



## Developing a Hybrid Model for Post-Divorce Child Support Enforcement in Indonesia

Setiyowati<sup>1\*</sup>, Lê Hồ Trung Hiếu<sup>2</sup>

<sup>1</sup>Universitas 17 Agustus 1945 (UNTAG) Semarang, Semarang, Indonesia

<sup>2</sup>Văn Lang University, Ho Chi Minh, Vietnam

\*Corresponding author: [setiyowati.untag@gmail.com](mailto:setiyowati.untag@gmail.com)

**Abstract.** The enforcement of post-divorce child support rights remains a major challenge in Indonesia. Although child support obligations are regulated under Law Number 1 of 1974 on Marriage, the Compilation of Islamic Law (KHI), and Law Number 35 of 2014 on Child Protection, compliance remains low due to the absence of an effective enforcement mechanism. This study analyzes the weaknesses of Indonesia's child support enforcement system, examines comparative practices in the United States, Singapore, Japan, and China, and formulates an enforcement model suitable for Indonesia. Using a normative-juridical approach with an international comparative method, the study evaluates child support systems based on five parameters: legal basis, implementing institutions, sanction mechanisms, information systems, and compliance. The findings show that effective enforcement depends on specialized institutions, integrated information systems, and graduated sanctions. Accordingly, this study proposes a Hybrid Child Support Enforcement Model supported by the Child Support Enforcement Agency (BPNA) and the Integrated Child Support Information System (SINAT). This model provides a practical framework to strengthen child rights protection and improve compliance with post-divorce child support obligations in Indonesia.

**Keywords:** Child Support Enforcement, Comparative Law, Hybrid Model, Post-Divorce Child Support, Legal Reform.

---

Received: March 1, 2026 | Revised: May 3, 2026 | Accepted: June 20, 2026

---



**Abstrak.** *Penegakan hak nafkah anak pasca perceraian masih menjadi tantangan utama di Indonesia. Meskipun kewajiban nafkah anak diatur dalam Undang-Undang Nomor 1 Tahun 1974 tentang Perkawinan, Kompilasi Hukum Islam (KHI), dan Undang-Undang Nomor 35 Tahun 2014 tentang Perlindungan Anak, kepatuhan masih rendah karena tidak adanya mekanisme penegakan yang efektif. Studi ini menganalisis kelemahan sistem penegakan nafkah anak di Indonesia, meneliti praktik komparatif di Amerika Serikat, Singapura, Jepang, dan Tiongkok, serta merumuskan model penegakan yang sesuai untuk Indonesia. Dengan menggunakan pendekatan normatif-yuridis dengan metode perbandingan internasional, studi ini mengevaluasi sistem nafkah anak berdasarkan lima parameter: dasar hukum, lembaga pelaksana, mekanisme sanksi, sistem informasi, dan kepatuhan. Temuan menunjukkan bahwa penegakan yang efektif bergantung pada lembaga khusus, sistem informasi terintegrasi, dan sanksi bertingkat. Oleh karena itu, studi ini mengusulkan Model Penegakan Nafkah Anak Hibrida yang didukung oleh Badan Penegakan Nafkah Anak (BPNA) dan Sistem Informasi Nafkah Anak Terpadu (SINAT). Model ini menyediakan kerangka kerja praktis untuk memperkuat perlindungan hak anak dan meningkatkan kepatuhan terhadap kewajiban nafkah anak pasca perceraian di Indonesia.*

**Kata kunci:** *Penegakan Nafkah Anak, Hukum Perbandingan, Model Hibrida, Nafkah Anak Pasca Perceraian, Reformasi Hukum.*

## 1. Introduction

The protection of children's rights following parental divorce has become an important issue in contemporary family law. Internationally, every child has the right to receive adequate maintenance from both parents as an essential component of child welfare and development. The United Nations Convention on the Rights of the Child (CRC) recognizes parental responsibility for ensuring children's physical, mental, spiritual, and social development.<sup>1</sup> Consequently, child support obligations are increasingly viewed not only as private family responsibilities but also as matters of public interest requiring effective state intervention.<sup>2</sup> As divorce rates continue to increase worldwide, the effectiveness of child support enforcement has become a key indicator of a legal system's ability to protect children's socio-economic rights after family dissolution.<sup>3</sup>

Indonesia faces substantial challenges in this area. According to data from the Central Bureau of Statistics (*Badan Pusat Statistik* /BPS), there were 516,334 cases of divorce in 2022.<sup>4</sup> Many of these cases involve children whose welfare depends on the fulfillment of maintenance obligations after divorce. However, compliance with child support orders remains low. The Supreme Court Annual Report 2022 noted that more than 60% of child support decisions are not effectively implemented.<sup>5</sup> Consequently, many children fail to receive financial support despite favorable court rulings. This situation reflects a significant gap between

---

<sup>1</sup> Roos Wind et al., "The Child-specific Right to Adequate Housing in the Convention on the Rights of the Child," *The International Journal of Children's Rights* 31, no. 2 (2023): 458. See also, Marta Santos Pais, and Susan Bissell, "Overview and implementation of the UN Convention on the Rights of the Child," *The Lancet* 367, no. 9511 (2006): 694; UN CRC, "General Comment No. 14 On the Right of the Child to Have His or Her Best Interests Taken as a Primary Consideration (art. 3, para. 1)," *Al-Zyan Jurnal Ilmu Sosial & Hukum* 4, no. 1 (2013): 12.

<sup>2</sup> Mia Hakovirta et al., "Child support policy across high-income countries: Similar problems, different approaches," *The Annals of the American Academy of Political and Social Science* 702, no. 1 (2022): 105. See also, Laura Cuesta et al., "Child support policy in middle-and low-income countries: current approaches and policy dilemmas," *Journal of International and Comparative Social Policy* 39, no. 1 (2023): 71.

<sup>3</sup> Adedayo Adelokun et al., "Poverty, gender and child support systems in comparative perspective." In *Single Parents and Child Support Systems*, (Cheltenham: Edward Elgar Publishing, 2024), 18.

<sup>4</sup> Andi Kustanto et al., "Unravelling Rising Divorces in Indonesia: The Interplay of Economic Stress, ICT Use, Domestic Violence, and the Moderating Role of Education," *Journal of Family Violence* 14, no. 2 (2025): 7.

<sup>5</sup> Mahkamah Agung Republik Indonesia, "Membangun peradilan modern berbasis teknologi informasi MA RI," *Laporan tahunan Mahkamah Agung Republik Indonesia tahun*, February 18, 2022. Retrieved in February 23, 2024 from. <https://kepaniteraan.mahkamahagung.go.id/publikasi/laporan-tahunan/2180-laporan-tahunan-ma-2022>

legal recognition and practical implementation, indicating that judicial decisions alone are insufficient to guarantee compliance.

The consequences of ineffective enforcement extend beyond financial hardship. Studies show that inadequate child support contributes to educational disruption, limited access to healthcare, increased poverty risks, and long-term social vulnerability among children of divorced families.<sup>6</sup> The contributing role of family, school, and peer supportive relationships in protecting the mental wellbeing of children and adolescents. School Mental Health, Custodial mothers also frequently bear disproportionate financial responsibilities, reinforcing economic inequality after divorce.<sup>7</sup> As a result, weak enforcement affects not only child welfare but also broader concerns relating to social justice and economic equality.

