

## Analysis of Law Enforcement Against Sexual Crimes Against Children

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**Abstract.** *Children are very vulnerable to becoming victims of sexual violence. Therefore, law enforcement carried out by the Batang Police in the legal process against the perpetrators uses Law No. 35 of 2014 concerning Amendments to Law No. 23 of 2002 concerning Child Protection with a maximum prison sentence of 15 years. Obstacles experienced in law enforcement include lack of resources, limited authority, ineffective policies and lack of support in the community. However, these obstacles can be overcome with continuous training, trying to remain adaptive in various situations and cross-sectoral cooperation such as collaborating with other agencies. Legal protection for victims with assistance to victims through related agencies and perpetrators are subject to articles 81 and 82 concerning Child Protection and provide psychological support, ensure the victim's privacy is maintained and guarantee the legal process is fair and transparent*

**Keywords:** *Children; Protection; Sexual; Violence.*

### 1. Introduction

In living together, humans need rules that must be followed to create peace and order between individuals in society. However, not everyone is aware of these legal rules and norms. Law can be explained as a set of regulations that regulate social order; not complying with these regulations can result in sanctions. Law has two main characteristics. First, imperative law is a rule that is a priori, must be followed, and has a binding and coercive nature. Second, facultative law is a rule that does not bind the perpetrator and is only a statement.<sup>1</sup>

Visionarily, children are an investment that shows the success of a country in implementing development. Human resources in the future will be determined

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<sup>1</sup>Wantu, 2015, Introduction to Legal Science, Reviva Cendikia, Gorontalo

by how well the development is built by the nation's children.<sup>2</sup>

Sexual violence against children can occur in various places and times, regardless of the location or situation whenever the child is in it. and because there are no specific characteristics that make a perpetrator of sexual violence. People who commit sexual violence against children may have relationships with children, and these children can come from various backgrounds. Children are considered weak and vulnerable individuals because of their dependence on adults, making them easy victims of sexual violence. When children are threatened to keep their experiences secret, this makes them even more helpless.

The perpetrator is usually someone close to the victim or someone who has control over them, such as a parent or teacher. There are no specific signs that can identify someone as a child sexual abuser or a pedophile.

The challenges faced by teenagers can be related to their surrounding environment which is filled with sexual activities, which currently appear to have worrying impacts.<sup>3</sup> It is called a serious problem because of the deviant behavior of a number of young adults, which is reflected in the lifestyle of various forms of inappropriate and incorrect sexual behavior. In addition to the intellectual aspect, there are other factors that contribute to the increase in crimes of sexual abuse against children. In particular, the negative impact of the surrounding environment, consumption of pornographic content such as books, pictures, films, and VCDs that may be widely distributed, are the main causes. The distribution of pornographic material can stimulate and influence individuals who consume it, triggering many deviant sexual behaviors, especially in children and young people.

Unnatural sexual behavior among adolescents is a worrying issue, because it involves violations of the law, especially within the framework of Positive Law in Indonesia.<sup>4</sup> Sexual abuse of adolescents is not a new phenomenon in society. In formal legal terms, juvenile delinquency has become a significant indicator of crime, and the requirements applicable to children involved in criminal behavior are a major consideration.

In fact, many victims of sexual violence and their families are reluctant to report the incident to the authorities, on the grounds that the act is considered a disgrace or because they are afraid of the emergence of stigma against children if it is known to the wider community. Therefore, it is necessary to establish a social institution that can provide protection and support to children who are

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<sup>2</sup>Suyanto, 2003, *Child Labor and the Continuity of Their Education*, Airlangga Press, Surabaya

<sup>3</sup>Welly Wirman et al., 2021, "Dimensions of Self-Concept of Cyber Sexual Harassment Victims in Pekanbaru City", *Journal of Communication Studies*, Vol. 9 No.1

<sup>4</sup>Ratri Novita Erdianti, 2020, *Indonesian Child Protection Law*, UMM Press, Malang

victims of violence or sexual violence.

