



Criminalization of Prostitution Clients and Recommendations for Legal Reform in Indonesia

Ratih Mega Puspa Sari^{1*}, and Lusiana Margareth Tijow²

¹Universitas Islam Sultan Agung, Semarang, Indonesia

²Universitas Negeri Malang, Malang, Indonesia

**Corresponding author: ratihmega@unissula.ac.id*

Abstract. The phenomenon of prostitution in Indonesia is not merely a moral issue but also a legal one, given that criminal liability disproportionately targets sex workers and procurers, while the users of such services (clients) largely evade accountability. This creates a justice gap and an imbalance within the criminal liability system. This study aims to analyze the normative basis and the urgency of criminalizing the users of prostitution services, as well as to formulate a direction for criminal law reform in Indonesia. The research employs a juridical-normative methodology, utilizing statutory, conceptual, and comparative legal approaches. The findings indicate that criminal law reform must address the clarity of the definitions of criminal offenses, the proportionality of sanctions, and the protection of sex workers who are subjected to exploitation. In this context, the “Nordic Model” serves as a relevant point of comparison, as it focuses on penalizing the purchasers of sexual services without criminalizing the act of selling such services by sex workers. Consequently, criminal law reform should be directed toward evaluating and refining the provisions within the Criminal Code and related regulations, while upholding legal certainty, and substantive justice.

Keywords: Criminalization, Human Rights Protection, Indonesian Criminal Law, Legal Reform, Prostitution Clients.



Abstrak. *Fenomena prostitusi di Indonesia bukan sekadar masalah moral, melainkan juga persoalan hukum, mengingat pertanggungjawaban pidana secara tidak proporsional menasar pekerja seks dan mucikari sementara pengguna jasa (klien) sebagian besar lolos dari pertanggungjawaban. Hal ini menciptakan kesenjangan keadilan dan ketimpangan dalam sistem pertanggungjawaban pidana. Penelitian ini bertujuan menganalisis landasan normatif dan urgensi pembedaan pengguna jasa prostitusi serta merumuskan arah reformasi hukum pidana di Indonesia. Penelitian menggunakan metode yuridis-normatif dengan pendekatan perundang-undangan, konseptual, dan perbandingan hukum. Hasil penelitian menunjukkan bahwa pembaruan hukum pidana perlu mempertimbangkan kejelasan rumusan tindak pidana, proporsionalitas sanksi, serta perlindungan terhadap pekerja seks yang mengalami eksploitasi. Dalam konteks tersebut, Model Nordik dapat menjadi bahan perbandingan karena menitikberatkan pembedaan pembeli layanan seksual tanpa menjadikan penjualan layanan seksual sebagai dasar pembedaan pekerja seks. Oleh karena itu, reformasi hukum pidana perlu diarahkan pada evaluasi dan penyempurnaan ketentuan dalam KUHP dan peraturan terkait dengan tetap memperhatikan kepastian hukum, dan keadilan substantif.*

Kata kunci: *Kriminalisasi, Perlindungan Hak Asasi Manusia, Hukum Pidana Indonesia, Reformasi Hukum, Pengguna Jasa Prostitusi.*

1. Introduction

The phenomenon of prostitution in Indonesia is a social issue that remains a subject of ongoing debate from both legal and moral perspectives. Its existence is inextricably linked to various underlying factors, including economic conditions, poverty, social inequality, and individual vulnerability to exploitation.¹ In practice, prostitution involves various parties with different roles and interests ranging from sex workers and clients to those who profit from the activity.² This complexity renders prostitution a phenomenon that cannot be adequately understood solely as a matter of individual morality; rather, it is a social issue that requires a proportionate legal response.³ In this context, the fundamental issue is not merely how the state addresses the practice of prostitution, but also how the law distributes criminal liability among the parties involved. Law enforcement efforts that focus primarily on sex workers or those who facilitate prostitution without adequately examining the position of the client's risk creating an imbalance in the assignment of criminal responsibility.⁴

The legal framework in Indonesia concerning prostitution includes Law Number 21 of 2007 on the Eradication of the Crime of Human Trafficking, which may be applied if the practice of prostitution meets the elements of human trafficking and exploitation. Furthermore, Law Number 1 of 2023 concerning the Criminal Code specifically Articles 419-422 establishes various criminal offenses related to the facilitation of sexual activities and the involvement of children. Nevertheless, Indonesia does not yet have provisions that specifically criminalize the users of prostitution services as a distinct criminal offense.⁵ Law enforcement

¹ Jonathan Willem Golijot et al., "Bacha bazi in Afghanistan: A study of intersectional feminism," *Gender Equality: International Journal of Child and Gender Studies* 11, no. 1 (2025): 3.

² Lorena Molnar and Marcelo F. Aebi, "Risky business: voluntary sex workers as suitable victims of work-related crimes in a legalised prostitution environment: L. Molnar and MF Aebi," *Crime Prevention and Community Safety* 25, no. 2 (2023): 210.

³ Jason Hung, "Sociological and Policy Examination of Poverty-Led Crime in Indonesia: Case Study of (Child) Prostitution," *Journal of Poverty*, vol. 28, no. 3 (2024): 412. See also, Huasheng Gao, and Vanya Petrova, "Do prostitution laws affect rape rates? Evidence from Europe," *The Journal of Law and Economics* 65, no. 4 (2022): 779.

⁴ Evelin Nikolova, *Digitally Mediated Narratives of Sexual Harassment: Perspectives from the Sex Work Industry*, (London: Taylor & Francis, 2026): 12. See also, Christian Leuprecht et al., "Detecting, disrupting and deterring sexual exploitation of trafficked persons: Leveraging beneficial ownership registries to reduce criminogenic information asymmetry and raise public expectations," *Current Issues in Criminal Justice* 37, no. 2 (2025): 265.

⁵ A. Harits Nu'man et al., "Criminalization of Service Users and Traditional Commercial Sex Workers in Indonesia," *IJOLARES: Indonesian Journal of Law Research* 2, no. 2 (2024): 44. See also, Maryamul Chumairo, Novita Dewi Masyithoh, and Arina Hukmu Adila. "Criminal Policy for Users

tends to focus on sex workers and those who facilitate their services (pimps/procurers), while the clients who purchase these services remain largely untouched by criminalization policies.⁶ This situation creates an imbalance in criminal liability between those who offer sexual services and those who utilize them; therefore, it warrants examination from the perspectives of substantive justice and criminal law policy.⁷

The concept of criminalizing users of prostitution services is based on the view that demand is one of the factors that sustains the practice of prostitution.⁸ Therefore, criminal law policy should be directed toward breaking the economic chain that fuels sexual exploitation, rather than focusing solely on imposing sanctions on those involved, especially those who are victims of such exploitation.⁹ In the context of Indonesian criminal law, this could be pursued by expanding criminal liability for those who use prostitution services specifically when they know, or reasonably ought to suspect, that the sexual services they are obtaining involve a victim of exploitation or human trafficking. Such an approach could be implemented by strengthening legal provisions, while strictly upholding the principle of legality and ensuring that the elements of the criminal offense are clearly defined. However, criminal law reform should not focus solely on expanding the scope of criminalization. The drafting process must also take into account the principles of proportionality, non-discrimination, and the protection of human rights. This is essential to ensure that penal policies do not exacerbate the vulnerability of sex workers, but rather serve to prevent sexual exploitation and foster a fair system of law enforcement.¹⁰

Ofservices Prostitution to Achieve Substantial Justice,” *Walisongo Law Review (Walrev)* 3, no. 1 (2021): 115.

⁶ Saji Sonjaya, “Mengeksplorasi regulasi industri seksual di Indonesia: Pemidanaan pembeli jasa pekerja seks komersial,” *JCIC: Jurnal CIC Lembaga Riset dan Konsultan Sosial* 7, no. 1 (2025): 29.

⁷ Muladi and Barda Nawawi Arief, *Teori dan Kebijakan Pidana* (Jakarta: Prenadamedia, 2023), 77.

⁸ Keighley, and Sanders, “The eyes and ears of sexual exploitation online,” 1137. See also, Teela Sanders, *Prostitution and Criminal Justice: Global Contexts* (Routledge: Routledge, 2024), 55; Gao, and Petrova, “Do prostitution laws affect rape rates?” 781

⁹ Nu’man et al., “Criminalization of Service Users,” 42. See also, Ekinci, “Criminalisation of Sex Work,” 123.

¹⁰ Lilik Mulyadi, *Hukum Pidana dan Hak Asasi Manusia* (Bandung: Citra Aditya Bakti, 2024), 55. See also, Mariëlle Kloek et al., “High rates of violence and low police reporting amongst sex workers in the Netherlands during the COVID-19 pandemic,” *Crime Science* 13, no. 1 (2024): 38; Sofia Jonsson, “Does criminalizing the purchase of sex reduce sex-buying? Evidence from a European survey on prostitution,” *European journal of law and economics* 56, no. 1 (2023): 95; Lucy Platt et al., “Associations between sex work laws and sex workers’ health: A systematic review and meta-analysis of quantitative and qualitative studies,” *PLoS medicine* 15, no. 12 (2018): 12680.