From a regulatory perspective, Indonesia already possesses a relatively comprehensive legal framework. Law Number 1 of 1974 concerning Marriage, the Compilation of Islamic Law (*Kompilasi Hukum Islam /KHI*), and Law Number 35 of 2014 concerning Child Protection affirm parental obligations to provide maintenance and ensure children's welfare following divorce.<sup>8</sup> Religious Courts have authority to determine child support obligations through legally binding decisions. Nevertheless, Indonesia lacks a dedicated enforcement mechanism capable of ensuring compliance. Enforcement remains largely dependent upon voluntary compliance by the obligated parent, while court decisions frequently encounter difficulties during execution. This condition creates a persistent gap between legal rights and their realization in practice.<sup>9</sup>

The limitations of Indonesia's framework become clearer when compared with other jurisdictions. The United States operates specialized child support enforcement agencies supported by wage withholding systems, administrative sanctions, and integrated databases. Singapore has developed an integrated family

---

<sup>6</sup> Hakovirta et al., "Child support policy across," 105. See also, Nadia Butler et al., "The contributing role of family, school, and peer supportive relationships in protecting the mental wellbeing of children and adolescents," *School Mental Health* 14, no. 3 (2022): 782.

<sup>7</sup> Selvy Yuspitari, "Women's Rights in Divorce and Post-Divorce Maintenance: Perspectives from Islamic Family Law in Indonesia and Human Rights," *Nusantara: Journal of Law and Islamic Law* 1, no. 3 (2026): 12. See also, Thembelihle Vumokuhle Zondi, and Nathaniel Phuti Kgadima, "Challenging experiences of custodial mothers," *Social Work/Maatskaplike Werk* 60, no. 4 (2024): 792.

<sup>8</sup> Sudarsono, *Hukum kekeluargaan Indonesia*, (Jakarta: Rineka Cipta, 1991), 10. See also, Presiden RI, "Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan," *LN Nomor 1* (1974); Fitra Mulyawan, "Politik Hukum Dalam Bidang Hukum Keluarga Islam," *Ensiklopedia of Journal* 3, no. 2 (2021): 117; Nurul Novitasari, "Analisis undang-undang nomor 35 tahun 2014 terhadap kekerasan anak pada masa pandemi covid-19," *JCE (Journal of Childhood Education)* 5, no. 2 (2021): 343.

<sup>9</sup> Olif Skear Prbasini, "Legal protection for children in conflict with the law: Process and problems," *The Indonesian Journal of International Clinical Legal Education* 3, no. 3 (2021): 390.

justice system supported by digital monitoring mechanisms.<sup>10</sup> Japan combines Family Court procedures with administrative assistance from government institutions.<sup>11</sup> Meanwhile, China employs judicial and administrative measures, including social credit sanctions for non-compliant parents.<sup>12</sup> These experiences demonstrate that effective enforcement requires not only legal obligations but also specialized institutions, integrated information systems, and effective sanction mechanisms.<sup>13</sup>

Although child support has received increasing scholarly attention in Indonesia, existing studies remain fragmented. Previous research has mainly focused on child custody, maintenance obligations, and the protection of women's and children's rights after divorce.<sup>14</sup> Other studies discuss digital transformation and access to justice without specifically addressing child support enforcement.<sup>15</sup> Meanwhile, research on judicial practice generally identifies implementation problems but rarely proposes comprehensive enforcement solutions.<sup>16</sup> Consequently, current scholarship lacks an integrated framework that connects legal, institutional, and technological dimensions of child support enforcement. More importantly, no previous study has formulated a comprehensive Hybrid Model combining juridical, administrative-social, and digital mechanisms within a single enforcement system. This gap constitutes the primary novelty of the present study.

The urgency of this research is therefore both legal and social. Weak enforcement may result in continuing violations of children's economic rights, undermine public confidence in judicial institutions, and contribute to poverty

---

<sup>10</sup> Yarni Loi, and Suzanne Chin, "Therapeutic Justice-What It Means for the Family Justice System in Singapore," *Family Court Review* 59, no. 3 (2021): 433.

<sup>11</sup> Kent Anderson, and Mark Nolan, "Lay Participation in the Japanese Justice System," *Vanderbilt Journal of Transnational Law* 37, no. 4 (2004): 935.

<sup>12</sup> Yu-Jie Chen et al., "Rule of Trust: The Power and Perils of China's Social Credit Megaproject," *Columbia Journal of Asian Law* 32, no. 1 (2018): 18.

<sup>13</sup> Mia Hakovirta et al., "Child support policy across," 105. See also, Cuesta et al., "Child support policy," 71.

<sup>14</sup> Yuspitasari, "Women's Rights in Divorce and Post-Divorce Maintenance," 12. See also, Mohammad Agni Ariyanto Agni, "Analisa tentang kepastian jaminan hak asuh anak pada kasus perceraian di pengadilan agama kabupaten cirebon: a. kasus perceraian di kabupaten cirebon, b. jaminan kepastian hak asuh anak pada kasus perceraian di kabupaten Cirebon," *Jurnal Studi Islam* 14, no. 1 (2025): 119.

<sup>15</sup> Nurul Fitri Kayati et al., "Legal Implementation in the Digital Era: Protection of Child Support Rights after Divorce in Indonesia," *Hakamain: Journal of Sharia and Law Studies* 4, no. 1 (2025): 7.

<sup>16</sup> Bustanul Arifien Rusydi et al., "Resolution without Enforcement: A Critical Study," *Justicia Islamica* 23, no. 2 (2026): 547. See also, R. F. Rini Fathonah, and Heni Siswanto, "Humanist law: law enforcement strategy against child persons of crime in Indonesia," *International Journal of Advanced Research (IJAR)* 11, no. 1 (2023): 67.

among vulnerable households.<sup>17</sup> Accordingly, this study seeks to answer three research questions concerning the weaknesses of Indonesia's child support enforcement system, lessons from the experiences of the United States, Singapore, Japan, and China, and the formulation of an enforcement model suitable for Indonesia. The study aims to analyze weaknesses in the existing framework, conduct a comparative examination of foreign enforcement systems, and formulate a Hybrid Model of Child Support Law Enforcement consisting of juridical, administrative, and digital dimensions. Theoretically, the study contributes to family law and legal system scholarship, while practically providing policy recommendations for strengthening the protection of children's economic rights following divorce in Indonesia.

## 2. Research Methods

This study employs a qualitative research design because it seeks to examine legal norms, institutional arrangements, and law enforcement mechanisms governing post-divorce child support obligations rather than measuring variables quantitatively.<sup>18</sup> The research is grounded in Friedman's legal system theory, which emphasizes the interaction between legal substance, legal structure, and legal culture, and is complemented by the principle of restorative justice that prioritizes the protection and fulfillment of children's rights.

The study applies a normative-juridical approach combined with an international comparative legal method. The normative approach focuses on analyzing legal rules, principles, and institutional frameworks regulating child support enforcement, while the comparative method is used to identify best practices from selected jurisdictions, namely the United States, Singapore, Japan, and China. These countries were selected because they represent different legal traditions and possess relatively effective child support enforcement systems that offer lessons relevant to Indonesia.

The study draws upon three categories of legal materials. Primary legal materials comprise Law Number 1 of 1974 concerning Marriage, the Compilation of Islamic Law (*Kompilasi Hukum Islam /KHI*), Law Number 35 of 2014 concerning Child Protection, the Convention on the Rights of the Child (CRC), as well as relevant legal regulations from the selected comparative jurisdictions.<sup>19</sup> Secondary

---

<sup>17</sup> Adalakun et al., "Poverty, gender and child support systems," 18. See also, Cuesta et al., "Child support policy," 71.

<sup>18</sup> Matthew Mitchell, "Analyzing the law qualitatively," *Qualitative research journal* 23, no. 1 (2023): 108.

<sup>19</sup> Muhamad Hasan Sebyar, "Politik Hukum Undang-Undang Nomor 16 Tahun 2019 Tentang Perubahan Atas Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan," *IUS: Jurnal Ilmiah*

legal materials include academic journal articles, books, court reports, and prior research relevant to the subject matter. Meanwhile, tertiary legal materials consist of legal dictionaries, encyclopedias, and official online resources that support the interpretation and analysis of the primary and secondary materials.

