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Juridical Analysis of the Imposition of Imprisonment and Measures for a Juvenile Sexual Offender with Recidivist Status: A Study of Rokan Hilir District Court Decision Number 10/Pid. Sus-Anak/2025/PN RhI

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ABSTRACT

This research examines the law enforcement dilemma in sexual violence cases committed by a juvenile with recidivist status exhibiting characteristics of predatory behavior. This phenomenon palpably challenges the fundamental principle of child protection, which has traditionally prioritized out-of-court settlement (diversion). Unlike general approaches that tend to be trapped in a binary choice between retributive punishment or pure release, this research aims to analyze the rationality and effectiveness of applying the double track system in Decision Number 10/Pid.Sus-Anak/2025/PN Rhl. This decision serves as a legal response to the closure of diversionary programs for offenders who repeatedly commit crimes. By employing normative legal research methods through a case approach and supported by an in-depth analysis of recent literature, this research finds that the judge imposed combined sanctions consisting of 2 years and 6 months' imprisonment and a 6-month job-training measure. The findings indicate that the judge's consideration was based on proving systematic elements of violence, namely targeting, isolating, and overpowering. Furthermore, the juvenile recidivism status legally nullifies the right to diversion as regulated in Law Number 11 of 2012. This research concludes that in the context of a recidivist juvenile, legal protection is not manifested through release from charges. Conversely, protection is realized through structured mandatory rehabilitation within a closed institution. The theoretical and practical implications of this research recommend that law enforcement officials more explicitly include recidivism status and the offender's risk profile as a basis for aggravating considerations in the verdict holding. This is crucial to ensure a balance between offender rehabilitation and societal protection from potential repeated crimes.

Keywords: *Child Sexual Violence; Double Track System; Measures; Predatory Behavior; Recidivist.*

INTRODUCTION

Cases of sexual violence against children in Indonesia are experiencing a disturbing increase, both in terms of the frequency of incidents and the modus operandi employed by the perpetrators. This condition demands a more advanced and comprehensive legal response to ensure justice is upheld. This crime becomes increasingly complex when the perpetrator is also a juvenile facing the law. Their position is unique as they are simultaneously offenders and a vulnerable group that the state is obligated to protect (Rivanie et al., 2021; Ahmad et al., 2024; Aidy & Sanaky, 2024). In law enforcement, this situation often creates a sharp divergence between public expectations of retribution and the statutory mandate to protect the juvenile's future, even when they are deemed an offender. Mawarni et al. (2023) and Suartana (2024) highlighted that the success of law enforcement in child sexual violence cases is frequently hindered by the ability of officials to balance these two conflicting interests. Consequently, this leads to public dissatisfaction with court decisions that are perceived as too lenient or unjust.

Normatively, the Juvenile Criminal Justice System in Indonesia has shifted its perspective from mere punishment to restorative justice. This perspective prioritizes restoring the situation and rehabilitating the Juvenile Offender. Riyadi (2023) asserted that the basis of protection within the Juvenile Criminal Justice System is to pursue out-of-court settlements (diversion) and avoid imprisonment for the best interests

of the child. In line with this, [Mahmud et al. \(2019\)](#) and [Zakaria et al. \(2023\)](#) argued that the restorative approach is the ideal mechanism for resolving juvenile criminal conflicts to ensure their reintegration into society. However, these legal ideals often clash with the reality in court proceedings. This conflict arises primarily when judges are confronted with legal facts indicating that the Juvenile Offender is not a first-time offender, but rather a Recidivist Juvenile Offender with a dangerous disposition.

