

Analysis of Islamic Criminal Law on Cases of Sexual Violence by Persons With Physical Disabilities (Case Study of Mataram District Court Decision No. 23/PID.SUS/2025/PN MTR)

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ABSTRACT

Cases of sexual violence are crimes against humanity that not only physically injure the victim but also cause deep psychological trauma. However, the phenomenon that occurred in Mataram in 2024 shows a different condition, where people with physical disabilities are actually perpetrators of sexual violence. This raises complex legal issues, especially related to the limits of criminal liability and the application of the principle of justice. This research aims to analyze the criminal liability of perpetrators with physical disabilities in cases of sexual violence based on the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr and review its relevance to the principles of Islamic criminal law. The method used is normative juridical with a case approach, through the study of primary legal sources in the form of the Qur'an, hadith, fiqh jinayah books, as well as laws and regulations such as Law Number 12 of 2022 concerning the Crime of Sexual Violence and Law Number 8 of 2016 concerning Persons with Disabilities. The results of the study show that in positive law, perpetrators with physical disabilities can obtain mitigating considerations, as reflected in Decision Number 23/Pid.Sus/2025/PN Mtr which imposes a lighter sentence than the prosecutor's demands. While from the perspective of Islamic criminal law, the measure of criminal liability is determined by reason ('aql) and moral awareness (ahliyyah al-adā), not by physical conditions. Therefore, people with physical disabilities who have common sense are still seen as full mukallaf who are obliged to account for their actions. Acts of sexual violence in this context are classified as jarimah ta'zīr syadidah (heavy ta'zir), the sanctions of which can be increased according to the level of social and moral damage caused. This study emphasizes the importance of applying the principles of substantive justice and benefits in deciding cases involving perpetrators with disabilities, without removing the essence of criminal responsibility. These findings are expected to contribute to the development of inclusive and contextual Islamic criminal law on disability and sexual violence issues in Indonesia.

Keywords: *Islamic Criminal Law, Sexual Violence, Physical Disability, Criminal Accountability, Substantive Justice.*

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INTRODUCTION

Sexual violence is one of the most serious forms of crimes against humanity because it not only physically harms the victim but also leaves deep and prolonged psychological trauma (Dos Reis, Lopes, & Osis, 2017). This case is not only a social issue but also a legal problem that demands the enforcement of justice for the victim as well as legal certainty for the perpetrator (Hamel, 2020). In the legal context in Indonesia, sexual violence remains a crucial issue. Based on the 2024 Komnas Perempuan Annual Report (CATAHU), there were 445,502 cases of violence against women, of which 26.94% were sexual violence (Lestari, GS, & Noor, 2025). The data confirms that sexual violence remains high and requires serious attention, especially in ensuring justice for vulnerable groups such as women and people with disabilities (Mailhot Amborski, Bussi  res, Vaillancourt-Morel, & Joyal, 2022).

Generally, the crime of sexual violence is committed by people without disabilities against vulnerable groups such as women and people with disabilities (Ledingham, Wright, & Mitra, 2022). However, the phenomenon that occurred in Mataram in 2024 shows a new legal anomaly, where the perpetrator of sexual violence is actually a person with a physical disability (Tuoi, 2023). This condition raises a debate about the limits of criminal liability for perpetrators who have physical limitations, especially from the perspective of the principle of equality before the law and the principle of substantive justice (Kalverkämper, 2023). The Law Number 8 of 2016 concerning Persons with Disabilities guarantees legal protection and equality for individuals with disabilities and affirms the rights of persons with disabilities as full legal subjects. On the other hand, Law Number 12 of 2022 concerning the Crime of Sexual Violence (TPKS Law) requires strict law enforcement against perpetrators of sexual violence, both physical and non-physical, without discrimination (Poetri & Indraswari, 2024). One of the cases that reflects the tension between the two principles is listed in the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr, where people with physical disabilities were found guilty of committing the crime of sexual violence. The judge in the case sentenced a lighter sentence than the prosecutor's demand, reducing it from 12 years in prison and a fine of 100 million rupiah to 10 years in prison and a fine of 100 million rupiah, taking into account the physical condition of the perpetrator. This decision then gave rise to a juridical and moral debate: Can people with physical disabilities be held fully criminally responsible, and to what extent can the condition of disability be used as a mitigating factor in sentencing?