The Department of Women's Empowerment, Child Protection, Population Control and Family Planning (DP3AP2KB) is an element tasked with handling the duties of the Regional Government in the field of Women's Empowerment and Child Protection, as well as the field of Population Control and Family Planning and eradicating cases of violence against women and children in the household.<sup>5</sup>The Women's Empowerment, Child Protection and Family Planning Service is responsible as a partner of the Regent of Batang Regency in completing government tasks that are under the authority of the Region in the field of women's empowerment and child protection, as well as in the realm of population control and family planning. This institution also has a role in preventing cases of violence against women and children, involving regional officials, and providing special services for children who need special protection from the Provincial/City Government.

In the context of Islamic Law, although Indonesia does not handle juvenile criminal cases using Islamic law, the purpose of resolving juvenile cases is to provide education. Thus, individuals who commit crimes while underage will not be punished criminally for the sins they have committed, but can be given alternative education. Although this instruction is actually a punishment, it is considered educational law and not criminal law.

Currently, legal protection applied to defend victims of sexual harassment is regulated in the Criminal Code (KUHP), specifically in chapter XIV concerning Criminal Offenses Against Morality. Article 290 of the Criminal Code stipulates that perpetrators of such crimes can be subject to a maximum prison sentence of seven years.

For example, a case in Batang Regency concerning sexual crimes against minors committed by a teacher in a high school. With the lure of being given good grades and under the pretext of a physical examination to be able to take part in the OSIS selection. Another case in an Islamic boarding school environment was committed by the caretaker of the Islamic boarding school against students. Among the 22 female students who were suspected of being victims of sexual violence, 17 admitted to being victims of rape, four of them admitted to being victims of molestation, and one had not yet undergone a medical examination. Then, the perpetrator seduced the victim with the promise of getting a blessing, and without a guardian or witness to the marriage, he married the victim in secret. The perpetrator then harassed his female students. In this case, the suspect was charged with Article 82 of the Child Protection Law

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<sup>5</sup>Syafriani, "Protection Assistance for Women and Children Victims of Violence in Sumenep Regency", *Journal of Community Service and Empowerment*, 01(02), p. 60, <http://journal.uim.ac.id/index.php/darmabakti>

with a maximum prison sentence of 15 years and a fine of 300 million rupiah.

From the case, it can be concluded that the case of sexual harassment of minors was carried out by people close to the victim. And it was done with the lure that made the victim follow the perpetrator's wishes and intimidation that made the victim not dare to reveal the perpetrator's crimes. In addition to intimidation, the victim tends to be ashamed of the views of society who consider it still taboo to be expressed.

From the problems above, the researcher wants to analyze the applicable law to ensnare perpetrators of sexual harassment. Because this case is considered a new case, so there has been no decision letter from the court. Based on the background above, the author focuses on the formulation of the problem as follows:

1. How is the law enforced against sexual crimes against children based on the law?
2. What are the obstacles in enforcing the law on sexual crimes against children?
3. How is the legal protection for child victims of sexual violence?

## **2. Research Methods**

This study uses qualitative research methods involving the collection and processing of descriptive data, such as interview transcripts, field notes, pictures, and video recordings.<sup>6</sup>A sociological juridical approach will be used to conduct normative legal research.<sup>7</sup>This research was conducted in the jurisdiction of the Batang Police and DP3AP2KB to explore more deeply about law enforcement and the legal assistance process for victims. In this study, the main data consisted of a literature review and interviews with the Head of Criminal Investigation Unit of the Batang Police and the Head of DP3AP2KB. Primary data or main data in this study are primary, secondary and tertiary legal materials. In this study, the types of data collected through observation, interviews, document studies and literature studies<sup>8</sup>

## **3. Research & Discussion**

### **3.1. Law Enforcement Against Sexual Crimes Against Children Based on Law**

Child sexual abuse, including rape and sodomy, is a serious crime that can harm the victim's life, body, and health. In handling cases of sexual crimes, the role of

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<sup>6</sup>Sugiyono, 2011, Quantitative and Qualitative Research Methods and R&D, Alfabeta, Bandung

<sup>7</sup>Soejono Soekanto, 2005, Introduction to Legal Research, University of Indonesia Press, Jakarta

<sup>8</sup>Sugiyono, 2020

competent medical experts is very important, and this information is usually explained in the *Visum et Repertum*.

