

# Criminal Liability of Child Perpetrators of Sexual Offenses: A Study of Decision Number 4/Pid.Sus-Anak/2025/PN Pgp from the Perspective of the Child Criminal Justice System

Riescha Novianda<sup>1</sup>, Abdul Rasyid Saliman<sup>2</sup>, Enny Agustina<sup>3</sup>

<sup>1,2,3</sup>Universitas Pertiba, Pangkal Pinang, Indonesia

Email: [novianda.riescha@yahoo.co.id](mailto:novianda.riescha@yahoo.co.id)

## Abstract

This study examines the criminal responsibility of a child perpetrator of sexual intercourse offenses under Indonesia's juvenile justice system, focusing on the analysis of the District Court of Pangkalpinang Decision Number 4/Pid.Sus-Anak/2025/PN Pgp. The child was sentenced to three months in a Special Child Development Institution and required to participate in a three-month vocational training program. The sentence was conditional, emphasizing rehabilitative and educational approaches. This research aims to assess the alignment of the judicial verdict with the principles of Law Number 11 of 2012 on the Juvenile Criminal Justice System, particularly the application of restorative justice and non-penal approaches for juvenile offenders. Employing normative juridical methods and a case study approach, this paper reveals that the conditional sentence and vocational training illustrate a concrete application of juvenile criminal punishment prioritizing the child's best interests and legal protection. Furthermore, the involvement of legal counsel, social advisors, and the child's parents signifies the practical implementation of restorative justice principles within juvenile court proceedings.

**Keywords:** *Criminal Liability, Child Perpetrators, Sexual Offenses.*



## A. INTRODUCTION

The occurrence of youngsters committing criminal offenses is becoming a significant legal concern, particularly in cases involving sexual crimes such as intercourse (Miller, 2013; Nada, 2023). An example that shows how complicated this issue is is Decision Number 4/Pid.Sus-Anak/2025/PN Pgp, in which a 15-year-old child was found guilty beyond a reasonable doubt of getting another youngster to have sex with them (Wajdi & Arif, 2021). The courts decided that the youngster would serve three months in prison and three months of job training, but only if the child broke the law again during the six-month probationary period (Craissati et al., 2002; Kotanen & Kronstedt, 2019). This case is interesting to study because it has a lot of important parts of child criminal law enforcement, especially when it comes to the type of criminal liability, the ways that the law protects children who break the law (ABH), and the use of the principle of restorative justice (Badenhorst & Conradie, 2008).

The legal difficulties in this case are not just about the crime that was committed but also about how the Indonesian juvenile criminal justice system handles the child's

acts (Simatupang, 2024; Gulo, 2024). The youngster in this case has been convicted of illegal conduct; nonetheless, the child remains at an age that legally necessitates special care (Stroud et al., 2000). This circumstance brings up legal questions concerning what the right, fair, and fairest way to hold child sex offenders accountable is (Malvaso et al., 2020). Does the use of conditional sentences along with employment training programs follow the idea of child protection as set out in Law Number 11 of 2012 about the Child Criminal Justice System?

The juvenile criminal justice system in Indonesia is different from the broader criminal justice system, as is well known. Law No. 11 of 2012 stresses that kids who break the law should be treated differently using a restorative justice approach. This method puts fixing the damage done by the crime ahead of punishing the person who did it. The best way to handle juvenile criminal cases in the context of restorative justice is to involve everyone who is affected, including the offender, the victim, their family, and the community. The goal is to fix broken social ties and stop the child from breaking the law again (Eastwood & Patton, 2002).

In practice, nevertheless, not all court verdicts against child offenders fully embody the idea of restorative justice. In Decision Number 4/Pid.Sus-Anak/2025/PN Pgp, the judge has given a conditional sentence and job training. It is crucial to carefully look into whether the legal reasons stated are in line with the principle of restorative justice as the law meant for it to be (Prima, 2024). Also, the role of community service officers, legal advisors, and family in the legal process is an important part of figuring out if the procedure is really focused on helping the child grow and get well.