In previous research, Radhiah Tulhidayah et al. (2024), in "Sexual Harassment among Disabilities in Makassar City: An Islamic Law Perspective," examined sexual violence involving persons with disabilities but focused on the protection aspect of victims with disabilities. This research fills the gap by analyzing the criminal liability of perpetrators with physical disabilities, creating a new perspective in the study of Islamic criminal law and positive Indonesian law (Efendi, Akbar, & Khalidi, 2025). From the perspective of Islamic criminal law, the measure of criminal liability is not determined by physical conditions but by the ability of reason (*'aql*) and moral awareness (*ahliyyah al-adā*) (Abdillah, Nurhayati, Najichah, Zohara, & Tholchah, 2024). From this perspective, sexual violence is a form of violation of honor (*al-'ird*) and soul (*al-nafs*), two aspects that are part of the purpose of the sharia (*maqāṣid al-syarī'ah*) (Purnomo, Salam, Zamzami, & Bakar, 2023). A person who has common sense (*mukallaf*) is still obliged to account for his actions even though he has physical limitations (Ali Albar & Chamsi-Pasha, 2015; Zafar, 2020). Therefore, acts of sexual violence committed consciously are included in the category of severe *jarimah ta'zīr syadidah* (heavy *ta'zir*) because they damage honor (*al-'ird*) and offspring (*al-nasl*). Research such as that conducted by Mukhtor Akramov (2023) shows that the *ta'zīr* system in Islamic law has high flexibility in determining the form of punishment according to the level of social and moral damage caused. Islamic Shari'a places the preservation of human dignity as the main principle of justice and benefit. Therefore, acts of sexual violence, regardless of the perpetrator, are seen as crimes that damage the social and moral order of society (Azmi, 2022; Kardono, Wangga, & Rochaety, 2019). This principle aligns with the basic values of Islamic law, which emphasize justice, balance, and the moral responsibility of each individual (Bhat, 2024; Nurdiana, Muin, & Wahab, 2025).

The purpose of this study is to analyze the criminal liability of perpetrators with physical disabilities in the crime of sexual violence based on the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr and examine its relevance to the principles of Islamic criminal law. This research is important because it touches on two sensitive issues: the protection of persons with disabilities and the enforcement of justice for victims of sexual violence (McGilloway, Smith, & Galvin, 2020). This analysis is expected to contribute to the development of Islamic criminal law that is inclusive and responsive to disability issues, as well as enrich Indonesia's positive legal discourse in realizing civilized substantive justice (Billah et al., 2025; Nashih, 2025).

METHOD

This research uses a normative juridical approach, which explores legal principles, written legal norms, and applicable laws and regulations as the basis for analysis. This approach was chosen because the focus of the study lies in the interpretation of legal norms regarding the criminal responsibility of perpetrators with physical disabilities in the crime of sexual violence. The method used is a case approach by examining the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr as a primary legal source. In addition, this study also examines the conceptual approach through theories of criminal responsibility and the principle of justice in Islamic criminal law and positive law in Indonesia. The data in this research consist of primary legal materials, including the Qur'an, Hadith, classical and contemporary jinayah fiqh books such as al-Fiqh al-Islami wa Adillatuhu by Wahbah az-Zuhaili and al-Mughni by Ibn Qudamah, laws and regulations such as Law Number 12 of 2022 concerning the Crime of Sexual Violence and Law Number 8 of 2016 concerning Persons with Disabilities, as well as the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr as the main material of the case analysis. The secondary legal materials are obtained from scientific literature, books, journals, and research results relevant to the theme of Islamic criminal law and national criminal law. The data obtained are analyzed qualitatively and descriptively by interpreting legal norms and expert doctrines to find suitability, differences, and common points between the two legal systems in the context of criminal liability of perpetrators with physical disabilities.

The research data was collected through library research by examining relevant Islamic law and positive law literature. All data were analyzed using a descriptive-analytical and normative comparative approach, namely by describing the legal facts in the court decision, then interpreting them through the theory of criminal responsibility (al-mas'ūliyyah al-jinā'iyah) and the principle of substantive justice (al-'adl al-ḥaqīqī) in Islamic criminal law. This approach allows the author to find common ground between the principle of equality before the law in positive law and the principle of benefit (maqāṣid al-syarī'ah) in Islamic law.