Data was collected through library research by reviewing legislation, judicial reports, international legal instruments, academic publications, and official documents issued by government institutions and international organizations. The collected materials were then classified according to the analytical needs of the study. Data were analyzed qualitatively using five parameters: legal basis, implementing institutions, sanction mechanisms, information systems, and compliance levels. Comparative findings were synthesized to formulate a Hybrid Model of Child Support Law Enforcement. To enhance validity, source triangulation was conducted by comparing statutory regulations, judicial documents, academic literature, and official reports from Indonesia and the selected comparative jurisdictions.

### 3. Results and Discussion

#### 3.1. Systemic Diagnosis of Weaknesses in Indonesia's Child Support Enforcement System

The analysis of Indonesia's child support enforcement system reveals that the persistent failure to ensure compliance with post-divorce child support obligations is not merely the result of inadequate legal norms. Rather, it reflects systemic weaknesses involving three interconnected dimensions of the legal system: legal substance, legal structure, and legal culture. Consistent with Friedman's legal system theory, legal effectiveness depends on the interaction among these elements. Consequently, deficiencies in one dimension may undermine the realization of children's rights despite the existence of formal legal protection.<sup>20</sup>

At the level of legal substance, Indonesia has established a relatively comprehensive framework governing parental responsibilities after divorce. Law Number 1 of 1974 concerning Marriage, the Compilation of Islamic Law (*Kompilasi Hukum Islam /KHI*), and the Child Protection Law recognize that parents remain responsible for providing financial support and ensuring the welfare of their

---

*Fakultas Hukum* 9, no. 01 (2022): 57. See also, Novitasari, "Analisis undang-undang nomor 35 tahun 2014," 343; CRC, "General Comment No. 14 On the Right of the," 12.

<sup>20</sup> Alan M. Daniel, and Kelly S. Treece, "Law enforcement pathways to mental health: Secondary traumatic stress, social support, and social pressure," *Journal of police and criminal psychology* 37, no. 1 (2022): 136. See also, Iba Banaesa, "Perkembangan perceraian di Indonesia," (PhD diss., UIN Gunung Djati, 2022), 23.

children despite the dissolution of marriage.<sup>21</sup> These regulations demonstrate the state's commitment to protecting children's rights and affirm that child support constitutes a continuing parental obligation.

However, several substantive weaknesses reduce the effectiveness of this framework. First, Indonesian law does not provide specific administrative or criminal sanctions for parents who intentionally fail to comply with court-ordered child support obligations. Although the Child Protection Law contains provisions concerning child neglect, these provisions are rarely applied in unpaid child support cases because non-payment is not expressly regulated as a distinct violation.<sup>22</sup> Consequently, many non-compliant parents face limited legal consequences, weakening both deterrence and the authority of judicial decisions.

Second, child support judgments generally lack direct executorial force. Custodial parents must initiate separate execution proceedings to compel compliance, creating procedural burdens that are often costly and time-consuming.<sup>23</sup> This condition contributes to a significant gap between judicial recognition of children's rights and their realization in practice.

Third, Indonesia lacks a nationally standardized formula for determining child support obligations. Judges rely largely on discretionary assessments of parental income and children's needs, resulting in inconsistent decisions among courts.<sup>24</sup> Existing regulations also provide limited mechanisms for adjusting support obligations in response to inflation, changing income levels, or increasing educational and healthcare costs. As a result, the legal framework remains insufficiently responsive to socio-economic developments.

The second major weakness lies within the legal structure responsible for implementing and enforcing child support obligations. Although Religious Courts possess authority to determine child support obligations through legally binding decisions, they lack specialized enforcement units and effective post-judgment monitoring mechanisms.<sup>25</sup> Once a decision becomes final, responsibility for

---

<sup>21</sup> Purva D. Lanjekar et al., "The effect of parenting and the parent-child relationship on a child's cognitive development: A literature review," *Cureus* 14, no. 10 (2022): 27.

<sup>22</sup> E. Musaddad et al., "Guaranteeing the Rights of Children and Women Post-Divorce: A Comparative Study Between Indonesia and Malaysia," *Volksgeist: Jurnal Ilmu Hukum Dan Konstitusi* 8, no. 1 (2025): 7. See also, Clare Huntington, and Elizabeth S. Scott, "The Enduring Importance of Parental Rights," *Fordham L. Rev.* 90, no. 6 (2022): 2529.

<sup>23</sup> Rusydi et al., "Resolution without Enforcement: A Critical Study," 547.

<sup>24</sup> Yuspitasari, "Women's Rights in Divorce and Post-Divorce Maintenance," 12. See also, Sudarsono, *Hukum kekeluargaan Indonesia*, 10.

<sup>25</sup> Mahkamah Agung Republik Indonesia, "Membangun peradilan modern berbasis teknologi informasi MA RI," *Laporan tahunan Mahkamah Agung Republik Indonesia tahun*, February 18, 2022. See also, Asrianti Sukirman et al., "Islamic Judicial Activism in Determining Child Maintenance: Ex Officio Authority and Peaceful Settlement in Indonesian Religious Courts," *Al-Istinbath: Jurnal Hukum Islam* 10, no. 2 (2025): 687.

pursuing enforcement largely falls upon the custodial parent, limiting the state's role in ensuring compliance.

Unlike jurisdictions with dedicated child support enforcement agencies, Indonesia has no specialized institution authorized to monitor payments, verify financial information, collect arrears, or impose administrative sanctions. Consequently, enforcement remains fragmented and highly dependent on individual initiative rather than systematic state intervention. The absence of a centralized enforcement body also limits the availability of reliable national data on compliance rates and enforcement outcomes, thereby reducing opportunities for evidence-based policy development.<sup>26</sup>

Another structural weakness concerns the absence of an integrated national information system. Data relating to child support obligations remain dispersed among Religious Courts, the Ministry of Social Affairs, the Indonesian Child Protection Commission (KPAI), the Directorate General of Population and Civil Registration, and financial institutions. The lack of effective data-sharing mechanisms makes it difficult to monitor compliance, identify delinquent parents, and verify economic capacity.

Comparative studies demonstrate that successful child support enforcement systems rely on strong institutional coordination and integrated information systems capable of supporting monitoring and enforcement activities.<sup>27</sup> Countries with relatively high compliance rates generally utilize centralized databases linking employment, taxation, banking, and population records. Indonesia's current institutional structure lacks these capabilities, limiting both administrative efficiency and enforcement effectiveness.

Human resource limitations further weaken implementation. Courts frequently manage large caseloads and therefore have limited capacity to monitor post-judgment compliance. The absence of specialized personnel dedicated to child support enforcement reduces institutional effectiveness in ensuring that court decisions are implemented, while limited administrative resources constrain legal assistance and follow-up actions in cases of persistent non-payment.

In addition to weaknesses in legal substance and legal structure, deficiencies in legal culture continue to undermine child support enforcement. Friedman's legal system theory emphasizes that legal effectiveness depends not only on legal rules

---

<sup>26</sup> Dyah Mustika Prasetyaningsih et al., "Effectiveness of Environmental Law Implementation: Compliance and Enforcement," *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi* 5, no. 2 (2022): 57. See also, Zoe Lindenfeld et al., "Specialized Mental Health Crisis Response Activities Within US Law Enforcement Agencies," *Community Mental Health Journal* 62, no. 1 (2026): 130.