In the collection of evidence in sexual crime cases, such as semen, the necessary procedures include drying before shipping. Smears can be taken from various parts of the human oral cavity, such as the oral cavity (in the case of fellatio, oral sex), the vaginal opening (in the case of sodomy), or the anus. The process of collecting and processing this evidence is carried out carefully to ensure the integrity and sustainability of the investigation.<sup>9</sup>

Article 292 states, among other things, that if an adult commits an indecent act with another person of the same sex who is known or should be suspected to be a minor, they will be sentenced to a maximum of five years in prison. The Great Dictionary of the Indonesian Language states that "cabul" means "vile, dirty, indecent (violating decency, morality)." However, in the Criminal Code, there is no official definition for the word.

To improve the success of law enforcement in eradicating the rampant cases of sexual violence, serious coordination is needed between the police, prosecutors, and judges in court. Judges' decisions in examining cases of sexual violence in various courts often vary. In fact, there are cases of sexual violence that are only sentenced to six months in prison.<sup>10</sup> This can be justified because within the maximum and minimum limits of punishment (one day to twelve years) stipulated in Article 292 of the Criminal Code, the judge has the authority to decide according to the circumstances and evidence presented in the trial. The judge's decision must consider various factors, such as the perpetrator's objection, the victim's condition, and the evidence presented during the trial. By providing flexibility to judges, the legal system provides space to respond to cases fairly and proportionally according to the facts in each individual case.

Article 63 Paragraph (2) of the Criminal Code states that if the law determines a rule that is different from the Criminal Code, then the rule can be applied. In this case, serious coordination from the police, prosecutors, and judges is very important to realize the success of law enforcement in eradicating the rampant cases of sexual violence. Non-uniformity in judges' decisions in cases of sexual violence can occur because judges have the authority to decide according to the circumstances and facts in the trial. This is in accordance with the principle that each case has its own characteristics that require unique considerations. The maximum and minimum limits in the sentences stipulated in the Criminal Code provide flexibility for judges to decide according to the circumstances of the case. The existence of regulations that specifically regulate sexual violence in the Child Protection Law provides a more specific legal basis. The threat of

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<sup>9</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), on January 13, 2024

<sup>10</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), on January 13, 2024)

minimum sentences for imprisonment and fines that are threatened cumulatively provides clarity regarding the legal sanctions that can be imposed in these cases. This aims to provide more protection to victims of sexual violence and increase the effectiveness of law enforcement.

Article 65 of the Criminal Code regulates the combination of criminal acts. If an act of sexual violence is committed more than once, either against the same or different victims, this rule can be applied. Article 65 Paragraph (2) states that the perpetrator can be sentenced to a maximum of 20 years in prison. If the crime is committed by more than one person, then the principle of participation can be applied as regulated in Article 55 and/or 56 of the Criminal Code, depending on the role of each perpetrator in the crime. Article 55 of the Criminal Code regulates participation in committing a crime, while Article 56 of the Criminal Code regulates active and passive participation. Thus, perpetrators who have been identified as being involved in a case of sexual violence can be sentenced to a maximum of 20 years in prison, and for those who are actively or passively involved in the act, the principle of participation in criminal law can be applied.

The application of Article 65, 55, and/or 56 of the Criminal Code in cases of sexual violence is based on Article 103 of the Criminal Code. This article states that the general provisions in Book I of the Criminal Code, including Articles 65, 55, and 56, also apply to acts that are subject to criminal penalties under other statutory provisions. However, this may be an exception if otherwise determined by law. In the context of cases of sexual violence, Article 82 of the Child Protection Law provides criminal sanctions. Therefore, in the absence of provisions in the Child Protection Law that determine rules that differ from the Criminal Code, articles in the Criminal Code, such as Articles 65, 55, and 56, can be applied to handle cases of sexual violence. This allows the use of the principle of inclusion (Articles 55 and 56) and provisions on combined criminal acts (Article 65) to treat perpetrators involved in the act.

Law enforcement in handling cases of sexual violence requires serious coordination from the police, prosecutors, and judges in court. Judges' decisions in these cases can vary, there are even cases where the prison sentence is only six years. This decision can be justified by the judge's freedom to decide within the maximum and minimum limits of the sentence that has been set, namely one day to twelve years, in accordance with applicable law. In the criminal justice system, criminal law holds a central position. Decisions in sentencing have broad consequences, and decisions that are considered inappropriate can cause controversial reactions. Criminal issues are complex and have deep meanings from both legal and sociological aspects. As is known, criminal acts are committed by humans (*natuurlijke personen*) as the main perpetrators of criminal acts.