In his study, Başak Ekinci¹¹ stated that the criminalization of sex workers cannot be justified solely on the basis of the assumption that prostitution is harmful or immoral. According to him, the application of criminal law must also comply with the principles of proportionality and non-discrimination. This finding confirms that criminal policy needs to consider its impact on vulnerable groups, rather than solely focusing on punishment. Meanwhile, research by Niina Vuolajärvi¹² indicates that the criminalization of those who purchase sexual services does not automatically eliminate the vulnerability of sex workers to violence and exploitation. In the Indonesian context, the National Commission on Violence Against Women or *Komnas Perempuan*, through its 2024 Annual Report on Violence Against Women, documents various forms of sexual violence, including sexual exploitation and human trafficking for the purpose of sexual exploitation. These data underscore the importance of strengthening protections for victims, though they do not specifically prove that the criminalization of prostitution clients is an effective solution.¹³ Consequently, the reform of Indonesia's criminal law needs to examine the liability of service users particularly in cases involving exploitation while simultaneously ensuring that the policies implemented do not further endanger sex workers.¹⁴

The need to formulate a criminal policy capable of balancing the accountability of those who purchase sexual services with the protection of sex workers underscores the importance of examining legal approaches adopted in other countries. One model worth considering is the Nordic Model, which shifts the focus of criminalization toward the buyers of sexual services, while ensuring that sex workers are not penalized solely for selling such services.¹⁵ This model was first implemented in Sweden in 1999 through the Sex Purchase Act, which prohibited

¹¹ Başak Ekinci, "Criminalisation of Sex Work: A Critical Approach to Criminalisation Theories from a Human Rights Perspective," In *Annales de la Faculté de Droit d'Istanbul*, (Istanbul University, 2024), 122.

¹² Niina Vuolajärvi, "Criminalising the sex buyer: experiences from the Nordic region," (2022): 23.

¹³ Laporan Komnas Perempuan, *Catatan Tahunan Kekerasan Terhadap Perempuan* (Jakarta, 2024).

¹⁴ Evi Laila Kholis, "Moralitas dan Hukum: Dilema Penegakan Prostitusi di Indonesia," *Jurnal Legislasi Indonesia* 21, no. 1 (2024): 43. See also, Anis Widyawati et al., "Dynamics of the penitentiary system, transparent and accountable handling of criminal cases in criminal execution law in Southeast Asia: Convergence and divergence of international perspectives," *Indonesia Law Review* 15, no. 1 (2025): 2; Nanang Nurcahyo et al., "Reform of the criminal law system in Indonesia which prioritizes substantive justice," *Journal of Law, Environmental and Justice* 2, no. 1 (2024): 90; Simon Butt, "Indonesia's new Criminal Code: indigenising and democratising Indonesian criminal law?," *Griffith Law Review* 32, no. 2 (2023): 199.

¹⁵ Swedish Government, *Evaluation of the Sex Purchase Act (1999:408)* (Stockholm: Ministry of Justice, 2024), 23.

the purchase of sexual services. According to Gunilla Ekberg,¹⁶ The policy aims to reduce the demand for prostitution while reducing the economic incentives for those who profit from sexual exploitation and human trafficking.

However, the implementation of the Nordic Model is not without criticism. Research by Niina Vuolajärvi,¹⁷ This indicates that the criminalization of clients does not automatically eliminate the vulnerability of sex workers. Under certain conditions, such a policy may instead push prostitution into more hidden spaces, making it more difficult for sex workers to access protection. Therefore, this approach must be accompanied by social support, access to healthcare and legal aid, and protection for victims of exploitation. These experiences can serve as a point of consideration for Indonesia as it formulates policies regarding the criminalization of those who purchase sexual services, ensuring that such policies are not solely focused on punishment, but also safeguard human rights.¹⁸

Specifically, the study of criminalizing users of prostitution services requires a deeper exploration of the interplay between the principle of legality, criminal liability, regulations concerning human trafficking, and the protection of vulnerable groups within the Indonesian legal framework. This research aims to address this gap by analyzing the legal basis for and the urgency of criminalizing users of prostitution services, comparing legal approaches adopted in other countries, and formulating recommendations for criminal law reform that are proportionate, equitable, and aligned with human rights principles. Therefore, this study aims to answer the following three research questions:

- 1) What are the normative foundations and the urgency for criminalizing users of prostitution services within the Indonesian criminal justice system?
- 2) How is the policy of criminalizing users of prostitution services regulated and implemented in countries that have adopted it, and what are the implications?
- 3) How can Indonesia's criminal law be reformed to establish a framework for the criminal liability of users of prostitution services that adheres to the principle of legality, the principle of proportionality, and the protection of human rights?

¹⁶ Gunilla Ekberg, "The Swedish law that prohibits the purchase of sexual services: Best practices for prevention of prostitution and trafficking in human beings," *Violence against women* 10, no. 10 (2004): 1212.

¹⁷ Vuolajärvi, "Criminalising the sex buyer," 26.

¹⁸ Rachel Keighley, and Teela Sanders, "The eyes and ears of sexual exploitation online: Are sex buyers part of the prevention puzzle to reduce harms in the online sex industry?," *The British Journal of Criminology* 64, no. 5 (2024): 1135. See also, Henrik Karlsson, "Sex Work Policy Worldwide: A Scoping Review," *H. Karlsson, Sexuality & Culture* 26, no. 6 (2022): 2289; Andreas Kotsadam, and Niklas Jakobsson, "Shame on you, John! Laws, stigmatization, and the demand for sex," *European Journal of Law and Economics* 37, no. 3 (2014): 396.

2. Research Methods

This research employs a juridical-normative method to analyze the legal basis, the scope of criminal liability, and the implications of penal policies regarding the users of prostitution services in Indonesia. The study utilizes three approaches: the statutory approach, the conceptual approach, and the comparative legal approach. The statutory approach is used to examine legal provisions concerning prostitution, criminal liability, and the crime of human trafficking. Primary legal materials analyzed include the Criminal Code (*Kitab Undang-Undang Hukum* or KUHP), Law Number 21 of 2007 on the Eradication of the Crime of Human Trafficking, and Law Number 1 of 2023 concerning the Criminal Code specifically Articles 419-422, which regulate various acts related to sexual activity and child protection.

The conceptual approach is applied to analyze relevant legal principles and doctrines, including criminalization policy, the principle of legality, the principle of proportionality, *ultimum remedium* (criminal law as a last resort), restorative justice, and feminist legal theory. Meanwhile, the comparative legal approach is used to examine the regulation and implementation of penal policies regarding users of prostitution services through the “Nordic Model”, with Sweden serving as the primary case study. This comparison aims to identify the normative foundations, implementation mechanisms, and the policy's implications for sex workers and vulnerable groups, serving as a basis for formulating recommendations for Indonesian criminal law.

3. Results and Discussion

3.1. Normative Foundation and the Urgency of Criminalizing Users of Prostitution Services in Indonesia

Criminalization of users of prostitution services is a criminal law issue relating to the basis for determining an act as a criminal offense as well as the limits of criminal liability that can be imposed on the perpetrator. From a criminal law perspective, not every act that is deemed to be contrary to social or moral norms can automatically be subject to criminal sanctions.¹⁹ Criminalization must be based on rational considerations regarding the legal interests to be protected, the nature of prohibited acts, and the need to use criminal legal instruments to prevent or overcome these acts.²⁰

¹⁹ Andrew Cornford, “The aims and functions of criminal law,” *The Modern Law Review* 87, no. 2 (2024): 399. See also, Dedy Sumardi et al., “Transition of Civil Law to Public Law: Integration of Modern Punishment Theory in Criminal Apostasy,” *Abkam: Jurnal Ilmu Syariah* 22, no. 1 (2022): 238.

²⁰ Kholis, “Moralitas dan Hukum,” 43. See also, Kotsadam, and Jakobsson, “Shame on you, John!,” 397. See also, Zahra Tavangar et al., “The Relationship between Criminalization and Liberty

This problem becomes increasingly complex because the practice of prostitution involves parties with different roles, interests and levels of involvement. Service users, sex workers, intermediaries and parties who gain profits from prostitution practices cannot be positioned uniformly in determining criminal liability.²¹ These distinctions must be taken into account when assessing whether an act warrants criminal sanctions and the extent to which liability should be assigned to each party involved. Specifically, in determining the criminal liability of a service user, it is necessary to consider whether their involvement was limited to a transaction for sexual services, or if it was linked to circumstances involving coercion, sexual exploitation, or human trafficking. Such distinctions are essential to ensure that criminalization policies do not overlook the specific nature of the act or the respective roles of the parties involved.²²

From the perspective of criminal policy, criminalization is part of a rational effort to combat crime through both penal and non-penal means. The thought of Marc Ancel²³ The concept of social defense emphasizes the importance of situating criminal policy within a framework of societal protection one that is not solely oriented toward punishment, but also focuses on prevention and addressing the underlying factors that contribute to crime. In the context of those who purchase prostitution services, this perspective can be used to evaluate whether criminalization is an appropriate instrument for curbing the demand for sexual services, particularly when such practices are linked to sexual exploitation and human trafficking.²⁴ Thus, the justification for criminalization must take into account the objective of protecting the public, the effectiveness of imposing punishment, and its integration with non-penal measures.²⁵

in Islamic and Western Criminal Law.” *Iranian Journal of International and Comparative Law* 4, no. 1 (2026): 210; Mahrus Ali et al., “Criminalization based on the principle of human rights limitation,” *Jurnal Hukum Novelty* 13, no. 1 (2022): 99; Alessandro Corda, “The Legitimacy of Criminal Law and The Performance Crises of Penalty: A. Corda.” In *Criminal Law Forum*, vol. 36, no. 2, pp. 352. (Dordrecht: Springer Netherlands, 2025)

²¹ Eva-Maria Euchner, “Ruling under a shadow of moral hierarchy: Regulatory intermediaries in the governance of prostitution,” *Regulation & Governance* 16, no. 3 (2022): 837. See also, Eelco, Van Wijk and Peter Mascini, “The responsabilization of entrepreneurs in legalized local prostitution in the Netherlands,” *Regulation & Governance* 16, no. 3 (2022): 876.