<sup>27</sup> Chien-Chung Huang, and Ke-Qing Han, "Child support enforcement in the United States: Has policy made a difference?" *Children and Youth Services Review* 34, no. 4 (2012): 625. See also, Istiqomah Sinaga et al., "Whole of Government: An Effective Strategy for Ensuring Child Support Post-Religious Court Rulings," *Nurani: jurnal kajian syari'ah dan masyarakat* 24, no. 2 (2024): 336.

and institutions but also on societal attitudes toward legal obligations.<sup>28</sup> Even comprehensive legal frameworks may fail if they are not supported by public awareness and voluntary compliance.

In practice, child support obligations are often perceived as moral or personal responsibilities rather than legally enforceable obligations.<sup>29</sup> Many individuals continue to regard child support disputes as private family matters that should be resolved informally between former spouses. This perception contributes to low reporting rates and discourages the use of formal legal mechanisms when violations occur.

Cultural and social factors further reinforce these challenges. Divorced women frequently experience social pressure and stigma when pursuing legal remedies against former spouses, causing many violations to remain unreported. Gender inequality exacerbates these difficulties because custodial mothers often face economic constraints, limited legal knowledge, and procedural barriers in enforcing support orders.<sup>30</sup> At the same time, low public legal awareness contributes to the perception that child support is a voluntary parental contribution rather than a legally protected right of the child.

Based on this analysis, the Indonesian child support enforcement system suffers from three fundamental weaknesses: ineffective legal coercion mechanisms, the absence of specialized enforcement institutions and integrated information systems, and limited public awareness regarding the legal nature of child support obligations. These interconnected weaknesses explain the persistent gap between judicial decisions and actual compliance and demonstrate the need for a more comprehensive enforcement framework integrating legal, administrative-social, and digital dimensions.

### **3.2. Comparative Analysis of Child Support Enforcement in Four Countries**

The following table presents a systematic comparison using the five-parameter framework:

---

<sup>28</sup> Adilson Carlos Yoshikuni, and Rajeev Dwivedi, “The role of enterprise information systems strategies enabled strategy-making on organizational innovativeness: a resource orchestration perspective,” *Journal of Enterprise Information Management* 36, no. 1 (2023): 184. See also, Lawrence M. Friedman, *the legal system: A social science perspective*, (New York: Russell Sage Foundation, 1975) 326; Adam D. Fine, and Benjamin van Rooij, “Legal socialization: Understanding the obligation to obey the law,” *Journal of Social Issues* 77, no. 2 (2021): 385.

<sup>29</sup> Soetandyo Wignjosoebroto, “*Hukum dalam Masyarakat*,” (Yogyakarta: Graha Ilmu, 2013), 5. See also, Satjipto Rahardjo, “*Hukum progresif: Sebuah sintesa hukum Indonesia*,” (Yogyakarta: Genta Pub, 2009), 152. See also, Inger Ekman, “Practising the ethics of person-centred care balancing ethical conviction and moral obligations,” *Nursing philosophy* 23, no. 3 (2022): e12382.

<sup>30</sup> Adelakun et al., “Poverty, gender and child support systems,” 18. See also, Musaddad et al., “Guaranteeing the Rights of Children,” 7.

**Table 1.** Comparison of Child Support Enforcement Systems in Five Jurisdictions

<b>Parameter</b>	<b>United States of America</b>	<b>Singapore</b>	<b>Japan</b>	<b>China</b>	<b>Indonesia (At the moment)</b>
Legal basis	Child Support Enforcement Amendments 1984; Family Support Act 1988	Women’s Charter; Family Justice	Act 2014	Civil Code; Family Court Act	Marriage Law; Supreme Court Circular 2017
Implementing Agency	Office of Child Support Enforcement (OCSE) under DHHS	Family Justice Courts	– MEO Unit	Family Court	+ Child Support Division (MHLW)
Sanction Mechanism	Automatic salary deductions, asset freezing, driver’s license/passport revocation	Asset seizure, arrest, electronic reporting (iFAMS)	Automatic income deductio, mandatory mediation	Social blacklists, travel bans, restrictions on public services	There are no effective administrative/criminal sanctions
Information Systems	Federal Parent Locator Service (FPLS) – integrated national database	iFAMS (Integrated Family Application Management System)	Digital court records + automatic ayment system	Social Credit Database– connected to all public services	There is no integrated system; data is spread across various institutions.
Compliance Level	Approximately 70% of cases are collected (OCSE data 2023)	Relatively high thanks to the integrated electronic system	Significant increase after digitalization	Increase 30–50% since the implementation of the blacklist	Very low; no comprehensive national data
Approach Model	State responsibility– the state actively collects without waiting for a report	Proactive + digital; courts as integrated hubs	Combination of civil law + ministerial social support	Hybrid of law + administrative social sanctions	Reactive; depends on the caregiver’s initiative
Main Weaknesses	High bureaucratic burden; less effective for informal workers	Effective only for permanent residents; less adaptable across borders	Non-confrontational culture; voluntary compliance is still low	Risk of human rights violations;	Main Weaknesses

As shown in Table 1, countries with specialized enforcement institutions, integrated information systems, and effective sanction mechanisms generally demonstrate higher levels of compliance than Indonesia, where enforcement still relies largely on voluntary compliance and lacks institutional support.

The United States operates one of the most developed child support enforcement systems through the Office of Child Support Enforcement (OCSE). Enforcement mechanisms include wage garnishment, tax refund interception, bank account freezes, and suspension of driver's licenses or passports for non-compliant parents. In 2022, the OCSE collected approximately USD 32.7 billion in child support payments, reflecting the effectiveness of the system.<sup>31</sup> Its success is supported by the Federal Parent Locator Service (FPLS), which enables authorities to identify and track delinquent parents nationwide. Moreover, enforcement is initiated by state institutions rather than custodial parents, reducing barriers to collection. However, the model requires substantial administrative resources and is less effective for informal workers whose income is difficult to monitor.<sup>32</sup>

Singapore combines judicial efficiency with digital governance through the Family Justice Courts, Maintenance Enforcement Officer (MEO) Units, and the Integrated Family Application Management System (iFAMS). This centralized platform facilitates reporting, monitoring, and case management, improving transparency and administrative efficiency.<sup>33</sup> The MEO Unit has authority to investigate financial conditions, access banking information, seize assets, and recommend enforcement measures. The integration of judicial, banking, and immigration databases enables rapid verification and enforcement actions.<sup>34</sup> Although challenges remain in cross-border cases and among individuals with limited traceable assets, Singapore demonstrates the significant role of technology in strengthening child support enforcement.<sup>35</sup>

Japan adopts a model that combines legal enforcement with social support mechanisms. Child support obligations become enforceable through Family Court

---

<sup>31</sup> Lawrence M. Berger et al., "Barriers to formal child support payment," *Social Service Review* 95, no. 2 (2021): 338.

<sup>32</sup> Huang, and Han, "Child support enforcement in the United States," 625. See also, Hakovirta et al., "Child support policy across," 105.; Astraea Augsberger et al., "Examining a child welfare parenting intervention for parents with intellectual disabilities," *Research on Social Work Practice* 31, no. 1 (2021): 89.

<sup>33</sup> Taiana Gomes et al., "Emerging technologies used in the process of digital transformation in the judiciary," *International Journal of Innovation Science* 2, no. 3 (2026): 13.

<sup>34</sup> Hamid NoghaniBehambari et al., "Child support enforcement and child mortality," *Applied economics letters* 29, no. 5 (2022): 396.