In the context of handling sexual violence against children, several provisions in the Criminal Code (KUHP) are considered weak and have received criticism. For example, Article 287 of the Criminal Code only provides a maximum sentence of 9 years for rape outside of marriage. Meanwhile, Article 288 of the Criminal Code provides a maximum sentence of 4 years for rape within marriage, on the condition that the act causes injury. Criticism is also directed at the handling of this case as a complaint offense, which means that this case requires a report or complaint from the victim or interested party in order to be tried. This decision is often considered to complicate the judicial process, especially considering the characteristics of sexual violence crimes that can make victims reluctant or have difficulty reporting the incident.

In response to these weaknesses, there may be calls for changes or improvements in legal provisions to strengthen protection for victims and provide more severe sanctions for perpetrators of sexual violence against children.

It is true that in some cases of sexual violence, especially those related to pedophilia, the legal provisions that are often applied are Article 292 of the Criminal Code concerning the crime of indecent assault. However, there is criticism of the maximum sentence imposed by Article 292 of the Criminal Code, which is 5 years in prison, which is considered not to provide an adequate deterrent effect.<sup>11</sup>

Child protection activists and several parties argue that the current maximum penalty demands are not commensurate with the severity of the crime and the traumatic impact experienced by the victim, especially when the perpetrator is a pedophile. Therefore, there is a push to revise the legal provisions or create new laws that provide heavier sanctions and are commensurate with the severity of the crime of sexual violence, especially against children.<sup>12</sup>

Changes or improvements to these legal provisions can be considered a progressive step in realizing justice and protection for victims of sexual violence, including pedophilia.

In the context of criminal acts of sexual violence against children, handling may involve other more specific articles, such as Article 76E of the Child Protection Law which states that perpetrators of sexual violence against children can be subject to life imprisonment or a maximum imprisonment of 20 years.

If the act is committed by more than one person, the principle of participation or Articles 55 and 56 of the Criminal Code can be applied, and punishment can be imposed according to the role of each perpetrator and their level of

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<sup>11</sup>Interview with Mr. Reno Kanis, Criminal Investigation Unit of PPA

<sup>12</sup>Interview with Mr. Supriyono, Head of DP3AP2KB

involvement in the crime.

Handling cases of sexual violence, especially those involving people who have responsibility for children at school or Islamic boarding schools, must indeed consider Article 58 paragraph (2) of Law No. 39 of 1999 concerning Human Rights. The article states that in deciding criminal action, the court must consider aggravating factors. The application of the articles in Law No. 35 of 2014 concerning Child Protection, especially Articles 81 and 82, is also very relevant to cases of sexual violence against children. Article 81 regulates indecent acts committed against children with the threat of a maximum prison sentence of 5 years or a maximum fine of IDR 100 million. Meanwhile, Article 82 states that anyone who intentionally or recklessly causes a child to commit indecent acts can be punished with a maximum prison sentence of 5 years or a maximum fine of IDR 100 million.<sup>13</sup>

In Islam, the enforcement of sexual harassment cases is explained in Islamic law which can be seen from the perspective of the Qur'an which emphasizes justice, protection of human rights, and fair law enforcement. For example, the Qur'an Surah An-Nisa (4:135) states,

"O you who believe, be upholders of justice, witnesses for Allah, even if it be against yourselves or your parents and relatives."

Thus, law enforcement against sexual harassment must be based on the principles of justice and honesty, and involve witnesses who can provide strong evidence in order to provide protection to victims and enforce appropriate punishment against perpetrators.

### **3.2. Obstacles in Law Enforcement of Sexual Crimes Against Children**

Obstacles in law enforcement can be interpreted as any factor or condition that hinders or obstructs the authorities' efforts to enforce the law effectively. Some factors that can cause obstacles in law enforcement include lack of resources, limited authority, corruption, ineffective policies, and limited support from the community.