The case is getting more complicated because it involves a child committing sexual offenses against another minor. Many people think that sexual violence, including rape, is a crime that has major effects on the victim, both physically and mentally (Santhosh, 2016). When both the culprit and the victim are youngsters, law enforcement, especially judges, has a moral and legal problem: how to make a decision that protects the victim while also respecting the rights of the child who did the crime. Is the decision to punish the kid offender fair and appropriate, given that they are still growing and developing their character?

Conversely, the coaching methodology for juvenile offenders must not overlook the significance of substantive justice for victims. Consequently, examining this case is crucial for evaluating the efficacy of implementing restorative justice ideas in juvenile courts (Nisa & Jaya, 2020). Is the employment training program adequate to fulfill the objectives of punishment concerning children? How do probation officers keep an eye on kids during their probation time, and how well do they help them avoid doing the same things again?

This study is also significant for analyzing the impact of legal advisors and probation officers on the decision-making process and its results. In this case, the youngster was with a team of lawyers from the Public Policy Support Center (PDKP) of Bangka Belitung and a probation officer from the Correctional Center (Bapas). This fact shows that the law is upholding children's entitlement to legal and social help.

However, additional research is needed to find out how beneficial this kind of support is: whether it can help people make more thoughtful decisions about the child's needs or if it is just for administrative purposes.

This research is of academic and practical significance in the context of reforming the juvenile criminal justice system, with a focus on the principle of the best interests of the child. This research can enhance the academic discourse on juvenile criminal law in Indonesia, especially with the imposition of punishments on minors who commit sexual offenses. This research aims to furnish law enforcement officers, policymakers, and child protection agencies with insights for developing more effective, humane, and equitable policies and strategies concerning minors engaged in illegal activities.

Consequently, this study will concentrate on two primary issues: (1) the type of criminal responsibility assigned to juvenile offenders of sexual offenses in Decision Number 4/Pid.Sus-Anak/2025/PN Pgp, and (2) the application of the restorative justice principle within the juvenile criminal justice system as informed by that decision. This research aims to enhance comprehension of child criminal justice procedures and address essential inquiries regarding justice, protection, and rehabilitation of children within the Indonesian legal framework.

## **B. METHOD**

This research employs a statutory and case-based methodology to investigate the criminal liability of juvenile offenders involved in sexual intercourse offenses and the implementation of restorative justice principles within the juvenile justice system, as exemplified by Decision Number 4/Pid.Sus-Anak/2025/PN Pgp. The data sources utilized in this study comprise secondary data, specifically primary legal materials including pertinent legislation such as Law Number 11 of 2012 regarding the Child Criminal Justice System and Law Number 35 of 2014 concerning Child Protection, alongside secondary legal materials consisting of literature, journals, and other official documents, including copies of court rulings. Data collection was performed by library research, and data analysis was executed qualitatively, concentrating on the legal interpretation of relevant legal standards and their implementation in juvenile criminal justice practice.

## **C. RESULTS AND DISCUSSION**

### **1. Analysis of the Form of Criminal Liability for Child Perpetrators of Sexual Intercourse in Decision Number 4/Pid.Sus-Anak/2025/PN Pgp**

Criminal responsibility is a key part of criminal law, and this includes juvenile criminal law. In theory, criminal culpability means that a person can only be punished if it is shown that they committed a crime on purpose and with legal responsibility. Nevertheless, when considering children as offenders of criminal activities, this principle must be interpreted within the context of particular protection as required by numerous national and international legal instruments.

The Pangkalpinang District Court Decision Number 4/Pid.Sus-Anak/2025/PN Pgp is a clear illustration of how youngsters who break the law (ABH) are held criminally responsible, especially when it comes to sex. A 15-year-old kid named Daka Variez Narada, also known as Daka, was found guilty in court of the offense of persuading a minor to have sex with him. The decision gave the youngster a three-month prison sentence and compelled them to go to the Industrial Training Center for three months of employment training. The child was given a conditional prison term, which meant that they wouldn't have to serve it unless they broke the law again during a six-month probationary period.