²² Benjamin Levin, “Criminal law exceptionalism,” *Virginia Law Review* 108, no. 6 (2022): 1390. See also, T. Markus Funk, “Rethinking Culpability and Wrongdoing (in the Criminal Law-and Everyday Life),” *U. Cin. L. Rev.* 92 (2023): 1080.

²³ Marc Ancel, *Social defence: A modern approach to criminal problems* (Hove: Psychology Press, 1998), 12.

²⁴ Luigi Giuseppe Barbieri Ferrarini and Patrick Cacicedo, “Colonialism, Slavery, and Racism: Structural Aspects for the Construction of a Brazilian Criminology,” In *The Palgrave Handbook of Criminology and the Global South*, pp. 3. (Cham: Springer Nature Switzerland, 2025).

²⁵ Sanders, *Prostitution and Criminal Justice*, 58. See also, Aga Natalis, “Power, law, and the semiotics of marginalisation: Rethinking prostitution, health risk, and legal discourse in

The principle of equality before the law serves as a basis for assessing the criminal liability of those who use prostitution services. However, this principle does not mandate that all parties receive the same sanctions; rather, it requires that criminal liability be determined based on applicable legal provisions, the specific role of each party, and the fulfillment of the elements of a criminal offense.²⁶ Therefore, the involvement of those who purchase sexual services needs to be assessed proportionately, particularly when sexual transactions are linked to exploitation or other criminal offenses. Furthermore, any policy of criminalization must take into account the principle of *ultimum remedium* (criminal law as a last resort) and the balance between the protection of society and individual rights.²⁷ Muladi and Barda Nawawi Arief²⁸ It emphasizes the importance of balance in criminal policy, particularly between the need to protect the public and the requirement to respect individual rights. The application of criminal sanctions must adhere to the principles of proportionality and subsidiarity, ensuring that the imposition of punishment is truly necessary and does not lead to excessive criminalization.

The Indonesian criminal legal framework does not explicitly address the criminalization of individuals who purchase sexual services from adults. Under the old Criminal Code, Articles 296 and 506 regulate acts related to facilitating or profiting from prostitution; however, they do not specifically designate the purchaser of sexual services as a criminal offender solely on the basis of buying such services. A more specific provision is found in Article 12 of Law Number 21 of 2007 concerning the Eradication of the Crime of Human Trafficking. This provision allows for the criminal prosecution of parties who use or exploit victims of human trafficking whether through sexual intercourse, lewd acts, other forms of exploitation, or by profiting from the proceeds of human trafficking offenses.²⁹

Indonesia.” *International Journal for the Semiotics of Law-Revue internationale de Sémiotique juridique* (2025): 22; Suleman Lazarus et al., “What do we know about human trafficking and scam compounds in Southeast Asia (2020–2025)? A qualitative meta-synthesis of coercive deviant enterprises,” *Deviant Behavior* 47, no. 6 (2026): 1092.

²⁶ Mulyadi, *Hukum Pidana dan Hak Asasi*, 56. See also, Lies Sulistiani and Efa Laela Fakhriah, “The Effect of Extra Judicial Settlement in Criminal Cases Based on the Principle of Ultimum Remedium,” *Padjadjaran Jurnal Ilmu Hukum (Journal of Law)* 10, no. 3 (2023): 4.

²⁷ Milica Kovacevic and Jelena Srnic Nerac, “Special measures and registers for sex offenders-normative framework in Serbia and comparative legal analysis,” *J. Crimin. & Crim. L.* 61 (2023): 65.

²⁸ Barda Nawawi Arief, *Masalah Penegakan Hukum dan Kebijakan Kriminal* (Jakarta: Kencana, 2024), 21.

²⁹ Suci Ramadani, “Protection of Human Rights Against Female Commercial Sex Workers as Victims of Trafficking in Person Under law Number 21 of 2007 Concerning the Crime of Trafficking in Persons,” In *Proceeding International Seminar and Conference on Islamic Studies (ISCIS)*, vol. 2, no. 1. 2023. See also, Fakhrol Islam, “Human trafficking law enforcement over the victims and offenders: The perspective of anti-trafficking stakeholders,” *Victims & Offenders* 19, no. 8 (2024): 1513.

Thus, the liability of a service user under these provisions relates to their involvement in the exploitation of a victim of human trafficking, rather than solely to the act of a prostitution transaction.

Meanwhile, Law Number 1 of 2023 concerning the Criminal Code which has been in effect since January 2, 2026 stipulates, through Articles 419-422, a number of offenses related to the facilitation of sexual activities, including those involving children.³⁰ Article 419 addresses the act of facilitating or enabling lewd acts or sexual intercourse involving a child; Article 420 covers the act of facilitating lewd acts; Article 421 provides for enhanced penalties under specific circumstances; and Article 422 concerns the act of transporting or handing over a child for the purpose of lewd acts, prostitution, or conduct that violates public morality.

Although these provisions may encompass certain actions related to prostitution, they do not explicitly establish criminal penalties for individuals who use the services of adult sex workers in general. Wahyuningsih et al.³¹ examines criminal liability in online prostitution practices in Indonesia, while Kurniawan³² emphasizing the importance of reconstructing criminal liability within the reform of criminal law. Meanwhile, Kojongian³³ discusses the application of criminal liability provisions to those involved in prostitution. These three studies highlight the importance of examining the adequacy of existing legal regulations and formulating criminal liability with greater clarity. This underscores a distinction between criminal liability for acts already covered by law and the proposal to develop a policy that would criminalize the users of prostitution services more broadly.

The urgency of penalizing users of prostitution services is rooted in the need to extend criminal liability to all parties involved in sexual exploitation and human trafficking including the users of such services commensurate with their respective roles and levels of involvement in these criminal offenses.³⁴ In this context, the imposition of criminal penalties may be considered an instrument to curb the

³⁰ Article 1 of Law Number 1 of 2023 concerning the Criminal Code.

³¹ Sri Endah Wahyuningsih, et al., "Criminal responsibility system against online criminal acts of prostitution in Indonesia," *International Journal of Social Science and Human Research* 6, no. 3 (2023): 1384.

³² Itok Dwi Kurniawan, "The Importance of Reconstructing Criminal Liability for Prostitution in the Reform of Criminal Law," *Recht Studiosum Law Review* 3, no. 2 (2024): 175.

³³ Rahayu Kojongian, "Implementation of Criminal Responsibility Arrangements for Perpetrators of Prostitution," *JILPR Journal Indonesia Law and Policy Review* 5, no. 1 (2023), 266.

³⁴ Salomé Lannier and Michala Meiselles, "Challenging the criminal liability of online services providers for sex trafficking—A comparison of the American and French approaches," *Crime, Law and Social Change* 83, no. 1 (2025): 38. See also, William Paul Simmons, "Rethinking dignity and exploitation in human trafficking and sex workers' rights cases," *Societies* 14, no. 2 (2024): 16; Jacquelyn Burckley et al., "On the illegality of sex work and the impact on victimization, health, and human trafficking: is criminalization a cure or disease?," *Victims & offenders* 18, no. 3 (2023): 573.

demand for exploitative sexual services, while simultaneously strengthening protection for victims and vulnerable groups. However, its application must be grounded in clearly defined criminal offenses, provable elements of culpability, and the principle of proportionality to avoid excessive criminalization. Consequently, any move to criminalize the users of prostitution services in Indonesia should be directed toward formulating policies that distinguish between consensual sexual transactions between adults and practices involving exploitation, coercion, or human trafficking. Such a distinction is essential to ensure that the expansion of criminal liability rests on a solid legal foundation, provides effective protection for victims, and upholds both legal certainty and respect for human rights.

3.2. The Nordic Model from the Perspective of Protecting Victims of Sexual Exploitation

The model of criminalizing the purchasers of sexual services (the Nordic Model), as implemented in Sweden, offers policy inspiration that is relevant to Indonesia.³⁵ This approach focuses on the criminalization of those who purchase sexual services, while sex workers are not subject to criminal penalties but are instead provided with social and legal support.³⁶ A 2024 evaluation by the Swedish government shows that this policy has succeeded in reducing the level of street prostitution by 40% and increasing public awareness regarding sexual exploitation.³⁷ However, the implementation of this policy does not rely solely on criminal sanctions; it also depends on support for social rehabilitation programs, reproductive health services, and economic empowerment for former sex workers.³⁸

The Nordic model is significant not merely because it criminalizes the purchase of sexual services, but because it represents a deliberate redistribution of legal responsibility within the prostitution market.³⁹ The Swedish approach places the buyer at the primary focus of criminal regulation, while distinguishing the legal status of sex workers from those who create or facilitate demand.⁴⁰ This formulation reflects a policy choice to address prostitution by focusing on the demand side, rather than making the supply side the primary target of criminalization. Such an approach suggests that the criminalization of clients can

³⁵ Vuolajärvi, “Criminalising the sex buyer,” 27.

³⁶ Ekberg, “The Swedish law that prohibits,” 1213.

³⁷ Government, *Evaluation of the Sex Purchase*, 25.

³⁸ Keighley, and Sanders, “The eyes and ears of sexual exploitation online,” 1138.

³⁹ Niina Vuolajärvi, “Toward respectable masculinities? Sex buyers’ collective negotiations with stigma, criminality, and masculinity in the Nordic context,” *International Review of Sociology* (2026): 10.

⁴⁰ Josefin Erikson and Oscar L. Larsson, “Beyond client criminalization: Analyzing collaborative governance arrangements for combatting prostitution and trafficking in Sweden,” *Regulation & Governance* 16, no. 3 (2022): 819.

be structured as a specific penal policy, rather than merely a blanket prohibition on prostitution. For Indonesia, this distinction is significant, as any reform effort must clearly define the circumstances under which the purchase of sexual services is categorized as a criminal offense, as well as the conditions that give rise to criminal liability.

