

Restorative Justice as an Effort to Reduce Recidivism in Child Offenders of Theft

Khomaini

Universitas Pembinaan Masyarakat Indonesia, Medan, Indonesia
Email: khomaini@upmi.ac.id

The number of children in conflict with the law in Indonesia continues to increase, with theft being the most dominant type of crime. Data from the National Legal Development Agency (BPHN) in the 2020-2022 period shows 838 cases of theft committed by children out of a total of 2,302 cases of children facing the law. Meanwhile, the punitive approach through imprisonment has not been effective in reducing recidivism rates among child offenders. This study aims to analyze the application of restorative justice as an effort to reduce recidivism in child theft offenders and identify the obstacles faced in its implementation. The research method used is normative legal research with statutory, conceptual, and case approaches. The results show that restorative justice through diversion as regulated in Law Number 11 of 2012 concerning the Juvenile Criminal Justice System has a strong legal basis but its implementation still faces various obstacles. Based on data from the Directorate General of Corrections, out of 29,228 children handled by police in the 2017-2020 period, only 14.1% of cases were closed through diversion. The obstacles include the limited understanding of law enforcement officers regarding restorative justice, the retributive mindset that still dominates society, and the lack of supporting infrastructure. Optimization strategies can be implemented through strengthening diversion mechanisms, enhancing the capacity of law enforcement officers, and transforming the legal culture towards a rehabilitative approach. The enactment of the National Criminal Code (Law Number 1 of 2023) effective January 2, 2026, and Supreme Court Regulation Number 1 of 2024 concerning Guidelines for Adjudicating Criminal Cases Based on Restorative Justice further strengthen the legal basis for the application of restorative justice for child offenders.

Keywords: Restorative Justice, Recidivism, Children, Theft, Diversion

This is an open access article under the [CC BY-NC](#) license



Corresponding Author:

Khomaini
Universitas Pembinaan Masyarakat Indonesia, Medan, Indonesia
khomaini@upmi.ac.id

1. Introduction

The issue of children in conflict with the law (ABH) in Indonesia is not new, but it continues to be an unresolved problem. Every year, the number of children involved in criminal acts shows a concerning trend. Data from the Indonesian National Police published by Kompas.id records that in 2017 there were 3,964 ABH cases, then this number surged to 9,387 in 2018, and remained fluctuating in the thousands in the following years [1]. What is even more concerning is that the type of criminal act most involving children is theft. The National Legal Development Agency (BPHN) of the Ministry of Law and Human Rights recorded that in the period from 2020 to 2022, out of a total of 2,302 ABH cases handled through legal aid organizations, 838 of them were theft cases [2]. This number far exceeds other cases such as narcotics abuse, which totaled 341 cases.

The Directorate General of Corrections also recorded that the number of child detainees or Correctional Students (Andikpas) experienced fluctuations with an upward trend. In 2023, the number of Andikpas reached its highest figure of 1,639 children, dominated by 1,617 boys [3]. Until August 2023, nearly 2,000 children were in conflict with the law, of which 1,467 were still undergoing judicial proceedings and 526

children had already been convicted as prisoners [1]. This data indicates that the punitive approach that has been applied to children has not been able to prevent the recurrence of criminal acts or recidivism.

Recidivism among child offenders of theft has become a particular problem that deserves attention. The Director General of Human Rights, Dhahana Putra, stated that the increase in ABH cases indicates the need for reform of the juvenile criminal justice system. The handling of juvenile criminal cases must be re-examined because it continuously produces recidivism or repetition of criminal behavior. The reality on the ground shows that prison has instead become a "school of crime" for children. Rather than providing a deterrent effect, imprisonment actually exposes children to a harsher criminal environment and deprives them of the opportunity for normal growth and development.

Law Number 11 of 2012 concerning the Juvenile Criminal Justice System (UU SPPA) has actually paved the way for the settlement of juvenile cases outside the court through a diversion mechanism based on restorative justice. Article 5 of the UU SPPA affirms that the Juvenile Criminal Justice System must prioritize the restorative justice approach. Diversion must be pursued at every level of examination, from investigation, prosecution, to trial, as long as the criminal act committed is punishable by imprisonment of less than seven years and does not constitute a repeat offense, as regulated in Article 7 of the UU SPPA. However, in reality, the implementation of diversion is still far from expectations. Data from the Directorate General of Corrections shows that out of 29,228 ABH handled by police in the 2017-2020 period, only 4,126 children or approximately 14.1 percent had their cases resolved through diversion [4]. This means that the majority of children still had to go through a lengthy and exhausting formal judicial process.