<sup>35</sup> Michael Yong Hwa Chia et al., "Associations between parent attitudes and on-and off-screen behaviours of preschool children in Singapore," *International Journal of Environmental Research and Public Health* 19, no. 18 (2022): 11508.

decisions, while the Child Support Division under the Ministry of Health, Labour and Welfare (MHLW) provides consultation, verification services, legal information, and administrative assistance to custodial parents Japan also utilizes electronic payment systems and digital records to facilitate monitoring and improve administrative efficiency.<sup>36</sup> However, strong cultural preferences for consensus and voluntary compliance may reduce effectiveness in cases of persistent non-payment. Nevertheless, Japan highlights the importance of combining enforcement with institutional support to achieve sustainable compliance.<sup>37</sup>

China employs a model characterized by strong state intervention through cooperation between the People's Courts and the Social Credit System. Parents who fail to comply with court orders may be placed on public blacklists that restrict access to travel, financial services, luxury consumption, and certain public benefits.<sup>38</sup> Integration with national administrative databases enables rapid identification of violations and efficient sanction implementation.<sup>39</sup> Although concerns remain regarding privacy, proportionality, and human rights implications, studies indicate that blacklist mechanisms and social credit sanctions have improved compliance rates.<sup>40</sup>

Comparative findings indicate that successful child support enforcement depends on three key elements: specialized institutions, integrated information systems, and effective sanctions. Although the United States, Singapore, Japan, and China employ different approaches, each demonstrates the importance of combining legal authority with institutional and technological support to protect children's rights.<sup>41</sup> However, differences in administrative capacity, digital

---

<sup>36</sup> Angela Olivia Burton, and Angeline Montauban, "Toward community control of child welfare funding: Repeal the child abuse prevention and treatment act and delink child protection from family well-being," *Columbia Journal of Race and Law* 11, no. 3 (2021): 664. See also, Masato Shizume et al., "A corporate-centred conservative welfare regime: three-layered protection in Japan," *Journal of asian public policy* 14, no. 1 (2021): 122.

<sup>37</sup> Friedman, *The legal system: A social science perspective*, 326. See also, Wignjosoebroto, "Hukum dalam Masyarakat," 5; Paul Vinod Khiatani et al., "Advancing child protection systems in Indonesia and Ethiopia: A comparative analysis of progress and challenges," *Child Abuse & Neglect* 170, no. 2 (2025): 107762.

<sup>38</sup> Hailing Zhao, and Tingting Liu, "China's social credit system and the family: Punishment and collective resistance," *Economy and society* 54, no. 1 (2025): 59.

<sup>39</sup> Bryan R. Early, "Making sanctions work: Promoting compliance, punishing violations, and discouraging sanctions busting," In *Research handbook on economic sanctions*, (Cheltenham: Edward Elgar Publishing, 2021), 72.

<sup>40</sup> Dayong Yu, and Mingxun Xie, "A Review of Administrative Law Mechanisms in China: Balancing Authority and Accountability," *Asian Crime and Society Review* 12, no. 1 (2025): 6. See also, Mo Chen, and Jens Grossklags, "Social control in the digital transformation of society: A case study of the Chinese Social Credit System," *Social sciences* 11, no. 6 (2022): 229.

<sup>41</sup> John Braithwaite, *Restorative justice & responsive regulation*. (Great Britain: Oxford University Press, 2002), 243. See also, Andrés Payà Rico, and Jaume Bantulà Janot, "Children's right to play

readiness, and socio-economic conditions, particularly Indonesia's large informal sector and fragmented governance structure, limit the feasibility of direct replication. Therefore, these comparative experiences should serve as references for developing an enforcement framework suited to Indonesia's legal, institutional, and financial context.

### **3.3. Designing a Hybrid Model for Child Support Law Enforcement in Indonesia**

The Hybrid Model for Child Support Law Enforcement is a framework that integrates legal, administrative-social, and digital dimensions. It is grounded in legal system theory, which requires harmony between legal substance, structure, and culture; the principle of the best interests of the child; and the principle of state responsibility under Article 28B paragraph (2) of the 1945 Constitution. The model contains operationalized components, implementing instruments, measurable performance indicators, and a phased implementation roadmap.

The Hybrid Model also reflects restorative justice principles in family law. Rather than focusing solely on punishment, it seeks to restore children's welfare by ensuring the fulfillment of their economic rights while promoting sustainable parental responsibility. This approach combines accountability with supportive measures to prevent harm resulting from unpaid child support.

Its restorative orientation is reflected in several mechanisms. The proposed Child Support Enforcement Agency (*Badan Permusyawaratan Negeri Administratif /BPNA*) functions as both an enforcement and facilitative institution through mediation, verification, and dispute resolution. Family law education programs strengthen legal awareness and voluntary compliance, while temporary child support subsidies protect children's welfare when parents fail to meet their obligations.<sup>42</sup>

Implementation challenges remain, including the need for a clear legal mandate, inter-agency coordination, sustainable funding, effective data sharing, and robust governance safeguards. The model is distinguished by its operationalized structure, synergistic dimensions, and realistic implementation roadmap.

Three things distinguish the Hybrid Model from simply a collection of policy recommendations: (1) each dimension has operationalized components, implementing instruments, and success indicators; (2) the three dimensions are

---

and its implementation: A comparative, international perspective," *Journal of new approaches in educational research* 10, no. 2 (2021): 286; Hakovirta et al., "Child support policy across," 105.

<sup>42</sup> Andrew Shepard, "Family law with skills ten years later: Experiential education in the introductory family law course," *Family Court Review* 60, no. 4 (2022): 844. See also, Kustanto et al., "Unravelling Rising Divorces in Indonesia," 7.

designed to reinforce each other, not operate in isolation; and (3) the model is accompanied by a realistic, phase-based implementation roadmap.

**Table 2.** Hybrid Model Architecture of Child Support Enforcement

Dimensions	Main Components	Implementation Instruments	Success Indicators
Dimension 1: Legal	Direct executive power over alimony decisions; tiered administrative sanctions; revision of the Compilation of Islamic Law and the Marriage Law	Religious Court; Supreme Court; DPR (legislative revision)	Decrease in re-execution requests; increase in voluntary compliance in the first 6 months
Dimension 2: Administrative & Social	BPNA as an executive institution; temporary subsidy; mediation and family law education	BPNA at provincial/district/city level; Ministry of Social Affairs; KPAI; Social Services	Number of cases resolved per year; percentage of on-time payments; caregiver satisfaction
Dimension 3: Digital & Data Interconnection	SINAT as an integrated national platform; automatic salary deductions; early warning system for violations	OJK; Directorate General of Civil Registration; Banking; Ministry of Communication	Average claims processing time; data accuracy; percentage of cases detected early through the system

Based on the comparative findings and identified weaknesses of Indonesia’s system, Table 2 presents a Hybrid Model integrating legal, administrative-social, and digital dimensions through specific implementation instruments and measurable indicators. The judicial dimension serves as the foundation of the model by ensuring that child support obligations have effective coercive force. First, child support judgments should be granted direct executorial power, enabling courts to issue enforcement orders without separate execution proceedings. This reform would strengthen legal certainty and improve the effectiveness of judicial protection for children’s rights.<sup>43</sup>

Second, a graduated administrative sanction system should be introduced. Arrears of up to three months would trigger official warnings; three to six months would result in inclusion in the National Child Support Arrears List and restrictions on driver’s license renewal.<sup>44</sup> Arrears exceeding six months would lead to bank

<sup>43</sup> Sudikno Mertokusumo, “Penemuan hukum sebuah pengantar,” (2007). <https://library.stik-ptik.ac.id/detail?id=19777&lokasi=lokal>. See also, Rusydi et al., “Resolution without Enforcement: A Critical Study,” 547.

<sup>44</sup> Sutarjo Sutarjo, and Diah Pudjiastuti, “The Role of Mediators in Dispute Resolution Based on Progressive Law to Achieve Substantive Justice,” *Trunojoyo Law Review* 8, no. 2 (2026): 24.

account restrictions, limitations on administrative services, asset seizure, travel restrictions, and criminal sanctions under the Child Protection Law.