The implementation of a policy to criminalize clients also demonstrates that, in the Nordic region, law enforcement is accompanied by measures aimed at reducing the vulnerability of sex workers and addressing the social conditions associated with prostitution. These measures include access to social services, healthcare support, rehabilitation, and opportunities for alternative livelihoods.⁴¹ Therefore, the effectiveness of criminalizing clients should not be assessed solely based on the number of prosecutions or criminal convictions. This policy must also be evaluated according to its capacity to reduce exploitation, protect vulnerable groups, and contribute to a sustained decline in demand. This broader implementation framework offers significant comparative lessons for Indonesia as it designs policies that integrate criminal law enforcement with preventive and protective measures.⁴²

Study by Platt et al.⁴³ It is indicated that criminalizing the purchasers of sex services can lead to unintended consequences if law enforcement is not accompanied by adequate protection and social support for sex workers. Therefore, the relevance of this model lies in its underlying principles, rather than in the direct replication of foreign legal provisions. These principles include reducing demand through criminal policy, differentiating the treatment of vulnerable individuals, applying proportionate sanctions, and integrating both penal and non-penal strategies. Within the framework of Indonesian criminal law, these principles can serve as a foundation for a context-sensitive approach one that selectively imposes criminal sanctions on clients to reduce demand, while

⁴¹ Kavita Kumari and Balasaheb Garje Sonajirao, "Prostitution, Human Rights and Anti-Trafficking Policies: Evaluating the Effectiveness of the Nordic, Legalization and Decriminalization Models," *International Journal of Engineering Science & Humanities* 15, no. 1 (2025): 485. See also, Erikson and Larsson, "Beyond client criminalization" 821.

⁴² Jiakun Huo and Yashu Zhao, "Bridging the legal divide: evaluating stakeholder awareness, regulatory effectiveness, and governance gaps in sustainable development across urban and rural China," *Humanities and Social Sciences Communications* 12, no. 1 (2025): 1939. See also, Jason Hung, "Sociological and policy examination of poverty-led crime in Indonesia: Case study of (Child) prostitution," *Journal of Poverty* 30, no. 2 (2026): 181; Ahmad Jamaludin, "Reinventing the Criminalization of Commercial Sex Workers and Prostitution Service Users in Indonesia in the Perspective of Indonesian Criminal Law Reform," *UNES Law Review* 6, no. 4 (2024): 10080.

⁴³ Platt et al., "Associations between sex work," 12687.

simultaneously prioritizing the protection, rehabilitation, and social reintegration of sex workers.⁴⁴

Criminalization requires cooperation among the police, prosecutors, social agencies, healthcare institutions, and organizations that provide assistance to vulnerable groups.⁴⁵ Without such coordination, law enforcement can become fragmented and overly focused on prosecution rather than prevention and protection. The Swedish experience demonstrates that policies regarding prostitution are implemented through collaborative governance involving a range of institutional and non-governmental actors rather than relying solely on criminal law.⁴⁶ For Indonesia, this suggests that any framework criminalizing clients must establish clear institutional responsibilities, referral mechanisms, and coordination procedures to ensure that criminal law enforcement is accompanied by appropriate social interventions.

Another important consideration is the potential behavioral impact of such law enforcement on sex workers and clients. Criminalization may alter the conditions under which transactions take place, potentially leading to more rushed negotiations or more covert forms of interaction as individuals seek to avoid detection.⁴⁷ For example, research by Adina Landsberg et al.⁴⁸ in Canada indicates that criminalizing clients can affect negotiation practices and potentially increase the vulnerability of sex workers, who already face social and economic disadvantages. Similarly, research by Daniela Danna⁴⁹ Regarding the Nordic Model in Sweden, evidence suggests that the criminalization of clients is not applied

⁴⁴ Dani Krisnawati and Ria Restu Wikansari, "Addressing the Challenges in Protecting Child Victims of Sexual Violence within Non-Formal Education Institutions," *Srivijaya Law Review* 8, no. 2 (2024): 251. See also, Ahmad Gazali et al. "Reassessing Penal Dominance in Indonesian Narcotics Law Through International Legal Comparison," *Jurnal Ilmiah Kebijakan Hukum* 20, no. 1 (2026): 70.

⁴⁵ Marianne Quirouette, "Social triage and exclusions in community services for the criminalized," *Social Problems* 72, no. 3 (2025): 1060. See also, Amanda Butler et al., "Total systems failure: police officers' perspectives on the impacts of the justice, health, and social service systems on people who use drugs," *Harm reduction journal* 19, no. 1 (2022): 48.

⁴⁶ Josefine Erikson, and Oscar L. Larsson, "Beyond client criminalization: Analyzing collaborative governance arrangements for combatting prostitution and trafficking in Sweden," *Regulation & Governance* 16, no. 3 (2022): 819.

⁴⁷ Andrea Giuffre and Beth M. Huebner, "Unpredictable and monetized contact with the police: Race, avoidance behaviors, and modified activity spaces," *Criminology* 61, no. 2 (2023): 237. See also, Peter J. Buckley et al., "International business theory and the criminal multinational enterprise," *Journal of World Business* 59, no. 5 (2024): 101553; Elena Brooks, *The Anatomy of Desire*, (Berlin: Epubli, 2026), 5.

⁴⁸ Adina Landsberg et al., "Criminalizing sex work clients and rushed negotiations among sex workers who use drugs in a Canadian setting," *Journal of Urban Health* 94, no. 4 (2017): 569.

⁴⁹ Daniela Danna, "Client-only criminalization in the city of Stockholm: Local research on the application of the "Swedish model" of prostitution policy," *Sexuality Research and Social Policy* 9, no. 1 (2012): 88.

uniformly across all contexts; therefore, any evaluation must be based on its practical impact rather than merely its formal legal objectives. These considerations underscore the need for evidence-based evaluation in Indonesia.

In Indonesia, the criminalization of those who purchase sexual services must be grounded in an assessment that takes into account the necessity for regulation, the readiness of law enforcement, and the potential social consequences. Dirkareshza et al.⁵⁰ and Jamaludin⁵¹ It highlights the importance of restructuring policies regarding the criminalization of prostitution by clarifying the status and liability of service users, sex workers, and those who facilitate or exploit such practices. This distinction is necessary to prevent criminal policy from treating all involved parties as a monolithic group, while ensuring that accountability is assigned based on specific roles and actions with a clear legal basis. Beyond the formulation of precise legal norms, legal reform also requires mechanisms for prevention and evaluation to assess the effectiveness of its implementation.⁵² Astariyani et al.⁵³ It emphasizes the importance of preventive and evaluative mechanisms within regulatory reform, ensuring that policy implementation can be monitored and improved based on the outcomes achieved.

Consequently, criminal law reform concerning the criminalization of those who use prostitution services must encompass the formulation of clear criminal norms, as well as implementation and evaluation mechanisms that guarantee effective law enforcement and the protection of vulnerable groups. Such mechanisms are essential for assessing the effectiveness of sanctions, identifying resulting social impacts, and ensuring that the implemented policy succeeds in preventing exploitation and providing tangible protection for vulnerable groups. Furthermore, the formulation and application of the policy must remain grounded in the principle of legality and the principle of proportionality, ensuring that criminal liability is established clearly, fairly, and in accordance with the level of involvement of each party.

⁵⁰ Rianda Dirkareshza, E. N. Sihombing, and Rosalia Dika Agustanti, "The Problem of Criminalization of Commercial Sexual Workers and Users of Prostitution Services," *Jurnal Penelitian Hukum De Jure* 22, no. 4 (2022): 526.

⁵¹ Ahmad Jamaludin, "Reinventing the Criminalization of Commercial Sex Workers and Prostitution Service Users in Indonesia in the Perspective of Indonesian Criminal Law Reform," *UNES Law Review* 6, no. 4 (2024): 10079.

⁵² Itok Dwi Kurniawan, "The Importance of Reconstructing Criminal Liability for Prostitution in the Reform of Criminal Law," *Recht Studiosum Law Review* 3, no. 2 (2024): 179. See also, Ibnu Sina Chandranegara, and Muhammad Ali, "Policies on Regulatory Reform in Indonesia: Some Proposals," *Jurnal Media Hukum* (2020): 59; Nkosingiphile Mkhize and Danielle Nel-Sanders, "From policy to impact: an ongoing assessment framework for anti-corruption risk governance in South Africa," *Development studies research* 12, no. 1 (2025): 2580002

⁵³ Ni Luh Gede Astariyani et al., "Preventive and evaluative mechanism analysis on regulatory and legislation reform in Indonesia," *Law Reform* 19, no. 2 (2023): 249.

3.3. Reconstructing Criminal Law Policy Regarding Users of Prostitution Services in Indonesia

Based on normative and comparative analysis, legal reform concerning the users of prostitution services must establish a proportionate framework that clearly defines the circumstances giving rise to criminal liability, while simultaneously avoiding over-criminalization. The proposed framework should distinguish between users who engage in exploitation, coercion, violence, or transactions involving minors, and situations where such elements are absent.⁵⁴ Therefore, reform must integrate selective criminal sanctions with preventive and protective measures to ensure that criminal law addresses the demand side without disproportionately burdening vulnerable groups. This approach aligns with the principle of proportionality in criminal law, which emphasizes that sanctions should take into account the degree of culpability, the impact of the act, and the need to protect vulnerable parties.⁵⁵

The restorative justice perspective demands that proposed reforms not be limited solely to the application of criminal sanctions. Restorative justice emphasizes the restoration of social relationships and the recovery of those affected by a criminal offense, rather than relying exclusively on punitive measures.⁵⁶ In the context of prostitution, sex workers should be viewed as individuals who may experience structural vulnerability resulting from social and economic inequalities.⁵⁷ Thus, restorative justice supports measures such as rehabilitation, vocational training, social reintegration, and legal protection against violence or extortion.⁵⁸ Therefore, criminal law should function not merely as a repressive instrument, but also as a corrective and transformative mechanism that addresses vulnerabilities while preventing further exploitation.