Recent legal developments have also further strengthened the basis for applying restorative justice. Law Number 1 of 2023 concerning the Criminal Code (National Criminal Code), which becomes effective on January 2, 2026, brings a paradigm shift from retributive to restorative punishment. Article 51 of the National Criminal Code affirms that the purposes of punishment include prevention of criminal acts, rehabilitation of convicts, conflict resolution, restoration of balance, and fostering remorse. In addition, Supreme Court Regulation Number 1 of 2024 concerning Guidelines for Adjudicating Criminal Cases Based on Restorative Justice also provides technical guidelines for judges in applying the restorative approach, including for juvenile cases where diversion has not been successful.

In light of these conditions, this article is written to examine and analyze the application of restorative justice as an effort to reduce recidivism in child offenders of theft in Indonesia. This study will examine how the existing legal framework supports the application of restorative justice, what obstacles hinder its implementation, and what strategies can be undertaken to optimize this approach. The novelty of this research lies in the effort to examine restorative justice not only from a normative perspective but also from the perspective of recidivism prevention by considering the latest legal developments including the National Criminal Code and Supreme Court Regulation Number 1 of 2024.

2. Literature Review and Problem Statement

Various definitions of restorative justice have been put forward by experts. According to Tony Marshall, restorative justice is a process that involves parties who have an interest in a particular offense, with the common goal of collectively resolving the problem and responding to its consequences and future impacts. From a legal perspective, the age of children also has a different meaning; legal experts and human rights experts define the age range of children as those under 18 years of age [5]. Based on the 1989 International Convention on the Rights of the Child, childhood is the period before reaching the age of 18, and this age limit has been agreed upon by all members of the United Nations (UN) who have ratified the convention, including Indonesia. At this age, parents or guardians still have full rights to regulate and fulfill the rights of

children to the fullest extent, especially in the field of education. In addition, this age range is also a reference in marriage regulations, with a prohibition on marriage for those who have not reached the age of 18 [5].

The crime of theft is the deliberate act of taking someone else's property against the law. To steal means to take someone else's property illegally or without permission. Those who take someone else's property are called thieves, while theft itself refers to activities related to stealing. Gordon Bazemore states that the objectives of the juvenile justice system vary depending on the paradigm adopted, and there are three widely recognized paradigms, namely the individual rehabilitation paradigm, the retributive paradigm, and the restorative paradigm.

3. Method

This study employs normative legal research methods, which is research that focuses on the study of legal norms, legal principles, and legal doctrines related to the topic under investigation. Soerjono Soekanto (2007) [6] explains that normative legal research is research conducted by examining library materials or secondary data as the basic material, through the exploration of regulations and literature related to the issues being studied.

The approaches used include three types. The statutory approach (statute approach) is used to examine relevant legislation, particularly Law Number 11 of 2012 concerning the Juvenile Criminal Justice System, Law Number 1 of 2023 concerning the Criminal Code, and Supreme Court Regulation Number 1 of 2024. The conceptual approach is used to examine views and doctrines in criminal law science regarding restorative justice, diversion, and recidivism. The case approach is used to examine court decisions related to the application of restorative justice for child offenders of theft.

The legal materials used consist of primary and secondary legal materials. Primary legal materials include the 1945 Constitution of the Republic of Indonesia, Law Number 11 of 2012 concerning the Juvenile Criminal Justice System, Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 concerning Child Protection, Law Number 1 of 2023 concerning the Criminal Code, Government Regulation Number 65 of 2015 concerning Guidelines for the Implementation of Diversion, Supreme Court Regulation Number 4 of 2014 concerning Guidelines for the Implementation of Diversion in the Juvenile Criminal Justice System, Supreme Court Regulation Number 1 of 2024 concerning Guidelines for Adjudicating Criminal Cases Based on Restorative Justice, Attorney General Regulation Number 15 of 2020 concerning Termination of Prosecution Based on Restorative Justice, and Police Regulation Number 8 of 2021 concerning Handling of Criminal Acts Based on Restorative Justice. Secondary legal materials include criminal law books, scientific journals, research findings, and relevant legal expert opinions.

Legal material collection was conducted through library research by tracing, collecting, and inventorying relevant legal materials. The search was conducted through electronic journal databases such as Google Scholar, SINTA, and accredited legal journal portals, as well as official government institution websites. The analysis was conducted prescriptively-analytically, namely describing legal provisions, identifying problems, evaluating their application, and formulating recommendations. Conclusions were drawn using the deductive method.