In conditions where the Juvenile Offender demonstrates behavior that endangers society, forcing a peaceful settlement or release becomes a high-risk measure that defies common sense. The Law itself provides strict limitations on when lenient approaches must cease. However, its implementation in the field often creates a dilemma for judges. [Angriani et al. \(2023\)](#) and [Setyawan and Setiawati \(2023\)](#) noted that legal protection is frequently misinterpreted as legal immunity for juveniles. In reality, genuine protection should include efforts to stop the juvenile's bad behavior from escalating into that of a more dangerous adult criminal. Therefore, the firmness of the judicial system is required to draw a clear line between juveniles who are suitable for guidance outside institutions and those who require strict supervision within an institution.

The legal anxiety underlying this research emerges when child protection instruments that prioritize peaceful approaches prove powerless against the reality of a Recidivist Juvenile Offender. In a case at the Rokan Hilir District Court, a Juvenile Offender who had previously undergone guidance for a theft case committed a far more severe criminal act, specifically sexual violence accompanied by death threats. This fact triggers fundamental questions regarding whether the current juvenile justice system has loopholes that fail to provide a deterrent effect for specific juveniles. The closure of the diversion space due to recidivism status is the background for selecting this research topic. The author deems it necessary to examine the judge's step of departing from general practice by imposing double sanctions, namely imprisonment and job training. This step is a response to the deadlock in handling the said Recidivist Juvenile Offender, as well as its relation to the psychological profile of the offender pointing towards predatory behavior as described by [Butt and Abdelaziz \(2025\)](#).

This handling gap is clearly reflected in the Rokan Hilir District Court Decision Number 10/Pid.Sus-Anak/2025/PN Rhl. In this decision, the judge imposed imprisonment accompanied by job training on the Juvenile Offender proven to have committed sexual violence with a sadistic modus operandi. This case serves as a crucial example challenging the general assumption that juveniles must always be kept away from prison. Previous research by [Widodo et al. \(2023\)](#) and [Halawa \(2025\)](#) indicated that criminal liability for juveniles remains possible and necessary in certain cases. However, these studies often fail to explain the boundaries of when the punitive approach must completely replace the restorative approach for a recidivist.

This research aims to fill this academic gap by dissecting the application of the double-track system for Recidivist Juvenile Offenders. Unlike the research by [Aprilianda et al. \(2022\)](#) which focused on customary law options, or the discourse on harsher physical punishments such as chemical castration discussed by [Nasrullah \(2023\)](#) and [Hariyanto et al. \(2024\)](#), this research specifically analyzes the effectiveness of combined imprisonment and mandatory training as a middle-ground solution. The originality of this research lies in the critical view that, for juvenile recidivists, legal protection does not mean exemption from imprisonment. Conversely, protection is achieved through mandatory guidance to prevent the juvenile from becoming a habitual criminal in the future. This approach rejects the rigid dichotomy between punishing and guiding. Instead, it proposes a mixed model adapted to the juvenile's degree of culpability and the principle of the best interests of the child as discussed by [Sholehudin and Maharani \(2025\)](#).

Based on the background and academic anxiety above, this research formulates two research objectives. First, to analyze the proof of the element of violence and "predatory" threats of violence in the child rape case in Decision Number 10/Pid.Sus-Anak/2025/PN Rhl. Second, to assess the judge's considerations in imposing double track system sanctions on the Juvenile with Recidivist Status viewed from the objectives of sentencing in the Juvenile Criminal Justice System. Theoretically, this research is expected to contribute to the development of juvenile criminal law, particularly by redefining rehabilitation in serious cases. Practically, the results of this research are beneficial for law enforcement officials, including Judges, Prosecutors, and Probation Officers, as a reference in handling cases of juveniles who repeatedly commit crimes with escalating patterns of violence.