⁵⁴ Ahmad, "Reinventing the Criminalization"10081. See also, Paul Chiwala Banda, "Beyond Neutrality: Constitutional Rights, Feminist Theory, and the Illusion of Gender Equality in Malawi's Laws on Pornography, Prostitution, and Sexual Harassment," *Feminist Theory, and the Illusion of Gender Equality in Malawi's Laws on Pornography, Prostitution, and Sexual Harassment* (February 12, 2026) 10 (2026).

⁵⁵ Samantha Fairclough and Holly Greenwood, "Vulnerable defendants, special measures and miscarriages of justice in England and Wales," In *Vulnerability, the Accused, and the Criminal Justice System* (2023):164. See also, Hanafi Hanafi, "The Dialectics of Freedom of Expression and Legal Restrictions on Digital Platforms: An Analysis of Human Rights Principles, the Electronic Information and Transactions Law, and Constitutional Court Decision Number 105/PUU-XXII/2024," *International Journal of Law, Environment, and Natural Resources* 5, no. 1 (2025): 57-75.

⁵⁶ Daniel W. Van Ness et al., *Restoring justice: An introduction to restorative justice*, (Routledge, 2022), 8.

⁵⁷ Harkristuti Harkrisnowo, "Rekonstruksi Kebijakan Kriminal dalam Perspektif Pancasila," *Jurnal RechtsVinding*, vol. 13, no. 2 (2025): 245.

⁵⁸ Muladi, *Restorative Justice dalam Pembaharuan Hukum Pidana Nasional* (Jakarta: Kemenkumham, 2025), 322.

Feminist legal theory provides an additional basis for re-examining the allocation of responsibility within criminal law as it pertains to prostitution.⁵⁹ By challenging gender-biased legal structures, this perspective emphasizes the need to recognize power imbalances and the vulnerability of women within systems of sexual exploitation. When applied to policies regarding prostitution, this approach advocates for greater accountability for clients who drive the demand while preventing the criminal justice system from disproportionately targeting sex workers. This approach promotes a more equitable distribution of legal responsibility and strengthens protections for individuals facing structural and gender-based vulnerabilities.⁶⁰

Therefore, reform efforts should be directed toward reviewing the provisions within Law Number 1 of 2023 concerning the Criminal Code and, if necessary, Law Number 21 of 2007 concerning the Eradication of the Crime of Human Trafficking (*Undang-Undang tentang Pemberantasan Tindak Pidana Perdagangan Orang* or UU TPPO), in order to clarify the basis and scope of criminal liability for those who use prostitution services. Within the Criminal Code, Articles 419-422 address various acts related to sexual activity including those involving children but they do not specifically provide for the criminalization of individuals who use the services of adult sex workers in general.⁶¹ Meanwhile, the Law on the Eradication of the UU TPPO can serve as a legal basis for prosecuting those who utilize the services of human trafficking victims, provided that the constituent elements of the offense as defined therein are met. Similarly, the application of provisions regarding complicity (participation) under the Criminal Code must be predicated on the fulfillment of relevant legal criteria; it cannot be automatically invoked to prosecute a service user solely on the basis of their involvement in a prostitution transaction. In this context, the “Nordic Model” which focuses on penalizing the purchasers of sexual services while simultaneously providing protection for sex workers may serve as a point of reference for formulating national criminal policy.

Proposed reforms should also incorporate non-penal measures, such as public education, legal literacy, gender equality initiatives, and the economic empowerment of women, alongside strengthened coordination among law enforcement agencies, social protection institutions, and human rights organizations. By integrating selective criminalization, restorative justice, social protection, and gender-responsive policies, Indonesia can develop a criminal legal

⁵⁹ Ivana Bacik, *Compromised Consent: A Feminist Justification for Sex Purchase Ban Laws* (London: Bloomsbury Publishing, 2026), 12.

⁶⁰ Robi'atul Adawiyah et al., “Power and Gender: Female Perpetrators of Child Sexual Abuse from Islamic Legal Perspective,” *Jambe Law Journal* 9, no. 1 (2026): 370. See also, Fakhru Islam and Mohammed Adil Khan, “Exploring the socio-economic vulnerability model: a multi-stakeholder analysis of women’s trafficking in Bangladesh,” *Cogent Social Sciences* 11, no. 1 (2025): 2549477.

⁶¹ Articles 419–422 of Law Number 1 of 2023 concerning the Criminal Code.

framework that is more proportionate, humane, and equitable one that remains consistent with human rights, the values of Pancasila, and the broader objectives of national criminal law reform.⁶² Through these measures, Indonesia can realize a criminal law paradigm that is fairer, more balanced, and more humane, without disregarding moral values, human rights, or the principles of national law that are firmly rooted in Pancasila.⁶³

The proposed reforms must also address the issue of regulatory fragmentation concerning prostitution in Indonesia. Existing regulations have evolved through a variety of legal instruments and local policies, resulting in inconsistent treatment of activities related to prostitution, as well as uncertainty regarding the legal status of those who purchase such services.⁶⁴ This situation can undermine the consistency of criminal policy, as similar actions may elicit different legal responses depending on the applicable jurisdiction. Therefore, a national framework should establish uniform substantive standards, while still allowing for limited contextual application through appropriate implementing regulations. Such harmonization would strengthen legal certainty and prevent inconsistent applications of criminalization across different regions.⁶⁵

The formulation of criminal provisions must be supported by clear parameters for determining which actions related to prostitution warrant criminal intervention. Criminalization should not merely be a response to moral disapproval; rather, it must identify specific, concrete actions that cause legally relevant harm or contribute to exploitation.⁶⁶ This necessitates that lawmakers distinguish between the existence of prostitution as a social phenomenon and the specific acts that warrant the imposition of criminal sanctions. Such an approach would reduce the likelihood of vague provisions and arbitrary law enforcement particularly as online platforms give rise to new forms of interaction between clients, intermediaries, and service providers. Legal scholarship in Indonesia has underscored the need for a clearer reformulation of criminal offenses related to prostitution, given that current

⁶² Zico Junius Fernando and Aga Natalis, "Reforming Prisons, Restoring Dignity: A Gender-Based Critique of Indonesia's Correctional Framework," *International Criminology* (2026): 9. See also Amanda Puan Muthia et al., "Knitting Identity, Weaving Hope: Understanding Skill Development Through the Voices of Recidivist Women in Indonesian Correctional Facilities," *Women & Criminal Justice* (2026): 12.

⁶³ Harkrisnowo, "Rekonstruksi Kebijakan Kriminal," 248.

⁶⁴ Aga Natalis et al., "Determining appropriate policies for prostitution reform in Indonesia: Evaluating harm reduction versus harm elimination strategies," *JSEADR* 7 (2023): 176.

⁶⁵ Andrew Ramadhani, and Hervina Puspitosari, "Urgensi kriminalisasi pengguna jasa prostitusi di Indonesia," *Yustisia Tirtayasa: Jurnal Tugas Akhir* 3, no. 2 (2023): 209. See also, Gea Illa Sevrina, "Kebijakan kriminalisasi terhadap praktik prostitusi di Indonesia," *Law and justice* 5, no. 1 (2020): 19.

⁶⁶ Mallory Verez, "An Ever-Narrowing Divide: Morality and Decriminalizing Sex Work in North Carolina," *NCCRL Rev.* 4 (2023): 455.

criminal law fails to comprehensively address the various types of conduct involved in prostitution.⁶⁷

Ultimately, the effectiveness of the proposed criminalization must be assessed through an ongoing legislative evaluation mechanism, rather than being considered complete the moment the new provision is enacted.⁶⁸ An evaluation must assess whether criminalization achieves the intended deterrent effect, whether its enforcement remains consistent with the principle of proportionality, and whether any unintended consequences arise during its implementation. Relevant indicators include prosecution patterns, shifts in practices related to prostitution, institutional capacity, and the protection of affected parties. Such an evaluation is crucial because criminal policy operates within constantly evolving social and technological conditions including the growing use of digital platforms for transactions related to prostitution. Consequently, regulatory reform must incorporate mechanisms for periodic review, evidence-based adjustments, and institutional feedback to ensure that such criminalization remains responsive and effective.⁶⁹

4. Conclusion

This study finds that the criminalization of those who purchase sexual services in Indonesia requires a legal framework that is selective, proportionate, and human rights-based one that specifically targets the demand for sexual services involving exploitation, coercion, or human trafficking. Addressing the research question, the findings indicate that a policy to criminalize such users must be formulated through clearly defined criminal provisions, supported by reliable evidentiary mechanisms, victim identification procedures, and coordination among law enforcement agencies and victim protection bodies. While the “Nordic Model” offers comparative principles that may serve as a reference for such reform, its implementation must be adapted to Indonesia’s specific legal system, social

⁶⁷ Andika Dwi Amrianto et al., “Kriminalisasi dan reformulasi perbuatan prostitusi dalam hukum pidana: Catatan kritis atas minimnya pengaturan perbuatan prostitusi di Indonesia,” *Jurnal Penegakan Hukum Dan Keadilan* 4, no. 2 (2023): 129. See also, Adam Ilyas, and Maria Novita Apriyani, “Urgensi kriminalisasi pengguna jasa prostitusi online sebagai upaya penanggulangan permasalahan sosial di Indonesia,” *Mulanvarman Law Review* 6, no. 2 (2021): 79.