4. Results and Discussion

Legal Framework of Restorative Justice for Child Offenders of Theft

Before discussing the application of restorative justice for children, it is necessary to first understand who is meant by "child" according to the law. Article 1 paragraph 3 of the UU SPPA defines a Child in Conflict

with the Law as a child who has reached the age of 12 years but has not yet reached the age of 18 years who is suspected of committing a criminal act. This age limit is important because it determines whether an offender will be processed through the juvenile criminal justice system or the general court system. For children under the age of 12, investigators and community counselors make the decision to hand them over to parents or enroll them in education and guidance programs, as regulated in Article 21 of the UU SPPA.

The UU SPPA constitutes an important milestone in the reform of juvenile criminal law in Indonesia. This law replaces Law Number 3 of 1997 concerning Juvenile Courts, which was considered no longer adequate. One of the most fundamental changes is the mandatory application of the restorative justice approach at every stage of juvenile case resolution. Article 5 paragraph (1) of the UU SPPA explicitly states that the Juvenile Criminal Justice System must prioritize the Restorative Justice approach. Restorative justice itself is defined as the resolution of criminal cases by involving the offender, victim, families of the offender/victim, and other related parties to jointly seek a fair resolution that emphasizes restoration to the original condition, rather than retaliation.

The main mechanism for realizing restorative justice in the UU SPPA is diversion. Diversion is the transfer of juvenile case resolution from the criminal justice process to a process outside the criminal justice system. Based on Article 7 of the UU SPPA, diversion must be pursued at the investigation, prosecution, and examination of juvenile cases at the district court level. The requirement is that the criminal act committed is punishable by imprisonment of less than 7 years and does not constitute a repeat offense. The basic criminal act of theft as regulated in Article 362 of the Criminal Code (now Article 476 of the National Criminal Code) is punishable by a maximum of 5 years imprisonment, thus meeting the requirements for diversion.

The objectives of diversion as stated in Article 6 of the UU SPPA are to achieve peace between the victim and the child, to resolve the child's case outside the judicial process, to prevent the child from deprivation of liberty, to encourage community participation, and to instill a sense of responsibility in the child. The diversion process is conducted through deliberation involving the child and their parents/guardians, the victim and/or their parents/guardians, community counselors, and professional social workers. In theft cases, the diversion agreement may include restitution, apology, return to parents, participation in education or training, or community service.

Supreme Court Regulation Number 4 of 2014 concerning Guidelines for the Implementation of Diversion in the Juvenile Criminal Justice System provides technical guidance for judges in implementing diversion. The Supreme Court responded progressively to the UU SPPA to ensure that diversion is truly prioritized before a juvenile case is continued to the formal judicial process [7]. In addition, Government Regulation Number 65 of 2015 concerning Guidelines for the Implementation of Diversion and Handling of Children Under the Age of 12 further regulates the procedures for implementing diversion.

The latest development that strengthens the legal framework for restorative justice is the issuance of Supreme Court Regulation Number 1 of 2024 concerning Guidelines for Adjudicating Criminal Cases Based on Restorative Justice. This regulation applies to all criminal cases, including juvenile cases where diversion has not been successful. Article 5 paragraph (1) letter d of this regulation states that judges apply restorative justice when receiving criminal cases involving child offenders whose diversion was unsuccessful. This means that even if diversion fails to reach an agreement, judges can still apply the restorative justice approach in deciding juvenile cases. The purpose of applying restorative justice according to this regulation is to restore the victim, restore the relationship between the defendant and the victim, encourage the defendant's accountability, and prevent anyone, especially children, from deprivation of liberty [8].

The National Criminal Code, which becomes effective on January 2, 2026, also brings fresh momentum for the application of restorative justice. Article 51 of the National Criminal Code formulates the purposes of punishment that are no longer solely retributive in nature. Punishment aims to prevent the commission of criminal acts by upholding legal norms, to reintegrate convicts through guidance, to resolve conflicts arising from criminal acts, to restore balance, and to foster remorse and relieve guilt in convicts. This paradigm shift opens wider space for the application of restorative justice, especially for child offenders of theft who fundamentally need guidance and mentoring, not merely punishment.