RESULTS AND DISCUSSION

Criminal Liability of Perpetrators with Physical Disabilities in Positive Criminal Law

In the national criminal law system, the principle of criminal responsibility is based on the principle of guilt (geen straf zonder schuld), which means that a person can only be convicted if they commit an unlawful act with full awareness. This principle is affirmed in Article 1 paragraph (1) of the Criminal Code (KUHP), which states that "No act can be

punished except on the strength of the criminal rules in the laws that existed before the act was committed." This affirms the principle of legality (*nullum crimen sine lege, nulla poena sine lege*), which is the foundation for criminal accountability in Indonesia.

Criminal liability is also closely related to the perpetrator's ability to understand the consequences of their actions (*toerekeningsvatbaarheid*). Moeljatno explained that a person can only be held accountable if they are able to recognize the unlawful nature of their actions and determine their will according to moral awareness. In this context, the perpetrator has physical limitations but does not experience mental disorders. Therefore, they are still considered legally responsible. Article 44 paragraph (1) of the Criminal Code states that a person cannot be convicted if their actions cannot be accounted for due to mental disorders or mental developmental disabilities. Thus, physical limitations alone are not grounds for forgiveness or criminal expungement because they do not affect moral awareness or the ability to understand legal consequences.

However, in the context of perpetrators with disabilities, the normative basis is provided by Law Number 8 of 2016 concerning Persons with Disabilities. Article 5 paragraph (1) affirms that persons with disabilities have the right to equal legal protection, including fair treatment before the law. This means disability is not a reason for removal of criminal liability but a factor that can affect the judge's assessment of responsibility and sentencing. Acts of sexual violence are specifically regulated in Law Number 12 of 2022 concerning the Crime of Sexual Violence (TPKS Law). Article 4 paragraph (1) defines sexual violence as any act degrading or attacking a person's body, sexual desire, or reproductive function by force, resulting in physical, psychological, and/or economic loss. The TPKS Law provides harsher criminal sanctions if the act targets vulnerable victims such as children, women, or persons with disabilities.

In practice, the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr is a key precedent where a defendant with a physical disability was found legally and convincingly guilty of sexual violence. The judge considered the defendant's physical condition as a mitigating factor but did not remove criminal liability because the defendant was deemed capable of understanding the consequences of their actions. This decision shows that Indonesia's positive law upholds the principle of equality before the law while considering the subjective condition of the perpetrator as part of corrective justice. Criminal liability for persons with disabilities here can be explained through the concept of responsible ability (*toerekeningsvatbaarheid*) as developed in criminal law doctrine. According to Moeljatno, a person is responsible if they understand their actions' meaning and determine their will according to moral awareness. For a physically disabled perpetrator, provided intellectual ability and consciousness are intact, they bear full responsibility. Additionally, Article 44 paragraph (1) of the Criminal Code excludes liability only for perpetrators "who cannot be held accountable due to mental disability or mental disorders." Therefore, physical limitations without psychiatric disorder do not warrant forgiveness or expungement.

Thus, persons with physical disabilities who knowingly commit sexual violence must still be punished, albeit with special humanitarian considerations during law enforcement. According to the verdict, the judge imposed a lighter sentence than the prosecutor's demand, considering the perpetrator's physical condition. However, this approach raises conceptual problems regarding the principle of equality before the law, as leniency based on physical limitations may cause unequal legal treatment between disabled and non-disabled perpetrators.

In positive criminal law, physical limitations alone do not erase legal awareness; thus, criminal accountability should be upheld based on mens rea and substantive justice principles, not mere empathy or compassion.

Analysis of Islamic Criminal Law on Sexual Violence by Persons with Physical Disabilities

In Islamic criminal law (*fiqh jināyah*), criminal liability (*al-mas'uliyah al-jinā'iyah*) is not only based on the external actions of the perpetrator, but also on his inner condition and intellect. Islam places *reason* ('*aql*') as the main condition for a person to be subject to the burden of law (*taklīf*). This is based on the words of the Prophet PBUH:

رُفِعَ الْقَلَمُ عَنْ ثَلَاثَةٍ: عَنِ النَّائِمِ حَتَّى يَسْتَيْقِظَ، وَعَنِ الصَّبِيِّ حَتَّى يَحْتَلِمَ، وَعَنِ الْمَجْنُونِ حَتَّى يَعْقِلَ

"The pen (*taklīf*) is lifted from three persons: the one who sleeps until he wakes up, the child until he reaches puberty, and the insane man until he wakes up." (HR. Abu Dawud, Tirmidhi, and Ibn Majah).