METHOD

This research is normative legal research focused on examining positive legal rules to address the issues of normative vacuum or vagueness ([Qamar & Rezah, 2020](#)). The choice of this type of research is based on the characteristics of the issue raised, namely the conflict between child protection principles prioritizing the restorative approach in Law Number 11 of 2012 and the reality of imposing imprisonment on a Juvenile Offender with recidivist status. Legal research in the context of juvenile justice does not end with reading the text of the Law. Research must be able to dissect the logical reasoning behind the judge's decision that deviates from the mainstream of out-of-court settlement. Therefore, the approach used is the statute approach to comprehensively examine the hierarchy of child protection rules and the Juvenile Criminal Justice System. Additionally, the case approach is employed to analyze in depth the judge's considerations in the court decision that serves as the object of this study. This case approach is crucial to understanding how the judge constructs legal

facts of sadistic violence into a basis for aggravating the punishment. This phenomenon is rarely revealed when using only a theoretical legal approach.

The data source used in this research is secondary data consisting of primary, secondary, and tertiary legal materials (Sampara & Husen, 2016). Primary legal materials include relevant regulations, specifically the Law regulating the Juvenile Criminal Justice System and child protection, as well as the district court decision file that serves as the material object of this research. Meanwhile, secondary legal materials include legal literature, prior research, and relevant scientific journals to strengthen the theoretical analysis of sentencing and juvenile criminology. Data collection techniques were carried out through library research by inventorying, classifying, and systematically arranging these legal materials. The data collection process focused on identifying legal documents containing trial facts related to the offender's recidivism status and the crime's *modus operandi*, as well as legal rules governing the limits on diversion and the types of sanctions that can be imposed on juveniles.

The applied data analysis technique is qualitative analysis using a deductive method, which involves concluding from general to specific matters (Irwansyah, 2020). The analysis begins by establishing the major premise as the legal principles within the Juvenile Criminal Justice System and the applicable sentencing provisions. Then, these principles are juxtaposed with the minor premise in the form of concrete legal facts found in the court decision. These legal facts contain elements of recidivism and predatory methods of violence. Based on the comparison of these two premises, this research concludes that the double-track system is appropriate for reinterpreting the concept of protection for Juveniles in Conflict with the Law. In this analysis, legal facts are dissected through a criminological lens to observe the Juvenile's behavioral patterns, and through juridical analysis to test whether the judge's decision complies with the objectives of sentencing outlined by the Law. Thus, this research produces legal recommendations that are solutive and applicable in judicial practice.

RESULTS AND DISCUSSION

A. Analysis of Proving the Element of Sexual Violence with Predatory Characteristics

The proof of the criminal act in this case is based on the Public Prosecutor's primary indictment, namely the violation of Article 81 section (1) of Law Number 17 of 2016 *juncto* Article 76D of Law Number 35 of 2014. The Panel of Judges of the Rokan Hilir District Court in Decision Number 10/Pid.Sus-Anak/2025/PN Rhl began its considerations by dissecting the element of "Every Person". Based on trial facts, the Defendant is a 16-year-old male juvenile who legally meets the

requirements of legal capacity as stipulated in Article 1 point 3 of Law Number 11 of 2012. The judge assessed that the Juvenile was capable of answering questions fluently and showed no signs of mental disorders that could eliminate criminal liability. This confirms that the Juvenile is a legal subject capable of being held accountable for his actions, even though his age is still classified as a child. This affirmation of the legal subject's status serves as a crucial entry point for the application of imprisonment, given that the Juvenile's age has exceeded the minimum limit of criminal liability, which is 12 years.

The subsequent analysis focuses on the core element of the offense, namely "committing violence or threats of violence forcing a Child to have sexual intercourse". Legal facts revealed in the trial indicate a systematic and planned series of acts or *actus reus*. The Defendant was proven to have committed physical acts by forcibly carrying the child victim who was playing alone, and smothering the victim's mouth with his left hand to muffle screams. This act of smothering was not merely an attempt to paralyze the victim's resistance, but rather a tangible manifestation of physical violence (*vis absoluta*) aimed at eliminating the victim's ability to defend herself. Widodo et al. (2023) and Halawa (2025), in their analysis of juvenile sentencing, asserted that proving the element of violence in crimes against morality does not require waiting for the occurrence of severe injuries or physical defects. Sufficient physical coercion that extinguishes the victim's free will perfectly fulfills the element of violence according to the law. In this case, the abrasion on the victim's cheek confirmed by *the Visum et Repertum* serves as irrefutable forensic evidence of such physical violence.