The judge's use of this type of criminal culpability shows that the law is moving in a more progressive direction that is in the best interests of the child. This is in keeping with the rules in Law Number 11 of 2012 about the Kid Criminal Justice System (Law on Child Criminal Justice), which says that every kid who is in trouble with the law must be treated differently at every step of the court process. One of the fundamental ideas behind the Child Criminal Justice Act is that jail should be the final resort for kids (*ultimum remedium*). If possible, child criminal offenses should be handled using a restorative justice method (Yulianto, 2023).

Rather than promptly imposing a pure prison sentence on the child perpetrator, the judge imposed a conditional sentence that is educational and rehabilitative in this case. This indicates that criminal responsibility for children is not merely perceived as a form of retribution for the criminal acts committed but also as a means of guidance to prevent children from reenacting them in the future. This method is pertinent to the theory of juvenile criminal responsibility, which prioritizes social reintegration and guidance over sheer punishment.

The judge also took into account the child's age, social circumstances, and the presence of legal and social support, including legal counsel from legal assistance institutions and community service officers from the Correctional Center (Bapas). It is crucial to have probation officers present, as judges rely on social research reports (*litmus*) to determine the appropriate ruling for minors. The recommendations of probation officers in numerous juvenile criminal cases act as a convergence point between legal objectives, child protection, and the socio-cultural factors of the child's residence. Consequently, the inclusion of a probation officer in the judicial process for children is not merely a formality; it is a critical component of the contextual and individual framework of criminal accountability for children (Hermawan et al., 2021).

Furthermore, the minor was mandated to participate in a three-month job training program in accordance with the data in the decision. This policy can be interpreted as a form of social reintegration that is designed to provide children with the necessary skills and productivity to enable them to reintegrate into society with a more positive identity. This is a form of constructive criminal accountability in which the legal process is not only focused on resolving past legal issues but also on anticipating the child's future as a member of society.

A more humanistic and pedagogical legal perspective is reflected in this form of criminal responsibility within the framework of the theory of juvenile criminal law

(Prasetyo, 2020). In this perspective, children are not only legal subjects but also vulnerable subjects of development with significant potential for change. Consequently, penal sanctions against children should not be interpreted solely as a form of punishment; they must also be consistent with the principles of social justice, guidance, and protection.

The theory of differentiation in criminal law can also be used to analyze this decision, which underscores the necessity of treating criminal offenders differently based on their individual characteristics and social circumstances. In this context, a juvenile who commits a criminal act is treated differently than an adult perpetrator in terms of the imposition of sanctions and the establishment of guilt. This differentiation is not discriminatory; rather, it is a form of positive affirmation within the legal system that acknowledges the fact that children have not yet completely developed the psychological maturity and legal responsibility of adults.

Nevertheless, the criminal liability of minors, as exemplified by this decision, continues to have legally binding implications (Glasser et al., 2001; Jainah et al., 2021). This implies that the minor is still found guilty and legally responsible for their actions, despite the fact that the sentence imposed is conditional and educational. This demonstrates that the Indonesian legal system, despite allowing for a wide range of non-penal approaches in juvenile cases, still upholds the principles of legal accountability and legality (Derluyn et al., 2015). Consequently, the constitutional constraints are maintained in the equilibrium between child protection and law enforcement.

The concrete application of the principle of proportionality in criminal law is also reflected in the form of criminal liability in this decision, which is the equilibrium between the severity of the sanction and the gravity of the criminal act committed. The judge took into account the fact that the perpetrator was a minor and had never committed a crime before and that the crime was committed within the intricate context of peer relationships in this context. The judge's decision not to impose the utmost sentence, as outlined in Article 81 paragraph (2) of the Child Protection Act, is predicated on these considerations. This decision could potentially result in severe imprisonment for adult perpetrators.

