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Advancing the Protection of Child Victims of Crime: A Comparative Study of Indonesia and the Philippines

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Abstract:
The protection of children as victims of crime remains one of the major challenges in modern child protection legal framework systems, particularly in developing states such as Indonesia and the Philippines. Although both states have constitutional commitments and national policies aimed at safeguarding children's rights, the implementation of protection for child victims often encounters structural, cultural, and institutional obstacles. This article examines the role of child protection legal framework in strengthening the protection of child victims through a comparative analysis of legal frameworks, policies, and law enforcement practices in both states. The study employs a comparative legal research method by analyzing relevant legislation, jurisprudence, and public policies on child protection. The findings indicate that Indonesia and the Philippines both possess a strong legal foundation for child protection, as reflected in the Child Protection Law of 2002 (amendment 2014 and 2016) and the Philippines' Republic Act No. 7610 of 1992. However, the effectiveness of implementation remains limited due to inadequate inter-agency coordination, resource constraints, and a lack of sensitivity among law enforcement officials toward child victims. This study underscores that child protection legal framework plays a crucial role not only as a normative regulatory instrument but also as a means of social engineering that promotes justice and the well-being of child victims of crime. The main recommendations include strengthening institutional capacity, enhancing training for law enforcement personnel, and harmonizing cross-sectoral policies to achieve more effective and sustainable child protection.

Keywords:
child protection; victim; Indonesia; Philipine.

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Introduction

Children are the most vulnerable group to various forms of crime due to their young age, dependence on adults, and underdeveloped ability to protect themselves. Social conditions such as poverty, gender inequality, and weak social protection systems further exacerbate these risks. Child victims also face barriers to accessing justice due to fear, stigma, and lack of access to legal or psychological assistance. This situation demands serious attention from the state to ensure children's rights are protected both legally and socially. Strong legal protection must be accompanied by sustainable prevention and recovery policies. Therefore, strengthening the child protection system is a necessity for states that uphold human values and justice.[1] A state that truly respects Human Rights does not merely enact legal rules, but

[1] M. Rezaul Islam, "Child Protection in South Asia: Assessing the Current Status, Progress, and Obstacles of the Legal Framework," *SN Social Sciences* 5, no. 4 (April 2025): 45, https://doi.org/10.1007/s43545-025-01082-0.

also ensures their enforcement through effective and just protection mechanisms.[2] Thus, the protection of child victims reflects the extent to which a state is able to guarantee the safety and dignity of all its citizens, especially vulnerable groups. Failure to protect child victims indicates a weakness in the state's function as a protector of human rights. Therefore, public policies that favor child victims must be a national priority and an integral part of human rights enforcement strategies. Such protection also serves as a moral and legal measure of a nation's civilization.[3]

Child protection legal framework plays a strategic role as a state instrument in ensuring justice and protection for all citizens, including children who are victims of crime. The existence of clear regulations forms the basis for prosecuting perpetrators, protecting victims, and preventing the recurrence of violence against children.[4] However, the effectiveness of child protection legal framework depends heavily on consistent implementation and the government's commitment to enforcing it. Therefore, policy updates and the strengthening of legal institutions are key to achieving comprehensive child protection. Thus, child protection legal framework not only functions normatively but also as a tool for social change toward a more just society.[5]

Child protection legal framework has provided a strong normative foundation, though its implementation often fails to operate effectively due to weak law enforcement and coordination among relevant agencies. Misalignment among law enforcement bodies, child protection institutions, and social agencies causes the victim protection process to be slow and suboptimal. Additionally, a lack of human resources, budget constraints, and overlapping authority further undermine the effectiveness of the child protection system. This situation reflects a gap between the idealism of the law and the bureaucratic reality encountered in practice. Without proper coordination, child protection legal framework loses its utility as a tool for social justice.[6]

Indonesia already has a fairly comprehensive legal framework to protect children through the Child Protection Law of 2022 (amendment 2014 & 2016), which affirms the responsibilities of the state, society, and family in guaranteeing children's rights.[7] This regulation covers protection against violence, exploitation, neglect, and discrimination, and provides a legal basis for enforcing justice for child victims of crime. However, there are still many cases where child victims of crime do not receive adequate legal assistance, while legal processes often focus on punishing perpetrators without considering the victim's recovery.

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[2] Sri Yulianingsih, Rengga Kusuma Putra, and Titi Christiana, "Aspek Hukum Penanganan Kekerasan Berbasis Gender Di Ruang Digital Studi Perbandingan Antara Indonesia Dan Negara-Negara Di ASEAN," *Jaksa: Jurnal Kajian Ilmu Hukum Dan Politik* 2, no. 4 (2024): 19–30, https://doi.org/https://doi.org/10.51903/jaksa.v2i4.2267.

[3] Cristina Lafont, "Are Human Rights Associative Rights? The Debate between Humanist and Political Conceptions of Human Rights Revisited," *Critical Review of International Social and Political Philosophy* 25, no. 1 (January 2022): 29–49, https://doi.org/10.1080/13698230.2020.1859221.

[4] Elizabeth A. Faulkner and Conrad Nyamutata, "The Decolonisation of Children's Rights and the Colonial Contours of the Convention on the Rights of the Child," *The International Journal of Children's Rights* 28, no. 1 (March 2020): 66–88, https://doi.org/10.1163/15718182-02801009.