In addition to physical violence, the Defendant was also proven to have launched psychological violence (*vis compulsiva*) in the form of death threats. The threatening sentence "don't tell anyone, don't make noise or I'll kill you" uttered by the Juvenile to the 8-year-old victim had a terrorizing impact that totally paralyzed the victim mentally. This threat created a state of absolute powerlessness, where the victim felt her life was threatened if she did not comply with the offender's will. Gunawan and Ridwan (2021) highlighted that in many cases of child sexual violence, verbal threats are often more effective in subduing the victim than physical violence alone. The judge in his consideration assessed that the combination of physical confinement and threats to life demonstrated a very high degree of malicious intent or *mens rea*. This malicious intent transcends the boundaries of ordinary juvenile delinquency and falls into the category of serious crimes.

Going deeper, the Juvenile's behavior in this event demonstrates characteristics that can be categorized as predatory behavior. Referring to the criminological theoretical framework proposed by Butt and Abdelaziz (2025), the

behavior of a sexual predator is marked by three main stages: targeting, isolating, and overpowering. In this case, the targeting stage is clearly visible when the Defendant selected a victim who was much younger, namely 8 years old, and was in an unsupervised condition. The Juvenile consciously evaluated the victim's vulnerability before launching his action. The choice of a victim who was physically and psychologically weak was not a coincidence, but the result of calculated malice to minimize the risk of resistance. This proves that the Defendant's actions were not purely impulsive, but contained elements of mature situational planning.

The subsequent stage, namely isolating, is evidenced by the act of the Juvenile taking the victim 200 meters away to a cemetery area obscured by trees. This location selection was highly strategic for the sexual offender to avoid public detection. [Ahmad et al. \(2024\)](#) explained that victim isolation is a common tactic of sexual predators to sever the victim's access to external assistance. By taking the victim to a desolate place considered haunted by the local community, namely a cemetery, the Juvenile created a private space allowing him to commit sexual exploitation without interruption. This fact reinforces the judge's conviction that the Defendant had full awareness of the unlawful nature of his actions and actively sought to conceal them. This act of concealment is a strong indicator of a developed criminal capacity.

The final stage, overpowering, is reflected in the Juvenile's total dominance over the victim's body and will through a combination of physical strength and psychological terror. [Butt and Abdelaziz \(2025\)](#) emphasized that offenders with a predator type tend to use excessive force or lethal threats to ensure the victim's absolute compliance. In this case, the act of forcibly stripping the victim's clothes after she was paralyzed by death threats was the culmination of such dominance. The subsequent sexual intercourse was a logical consequence of the Defendant's overpowering. Medical evidence in the form of a hymen tear (*ruptur hymen*) and the discovery of sperm fluid on the victim's genitals became material evidence locking the proof of the element "forcing sexual intercourse" in Article 76D of Law Number 35 of 2014.

A critical question arises regarding the driving factors for a 16-year-old juvenile to commit such sadistic acts. [Rivanie et al. \(2021\)](#) in their study found that early exposure to pornographic content often serves as a primary stimulant turning a child's sexual behavior aggressive and deviant. Although the judge's decision did not explicitly outline the Defendant's media consumption history, the behavioral pattern shown, ranging from the method of coercion, location selection, to the manner of intercourse, indicates copycat behavior from scenes of sexual violence he had seen. This factor, coupled with the Juvenile's background as a school dropout and lack of parental supervision, created a situation supporting

the formation of deviant behavior. This serves as a warning for the child protection system that a Juvenile Offender is often also a victim of environmental negligence, yet this does not erase his criminal liability in the eyes of the law.