Third, revisions to the Compilation of Islamic Law (*Kompilasi Hukum Islam /KHI*) and Law Number 1 of 1974 are necessary to allow periodic adjustment of child support according to inflation and parental economic capacity, while standardizing calculations across Religious Courts to ensure fairness and legal certainty.<sup>45</sup>

The hybrid model cannot be implemented all at once. A realistic, phased implementation roadmap with measurable targets is needed:

**Table 3.** Roadmap for Reforming the Child Support Enforcement System

Fase	Short Term (0–2 Years)	Mid Term (2–5 years)	Long Term (5+ Years)
Juridical	Revision of Law No. 1/1974 and the Compilation of Islamic Law; affirmation of the executive power of child support decisions; issuance of a Supreme Court Regulation (PERMA) on the execution of child support orders	Establishment of a special maintenance execution unit in Religious Courts throughout Indonesia; training of judges and clerks	Full integration with the national legal system; evaluation and improvement of regulations based on empirical data
Administrative and Social	BPNA pilot project in 5 provinces; appointment of child support coordinators at district/city social services offices	Expansion of BPNA to all provinces; massive legal education program; strengthening the capacity of family mediators	BPNA fully operational nationwide; standardized temporary livelihood subsidy program; social impact evaluation
Digital & Data	Development of the SINAT prototype; Integration of Religious Court data with the Civil Registration Office (Dukcapil) and the Financial Services Authority (OJK).	National launch of SINAT; implementation of automatic salary deductions for formal workers; online reporting application	SINAR is fully integrated with all financial institutions and public services; the early warning system operates in real-time.

---

<sup>45</sup> Elza Qorina Pangestika, “The Role of Responsive and Progressive Law In Addressing Legal Issues from a Sociological Perspective,” *Widya Pranata Hukum: Jurnal Kajian dan Penelitian Hukum* 6, no. 2 (2024): 196. See also, Braithwaite, *Restorative justice & responsive regulation*. 56.

Responsible Actor	Supreme Court, DPR, Ministry of Social Affairs, Kominfo	Ministry of Social Affairs, OJK, KPAI, Regional Government	All stakeholders; independent evaluation by academics and NGOs
-------------------	---	--	--

As shown in Table 3, the proposed reform strategy emphasizes gradual implementation to address legal, administrative, financial, and technological constraints while ensuring long-term sustainability. The implementation of the Hybrid Model depends on political, financial, technical, and socio-cultural feasibility. From a political perspective, reforms involving amendments to Law Number 1 of 1974, the Compilation of Islamic Law (*Kompilasi Hukum Islam /KHI*), and the issuance of a Supreme Court Regulation (*Peraturan Mahkamah Agung /PERMA*) require support from the legislature, judiciary, and government. Given the strong commitment to child protection, reform prospects are relatively favorable.<sup>46</sup> However, because legislative reform is often lengthy, PERMA and ministerial policies should be prioritized as short-term measures.<sup>47</sup>

From a financial perspective, establishing the National Child Support Agency (*Badan Permusyawaratan Negeri Administratif /BPNA*) and the Integrated Child Support Information System (*Sistem Informasi Nafkah Anak Terpadu/SINAT*) requires significant investment. Nevertheless, experiences from the United States demonstrate that effective enforcement systems can generate substantial returns through improved collection mechan.<sup>48</sup> Technical challenges include unequal digital infrastructure, requiring gradual implementation through pilot projects and institutional capacity building. Comparative evidence highlights the benefits of integrated digital platforms.<sup>49</sup> Socio-cultural challenges remain significant because child support is often perceived as a private matter. Therefore, legal awareness programs and community engagement are essential to strengthen compliance.<sup>50</sup>

<sup>46</sup> Linda J. Cook, and Elena Iarskaia-Smirnova, “Welfare reforms in post-soviet states: current issues and research highlights,” *Europe-Asia Studies* 75, no. 2 (2023): 179. See also, Asgeir Falch-Eriksen et al., “Children expressing their views in child protection casework: Current research and their rights going forward,” *Child & Family Social Work* 26, no. 3 (2021): 491.

<sup>47</sup> Rahardjo, “Hukum progresif: Sebuah sintesa hukum Indonesia,” 152.

<sup>48</sup> Lindsey Rose Bullinger, “Child support and the Affordable Care Act’s Medicaid expansions,” *Journal of Policy Analysis and Management* 40, no. 1 (2021): 53. See also, Huang, and Han, “Child support enforcement in the United States,” 625

<sup>49</sup> Shaun Lim, “Judicial decision-making and explainable artificial intelligence: a reckoning from first principles,” *Singapore Academy of Law Journal* 33, no. 5 (2021): 288.

<sup>50</sup> Handi Kurniyawan, and Sri Wahyuni Tanszil, “Strategy of civic education teachers in building awareness and legal compliance for the younger generation.” *Indonesian Journal of Social Science* 16, no. 2 (2024): 18. See also, Friedman, *The legal system: A social science perspective*; 326; Braithwaite, *Restorative justice & responsive regulation*, 56; Hafiza Ambreen Fatima, and Muhammad Javed Iqbal, “Community Engagement for Promoting Religious Tolerance: A Conceptual and

#### 4. Conclusion

This study demonstrates that the weak enforcement of post-divorce child support obligations in Indonesia is caused not only by regulatory limitations but also by deficiencies in legal structure and legal culture. Although existing laws recognize parental responsibility for child support, the absence of effective enforcement mechanisms, specialized institutions, and integrated monitoring systems has contributed to low compliance and inadequate protection of children's economic rights.

Comparative analysis of the United States, Singapore, Japan, and China indicates that effective child support enforcement generally depends on three key elements: specialized enforcement institutions, integrated information systems, and effective sanction mechanisms. These findings highlight the importance of proactive state involvement in ensuring compliance with child support obligations.

Based on these findings, this study proposes a Hybrid Child Support Enforcement Model integrating judicial, administrative-social, and digital dimensions through the establishment of the National Child Support Agency (*Badan Permusyawaratan Negeri Administratif* /BPNA) and the Integrated Child Support Information System (SINAT). The model offers a comprehensive framework for strengthening child rights protection and improving compliance in Indonesia.

As a policy priority, the government should first strengthen the executorial power of child support decisions through Supreme Court regulations, followed by pilot implementation of BPNA and SINAT in selected provinces. In the long term, amendments to the Marriage Law and the Compilation of Islamic Law are necessary to establish a sustainable and effective child support enforcement system. Future studies should focus on empirical testing and institutional feasibility assessments of the proposed model.

---

Strategic Analysis in the context of Pakistani society," *Nuqtah Journal of Theological Studies* 5, no. 2 (2025): 13.