Conversely, the rights of the victim are still taken into account when determining criminal liability for the juvenile perpetrator in this instance. The decision includes the return of the victim's property as a form of minimal restitution. Despite the absence of explicit references to a mediation process or victim involvement in the judicial process (as is intended in restorative justice), this form of criminal accountability still indicates that the judge is still concerned with the restoration of social and moral relationships between the perpetrator and victim. As stipulated in Law Number 35 of 2014 regarding Child Protection, this is consistent with the principle of safeguarding children who have been the victims of illicit activities (Shaqila et al., 2023).

The form of criminal responsibility for minors in Decision Number 4/Pid.Sus-Anak/2025/PN Pgp is indicative of a contextual, progressive, and adaptive model of

responsibility, as a preliminary conclusion from this analysis. In addition to the principle of punishment, judges underscore the significance of guidance, rehabilitation, and social reintegration. This criminal accountability pattern is a tangible example of the national legal system's commitment to child protection, as well as in accordance with the international principles outlined in the Convention on the Rights of the Child. It is worthwhile to preserve and cultivate this type of legal practice in order to establish a juvenile criminal justice system that is not only legalistic but also transformative.

## **2. Analysis of the Application of Restorative Justice Principles in the Child Criminal Justice Process Based on Decision Number 4/Pid.Sus-Anak/2025/PN Pgp**

Restorative justice is a novel approach to the criminal justice system that seeks to reconcile the community, offenders, and victims, all of whom are impacted by the crime, in addition to punishing offenders. The principle of restorative justice is normatively reinforced in the context of juvenile criminal justice by Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (Law on Juvenile Criminal Justice). This law mandates that the resolution of child cases be conducted with a restorative approach whenever feasible, even during the investigation stage. This represents a transition from a retributive justice model to a more humanistic and corrective justice model for minors who are in conflict with the law.

It is imperative to conduct a thorough examination of the implementation of restorative justice principles in the case governed by Decision Number 4/Pid.Sus-Anak/2025/PN Pgp to ascertain the extent to which this approach is genuinely integrated into the judicial process. In that instance, a 15-year-old was convicted of the criminal offense of enticing another minor to engage in sexual intercourse with him. The legal approach employed by the panel of judges appears to prioritize rehabilitation and education over punishment, despite the fact that the act is classified as a severe criminal offense that involves moral violation and has an impact on the victim.

The application of restorative justice principles in this case can be analyzed from a variety of perspectives, including the sentencing model, the function of probation officers, the presence of legal counsel, and the regulation of probation periods. Initially, the judge assigned the child to a three-month labor training program and imposed a three-month prison sentence from the perspective of sanctions. The minor was not to serve the prison sentence unless he or she committed another offense during the six-month probationary period, however. This suggests that the judge was attempting to circumvent direct punishment of the child by implementing a conditional sentence that included educational and productive activities.

This action is consistent with Article 71 of the Child Criminal Justice Act, which stipulates that imprisonment should be the primary form of punishment for children, and if it is unavoidable, it should be the least severe form feasible and include elements of rehabilitation. A form of conditional sentencing that is accompanied by

employment training within the framework of restorative justice demonstrates an orientation toward the empowerment and rehabilitation of the child. Work training is not only a substitute for punishment but also a form of social reintegration that shields children from the stigma of being criminals and provides them with the opportunity to enhance their lives.

Secondly, the community probation officer from the Correctional Center (Bapas) plays a critical role in the implementation of restorative justice in this instance. The Child Criminal Justice Act requires the presence of probation officers at all phases of the child criminal justice process. This includes the supervision and guidance of children while serving their sentence, as well as the provision of social investigation reports (litmus). In this decision, the probation officer not only submitted a report but also assisted the child in court and fulfilled supervisory duties during the 10-month probationary period established by the judge. The presence of probation officers serves as confirmation that the judicial process for children is not solely concerned with the legal processing of the perpetrator (Menajang, 2020). Rather, it is about the development of measured social interventions to ensure that the child comprehends their error and has a viable alternative. Although this ruling does not expressly specify whether a mediation process was conducted, probation officers are involved in the practice of restorative justice by facilitating communication between offenders, victims, and families in order to promote more open and solution-oriented dialogue.