The judge's assessment of the gravity of the Juvenile's culpability was also influenced by his status as a recidivist. The fact that the Defendant had previously been punished or undergone guidance for a theft case indicates a failure to internalize legal and social values. [Suartana \(2024\)](#) argued that the repetition of criminal acts, especially with an escalation in the quality of crime from theft (property) to rape (body and life), signals serious moral damage within the offender. The Juvenile had been given a second chance through the previous juvenile justice system, yet he squandered it by committing a far more severe crime. This condition invalidates the basic assumption of juvenile law that every child is inherently good and only temporarily astray. In this case, the Defendant has demonstrated a persistent criminal pattern, rendering lenient legal approaches irrelevant.

In his legal considerations on pages 14 to 19 of the decision, the Panel of Judges carefully assembled all these facts into a complete unity of proof. This sequence began from the identity of the legal subject, the series of violent acts, the predatory modus operandi, to the medical evidence. The judge viewed sexual intercourse not merely as a biological event, but as the culmination of a series of human rights violations consciously committed by the Juvenile. [Aprilianda et al. \(2022\)](#) emphasized that, in adjudicating juvenile cases, judges must be keen to discern *the mens rea* (malicious intent) behind the child's actions. The judge's conviction that the Defendant was guilty was not based on assumptions, but on the conformity between the victim witness's testimony, the Defendant's confession, and documentary evidence (*Visum et Repertum*) that mutually corroborated each other in court.

As a conclusion of this evidentiary analysis, it can be summarized that the Defendant has legally and convincingly violated Article 81 section (1) of Law Number 17 of 2016 *juncto* Article 76D of Law Number 35 of 2014. His actions fulfilled all elements of the offense, both objective elements (acts of violence/sexual intercourse) and subjective elements (culpability/intent). Moreover, the qualification of his actions containing characteristics of predatory behavior, such as targeting, isolating, and overpowering, places this case on the spectrum of the most severe juvenile crimes. This finding serves as a solid juridical foundation for the judge to proceed to the next stage, namely determining the appropriate punishment. This strong proof of elements closes the room for the defense that the act was consensual or due to ignorance, and affirms that the Defendant is a serious criminal offender requiring firm state intervention.

B. Juridical Rationality of Applying Imprisonment and Measures (Double Track System) for Recidivist Juveniles

The analysis of the holding of Decision Number 10/Pid.Sus-Anak/2025/PN Rhl reveals the application of a hybrid sentencing model. The Panel of Judges imposed imprisonment for 2 (two) years and 6 (six) months at the Pekanbaru Juvenile Correctional Institution (*Lembaga Pembinaan Khusus Anak or LPKA*) and a measure in the form of mandatory job training for 6 (six) months at the Abiseka Pekanbaru Social Rehabilitation and Vocational Center (*Sentra Kreasi Atensi or SKA*). This verdict construction is known in juvenile criminal law doctrine as the double track system. The application of this system marks a paradigm shift, in which judges no longer view sentencing merely as a means of retribution but as a dual instrument to simultaneously protect society and reform the offender. This legal choice is based on the objective consideration that the Juvenile requires guidance that restricts freedom on the one hand and empowers on the other.

The primary consideration aggravating the Juvenile's position and closing the opportunity for out-of-court settlement is his status as a recidivist. Trial facts revealed that the Defendant had previously faced the law in a theft case. This has fatal juridical consequences for the Defendant's right to obtain diversion. [Riyadi \(2023\)](#) explained that Law Number 11 of 2012 indeed prioritizes restorative justice, but it also sets strict limiting boundaries. Article 7 section (2) letter b of Law Number 11 of 2012 explicitly states that diversion does not apply to criminal acts that are a repetition of criminal acts. This provision is imperative, leaving no room for the judge to exercise discretion in pursuing peace. Thus, the judge's decision to proceed with the case to the substantive examination stage and to impose imprisonment is a constitutional step in compliance with the statutory mandate.