Restorative Justice as a Strategy to Reduce Recidivism among Child Theft Offenders

Recidivism or the repetition of criminal acts is one of the important indicators for assessing the success of a punishment system. If a child who has already been processed by the law then repeats their actions, it means there is something wrong with the way they were handled. The conventional approach that relies on imprisonment has proven ineffective in reducing recidivism among children. Children placed in correctional institutions are actually at risk of exposure to negative influences from other inmates, loss of access to education, and stigmatization that narrows their chances of being accepted back into society.

Restorative justice offers a different approach. Instead of punishing children with prison, restorative justice brings offenders and victims together to jointly seek a fair resolution. The child as the offender is required to take direct responsibility for their actions, for example by returning stolen goods, apologizing, or performing community service. This process helps the child understand the impact of their actions on others directly, rather than merely receiving abstract punishment. This approach is in line with what Marlina (2012) [9] stated, that juvenile criminal justice should be directed towards the development of diversion and restorative justice concepts in the best interest of the child.

Several studies show that the application of restorative justice through diversion yields more positive results compared to formal judicial processes. Research at the Lhokseumawe District Attorney's Office shows that the implementation of restorative justice in theft cases by children successfully reached agreements between the offender and victim parties, so that the child did not have to undergo lengthy judicial proceedings [10]. At the Kuranji Police Station in Padang City, the application of restorative justice for a child motorcycle theft offender was also successfully resolved through a compensation mechanism without having to bring the child to court[11].

However, it should also be noted that restorative justice is not without weaknesses. Research in Landak Regency found that in some cases, the application of restorative justice actually had negative impacts in the form of a lack of deterrent effect on the child. As a result, repeated offenses occurred, and there were even indications that adult criminals exploited children to become perpetrators of criminal acts by promising rewards, knowing that children would receive leniency in punishment [12]. These findings indicate that the application of restorative justice needs to be accompanied by adequate supervision and guidance to prevent abuse.

Despite these weaknesses, restorative justice remains a more humane approach and is more consistent with the principle of the best interest of the child. What needs to be improved is not the concept itself, but the way it is implemented. Children who undergo the restorative justice process must continue to receive guidance and mentoring after the case resolution. Families, schools, and the surrounding community must also be involved to ensure the child does not re-offend. In other words, restorative justice is not only about resolving cases outside of court but also about ensuring the child receives sufficient support to change.

From the perspective of recidivism prevention, restorative justice has several advantages over the conventional approach. The child is not removed from their social environment, so the socialization and

education process continues. The child learns to take direct responsibility for their actions, rather than merely "serving a sentence." The victim also receives more tangible restoration because they are directly involved in the resolution process. The community also plays an active role in supporting the child's recovery process. All these elements contribute to reducing the risk of the child repeating their criminal act.

Obstacles to the Application of Restorative Justice for Child Theft Offenders

Although the legal framework is quite adequate, the application of restorative justice for child theft offenders still faces various obstacles. These obstacles can be grouped into three aspects: the legal structure aspect, the legal substance aspect, and the legal culture aspect.

From the legal structure aspect, the main obstacle lies in the limited capacity and understanding of law enforcement officers regarding restorative justice. Not all juvenile investigators understand the diversion mechanism well. There is a tendency among officers to remain oriented toward punishment because that is what has been taught and practiced all along. Research at the Lhokseumawe District Attorney's Office found that one of the obstacles to implementing restorative justice is the lack of knowledge among the public and officers about restorative justice efforts themselves [10]. In addition, the number of community counselors from the Correctional Center (Bapas) who are tasked with accompanying children during the diversion process is also limited. Yet, the presence of community counselors is a mandatory requirement in the diversion process under the UU SPPA.

Available data also shows the low success rate of diversion. Out of 29,228 ABH handled by police in the 2017-2020 period, only 14.1 percent were successfully resolved through diversion [4]. This figure indicates that many juvenile cases are still processed through formal judicial channels. It is not precisely known whether the low diversion rate is due to the threat of punishment exceeding 7 years, thus not meeting the diversion requirements, or due to other factors such as the victim's reluctance to reconcile. What is clear is that Directorate General of Corrections data shows that in 2023, the majority of ABH were sentenced to more than 1 year of imprisonment, amounting to 72.3 percent of total juvenile prisoners [1].

From the legal substance aspect, there are several issues in the regulation of diversion and restorative justice. The diversion requirement that mandates a punishment threat of less than 7 years as regulated in Article 7 paragraph (2) of the UU SPPA limits the scope of diversion application. For aggravated theft as regulated in Article 363 of the Criminal Code (now Article 477 of the National Criminal Code) with a punishment threat of up to 7 years, there is debate about whether diversion can still be applied or not. The provision that diversion does not apply to children who are repeat offenders is also problematic, because it is precisely these recidivist children who most need the restorative approach to break the cycle of crime.