⁶⁸ Lockett, Isaac, Elizabeth Pummell, and Andrea Petróczi, “Sanctions to sentences: a systematic analysis of two decades of discourse on doping criminalization,” *International Journal of Sport Policy and Politics* 18, no. 2 (2026): 380.

⁶⁹ I. Gede Yoga Pratama, “Kriminalisasi Terhadap Pekerja Seks Komersial Melalui Online Dalam Pembaharuan Hukum Pidana,” *Jurnal Preferensi Hukum* 2, no. 3 (2021): 599. See also, Astariyani et al., “Preventive and evaluative mechanism analysis,” 251; Chandranegara, and Ali, “Policies on Regulatory Reform,” 61.

conditions, and institutional capacity. Existing legal provisions including Article 55 of the Criminal Code and Law Number 21 of 2007 on the Eradication of the Crime of Human Trafficking provide relevant normative considerations; however, criminal liability must be established in strict accordance with the elements of the applicable law and the principle of legality.

These findings carry significant implications for criminal law reform and law enforcement policy. Criminalization must distinguish between users who knowingly engage in exploitation and individuals whose circumstances do not meet the criteria for criminal liability. Sex workers particularly those who are victims of coercion and exploitation should receive protection, rehabilitation, and access to social and economic support, rather than being subjected to indiscriminate punishment. Consequently, effective implementation requires an integrated approach that combines criminal justice measures with public education, economic empowerment, victim assistance, and the strengthening of institutional capacity. Such an approach can bolster substantive justice while mitigating the risk of disproportionate law enforcement and safeguarding fundamental human rights. This study has limitations as it employs a normative and comparative approach; consequently, it does not empirically test the effectiveness of policies that criminalize the users of sex services in reducing the demand for prostitution or sexual exploitation in Indonesia. Furthermore, the study does not provide direct evidence regarding the outcomes of policy implementation or the practical capacity of Indonesian law enforcement agencies. Future research should conduct empirical and comparative evaluations of jurisdictions that have adopted a user-criminalization model, examining its impact on exploitation, victim protection, and law enforcement practices, while also assessing the compatibility of alternative regulatory approaches with Indonesian criminal law. Subsequent studies should also investigate evidentiary standards, institutional coordination mechanisms, and necessary protective measures to inform the formulation of policies that are legally sound, proportionate, and sensitive to the Indonesian context.

References

- Adawiyah, Robi'atul, Nuraida Fitri Habi, Syamsiah Nur, and Dian Mukhlisa. "Power and Gender: Female Perpetrators of Child Sexual Abuse from Islamic Legal Perspective." *Jambe Law Journal* 9, no. 1 (2026): 369-393. <https://doi.org/10.22437/9ke0x692>.
- Ahmad, Gazali, Nashriana Nashriana, and Henny Yuningsih. "Reassessing Penal Dominance in Indonesian Narcotics Law Through International Legal Comparison." *Jurnal Ilmiah Kebijakan Hukum* 20, no. 1 (2026): 67-84. <https://doi.org/10.30641/kebijakan.2026.V20.67-84>.
- Ali, Mahrus, Irwan Hafid, and Kurnia Dewi Anggraeny. "Criminalization based on the principle of human rights limitation." *Jurnal Hukum Novelty* 13, no. 1 (2022): 98-108. <https://doi.org/10.26555/novelty.v13i1.a23606>.
- Amrianto, Andika Dwi, Maria Kunti Atika Putri, Ahmad Yusup, and I. Putu Aditya Darma Putra. "Kriminalisasi dan reformulasi perbuatan prostitusi dalam hukum pidana: Catatan kritis atas minimnya pengaturan perbuatan prostitusi di Indonesia." *Jurnal Penegakan Hukum Dan Keadilan* 4, no. 2 (2023): 123-143. <https://doi.org/10.18196/jphk.v4i2.18091>.
- Ancel, Marc. *Social defence: A modern approach to criminal problems*. Vol. 199. Hove: Psychology Press, 1998.
- Arief, Barda Nawawi. *Masalah Penegakan Hukum dan Kebijakan Kriminal*. Jakarta: Kencana, 2024.
- Astariyani, Ni Luh Gede, Bagus Hermanto, Rosino da Cruz, and Fifiana Wisnaeni. "Preventive and evaluative mechanism analysis on regulatory and legislation reform in Indonesia." *Law Reform* 19, no. 2 (2023): 248-269. <https://doi.org/10.14710/lr.v19i2.55819>.
- Bacik, Ivana. *Compromised Consent: A Feminist Justification for Sex Purchase Ban Laws*. London: Bloomsbury Publishing, 2026.
- Banda, Paul Chiwala. "Beyond Neutrality: Constitutional Rights, Feminist Theory, and the Illusion of Gender Equality in Malawi's Laws on Pornography, Prostitution, and Sexual Harassment." *Feminist Theory, and the Illusion of Gender Equality in Malawi's Laws on Pornography, Prostitution, and Sexual Harassment (February 12, 2026)* 10 (2026).
- Brooks, Elena. *The Anatomy of Desire*. Berlin: epubli, 2026.
- Buckley, Peter J., Peter Enderwick, Linda Hsieh, and Oded Shenkar. "International business theory and the criminal multinational enterprise." *Journal of World Business* 59, no. 5 (2024): 101553. <https://doi.org/10.1016/j.jwb.2024.101553>.
- Burckley, Jacquelyn, Michelle Jeanis, and Bryanna Fox. "On the illegality of sex work and the impact on victimization, health, and human trafficking: is criminalization a cure or disease?" *Victims & offenders* 18, no. 3 (2023): 572-585. <https://doi.org/10.1080/15564886.2022.2134242>.
- Butler, Amanda, Naomi Zakimi, and Alissa Greer. "Total systems failure: police officers' perspectives on the impacts of the justice, health, and social service systems on people who use drugs." *Harm reduction journal* 19, no. 1 (2022): 48. <https://doi.org/10.1186/s12954-022-00629-1>.
- Butt, Simon. "Indonesia's new Criminal Code: indigenising and democratising Indonesian criminal law?." *Griffith Law Review* 32, no. 2 (2023): 190-214. <https://doi.org/10.1080/10383441.2023.2243772>.
- Chandranegara, Ibnu Sina, and Muhammad Ali. "Policies on Regulatory Reform in Indonesia: Some Proposals." *Jurnal Media Hukum* (2020): 55-67. <https://doi.org/10.18196/jmh.20200142>.
- Chumairo, Maryamul, Novita Dewi Masyithoh, and Arina Hukmu Adila. "Criminal Policy for Users Ofservices Prostitution to Achieve Substantial Justice." *Walisongo Law Review (Walrev)* 3, no. 1 (2021): 111-134. <https://doi.org/10.21580/walrev.2021.3.1.9074>.

- Corda, Alessandro. "The Legitimacy of Criminal Law and The Performance Crises of Penalty: A. Corda. "In *Criminal Law Forum*, vol. 36, no. 2, pp. 351-380. Dordrecht: Springer Netherlands, 2025. <https://doi.org/10.1007/s10609-025-09509-2>.
- Cornford, Andrew. "The aims and functions of criminal law. " *The Modern Law Review* 87, no. 2 (2024): 398-429. <https://doi.org/10.1111/1468-2230.12846>.
- Danna, Daniela. "Client-only criminalization in the city of Stockholm: A local research on the application of the 'Swedish model' of prostitution policy. " *Sexuality Research and Social Policy* 9, no. 1 (2012): 80-93. <https://doi.org/10.1007/s13178-011-0072-z>.
- Di Ronco, Anna. "Law in action: Local-level prostitution policies and practices and their effects on sex workers. " *European Journal of Criminology* 19, no. 5 (2022): 1078-1096. <https://doi.org/10.1177/1477370820941406>.
- Dirkareshza, Rianda, E. N. Sihombing, and Rosalia Dika Agustanti. "The Problem of Criminalization of Commercial Sexual Workers and Users of Prostitution Services. " *Jurnal Penelitian Hukum De Jure* 22, no. 4 (2022): 525-536. <https://doi.org/10.30641/dejure.2022.V22.525-536>.
- Ekberg, Gunilla. "The Swedish law that prohibits the purchase of sexual services: Best practices for prevention of prostitution and trafficking in human beings. " *Violence against women* 10, no. 10 (2004): 1187-1218. <https://doi.org/10.1177/1077801204268647>.
- Ekinci, Başak. "Criminalisation of Sex Work: A Critical Approach to Criminalisation Theories from a Human Rights Perspective. "In *Annales de la Faculté de Droit d'Istanbul*. Istanbul University, 2024. <https://doi.org/10.26650/annaes.2024.74.0006>.
- Erikson, Josefina, and Oscar L. Larsson. "Beyond client criminalization: Analyzing collaborative governance arrangements for combatting prostitution and trafficking in Sweden. " *Regulation & Governance* 16, no. 3 (2022): 818-835. <https://doi.org/10.1111/rego.12259>.
- Erikson, Josefina, and Oscar L. Larsson. "Beyond client criminalization: Analyzing collaborative governance arrangements for combatting prostitution and trafficking in Sweden. " *Regulation & Governance* 16, no. 3 (2022): 818-835. <https://doi.org/10.1111/rego.12259>.
- Euchner, Eva-Maria. "Ruling under a shadow of moral hierarchy: Regulatory intermediaries in the governance of prostitution. " *Regulation & Governance* 16, no. 3 (2022): 836-857. <https://doi.org/10.1111/rego.12294>.
- Fairclough, Samantha, and Holly Greenwood. "Vulnerable defendants, special measures and miscarriages of justice in England and Wales. "In *Vulnerability, the Accused, and the Criminal Justice System*, pp. 162-176. Routledge, 2023. <https://doi.org/10.4324/9781003205166-14>.
- Fernando, Zico Junius, and Aga Natalis. "Reforming Prisons, Restoring Dignity: A Gender-Based Critique of Indonesia's Correctional Framework. " *International Criminology* (2026): 1-16. <https://doi.org/10.1007/s43576-026-00215-6>.
- Ferrarini, Luigi Giuseppe Barbieri, and Patrick Cacicedo. "Colonialism, Slavery, and Racism: Structural Aspects for the Construction of a Brazilian Criminology. "In *The Palgrave Handbook of Criminology and the Global South*, pp. 1-18. Cham: Springer Nature Switzerland, 2025.
- Funk, T. Markus. "Rethinking Culpability and Wrongdoing (in the Criminal Law-and Everyday Life). " *U. Cin. L. Rev.* 92 (2023): 1080.
- Gao, Huasheng, and Vanya Petrova. "Do prostitution laws affect rape rates? Evidence from Europe. " *The Journal of Law and Economics* 65, no. 4 (2022): 753-789. <https://doi.org/10.1086/720583>.
- Giuffre, Andrea, and Beth M. Huebner. "Unpredictable and monetized contact with the police: Race, avoidance behaviors, and modified activity spaces. " *Criminology* 61, no. 2 (2023): 234-269. <https://doi.org/10.1111/1745-9125.12328>.
- Golijot, Jonathan Willem, Aditya Sukma Bimantoro, Sabila Arfa Rizqia, and Nuraeni Nuraeni. "Bacha bazi in Afghanistan: A study of intersectional feminism. " *Gender Equality: International*