The Juvenile's recidivism status also serves as a criminological indicator that non-institutional guidance methods previously applied have failed. [Suartana \(2024\)](#), in his study of juvenile criminal law enforcement, argued that the repetition of criminal acts by a juvenile indicates resistance to the legal values instilled during the initial guidance phase. The escalation or quality increase of the crime from property crime (theft) to crimes against the body and life (sexual violence with death threats) strengthens the argument that the Juvenile poses a high risk to society. Therefore, placing the Defendant in the LPKA through an imprisonment verdict serves not only to punish but also to act as a social defense to prevent new victims during this intensive guidance period.

In determining the duration of imprisonment, the Panel of Judges is bound by the principle of proportionality specifically regulated in juvenile criminal law.

The verdict of 2 years and 6 months is not an arbitrary figure, but the result of a strict juridical calculation. [Aprilianda et al. \(2022\)](#) emphasized the importance of applying the principle of *lex specialis derogat legi generali* in determining juvenile sanctions. Article 81 section (2) of Law Number 11 of 2012 stipulates that imprisonment imposed on a juvenile shall be at most 1/2 (one-half) of the maximum imprisonment for adults. Referring to Article 81 section (1) of Law Number 17 of 2016 which sets a minimum threat of 5 years for adult offenders, the figure of 2.5 years for the juvenile is a conversion equivalent to that minimum limit. This proves that the judge has applied objective legal standards in weighing the severity of the punishment.

The application of this imprisonment also addresses criticisms regarding substantive justice in sexual violence cases. [Setyawan et al. \(2025\)](#) highlighted that juvenile court decisions are often perceived as too lenient, thereby injuring the community's sense of justice. However, in this case, the 2.5-year sentence must be understood in the context of the maximum juvenile sentencing limits. The judge cannot impose a sentence exceeding the statutory corridor, even though the Juvenile's actions are classified as sadistic. By imposing a penalty equal to 1/2 the adult threat, the judge has essentially imposed a sufficiently severe sanction within the juvenile justice scale. This decision sends a firm message that juvenile status does not provide absolute immunity against deprivation of liberty if the crime committed is serious and repeated.

In addition to imprisonment, a breakthrough in this decision is the application of a job-training measure. This authority is based on Article 82 section (1) letter e of Law Number 11 of 2012 which allows judges to impose measures on juveniles. The selection of Abiseka Pekanbaru SKA as the job training location demonstrates the judge's vision oriented towards the Defendant's future. The Juvenile, known as a school dropout, needs skill intervention to avoid falling back into the criminal world due to economic factors or social inability. This job training serves as a bridge to reintegration, preparing the Defendant to return to society with productive skills rather than as an aimless ex-convict.

This educative approach through job training simultaneously serves as an antithesis to extreme physical punishment discourses such as chemical castration. [Nasrullah \(2023\)](#) and [Hariyanto et al. \(2024\)](#) in their research discussed chemical castration as an option for sexual offenders. However, the application of such retaliatory physical sanctions is deemed inconsistent with the philosophy of juvenile justice which prioritizes guidance. The judge in this case preferred skill building over corporal punishment. This choice affirms that although the Defendant is a recidivist and predator, the state still views him as a national asset

who possesses the potential for behavioral improvement through appropriate and directed educational methods.

The application of this double-track system also corrects the misconception about restorative justice. [Mahmud et al. \(2019\)](#) and [Zakaria et al. \(2023\)](#) often associate restorative justice with forgiveness or amicable settlement. However, in the context of a recidivist juvenile offender, this concept must be redefined. Restoration for the Defendant is not achieved through release from legal entanglements, but through mandatory state-imposed rehabilitation. The combination of imprisonment and job training is a form of functional restoration aimed at restoring the Juvenile's ability to live law-abidingly. Without the element of coercion through sentencing, guidance efforts are feared to be ineffective given the Defendant's track record of failed prior guidance.