Third, the procedural protection of the rights of minors in conflict with the law is demonstrated by the accompaniment of legal counsel from legal aid institutions (Sahputra, 2020). The presence of legal counsel in the restorative justice system is not solely to assist the child in legal defense but also to guarantee that the legal process is conducted in a fair, transparent, and consistent manner with the principles of child protection. In this instance, the child was accompanied by a legal advisory team from the inception of the process until the trial, indicating a full-scale effort to safeguard the child's interests during the legal proceedings.

Fourth, the six-month probationary period suggests that the judge is allowing the child to exhibit behavioral changes under supervision. In the context of restorative justice, the child's supervision during probation is a critical tool for preventing recidivism and guaranteeing that the child receives ongoing guidance. The probationary period also offers a chance for law enforcement and parents to observe changes in a child's attitude and behavior without the need to send them to a correctional facility, which could potentially impede the rehabilitation process.

However, the decision fails to explicitly address numerous aspects of the ideal implementation of restorative justice principles. Through a diversion procedure that commences during the investigation phase, the Child Criminal Justice Act (UU SPPA) allows for out-of-court settlements. Nevertheless, there is no explanation as to whether or not diversion efforts were implemented in this case. In fact, the Child Criminal Justice Act's Article 7 paragraph (1) explicitly mandates that diversion must be pursued during the investigation, prosecution, and court examination phases of child cases.

The absence of information regarding diversion initiatives prompts inquiries regarding the extent to which restorative justice mechanisms have been implemented in their most comprehensive form. Diversion is a critical component of restorative justice for children, as it is a method of out-of-court settlement that involves the perpetrator, the victim, both families, and other relevant parties in a process of deliberation to achieve a fair and beneficial resolution for all parties. Additionally, the absence of any reference to the victim's mediation or consultation process suggests that restorative justice may only be partially implemented in this instance, with emphasis on the pattern of child rehabilitation and the form of punishment. Ideally, restorative justice entails the restoration of the victim's physical, psychological, and social well-being. In this instance, it appears that the primary objective is not to restore the victim. The perpetrator has not provided any information regarding whether the victim received an apology, restitution, or any other form of accountability.

Victim involvement is essential for the establishment of a fair sense of justice from a comprehensive restorative justice perspective. Restorative justice is not solely concerned with the interests of the perpetrator; it also endeavors to assist the victim in healing from their trauma and to allow them to engage in the case resolution process. The victim's absence from this juvenile justice procedure suggests that the principle of restorative justice has not been fully and comprehensively implemented.

Nevertheless, it is crucial to recognize that the restorative justice approach in juvenile cases is not infallible. The degree of application of this principle can be influenced by a variety of factors, including the nature of the offense, the circumstances of the perpetrator and victim, and the social context. In this instance, the court's decision to continue the case until the verdict stage is comprehensible, as the offense committed was sexual intercourse, which is classified as a severe offense. However, the judge's decision to impose a conditional sentence, establish a period of supervision, and include a work training requirement suggests that the principles of restorative justice continue to be the foundation for consideration.

This decision can be viewed as an illustration of how courts can implement a criminal process that is rehabilitative in nature while still upholding the principle of justice from the perspective of juvenile criminal law reform. The court continues to enforce formal legal procedures; however, the ultimate result is more concerned with the child's future than with punishment as a form of retribution. In juvenile courts, the primary objective of restorative justice is to reconstruct social relationships and rectify the life trajectory of a child who has deviated. In general, the application of restorative justice principles in this decision can be regarded as quite progressive, despite the fact that it does not fully address all restorative elements, particularly victim involvement and the mediation process as part of diversion. Nevertheless, the juvenile criminal justice system is progressing in a more contextual and humane direction as a result of measures such as conditional sentencing, work training, probation, and comprehensive legal assistance.