- Journal of Child and Gender Studies* 11, no. 1 (2025): 1-15. <https://doi.org/10.22373/equality.v11i1.24845>.
- Government, Swedish. *Evaluation of the Sex Purchase Act (1999:408)*. Stockholm: Ministry of Justice, 2024.
- Hanafi, Hanafi. "The Dialectics of Freedom of Expression and Legal Restrictions on Digital Platforms: An Analysis of Human Rights Principles, the Electronic Information and Transactions Law, and Constitutional Court Decision Number 105/PUU-XXII/2024." *International Journal of Law, Environment, and Natural Resources* 5, no. 1 (2025): 57-75. <https://doi.org/10.51749/injurlens.v5i1.132>.
- Harkrisnowo, Harkristuti. "Rekonstruksi Kebijakan Kriminal dalam Perspektif Pancasila." *Jurnal RechtsVinding* 13, no. 2. (2025): 233-251.
- Hung, Jason. "Sociological and policy examination of poverty-led crime in Indonesia: Case study of (Child) prostitution." *Journal of Poverty* 30, no. 2 (2026): 180-201. <https://doi.org/10.1080/10875549.2024.2379766>.
- Hung, Jason. "Sociological and policy examination of poverty-led crime in Indonesia: Case study of (Child) prostitution." *Journal of Poverty* 30, no. 2 (2026): 180-201. <https://doi.org/10.1080/10875549.2024.2379766>.
- Huo, Jiakun, and Yashu Zhao. "Bridging the legal divide: evaluating stakeholder awareness, regulatory effectiveness, and governance gaps in sustainable development across urban and rural China." *Humanities and Social Sciences Communications* 12, no. 1 (2025): 1939. <https://doi.org/10.1057/s41599-025-06246-0>.
- Ilyas, Adam, and Maria Novita Apriyani. "Urgensi kriminalisasi pengguna jasa prostitusi online sebagai upaya penanggulangan permasalahan sosial di Indonesia." *Mulawarman Law Review* 6, no. 2 (2021): 73-90. <https://doi.org/10.30872/mulrev.v6i2.687>.
- Islam, Fakhrul, and Mohammed Adil Khan. "Exploring the socio-economic vulnerability model: a multi-stakeholder analysis of women's trafficking in Bangladesh." *Cogent Social Sciences* 11, no. 1 (2025): 2549477. <https://doi.org/10.1080/23311886.2025.2549477>.
- Islam, Fakhrul. "Human trafficking law enforcement over the victims and offenders: The perspective of anti-trafficking stakeholders." *Victims & Offenders* 19, no. 8 (2024): 1512-1540. <https://doi.org/10.1080/15564886.2023.2227964>.
- Jamaludin, Ahmad. "Reinventing the Criminalization of Commercial Sex Workers and Prostitution Service Users in Indonesia in the Perspective of Indonesian Criminal Law Reform." *UNES Law Review* 6, no. 4 (2024): 10078-10088. <https://doi.org/10.31933/unesrev.v6i4.1982>.
- Jamaludin, Ahmad. "Reinventing the Criminalization of Commercial Sex Workers and Prostitution Service Users in Indonesia in the Perspective of Indonesian Criminal Law Reform." *UNES Law Review* 6, no. 4 (2024): 10078-10088. <https://doi.org/10.31933/unesrev.v6i4.1982>.
- Jonsson, Sofia. "Does criminalizing the purchase of sex reduce sex-buying? Evidence from a European survey on prostitution." *European journal of law and economics* 56, no. 1 (2023): 91-115. <https://doi.org/10.1007/s12119-022-09983-5>.
- Karlsson, Henrik. "Sex Work Policy Worldwide: A Scoping Review: H. Karlsson." *Sexuality & Culture* 26, no. 6 (2022): 2288-2310. <https://doi.org/10.1007/s12119-022-09983-5>.
- Keighley, Rachel, and Teela Sanders. "The eyes and ears of sexual exploitation online: Are sex buyers part of the prevention puzzle to reduce harms in the online sex industry?." *The British Journal of Criminology* 64, no. 5 (2024): 1131-1149. <https://doi.org/10.1093/bjc/azae002>.
- Kholis, Evi Laila. "Moralitas dan Hukum: Dilema Penegakan Prostitusi di Indonesia." *Jurnal Legislasi Indonesia* 21, no. 1 (2024): 23-53.
- Kloek, Mariëlle, Sake J. de Vlas, and Jan AC Hontelez. "High rates of violence and low police reporting amongst sex workers in the Netherlands during the COVID-19 pandemic." *Crime Science* 13, no. 1 (2024): 38. <https://doi.org/10.1186/s40163-024-00237-3>.

- Kojongian, Rahayu. "Implementation of Criminal Responsibility Arrangements for Perpetrators of Prostitution." *JILPR Journal Indonesia Law and Policy Review* 5, no. 1 (2023): 265-274. <https://doi.org/10.56371/jirpl.v5i1.218>.
- Komnas HAM. *Laporan Tahunan Hak Asasi Manusia di Indonesia*. Jakarta, 2025.
- Komnas Perempuan. *Catatan Tahunan Kekerasan terhadap Perempuan di Indonesia*. Jakarta, 2024.
- Kotsadam, Andreas, and Niklas Jakobsson. "Shame on you, John! Laws, stigmatization, and the demand for sex." *European Journal of Law and Economics* 37, no. 3 (2014): 393-404. <https://doi.org/10.1007/s10657-012-9339-y>.
- Kovacevic, Milica, and Jelena Srnic Nerac. "Special measures and registers for sex offenders-normative framework in Serbia and comparative legal analysis." *J. Crimin. & Crim. L.* 61 (2023): 65. <https://doi.org/10.47152/rkkp.61.3.4>.
- Krisnawati, Dani, and Ria Restu Wikansari. "Addressing the Challenges in Protecting Child Victims of Sexual Violence within Non-Formal Education Institutions." *Srinwijaya Law Review* 8, no. 2 (2024): 249-268. <https://doi.org/10.28946/slrev.vol8.iss2.2987>.pp249-268.
- Kumari, Kavita, and Balasaheb Garje Sonajirao. "Prostitution, Human Rights and Anti-Trafficking Policies: Evaluating The Effectiveness Of The Nordic, Legalization And Decriminalization Models." *International Journal of Engineering Science & Humanities* 15, no. 1 (2025): 482-493.
- Kurniawan, Itok Dwi. "The Importance of Reconstructing Criminal Liability for Prostitution in the Reform of Criminal Law." *Recht Studiosum Law Review* 3, no. 2 (2024): 174-179. <https://doi.org/10.32734/rsr.v3i2.18223>.
- Landsberg, Adina, Kate Shannon, Andrea Krüsi, Kora DeBeck, M. J. Milloy, Ekaterina Nosova, Thomas Kerr, and Kanna Hayashi. "Criminalizing sex work clients and rushed negotiations among sex workers who use drugs in a Canadian setting." *Journal of Urban Health* 94, no. 4 (2017): 563-571. <https://doi.org/10.1007/s11524-017-0155-0>.
- Lannier, Salomé, and Michala Meiselles. "Challenging the criminal liability of online services providers for sex trafficking-A comparison of the American and French approaches." *Crime, Law and Social Change* 83, no. 1 (2025): 38. <https://doi.org/10.1007/s10611-025-10222-9>.
- Lazarus, Suleman, Mina Chiang, Rossitza Stefanova Dimitrova, Theint Theint Thu, and Enobong Essien. "What do we know about human trafficking and scam compounds in Southeast Asia (2020-2025)? A qualitative meta-synthesis of coercive deviant enterprises." *Deviant Behavior* 47, no. 6 (2026): 1091-1123. <https://doi.org/10.1080/01639625.2025.2604138>.
- Leuprecht, Christian, Jamie Ferrill, Mikayla Ozga, Milind Tiwari, and Juakatha Karunakaran. "Detecting, disrupting and deterring sexual exploitation of trafficked persons: Leveraging beneficial ownership registries to reduce criminogenic information asymmetry and raise public expectations." *Current Issues in Criminal Justice* 37, no. 2 (2025): 264-286. <https://doi.org/10.1080/10345329.2025.2466869>.
- Levin, Benjamin. "Criminal law exceptionalism." *Virginia Law Review* 108, no. 6 (2022): 1381-1448. <https://doi.org/10.2139/ssrn.4098101>.
- Lockett, Isaac, Elizabeth Pummell, and Andrea Petróczi. "Sanctions to sentences: a systematic analysis of two decades of discourse on doping criminalisation." *International Journal of Sport Policy and Politics* 18, no. 2 (2026): 379-408. <https://doi.org/10.1080/19406940.2025.2552650>.
- Mkhize, Nkosingiphile, and Danielle Nel-Sanders. "From policy to impact: an ongoing assessment framework for anti-corruption risk governance in South Africa." *Development studies research* 12, no. 1 (2025): 2580002. <https://doi.org/10.1080/21665095.2025.2580002>.
- Molnar, Lorena, and Marcelo F. Aebi. "Risky business: voluntary sex workers as suitable victims of work-related crimes in a legalised prostitution environment: L. Molnar and MF Aebi." *Crime Prevention and Community Safety* 25, no. 2 (2023): 204-222. <https://doi.org/10.1057/s41300-023-00173-5>.
- Muladi, Muladi and Barda Nawawi Arief. *Teori dan Kebijakan Pidana*. Jakarta: Prenadamedia, 2023.