## References

- Adelakun, Adedayo, Olanike S. Adelakun, Marisa Lo Bartolo, Christina Boll, Rhonda Breitreuz, Adrienne Byrt, Yiyoon Chung et al. "Poverty, gender and child support systems in comparative perspective." In *Single Parents and Child Support Systems*. Cheltenham: Edward Elgar Publishing, (2024): 1-19. <https://doi.org/10.4337/9781800882409.00006>
- Agni, Mohammad Agni Ariyanto, Abdul Aziz, and Ahmad Khalimy. "Analisa tentang kepastian jaminan hak asuh anak pada kasus perceraian di pengadilan agama kabupaten cirebon: a. kasus perceraian di kabupaten cirebon, b. jaminan kepastian hak asuh anak pada kasus perceraian di kabupaten cirebon." *Jurnal Studi Islam* 14, no. 1 (2025): 108-127. <https://doi.org/10.33477/jsi.v14i1.9854>
- Anderson, Kent, and Mark Nolan. "Lay Participation in the Japanese Justice System." *Vanderbilt Journal of Transnational Law* 37, no. 4 (2004): 925-935.
- Augsberger, Astraea, Wendy Zeitlin, Trupti Rao, Danielle Weisberg, and Noor Torarif. "Examining a child welfare parenting intervention for parents with intellectual disabilities." *Research on Social Work Practice* 31, no. 1 (2021): 65-74. <https://doi.org/10.1177/1049731520958489>
- Banaesa, Iba. "Perkembangan perceraian di Indonesia." PhD diss., UIN Gunung Djati, 2022. <https://digilib.uinsgd.ac.id/52782/>
- Berger, Lawrence M., Maria Cancian, Angela Guarin, Leslie Hodges, and Daniel R. Meyer. "Barriers to formal child support payment." *Social Service Review* 95, no. 2 (2021): 312-357.
- Braithwaite, John. *Restorative justice & responsive regulation*. Great Britain: Oxford University Press, 2002, 223-287.
- Bullinger, Lindsey Rose. "Child support and the Affordable Care Act's Medicaid expansions." *Journal of Policy Analysis and Management* 40, no. 1 (2021): 42-77. <https://doi.org/10.1002/pam.22238>
- Burton, Angela Olivia, and Angeline Montauban. "Toward community control of child welfare funding: Repeal the child abuse prevention and treatment act and delink child protection from family well-being." *Columbia Journal of Race and Law* 11, no. 3 (2021): 639-680.
- Butler, Nadia, Zara Quigg, Rebecca Bates, Lisa Jones, Emma Ashworth, Steve Gowland, and Margaret Jones. "The contributing role of family, school, and peer supportive relationships in protecting the mental wellbeing of children and adolescents." *School Mental Health* 14, no. 3 (2022): 776-788.
- Chen, Mo, and Jens Grossklags. "Social control in the digital transformation of society: A case study of the Chinese Social Credit System." *Social sciences* 11, no. 6 (2022): 219-229. <https://doi.org/10.3390/socsci11060229>
- Chen, Yu-Jie, Ching-Fu Lin, and Han-Wei Liu. "Rule of Trust: The Power and Perils of China's Social Credit Megaproject." *Columbia Journal of Asian Law* 32, no. 1 (2018): 1-36.
- Chia, Michael Yong Hwa, John Komar, Terence Buan Kiong Chua, and Lee Yong Tay. "Associations between parent attitudes and on-and off-screen behaviours of preschool children in Singapore." *International Journal of Environmental Research and Public Health* 19, no. 18 (2022): 11492-11508. <https://doi.org/10.3390/ijerph191811508>
- Cook, Linda J., and Elena Iarskaia-Smirnova. "Welfare reforms in post-soviet states: current issues and research highlights." *Europe-Asia Studies* 75, no. 2 (2023): 173-185. <https://doi.org/10.1080/09668136.2023.2168875>
- CRC, UN. "General Comment No. 14 On the Right of the Child to Have His or Her Best Interests Taken as a Primary Consideration (art. 3, para. 1)." *Al-Zyan Jurnal Ilmu Sosial & Hukum* 4, no. 1 (2013): 8-16.

- Cuesta, Laura, Mia Hakovirta, Mari Haapanen, and Daniel Ray Meyer. "Child support policy in middle-and low-income countries: current approaches and policy dilemmas." *Journal of International and Comparative Social Policy* 39, no. 1 (2023): 64-83. <https://doi.org/10.1017/ics.2023.4>
- Daniel, Alan M., and Kelly S. Treece. "Law enforcement pathways to mental health: Secondary traumatic stress, social support, and social pressure." *Journal of police and criminal psychology* 37, no. 1 (2022): 132-140.
- Early, Bryan R. "Making sanctions work: Promoting compliance, punishing violations, and discouraging sanctions busting." In *Research handbook on economic sanctions*, Cheltenham: Edward Elgar Publishing, 2021, 67-86. <https://doi.org/10.4337/9781839102721.00015>
- Ekman, Inger. "Practising the ethics of person-centred care balancing ethical conviction and moral obligations." *Nursing philosophy* 23, no. 3 (2022): 12372-12382. <https://doi.org/10.1111/nup.12382>Digital Object Identifier
- Fatima, Hafiza Ambreen, and Muhammad Javed Iqbal. "Community Engagement for Promoting Religious Tolerance: A Conceptual and Strategic Analysis in the context of Pakistani society." *Nuqtah Journal of Theological Studies* 5, no. 2 (2025): 11-15.
- Fine, Adam D., and Benjamin van Rooij. "Legal socialization: Understanding the obligation to obey the law." *Journal of Social Issues* 77, no. 2 (2021): 367-391. <https://doi.org/10.1111/josi.12440>
- Friedman, Lawrence M. *The legal system: A social science perspective*. New York: Russell Sage Foundation, 1975, 298-338.
- Gomes, Taiana, Carlos Filipe Cosentino Gomes, and Joselia E. Teixeira. "Emerging technologies used in the process of digital transformation in the judiciary." *International Journal of Innovation Science* 2, no. 3 (2026): 1-26. <https://doi.org/10.1108/IJIS>
- Hakovirta, Mia, Laura Cuesta, Mari Haapanen, and Daniel R. Meyer. "Child support policy across high-income countries: Similar problems, different approaches." *The ANNALS of the American Academy of Political and Social Science* 702, no. 1 (2022): 97-111. <https://doi.org/10.1177/00027162221119959>
- Huang, Chien-Chung, and Ke-Qing Han. "Child support enforcement in the United States: Has policy made a difference?." *Children and Youth Services Review* 34, no. 4 (2012): 622-627. <https://doi.org/10.1016/j.chilyouth.2011.12.006>
- Huntington, Clare, and Elizabeth S. Scott. "The Enduring Importance of Parental Rights." *Fordham L. Rev.* 90, no. 6 (2022): 2529.
- Kayati, Nurul Fitri, Syarif Hidayatullah, and Jainuddin Jainuddin. "Legal Implementation in the Digital Era: Protection of Child Support Rights after Divorce in Indonesia." *Hakamain: Journal of Sharia and Law Studies* 4, no. 1 (2025): 1-13.
- Khiatani, Paul Vinod, Wing Hong Chui, and Dagim Dawit Gonsamo. "Advancing child protection systems in Indonesia and Ethiopia: A comparative analysis of progress and challenges." *Child Abuse & Neglect* 170, no. 2 (2025): 107732-107762. <https://doi.org/10.1016/j.chiabu.2025.107762>
- Kurniyawan, Handi, and Sri Wahyuni Tanshzil. "Strategy of civic education teachers in building awareness and legal compliance for the younger generation." *Indonesian Journal of Social Science* 16, no. 2 (2024): 16-20.
- Kustanto, Andi, Sayifullah Sayifullah, Zahid Ullah Khan, Jabbar Ul-Haq, and Hubert Visas. "Unravelling Rising Divorces in Indonesia: The Interplay of Economic Stress, ICT Use, Domestic Violence, and the Moderating Role of Education." *Journal of Family Violence* 14, no. 2 (2025): 1-13.
- Lanjekar, Purva D., Shiv H. Joshi, Puja D. Lanjekar, Vasant Wagh, and VASANT WAGH. "The effect of parenting and the parent-child relationship on a child's cognitive development: A literature review." *Cureus* 14, no. 10 (2022): 25-28.