Therefore, research on this decision indicates that the application of restorative justice principles in juvenile criminal justice practice can manifest in a variety of ways,

including educational and adaptive sentencing patterns, in addition to non-judicial resolutions such as diversion. This demonstrates that child justice in Indonesia has the potential to serve as a tool for guidance, rather than punishment, in accordance with the principles of universal child protection and the Child Protection Law (SPPA).

#### D. CONCLUSION

The form of criminal responsibility for a child who commits sexual intercourse in Decision Number 4/Pid.Sus-Anak/2025/PN Pgp reflects a progressive and educational legal approach, where the judge instead imposes a conditional sentence, a work training program, and supervision during the probationary period, rather than a direct prison sentence. These principles of *ultimum remedium* and the best interests of the child are consistent with this form of accountability in the juvenile justice system. This method demonstrates that the legal system is not exclusively concerned with punishment; it also permits the rehabilitation and social reintegration of juvenile offenders.

The application of restorative justice principles in this case has been partially implemented through probation, work training, and the involvement of probation officers and legal counsel in the judicial process. Despite the absence of explicit references to diversion efforts or direct victim involvement in the case resolution process, the judge's actions still exemplified the spirit of restorative justice, as outlined in Law Number 11 of 2012. This demonstrates that restorative justice can be implemented through sentencing patterns that take into account the aspects of protection, guidance, and social rehabilitation of minors in conflict with the law, in addition to out-of-court settlements.

#### REFERENCES

1. Badenhorst, C., & Conradie, H. (2008). Children's perspectives on crime and the criminal justice system: main findings. *Acta Criminologica: African Journal of Criminology & Victimology*, 21(1), 77-86.
2. Craissati, J., McClurg, G., & Browne, K. (2002). Characteristics of perpetrators of child sexual abuse who have been sexually victimized as children. *Sexual Abuse: A Journal of Research and Treatment*, 14(3), 221-235.
3. Derluyn, I., Vandenhole, W., Parmentier, S., & Mels, C. (2015). Victims and/or perpetrators? Towards an interdisciplinary dialogue on child soldiers. *BMC international health and human rights*, 15(1), 28.
4. Eastwood, C., & Patton, W. (2002). *The experiences of child complainants of sexual abuse in the criminal justice system* (p. 156). Canberra: Criminology Research Council.
5. Glasser, M., Kolvin, I., Campbell, D., Glasser, A., Leitch, I., & Farrelly, S. (2001). Cycle of child sexual abuse: Links between being a victim and becoming a perpetrator. *The British Journal of Psychiatry*, 179(6), 482-494.