Barriers to law enforcement refer to factors or conditions that hinder or inhibit the effective and efficient process of law enforcement. These barriers can come from a variety of sources, including internal factors within the legal system, such as lack of adequate resources or infrastructure, or external factors, such as corruption, political influence, and public distrust of the legal system.

In line with the explanation from the Head of Criminal Investigation Unit of PPA, the main challenge faced is the complexity of the case and the variety of

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<sup>13</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), on January 13, 2024



perpetrators' modus operandi. However, through continuous training and cross-sectoral cooperation, we are committed to remaining adaptive and efficient in responding to every situation. We also strive to maintain the privacy of the victim while ensuring a smooth investigation process. In addition, we recognize that public education has a key role in preventing cases like this from happening.<sup>14</sup>

From the presentation of the Head of Criminal Investigation Unit of PPA, it shows that obstacles in law enforcement include various factors such as lack of resources, limited authority, corruption, ineffective policies, and lack of community support. These factors can hinder the effective and efficient law enforcement process, with examples of obstacles such as lack of human resources, corruption in the legal system, limited technology, and low public trust. Efforts to overcome these challenges involve continuous training, cross-sectoral cooperation, maintaining victim privacy, and increasing public education to prevent complex cases.

In addition, the Head of Criminal Investigation Unit of PPA said that the victim was reluctant to tell the story because of pressure from the perpetrator or because he was afraid of the views of the surrounding community who would look down on him.<sup>15</sup>

This statement is in line with the statement from the Head of DP3AP3KB Batang Regency who stated that the lack of openness of the victims was due to trauma or fear of threats from the perpetrators or shame in the eyes of the surrounding environment.<sup>16</sup>

### **3.3. Legal Protection for Victims of Sexual Violence**

In the late 1980s, the International Convention on the Rights of the Child introduced four main rights that children have, namely the right to survival (survival rights), the right to protection (protection rights), the right to growth and development (development rights), and the right to participation (participation rights).<sup>17</sup> This convention was later recognized by Indonesia through Presidential Decree Number 36 of 1990.

Furthermore, the Indonesian government has ratified two optional protocols to the Convention on the Rights of the Child as a step to improve child protection. In Law No. 9 of 2012, the Optional Protocol to the Convention on the Rights of the Child has been ratified, which emphasizes the prohibition on the

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<sup>14</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), January 13, 2024

<sup>15</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), on January 13, 2024)

<sup>16</sup>Interview with Mr. Supriyono (Head of DP3AP3KB), on January 12, 2024

<sup>17</sup>Supeno. 2010. *Criminalization of Children: Offering Radical Ideas for Juvenile Justice Without Criminalization*. PT Gramedia Pustaka Utama. Jakarta

involvement of children in armed conflict. The Optional Protocol to the Convention on the Rights of the Child on the Involvement of Children in Armed Conflict is a legal instrument that stipulates the prohibition on the participation of children in situations of armed conflict.

The importance of child protection is also emphasized in Law No. 23 of 2002 concerning Child Protection (Child Protection Law). This law states that "Child protection includes all efforts aimed at guaranteeing and protecting children's rights, including the right to live, grow, develop, and participate optimally in accordance with human dignity and worth." Furthermore, the Child Protection Law states that "In implementing child protection, the state, government, and regional governments have the responsibility to provide the necessary facilities, infrastructure, and human resources."

With the enactment of Law No. 23 of 2002 concerning Child Protection, this is a significant step to provide protection to children in Indonesia, including in the context of problems such as pedophilia. The law generally guarantees the fulfillment of children's rights so that they can grow, develop, and participate optimally in accordance with human dignity and worth, and receive protection from all forms of violence.

The Child Protection Law is considered to be able to provide more effective protection when compared to the Criminal Code (KUHP). For example, this Law stipulates heavier criminal sanctions, namely imprisonment with a range of 3 to 15 years and a maximum fine of IDR 300,000,000 and a minimum of IDR 60,000,000 for acts related to rape and child molestation, which are regulated in the Criminal Code. In the assessment of the Criminal Code, it is considered less strong in providing adequate punishment for the perpetrators of these crimes. As a concrete example, in the case of child trafficking, which is a serious crime in Indonesia, Article 297 of the Criminal Code only threatens with a maximum sentence of 4 years. In contrast, several countries such as the United States consider similar cases to be serious crimes with prison sentences exceeding 15 years. Strict action against visitors to child pornography sites has also been observed in several countries such as the United Kingdom and America, indicating the government's seriousness in combating these crimes. The same applies to sexual intercourse with a minor, where the Criminal Code Article 287 and Article 288 only provide a maximum sentence of 9 years and 4 years, with certain conditions. The implementation of this case as a complaint offense also further complicates legal handling.