The synergy between LPKA and SKA in this decision creates a layered control mechanism. While serving imprisonment in LPKA, the Juvenile will receive personality guidance and strict supervision to curb his aggressive impulses. During or after the sentencing period, the Defendant undergoes job training at SKA to build independence. [Sholehudin and Maharani \(2025\)](#) emphasized that the principle of the best interest of the child in court decisions must include post-sentencing life planning. The judge's decision detailing the duration and location of job training indicates that the judge's consideration has extended beyond retributive aspects to encompass utility or long-term benefit for the Juvenile.

Overall, this decision represents a hybrid justice model balancing the interests of protecting society and protecting the Juvenile Offender. The judge successfully navigated the dilemma between punishment and guidance by making the most of the legal instruments available under Law Number 11 of 2012. The refusal of diversion due to recidivist status, the proportional calculation of imprisonment, and the addition of job training measures, constitute a mutually reinforcing series of juridical considerations. This legal construction demonstrates that the Juvenile Criminal Justice System in Indonesia has sufficient flexibility to handle serious cases without compromising children's human rights. This decision serves as an important precedent that for juveniles who repeatedly conflict with the law, the state is present not only as a firm punisher but also as a responsible guide.

CONCLUSIONS AND SUGGESTIONS

Based on the research results and the elaborated discussion, two main conclusions can be drawn that address the legal issues in this research. First, the proof of elements of violence and threats of violence in Decision Number 10/Pid.Sus-Anak/2025/PN Rhl confirms that the actions of the Juvenile Offender have transcended

the boundaries of ordinary juvenile delinquency and constitute a serious crime with characteristics of predatory behavior. Through criminological analysis, the Defendant's behavioral pattern was proven to fulfill the stages of targeting a vulnerable victim, isolating her to a quiet area, and overpowering her through physical confinement and death threats. The finding of the legal fact that the Defendant has recidivist status became the determining factor, effectively closing the door on diversion, because the repetition of the criminal act proves the failure of previous guidance. Therefore, the judge appropriately exercised his authority to impose imprisonment for the interest of protecting society from the potential danger posed by the offender.

Second, the judge's consideration in imposing double track system sanctions constitutes a concrete manifestation of legal rationality balancing retribution and guidance. Imprisonment for 2 years and 6 months is assessed as proportional because it complies with the maximum limit of half the adult threat, while also serving as a deterrent to secure the offender within the institution. On the other hand, the addition of a 6-month mandatory job-training program at SKA demonstrates that the state remains committed to safeguarding the juvenile's future. In the context of a recidivist juvenile, restorative justice is not interpreted as release from punishment, but as structured mandatory rehabilitation to break the chain of criminal behavior and equip the juvenile with life skills to prevent him from returning as a criminal offender in the future.

Based on these conclusions, this research offers practical follow-up recommendations for law enforcement officials. For judges adjudicating juvenile cases, it is suggested that recidivism status and predatory characteristics be more explicitly included as specific aggravating considerations in the verdict holding. This is crucial to create jurisprudence or strict legal references indicating that peaceful settlement mechanisms cannot be applied as a blanket rule, particularly for juveniles who have repeatedly committed serious criminal acts. The firmness of this consideration is necessary to maintain the authority of the juvenile justice system so that it is not perceived as weak in facing offenders who endanger public order.

Furthermore, for the Juvenile Correctional Institution and job training providers like SKA, it is suggested to tighten the supervision and evaluation mechanisms regarding the implementation of measures for recidivist juveniles. Job training programs must not merely run as an administrative formality, but their effectiveness in changing the juvenile's behavior and mindset must be ensured. Strict supervision is crucial to ensure that after the imprisonment and training period ends, the juvenile truly possesses mental readiness and skills to return to society. Failure in this supervision carries a high risk of producing more skilled recidivists in the future, ultimately undermining the noble purpose of the Juvenile Criminal Justice System itself.

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