6. Gulo, B. D. (2024). Criminal Liability of Perpetrators of Sexual Violence in Law No. 12 of 2022 Concerning Criminal Acts of Sexual Violence. *REUSAM: Jurnal Ilmu Hukum*, 12(1), 1-10.
7. Hermawan, D., Sahari, A., & Fauzi, A. (2021). Pertanggungjawaban Pidana Anak Sebagai Pelaku Tindak Pidana Kekerasan Seksual. *Legalitas: Jurnal Hukum*, 13(2), 98. <https://doi.org/10.33087/legalitas.v13i2.265>
8. Jainah, Z. O., Seftiniara, I. N., & Yohanes, S. M. (2021). Analisis Pertanggungjawaban Pidana Terhadap Anak Pelaku Tindak Pidana Kekerasan. *Bureaucracy Journal: Indonesia Journal of Law and Social-Political Governance*, 1(3), 130–136. <https://doi.org/10.53363/bureau.v1i3.7>
9. Kotanen, R., & Kronstedt, J. (2019). Attribution of responsibility for sexual crimes beyond individual actors—Construction of responsibility of offenders, victims and society in laypersons' explanations. *International Review of Victimology*, 25(3), 358-374.
10. Malvaso, C. G., Proeve, M., Delfabbro, P., & Cale, J. (2020). Characteristics of children with problem sexual behaviour and adolescent perpetrators of sexual abuse: a systematic review. *Journal of sexual aggression*, 26(1), 36-61.
11. Menajang, R. T. (2020). Perlindungan Terhadap Anak dalam Proses Peradilan (Justice Juvenile) Menurut Instrumen Hukum Internasional dan Nasional. *Lex Et Societatis*, 8(4). <https://doi.org/10.35796/les.v8i4.30923>
12. Miller, L. (2013). Sexual offenses against children: Patterns and motives. *Aggression and Violent Behavior*, 18(5), 506-519.
13. Nada, R. K. (2023). Anak Dan Kejahatan Seksual. *As-Sibyan*, 6(1), 31–41. [https://doi.org/10.52484/as\\_sibyan.v6i1.408](https://doi.org/10.52484/as_sibyan.v6i1.408)
14. Nisa, C. U., & Jaya, N. S. P. (2020). Penerapan Bentuk Mediasi Penal Dengan Pendekatan Keadilan Restoratif Dalam Sistem Peradilan Pidana Anak. *Jurnal Komunikasi Hukum (JKH)*, 6(1), 253-265. <https://doi.org/10.23887/jkh.v6i1.23492>
15. Prasetyo, A. (2020). Perlindungan Hukum Bagi Anak Pelaku Tindak Pidana. *Mizan: Jurnal Ilmu Hukum*, 9(1), 51. <https://doi.org/10.32503/mizan.v9i1.1054>
16. Prima, J. (2024). Penerapan Restorative Justice Dalam Sistem Peradilan Pidana Anak. *JOSH: Journal of Sharia*, 3(01), 40–45. <https://doi.org/10.55352/josh.v3i01.702>
17. Sahputra, D. (2020). Kompetensi Wartawan dalam Liputan Anak yang Berhadapan dengan Hukum. *Jurnal Pewarta Indonesia*, 2(2), 97–105. <https://doi.org/10.25008/jpi.v2i2.42>
18. Santhosh, K. R. (2016). A review on the perpetrators of child abuse. *Review of Social Sciences*, 1(3), 45-52.
19. Shaqila, F., Marlina, & Lubis, R. (2023). Hak Restitusi Terhadap Anak Korban Tindak Pidana dan Implementasinya Dalam Putusan Hakim. *Neoclassical Legal Review: Journal of Law and Contemporary Issues*, 2(2), 63–70. <https://doi.org/10.32734/nlr.v2i2.11520>
20. Simatupang, R. S. A. (2024). Pelaksanaan Sistem Peradilan Pidana Anak di Indonesia Perspektif Nilai Keadilan. *Jurnal Yuridis*, 11(1), 54–63. <https://doi.org/10.35586/jjur.v11i1.8356>

21. Stroud, D. D., Martens, S. L., & Barker, J. (2000). Criminal investigation of child sexual abuse: A comparison of cases referred to the prosecutor to those not referred. *Child Abuse & Neglect*, 24(5), 689-700.
22. Wajdi, F., & Arif, A. (2021). Pentingnya Pendidikan Seks Bagi Anak Sebagai Upaya Pemahaman dan Menghindari Pencegahan Kekerasan Maupun Kejahatan Seksual. *Jurnal Abdimas Indonesia*, 1(3), 129–137. <https://doi.org/10.53769/jai.v1i3.130>
23. Yulianto, T. (2023). Keadilan Restoratif (Restorative Justice) Sebagai Alternatif Penyelesaian Perkara Tindak Pidana. *Orbith: Majalah Ilmiah Pengembangan Rekayasa dan Sosial*, 19(2), 154–159. <https://doi.org/10.32497/orbith.v19i2.4999>