- Lim, Shaun. "Judicial decision-making and explainable artificial intelligence: a reckoning from first principles." *Singapore Academy of Law Journal* 33, no. 5 (2021): 280-314.
- Lindenfeld, Zoe, Amanda I. Mauri, Saba Rouhani, and Charley E. Willison. "Specialized Mental Health Crisis Response Activities Within US Law Enforcement Agencies." *Community Mental Health Journal* 62, no. 1 (2026): 127-134.
- Loi, Yarni, and Suzanne Chin. "Therapeutic Justice-What It Means for the Family Justice System in Singapore." *Family Court Review* 59, no. 3 (2021): 423-443. <https://doi.org/10.1111/fcre.12587>
- Mahkamah Agung Republik Indonesia. "Membangun peradilan modern berbasis teknologi informasi MA RI." *Laporan tahunan Mahkamah Agung Republik Indonesia tahun*, February 18, 2022. Retrieved in February 23, 2024 from <https://kepaniteraan.mahkamahagung.go.id/publikasi/laporan-tahunan/2180-laporan-tahunan-ma-2022>
- Mertokusumo, Sudikno. *Penemuan hukum sebuah pengantar*. Yogyakarta: Liberty Yogyakarta (2007).
- Mitchell, Matthew. "Analyzing the law qualitatively." *Qualitative research journal* 23, no. 1 (2023): 102-113.
- Mulyawan, Fitra, Kiki Yulinda, and Dora Tiara. "Politik Hukum Dalam Bidang Hukum Keluarga Islam." *Ensiklopedia of Journal* 3, no. 2 (2021): 111-122.
- Musaddad, E., M. Ishom, M. N. Mat Hussin, and A. J. Jambunanda. *Guaranteeing the Rights of Children and Women Post-Divorce: A Comparative Study Between Indonesia and Malaysia*. *Volksgeist: Jurnal Ilmu Hukum Dan Konstitusi* 8, no. 1 (2025): 1-14.
- NoghaniBehambari, Hamid, Farzaneh Noghani, and Nahid Tavassoli. "Child support enforcement and child mortality." *Applied economics letters* 29, no. 5 (2022): 391-402. <https://doi.org/10.1080/13504851.2020.1869157>
- Novitasari, Nurul. "Analisis undang-undang nomor 35 tahun 2014 terhadap kekerasan anak pada masa pandemi covid-19." *JCE (Journal of Childhood Education)* 5, no. 2 (2021): 333-351.
- Pais, Marta Santos, and Susan Bissell. "Overview and implementation of the UN Convention on the Rights of the Child." *The lancet* 367, no. 9511 (2006): 689-690.
- Pangestika, Elza Qorina. "The Role of Responsive and Progressive Law In Addressing Legal Issues From A Sociological Perspective." *Widya Pranata Hukum: Jurnal Kajian dan Penelitian Hukum* 6, no. 2 (2024): 190-202. <https://doi.org/10.37631/widyapranata.v6i2.1612>
- Payà Rico, Andrés, and Jaume Bantulà Janot. "Children's right to play and its implementation: A comparative, international perspective." *Journal of new approaches in educational research* 10, no. 2 (2021): 279-294.
- Prabasini, Olif Skear. "Legal protection for children in conflict with the law: Process and problems." *The Indonesian Journal of International Clinical Legal Education* 3, no. 3 (2021): 381-398.
- Prasetyaningsih, Dyah Mustika, Eko Hendarto, Nurul Anwar, and Khalid Eltayeb Elfaki. "Effectiveness of Environmental Law Implementation: Compliance and Enforcement." *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi* 5, no. 2 (2022): 56-58.
- Rahardjo, Satjipto. *Hukum progresif: Sebuah sintesa hukum Indonesia*. Yogyakarta: Genta Pub., 2009, 148-156.
- RI, Presiden. "Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan." *LN Nomor* 1 (1974).
- Rini Fathonah, R. F., and Heni Siswanto Heni Siswanto. "Humanist law: law enforcement strategy against child persons of crime in indonesia." *International Journal of Advanced Research (IJAR)* 11, no. 1 (2023): 63-73.
- Rusydi, Bustanul Arifien, Ahmad Khairun Hamrany, Tata Wijayanta, and Deslaely Putranti. "Resolution without Enforcement: A Critical Study of Case Closure and Substantive Justice in Indonesian Court Mediation." *Justicia Islamica* 23, no. 2 (2026): 537-568. <https://doi.org/10.21154/justicia.v23i2.13286>

- Sebyar, Muhamad Hasan. "Politik Hukum Undang-Undang Nomor 16 Tahun 2019 Tentang Perubahan Atas Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan." *IUS: Jurnal Ilmiah Fakultas Hukum* 9, no. 01 (2022): 47-65.
- Schepard, Andrew. "Family law with skills ten years later: Experiential education in the introductory family law course." *Family Court Review* 60, no. 4 (2022): 836-854. <https://doi.org/10.1111/fcre.12678>
- Shizume, Masato, Masatoshi Kato, and Ryozo Matsuda. "A corporate-centred conservative welfare regime: three-layered protection in Japan." *Journal of asian public policy* 14, no. 1 (2021): 110-133. <https://doi.org/10.1080/17516234.2020.1829834>
- Sinaga, Istiqomah, Asmuni Asmuni, and Dhiauddin Tanjung. "Whole of Government: An Effective Strategy for Ensuring Child Support Post-Religious Court Rulings." *Nurani: jurnal kajian syari'ah dan masyarakat* 24, no. 2 (2024): 329-344. <https://doi.org/10.19109/nurani.v24i2.24714>
- Sudarsono. *Hukum kekeluargaan Indonesia*, Jakarta: Rineka Cipta, 1991, 1-20.
- Sukirman, Asrianti, Oyo Sunaryo Mukhlas, and Aden Rosadi. "Islamic Judicial Activism in Determining Child Maintenance: Ex Officio Authority and Peaceful Settlement in Indonesian Religious Courts." *Al-Istinbath: Jurnal Hukum Islam* 10, no. 2 (2025): 671-699. <https://doi.org/10.29240/jhi.v10i2.12755>
- Sutarjo, Sutarjo, and Diah Pudjiastuti. "The Role of Mediators in Dispute Resolution Based on Progressive Law to Achieve Substantive Justice." *Trunojoyo Law Review* 8, no. 2 (2026): 22-26.
- Wignjosoebroto, Soetandyo. "Hukum dalam masyarakat." *Yogyakarta: Graba Ilmu* (2013), 1-10.
- Wind, Roos, Michel Vols, and Berend Roorda. "The Child-specific Right to Adequate Housing in the Convention on the Rights of the Child." *The International Journal of Children's Rights* 31, no. 2 (2023): 444-470.
- Yoshikuni, Adilson Carlos, and Rajeev Dwivedi. "The role of enterprise information systems strategies enabled strategy-making on organizational innovativeness: a resource orchestration perspective." *Journal of Enterprise Information Management* 36, no. 1 (2023): 172-196. <https://doi.org/10.1108/JEIM-10-2021-0442>
- Yu, Dayong, and Mingxun Xie. "A Review of Administrative Law Mechanisms in China: Balancing Authority and Accountability." *Asian Crime and Society Review* 12, no. 1 (2025): 6-6. <https://doi.org/10.14456/acsr.2025.6>
- Yuspitasari, Selvy. "Women's Rights in Divorce and Post-Divorce Maintenance: Perspectives from Islamic Family Law in Indonesia and Human Rights." *Nusantara: Journal of Law and Islamic Law* 1, no. 3 (2026): 1-24.
- Zhao, Hailing, and Tingting Liu. "China's social credit system and the family: Punishment and collective resistance." *Economy and society* 54, no. 1 (2025): 49-69. <https://doi.org/10.1080/03085147.2024.2422187>
- Zondi, Thembelihle Vumokuhle, and Nathaniel Phuti Kgadima. "Challenging experiences of custodial mothers following their divorce: Implications for social work practice." *Social Work/Maatskaplike Werk* 60, no. 4 (2024): 782-802. <https://doi.org/10.15270/60-4-1398>