From the legal culture aspect, the greatest obstacle is the still strong retributive paradigm among the public. Many theft victims refuse to reconcile with child offenders because they feel dissatisfied if the offender is not sentenced to prison. Society still believes that imprisonment is the only way to deter offenders. Social stigma against children who have been in conflict with the law also remains strong. Even children who have undergone diversion are often labeled as "bad children" or "thieves" by their community, making it difficult for them to truly recover and return to normal life. The Ministry of Women's Empowerment and Child Protection through the Deputy for Special Child Protection emphasizes that this stigma can make children consider ending their lives because they feel rejected and ostracized [13].

Obstacles related to facilities and infrastructure also cannot be ignored. Not all regions have adequate facilities to support the implementation of diversion. Social Welfare Organizing Institutions (LPKS), which should serve as places for child guidance during the diversion process, are still limited in number.

Professional social workers with competence in handling ABH are also still lacking. These conditions make the implementation of diversion suboptimal, especially in areas far from urban centers.

Optimization Strategies for Restorative Justice to Reduce Recidivism among Child Theft Offenders

Based on the analysis of the obstacles described above, there are several strategies that can be pursued to optimize the application of restorative justice in order to reduce recidivism among child theft offenders.

In terms of legal substance, it is necessary to strengthen regulations that support a broader application of diversion. With the enactment of the National Criminal Code on January 2, 2026, there is momentum to adjust the provisions of the UU SPPA to be more aligned with the new punishment paradigm. The National Criminal Code through Article 51 has already affirmed that punishment aims to resolve conflicts, restore balance, and foster remorse. This spirit needs to be translated into a revision of the UU SPPA by expanding the requirements for diversion, for example, not only limited to punishment threats of less than 7 years but also considering other factors such as the child's background, the seriousness of the act, and the victim's readiness to reconcile. Supreme Court Regulation Number 1 of 2024, which allows judges to apply restorative justice in juvenile cases where diversion has failed, also needs to be massively disseminated so that all juvenile judges understand and apply it.

In terms of legal structure, strengthening the capacity of law enforcement officers is an urgent matter. Juvenile investigators, juvenile prosecutors, and juvenile judges need to receive regular training on restorative justice and diversion. This training is not only about the technical implementation but also about changing the mindset from a retributive to a restorative approach. The number of community counselors from Bapas also needs to be increased so that accompaniment of children during the diversion process can run optimally. Coordination among institutions involved in handling ABH, from police, prosecutors, courts, Bapas, Social Services, to educational institutions, must be strengthened so that the handling of children is integrated and sustainable.

In terms of legal culture, systematic efforts are needed to change the public's perspective on children in conflict with the law. Socialization of restorative justice must be conducted massively through various channels, from mass media, social media, to direct outreach to communities. The public needs to understand that restorative justice does not mean freeing offenders from responsibility but rather requires offenders to take direct responsibility to the victim. The BPHN "Mengasuh" program, which deploys legal counselors to schools to provide legal education to children, is a commendable step that should be expanded [14].

Furthermore, it is necessary to develop structured post-diversion mentoring programs to ensure that children do not re-offend. These programs may include psychological counseling, tutoring, skills training, and family involvement. [15]affirm that stakeholders need to work together in addressing ABH issues through diversion, including involving social workers, community counselors, investigators, prosecutors, judges, parents, and community leaders. This cross-sector collaboration is essential to ensure that children receive comprehensive support, not merely legal resolution.

5. Conclusion

This study demonstrates that restorative justice has great potential as an effort to reduce recidivism among child offenders of theft in Indonesia. The legal framework supporting the application of restorative justice is quite adequate, ranging from Law Number 11 of 2012 concerning the Juvenile Criminal Justice System which mandates diversion, the National Criminal Code (Law Number 1 of 2023) which shifts the punishment paradigm toward a restorative direction, to Supreme Court Regulation Number 1 of 2024 which provides technical guidelines for the application of restorative justice in courts. However,

implementation on the ground still faces serious obstacles in three aspects: legal structure in the form of limited capacity of officers and supporting infrastructure, legal substance in the form of rigid diversion requirements, and legal culture in the form of the still dominant retributive paradigm in society.