In relation to sexual violence against children, the Child Protection Law prohibits the act of forcing a child to have sexual relations with another person or with the perpetrator himself. Furthermore, this law also prohibits the act of forcing, using trickery, telling a series of lies, or enticing a child to do or allow indecent acts.

Head of Criminal Investigation Unit of PPA Batang Regency revealed that the case of sexual violence that occurred in his jurisdiction incriminated the suspect with articles 81 and 82 of the Child Protection Law.<sup>18</sup> Articles 81 and 82 emphasize the need for special protection for children who are victims of sexual violence. It is important to provide psychological support, ensure the privacy of victims, and ensure that the legal process is fair and transparent.

Article 81 and Article 82 of the Child Protection Law have similar substance, providing a criminal threat with a minimum sentence of 5 years and a maximum of 15 years in prison, and a maximum fine of Rp5,000,000,000.00. The imposition of punishment in this law is considered heavier when compared to the previous regulation which only threatened imprisonment with a minimum sentence of 3 years and a maximum of 15 years, and a maximum fine of Rp300,000,000.00 and a minimum of Rp60,000,000. The purpose of this change seems to be to create a deterrent effect on the perpetrator, with the hope of preventing the repetition of violent crimes and deterring others from committing similar acts.

Not only the Law and the police help provide legal protection for child victims of sexual abuse. But have close cooperation with the police, social institutions, and other related agencies. The team is involved in exchanging information and coordination to ensure a quick and effective response to cases involving children.<sup>19</sup> One of the institutions that assists in legal protection is the Department of Women's Empowerment, Child Protection, Population Control and Family Planning (DP3AP2KB).

The form of protection provided by DP3AP2KB Batang Regency can be described as follows. First of all, victims of violence who report their cases to DP3AP2KB will be received by a complaint officer. This complaint will be followed by a victim identification process by a designated officer or counselor, using a case detail form. Furthermore, victims will receive services tailored to individual needs.

According to data from DP3AP2KB, throughout the end of 2022-2023, it was recorded that it assisted in handling cases of sexual violence against children as many as 52 children.<sup>20</sup> Many are not exposed to the media. These children are given assistance to fight for their rights to receive protection and legal enforcement for what happened to them.

In line with the PPA Criminal Investigation Unit that focuses on three main pillars: prevention, action, and rehabilitation. Through this approach, not only prosecuting violations, but also trying to prevent them by increasing public

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<sup>18</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), January 13, 2024

<sup>19</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), January 13, 2024

<sup>20</sup>Interview with Mr. Supriyono, on January 12, 2024

awareness, as well as providing rehabilitation for victims so they can return to society.<sup>21</sup>

#### 4. Conclusion

Sexual violence against children, including rape and sodomy, is a serious crime that endangers the life, body, and health of the victim, and law enforcement in these cases requires serious coordination from various law enforcement agencies as well as the active role of the community in providing protection for victims so that sexual violence against children can be prevented and eradicated effectively. In several cases of sexual violence in Batang Regency, the legal sanctions used are Law No. 35 of 2014, Article 81 and Article 82 with a threat of 15 years in prison. Barriers to law enforcement, including lack of resources, limited authority, corruption, ineffective policies, and lack of community support, can hinder effective and efficient law enforcement processes, but efforts to overcome these challenges involve ongoing training, cross-sectoral collaboration, protecting victim privacy, and increasing public education to prevent complex cases from occurring. In efforts to protect children's rights, it is necessary to pay attention to four principles of child protection, namely that children cannot fight alone, the best interests of the child, life cycle planning, and cross-sectoral, and are supported by various laws and regulations that affirm children's rights and provide legal protection.

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<sup>21</sup>Interview with Mr. Reno (Head of Criminal Investigation Unit of PPA), January 13, 2024