This hadith emphasizes that the limit of a person's criminal responsibility lies in his awareness of his intellect, not in his physical condition or bodily ability. Therefore, people with physical disabilities who have common sense are still included in the category of *full mukallaf* who can be held criminally responsible for their actions.

In the study of *Jināyah Fiqh*, adultery is the main element of *jarimah al-zinā* determined by the occurrence of *idhkhāl al-ḥasyafah ilā al-farj*, which is the entry of the head of the male penis into the woman's vagina which is haram for her without a valid marriage contract. In other literature, it is defined as the entry of a man's *hasyafah* (penis) into a woman's *farji* (vagina) which is haram for him, without a valid marriage contract. Scholars such as Imam Abu Hanifah stated that adultery is "the conscious and voluntary insertion of the tip of the penis into the farji". While Imam Malik calls it a perfect sexual relationship, which is penetration that occurs between a man and a woman without a marriage bond. Based on these criteria, if there is no element of penetration (*idhkhāl*) in an act as referred to in the definition of adultery, then the event does not meet the requirements of *zina ḥaddiyyah*, but falls into the category of *jarimah ta'zīr fāḥisyah* (obscene acts) whose sanctions are determined by the judge (*qāḍī*) according to the degree of moral and social damage caused.

In the case of the defendant with a physical disability as adrift in the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr, the facts show that the perpetrator told the victim to hold his genitals and commit sexual acts that violated honor, but there is no evidence that there was penetration into the victim's farji. Therefore, in *fiqh jināyah* this act is not qualified as *zina ḥadd*, but can be qualified as *severe jarimah ta'zīr* because: (1) the element of intentionality (*qaṣd*) is fulfilled, (2) the object of honor of the victim is violated (*ḥifẓ al-'ird*), and (3) the social and moral damage that arises is on a large scale (*ifsād fī al-arḍ*).

Judges in Islamic law can apply the aggravated sanctions of *ta'zīr* according to the degree of damage, according to the understanding that Islamic law not only acts as retribution (*jazā'*) but also serves as education (*ta'dīb*) and prevention (*zajr*). Thus, even if the perpetrator's status is that of a person with a physical disability, this does not remove criminal liability due to reason ('*aql*') and the moral consciousness (*ahliyyah al-adā'*) of the perpetrator is considered to remain intact, only that the condition of disability can be a consideration in the sentencing of the sentence, not the abolition of the principle of accountability.

The concept of *ta'zīr* in Islamic law provides room for judges (*qādī*) to adjust the type and degree of punishment based on the degree of damage (*mafsadah*) caused.² In the context of the Mataram case, repeated acts of sexual violence, involving multiple victims, and using emotional manipulation indicate the presence of an element of *ifsād fī al-arḍ* (damage on the face of the earth). Based on this principle, punishments can be aggravated to close to *ḥadd* if they are considered to be damaging to public morals and threatening social honor.³ The principle of justice in Islamic criminal law not only demands a balance between the rights of the perpetrator and the victim, but also guarantees the protection of basic human values. The Qur'an affirms:

إِنَّ اللَّهَ يَأْمُرُ بِالْعَدْلِ وَالْإِحْسَانِ

"Indeed, Allah commands (you) to be just and to do good." (QS. An-Nahl [16]: 90).

This verse is the basis that the application of Islamic law must pay attention to substantive justice (*al-'adl al-ḥaqīqī*), which is to provide sanctions in accordance with the moral and social wrongs committed by the perpetrators. Therefore, in the view of *fiqh jinayah*, persons with physical disabilities are not included in the group that are exempt from criminal responsibility, as long as they have the ability to reason and moral awareness.

Thus, in the case of sexual violence by persons with physical disabilities as in the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr, Islamic criminal law emphasizes that the perpetrator can still be subject to severe *criminal sanctions of ta'zīr*. This punishment is not only retributive (*al-jazā'*), but also an educational and preventive means to safeguard the public interest (*ḥifẓ al-'ird wa al-naḥs*).⁵ Thus providing justice for many victims. Law enforcement against physically disabled perpetrators with a *ta'zīr approach* shows the flexibility of Islamic law in responding to social realities without ignoring the value of justice and humanity.