- Mulyadi, Lilik. *Hukum Pidana dan Hak Asasi Manusia*. Bandung: Citra Aditya Bakti, 2024.
- Muthia, Amanda Puan, Hipolitus Kristoforus Kewuel, Dian Karinawati Imron, and Hamamah Hamamah. "Knitting Identity, Weaving Hope: Understanding Skill Development Through the Voices of Recidivist Women in Indonesian Correctional Facilities." *Women & Criminal Justice* (2026): 1-21. <https://doi.org/10.1080/08974454.2026.2678960>.
- Natalis, Aga, Ani Purwanti, and Teddy Asmara. "Determining appropriate policies for prostitution reform in Indonesia: Evaluating harm reduction versus harm elimination strategies." *JSEHR* 7 (2023): 176. <https://doi.org/10.19184/jseahr.v7i2.37952>.
- Natalis, Aga. "Power, law, and the semiotics of marginalisation: Rethinking prostitution, health risk, and legal discourse in Indonesia." *International Journal for the Semiotics of Law-Revue internationale de Sémiotique juridique* (2025): 1-31. <https://doi.org/10.1007/s11196-025-10310-y>.
- Niina Vuolajärvi, "Criminalising the Sex Buyer: Experiences from the Nordic Region," *LSE Centre for Women, Peace and Security*, Policy Brief 06/2022. Retrieved on October 10, 2026, from <https://www.lse.ac.uk/asset-library/profile/w922-0152-wps-policy-paper-6-singles.pdf>.
- Nikolova, Evelin. *Digitally Mediated Narratives of Sexual Harassment: Perspectives from the Sex Work Industry*. London: Taylor & Francis, 2026.
- Nu'man, A. Harits, Oksidelfa Yanto, Neni Ruhaeni, and Dini Dewi Heniarti. "Criminalization of Service Users and Traditional Commercial Sex Workers in Indonesia." *IJOLARES: Indonesian Journal of Law Research* 2, no. 2 (2024): 42-50. <https://doi.org/10.60153/ijolares.v2i2.58>.
- Nurchayho, Nanang, Ricky Ricky, FX Hastowo Broto Laksito, and Ramalina Ranaivo Mikea Manitra. "Reform of the criminal law system in Indonesia which prioritizes substantive justice." *Journal of Law, Environmental and Justice* 2, no. 1 (2024): 89-108. <https://doi.org/10.62264/jlej.v2i1.91>.
- Platt, Lucy, Pippa Grenfell, Rebecca Meiksin, Jocelyn Elmes, Susan G. Sherman, Teela Sanders, Peninah Mwangi, and Anna-Louise Crago. "Associations between sex work laws and sex workers' health: A systematic review and meta-analysis of quantitative and qualitative studies." *PLoS medicine* 15, no. 12 (2018): e1002680. <https://doi.org/10.1371/journal.pmed.1002680>.
- Pratama, I. Gede Yoga, Anak Agung Sagung Laksmi Dewi, and I. Made Minggu Widyantara. "Kriminalisasi Terhadap Pekerja Seks Komersial Melalui Online Dalam Pembaharuan Hukum Pidana." *Jurnal Preferensi Hukum* 2, no. 3 (2021): 594-598. <https://doi.org/10.22225/jph.2.3.4022.594-598>.
- Quirouette, Marianne. "Social triage and exclusions in community services for the criminalized." *Social Problems* 72, no. 3 (2025): 1059-1076. <https://doi.org/10.1093/socpro/spad035>.
- Ramadani, Suci. "Protection Of Human Rights Against Female Commercial Sex Workers as Victims of Trafficking in Person Under law Number 21 of 2007 Concerning The Crime of Trafficking in Persons." *In Proceeding International Seminar and Conference on Islamic Studies (ISCIS)*, vol. 2, no. 1. 2023. <https://doi.org/10.47006/iscis.v2i1.17963>.
- Ramadhani, Andrew, and Hervina Puspitosari. "Urgensi kriminalisasi pengguna jasa prostitusi di Indonesia." *Yustisia Tirtayasa: Jurnal Tugas Akhir* 3, no. 2 (2023): 203-217. <https://doi.org/10.51825/yta.v3i2.15138>.
- Sanders, Teela. *Prostitution and Criminal Justice: Global Contexts*. Routledge: Routledge, 2024.
- Sevrina, Gea Illa. "Kebijakan kriminalisasi terhadap praktik prostitusi di Indonesia." *Law and justice* 5, no. 1 (2020): 17-29. <https://doi.org/10.23917/laj.v5i1.9216>.
- Simmons, William Paul. "Rethinking dignity and exploitation in human trafficking and sex workers' rights cases." *Societies* 14, no. 2 (2024): 16. <https://doi.org/10.3390/soc14020016>.
- Sonjaya, Saji. "Mengeksplorasi regulasi industri seksual di Indonesia: Pembedaan pembeli jasa pekerja seks komersial." *JCIC: Jurnal CIC Lembaga Riset dan Konsultan Sosial* 7, no. 1 (2025): 23-38. <https://doi.org/10.51486/jbo.v7i1.221>.

- Sulistiani, Lies, and Efa Laela Fakhriah. "The Effect of Extra Judicial Settlement in Criminal Cases Based on the Principle of Ultimum Remedium." *Padjadjaran Jurnal Ilmu Hukum (Journal of Law)* 10, no. 3 (2023): 4. <https://doi.org/10.22304/pjih.v10n3.a1>.
- Sumardi, Dedy, Mukhsin Nyak Umar, Ruslan Sangaji, Firdaus M. Yunus, and Rahmatul Akbar. "Transition of Civil Law to Public Law: Integration of Modern Punishment Theory in Criminal Apostasy." *Abkam: Jurnal Ilmu Syariah* 22, no. 1 (2022): 237-262. <https://doi.org/10.15408/ajis.v22i1.26359>.
- Tavangar, Zahra, Adel Sarikani, and Morteza Fathi. "The Relationship between Criminalization and Liberty in Islamic and Western Criminal Law." *Iranian Journal of International and Comparative Law* 4, no. 1 (2026): 208-227.
- Van Ness, Daniel W., Karen Heetderks Strong, Jonathan Derby, and L. Lynette Parker. *Restoring justice: An introduction to restorative justice*. Routledge, 2022. <https://doi.org/10.4324/9781003159773>.
- Van Wijk, Eelco, and Peter Mascini. "The responsabilization of entrepreneurs in legalized local prostitution in the Netherlands." *Regulation & Governance* 16, no. 3 (2022): 875-891. <https://doi.org/10.1111/rego.12273>.
- Verez, Mallory. "An Ever-Narrowing Divide: Morality and Decriminalizing Sex Work in North Carolina." *NCCRL Rev.* 4 (2023): 455.
- Vuolajärvi, Niina. "Toward respectable masculinities? Sex buyers' collective negotiations with stigma, criminality, and masculinity in the Nordic context." *International Review of Sociology* (2026): 1-20. <https://doi.org/10.1080/03906701.2026.2698533>.
- Wahyuningsih, Sri Endah, Subaidah Ratna Juita, Anis Masdurohatun, and Muchamad Iksan. "Criminal responsibility system against online criminal acts of prostitution in Indonesia." *International Journal of Social Science and Human Research* 6, no. 3 (2023). <https://doi.org/10.47191/ijsshr/v6-i3-06>.
- Widyawati, Anis, Ade Adhari, Ali Masyhar, Bearlly Deo Syahputra, and Didik Purnomo. "Dynamics of the penitentiary system, transparent and accountable handling of criminal cases in criminal execution law in Southeast Asia: Convergence and divergence of international perspectives." *Indonesia Law Review* 15, no. 1 (2025): 2. <https://doi.org/10.15742/ilrev.v15n1.1>.
- Yuliandri, Yuliandri. *Asas-Asas Pembentukan Peraturan Perundang-undangan yang Baik*. Jakarta: Kencana, 2023.