Efforts to optimize restorative justice to reduce recidivism among child theft offenders require integrated steps. Strengthening regulations through the revision of the UU SPPA to expand the scope of diversion, enhancing the capacity of law enforcement officers through continuous training, broadening the socialization of restorative justice to the public, developing post-diversion mentoring programs, and building a good monitoring system are strategies that need to be implemented simultaneously. The success of restorative justice is not only determined by the completeness of legal rules but also by the readiness of all parties to shift from a punitive perspective to a restorative perspective. Future research is recommended to examine the effectiveness of the implementation of the National Criminal Code and Supreme Court Regulation Number 1 of 2024 in handling juvenile cases after the enactment of both regulations, as well as to conduct comparative studies on recidivism rates between children who undergo diversion and those who undergo formal sentencing.

6. References

- [1] Kompas.id, "Meningkatnya kasus anak berkonflik hukum, alarm bagi masyarakat dan negara," 2023. [Online]. Available: <https://www.kompas.id/artikel/meningkatnya-kasus-anak-berkonflik-hukum-alarm-bagi-masyarakat-dan-negara>
- [2] Badan Pembinaan Hukum Nasional, "BPHN 'Mengasuh': Ini jenis tindak kejahatan dan perilaku kriminal anak yang menjadi fokus BPHN untuk dicegah," 2023. [Online]. Available: <https://bphn.go.id/berita-utama/bphn-mengasuh-ini-jenis-tindak-kejahatan-dan-perilaku-kriminal-anak-yang-menjadi-fokus-bphn-untuk-dicegah-3124>
- [3] Direktorat Jenderal Pemasarakatan, "Data anak didik pemsarakatan tahun 2020-2024. Kementerian Hukum dan HAM RI," 2024.
- [4] Dewan Perwakilan Rakyat Republik Indonesia, "Isu sepekan: Anak berhadapan dengan hukum," *Pusat Penelitian DPR RI*, p. 2023. [Online]. Available: https://berkas.dpr.go.id/pusaka/files/isu_sepekan/
- [5] S. Handayani, "PENERAPAN RESTORATIVE JUSTICE TERHADAP ANAK POLRESTA BANDA ACEH (Analisis Perspektif Hukum Islam)," 2022.
- [6] S. Soekanto, *Penelitian hukum normatif: Suatu tinjauan singkat*. Raja Grafindo Persada, 2007.
- [7] Mahkamah Agung Republik Indonesia, "Peraturan Mahkamah Agung Nomor 4 Tahun 2014 tentang Pedoman Pelaksanaan Diversi dalam Sistem Peradilan Pidana Anak," 2014.
- [8] B. Juventus, H. Silalahi, U. Ricardo, and S. A. Hasibuan, "THE EFFECTIVENESS OF DIVERSION IN RESOLVING CHILD CRIMINAL CASES TO ACHIEVE RESTORATIVE JUSTICE IN THE CHILD CRIMINAL JUSTICE SYSTEM," pp. 849–862.
- [9] Marlina, *Peradilan pidana anak di Indonesia: Pengembangan konsep diversi dan restorative justice*. Refika Aditama, 2012.
- [10] Sania, Husni, and Nurarafah, "PELAKSANAAN RESTORATIVE JUSTICE TERHADAP TINDAK PIDANA PENCURIAN YANG DILAKUKAN OLEH ANAK (Studi Penelitian Kejaksaan Negeri Lhokseumawe)," *J. Ilm. Mhs.*, vol. VII, 2024, doi: <https://doi.org/10.29103/jimfh.v7i3.16890>.
- [11] A. Chariri, "Criminal Settlement Of Criminal Acts Of Motorcycle Theft By Child Through Restorative Justice," pp. 1359–1367, 1945.
- [12] T. S. Hutagalung, "The Effectiveness of Restorative Justice Implementation in the Juvenile Criminal Justice System in Indonesia," no. 11, pp. 37–46, 2023.

- [13] Kompas.com, "Anak berhadapan dengan hukum boleh tetap sekolah? Ini kata ahli,," 2024. [Online]. Available: <https://www.kompas.com/edu/read/2024/04/05/>
- [14] F. Swandari and A. Hadi, *Good Corporate Governance*, vol. 176. 2021. doi: 10.2991/aer.k.210121.046.
- [15] A. Wardianti, "Pemangku Kepentingan Mengatasi Permasalahan Anak Berhadapan Dengan Hukum Melalui Diversi," pp. 158–172, 2024.