Comparison of the Principle of Justice in Islamic Law and Indonesian Positive Law

Both Islamic criminal law and positive Indonesian law basically have the same goal, which is to uphold justice and protect human dignity. However, both have different philosophical foundations and approaches in interpreting criminal liability for perpetrators with physical disabilities. In Islamic criminal law, justice is measured not only by the formal balance between the perpetrator and the victim, but also by the extent to which a punishment reflects the value of the benefit (*maṣlahah*) to the society. This principle is based on the concept of *maqāṣid al-syarī'ah*, which is the maintenance of the five basic purposes of Islamic law (*ḥifẓ al-dīn, ḥifẓ al-naḥs, ḥifẓ al-'aql, ḥifẓ al-nasl, and ḥifẓ al-māl*). In the context of sexual violence, the main objectives to be maintained are *ḥifẓ al-'ird* (the preservation of honor) and *ḥifẓ al-naḥs* (the protection of the soul). Therefore, even though the perpetrator has a physical limitation, he is still obliged to account for his actions if he has full awareness and evil intentions (*qaṣd*).

Meanwhile, Indonesia's positive law upholds the principle of justice based on the principles of *legal equality* and the protection of human rights as stipulated in Article 27 paragraph (1) of the 1945 Constitution which states that "*all citizens have equal positions in law and government*." This principle is strengthened in Law Number 8 of 2016 concerning Persons with Disabilities which affirms the right of persons with disabilities to receive fair and

humane treatment, including in the criminal justice process. Thus, national law also rejects the view that physical limitations automatically remove the criminal responsibility of the perpetrator. The main difference between the two legal systems lies in the moral basis and purpose of sanctions.

In Islamic criminal law, sanctions function not only as a form of retribution (*al-jazā'*) but also as a means of moral education (*ta'dīb*) and prevention (*zajr*). The punishment imposed must reflect human values and a balance between the rights of the victim and the perpetrator. Meanwhile, in Indonesia's positive law, criminal sanctions are oriented towards the principles of *retributive justice* (appropriate retribution) and *correctional justice* (fostering perpetrators), which are implemented through the consideration of judges in imposing sentences. Although they differ in their foundations, the two meet in the principle of *substantive justice*. In Islamic law, this principle is known as *al-'adl al-ḥaqīqī*, which is justice that considers the moral aspects, intentions, and social impact of the act. In positive law, this principle is reflected in the judge's authority to assess the *specific circumstances of the perpetrator* and the *consequences of the act* as a basis for determining the severity of the crime. Therefore, the Mataram District Court's decision Number 23/Pid.Sus/2025/PN Mtr which provides leniency for perpetrators with physical disabilities without removing their criminal responsibility shows the common point between the two legal systems in the application of balanced justice.

Thus, both Islamic criminal law and positive Indonesian law affirm that people with physical disabilities who have common sense can still be held accountable for their criminal acts. The difference in approach lies only in the aspect of moral judgment and the form of sanctions imposed. The similarity in the orientation of substantive justice shows that the two legal systems can complement each other in building an inclusive, just, and civilized legal paradigm.

CONCLUSION

Based on the results of the analysis, it can be concluded that people with physical disabilities who have common sense can still be held criminally responsible for the acts of sexual violence they commit. In Indonesia's positive legal perspective, perpetrators with physical disabilities are not included in the category exempt from criminal liability as stipulated in Article 44 of the Criminal Code, because physical limitations do not affect the ability to understand actions and their legal consequences. However, the condition of disability can be used as a mitigating consideration in the imposition of a criminal sentence, as reflected in the Mataram District Court Decision Number 23/Pid.Sus/2025/PN Mtr, which imposes lighter sanctions on humanitarian grounds.

Meanwhile, in Islamic criminal law, the measure of criminal responsibility is determined by reason (*'aql*) and moral awareness (*ahliyyah al-adā*), not by physical conditions. Therefore, people with physical disabilities who are aware and willing are still categorized as full mukallaf. Acts of sexual violence committed intentionally are classified as severe *jarimah ta'zīr*, with sanctions that can be aggravated according to the level of social and moral damage caused. Thus, both positive law and Islamic criminal law affirm the importance of substantive justice, which balances the protection of perpetrators with disabilities and the fulfillment of victims' rights. This research is expected to make a conceptual contribution to the development

of Islamic criminal law that is more inclusive and humanistic, as well as serve as a reference in applying national law that is fair to all parties, including people with disabilities.

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