recommended stronger internal accountability, independent reporting channels, sanctions for institutions that neglect prevention or protect perpetrators, periodic supervision, and integration of safeguarding into licensing and accreditation. The Ministry of Religious Affairs has also developed prevention teams and strengthened pesantren governance. These measures should respect pesantren’s educational character while ensuring that institutional autonomy does not become immunity from oversight (Komnas Perempuan, 2025, 2026; Ministry of Religious Affairs, 2025).

An integrated model should operate at four levels. First, judicial policy must apply the TPKS Law consistently, recognize spiritual and institutional power, avoid victim-blaming, impose proportionate punishment, and determine restitution. Second, victim services must provide independent assistance, risk assessment, confidentiality, medical and psychological care, education continuity, and restitution enforcement. Third, pesantren governance must establish safeguarding codes, accessible complaint channels outside the perpetrator’s chain of command, screening and training, and procedures for immediate protection. Fourth, state supervision must connect compliance to registration, accreditation, periodic evaluation, and enforceable administrative consequences.

Table 4 Integrated Criminal Policy for Preventing Sexual Violence in Pesantren

Policy level	Core measures	Expected contribution
Judicial	Accurate TPKS application; recognition of spiritual power; proportional punishment; restitution	Accountability and legal certainty
Victim protection	Independent assistance; confidentiality; recovery; education continuity; restitution enforcement	Safety, agency, and sustainable recovery
Institutional governance	Safeguarding code; external complaint channel; prevention unit; sanctions for concealment	Early detection and non-recurrence
State supervision	Licensing and accreditation standards; periodic monitoring; inter-agency coordination	Institutional accountability without stigmatizing pesantren

CONCLUSION

Decision Number 242/Pid.Sus/2024/PN Mkd represents an important judicial application of Article 6(c) in conjunction with Article 15(1) of the TPKS Law. The facts allowed the court to connect sexual conduct with abuse of religious and institutional authority, the victims’ educational and residential dependence, manipulated obedience, repeated conduct, and multiple victims. The case confirms that coercion in sexual violence need not be reduced to physical force. Nevertheless, judicial reasoning should expressly distinguish religious obedience from freely given sexual consent and should place harm to victims above institutional reputation in sentencing analysis.

The fifteen-year sentence and restitution order indicate movement toward a victim-centered criminal policy, but they do not by themselves establish full protection and recovery. Restitution must be distinguished from a fine and evaluated through its calculation and execution, while psychological and social recovery requires coordinated services beyond the criminal judgment. Effective policy must therefore integrate judicial accountability, victims’ rights, independent institutional safeguarding, and state supervision. Future empirical research should examine the actual execution of restitution and recovery services without exposing victim identities or confidential records.

REFERENCES

- Arief, B. N. (2010). Bunga rampai kebijakan hukum pidana. Kencana.
- Directorate General of General Courts. (2025a, February 4). Terbukti lecehkan 4 santriwati, pimpinan pondok pesantren diganjar 15 tahun penjara. Dandapala. <https://dandapala.com/article/detail/terbukti-lecehkan-4-santriwati-pimpinan-pondok-pesantren-diganjar-15-tahun-penjara>
- Directorate General of General Courts. (2025b, October 18). Menggali penerapan restitusi pasca PERMA 1/2022. Dandapala. <https://dandapala.com/article/detail/menggali-penerapan-restitusi-pasca-perma-12022>
- Fuadi, M. A., Rosyadi, M. H., Marintan, M. A., Mahanani, Q. F. I., & Aslambik, M. (2024). Prevention effort of sexual violence from power inequality relations in Islamic boarding schools in Indonesia. *Harmoni*, 23(1), 1–17. <https://doi.org/10.32488/harmoni.v23i1.720>
- Government of Indonesia. (2019). Law Number 18 of 2019 on Islamic Boarding Schools.
- Government of Indonesia. (2022). Law Number 12 of 2022 on Sexual Violence Crimes. <https://peraturan.bpk.go.id/Details/207944/uu-no-12-tahun-2022>
- Kenedi, J. (2017). Kebijakan hukum pidana (penal policy) dalam sistem penegakan hukum di Indonesia. Pustaka Pelajar.
- Komnas Perempuan. (2025, October 27). Memastikan ketidakberulangan kekerasan seksual di lembaga pendidikan pesantren. <https://komnasperempuan.go.id/siaran-pers-detail/siaran-pers-komnas-perempuan-memastikan-ketidakberulangan-kekerasan-seksual-di-lembaga-pendidikan-pesantren>
- Komnas Perempuan. (2026, May 9). Darurat kekerasan seksual di pesantren: Santri perempuan datang untuk belajar, bukan untuk menjadi korban. <https://komnasperempuan.go.id/siaran-pers-detail/siaran-pers-komnas-perempuan-darurat-kekerasan-seksual-di-pesantren>
- Madyana, R., & Faozi, S. (2023). Pemulihan korban melalui restitusi bagi korban kekerasan seksual: Studi Putusan Nomor 989/Pid.Sus/2021/PN Bdg. *UNES Law Review*, 6(1), 426–439. <https://doi.org/10.31933/unesrev.v6i1.863>
- Ministry of Religious Affairs. (2022). Minister of Religious Affairs Regulation Number 73 of 2022 on the Prevention and Handling of Sexual Violence in Educational Units under the Ministry of Religious Affairs.
- Ministry of Religious Affairs. (2025, October 28). Kemenag bentuk satgas pencegahan kekerasan di pesantren: Apa tugasnya? <https://kemenag.go.id/nasional/kemenag-bentuk-satgas-pencegahan-kekerasan-di-pesantren-apa-tugasnya-LHjLx>
- Mungskid District Court. (2025). Decision Number 242/Pid.Sus/2024/PN Mkd. Supreme Court Decision Directory. <https://putusan3.mahkamahagung.go.id/>
- Nurisman, E. (2022). Risalah tantangan penegakan hukum tindak pidana kekerasan seksual pasca lahirnya Undang-Undang Nomor 12 Tahun 2022. *Jurnal Pembangunan Hukum Indonesia*, 4(2), 170–196. <https://doi.org/10.14710/jphi.v4i2.170-196>
- Ramadianto, A. R., Istiqomah, M., & Aprilianda, N. (2025). Enhancing victim-centered justice through restitution: A proposed model of victim impact statement for child sexual violence cases in Indonesia. *International Journal of Educational Review, Law and Social Sciences*, 5(2). <https://doi.org/10.54443/ijerlas.v5i2.2572>
- Supreme Court of the Republic of Indonesia. (2022). Supreme Court Regulation Number 1 of 2022 on Procedures for Restitution and Compensation Applications for Crime Victims. <https://peraturan.bpk.go.id/Home/Details/209702/perma-no-1-tahun-2022>
- Winarno, E. P., Islah, Giyoto, Suharto, T., & Muharom, F. (2025). Investigasi pendidikan Islam terhadap kuasa otoritas kekerasan seksual di pesantren. *Al Qalam: Jurnal Ilmiah Keagamaan dan Kemasyarakatan*, 19(2), 958–972.
- Yosaliza, M., Fahmi, K., Hasbi, M., & Afwadi. (2025). Implementasi restitusi dalam tindak pidana kekerasan seksual. *Sumbang12 Law Journal*, 3(1). <https://jurnal.umsb.ac.id/index.php/smb12lj/article/view/6382>