[5] Tasya Faradina, "Implementation of the Child Protection Act: Evaluation and Recommendations," *Jurnal Hukum Dan Keadilan* 2, no. 3 (2025): 56–67, https://doi.org/https://doi.org/10.61942/jhk.v2i3.245.

[6] Faradina.

[7] Arrista Trimaya, "Pengaturan Perlindungan Khusus Bagi Anak Korban Kekerasan Dalam Undang-Undang Nomor 35 Tahun 2014 Tentang Perubahan Atas Undang-Undang Nomor 23 Tahun 2002 Tentang Perlindungan Anak (Arrangements for Child Protection as Victim of Violence in Law Number 35)," *Jurnal Legislasi Indonesia* 12, no. 3 (November 2018): 1–22, https://doi.org/10.54629/jli.v12i3.407.

This indicates a gap between the substance of the law and the protection practices implemented by law enforcement and social institutions.[8]

In 2023, a total of 3,547 cases of violence were recorded in Indonesia, which is an increase of 30% from the previous year.[9] Thus, psychosocial support for child victims in Indonesia is crucial, as adults who commit violence against children are generally emotionally immature.[10] Law enforcement officers and child support workers often lack adequate training to handle cases in a child-friendly manner. This situation exacerbates the trauma experienced by victims and hinders their comprehensive recovery. An integrated policy that combines legal, social, and psychological aspects is needed to ensure that child protection in Indonesia operates effectively and justly.[11]

In addition to Indonesia's fairly comprehensive legal practices to protect children, the Philippines also has a progressive legal framework for child protection through Republic Act No. 7610 of 1992, known as the Special Protection of Children Against Abuse, Exploitation, and Discrimination Act. This law affirms the state's commitment to providing special protection for children from various forms of physical, sexual, and economic violence, as well as guaranteeing their rights to safety and well-being.[12] However, the effectiveness of its implementation still faces various challenges on the ground. Law enforcement processes are often hindered by lengthy bureaucracy, lack of inter-agency coordination, and limited support facilities for child victims. This indicates that, while the legal foundation is strong, its implementation has not yet been able to reach all children in need of comprehensive protection.[13]

Another challenge faced by the Philippines is the lack of human and financial resources to implement child protection programs sustainably. Many areas in the Philippines, especially rural regions and poor communities, still do not have psychological support services or effective reporting mechanisms. Law enforcement officers also often lack training in handling child cases in a rights-based and sensitive manner. This situation indicates the need for improved institutional capacity and stricter oversight so that the law can truly become a protective instrument, not just a normative declaration.[14]

Many states, including Indonesia and the Philippines, already have comprehensive legal frameworks, but policy implementation is often hindered by weak coordination, limited resources, and complex bureaucracy. As a result, the rights of child victims that should be fully protected are not always fulfilled in practice. The mismatch between written regulations

[8] Steven Roche and Catherine Flynn, "Local Child Protection in the Philippines: A Case Study of Actors, Processes and Key Risks for Children," *Asia & the Pacific Policy Studies* 8, no. 3 (September 2021): 367–83, https://doi.org/10.1002/app5.332.
[9] Gusti Grehenson, "Psikolog UGM: Pelaku Kekerasan Anak Cenderung Punya Gangguan Kesehatan Mental," Berita Psikolog Universitas Gadjah Mada, 2024.
[10] Grehenson.
[11] Ahmad Rivaldi, "Legal Protection and Children's Rights Based on the 1945 Constitution in the Dynamics of Government in Indonesia," *Jurnal Hukum Keluarga* 1, no. 01 (June 2024): 1–8, https://doi.org/10.63731/jhk.v1i01.2.
[12] Maria Angela P. Cruz, Isabelle Therese G. Navarro, and Frances Mae T. Villanueva, "Child Protection Interventions in the Philippines – A Scoping Review," *International Journal of Social Sciences, Language and Linguistics* 05, no. 02 (February 2025): 09–15, https://doi.org/10.55640/ijssll-05-02-02.
[13] Cruz, Navarro, and Villanueva.
[14] Eduardo J. Andaya and ROnhel S. Patricio, "Mapping Child Protection in the Philippines: A Scoping Review of Implementation, Best Practices and Challenges," *Journal of Academic and Research in Social Sciences* 1, no. 2 (2025): 70–88, https://doi.org/https://doi.org/10.5281/zenodo.15723234.

and actual actions also erodes public trust in the legal system. Many cases end without a just resolution due to the lack of effective oversight mechanisms and a rapid response to victims' needs. To close this gap, implementation reforms, focusing on coordination efficiency, law enforcement transparency, and the involvement of civil society in oversight, are needed. Thus, the gap between legal norms and protection realities can be sustainably minimized.[15]

Research on law in child handling has been widely conducted, but has only focused on children in conflict with the law, i.e., children as perpetrators. Research by Kadek Krisna Mahendra in the Jurnal Pacta Sunt Servanda provides a comparative perspective on how the two states regulate children's criminal responsibility. This study finds that there are fundamental differences in the legal systems, where Indonesia tends to emphasize diversion mechanisms in the juvenile justice system, while the Philippines uses a more formal juvenile justice framework.[16] This research is important because it opens a cross-state comparative discourse in assessing the extent to which national laws align with child protection principles. From this, it can be seen that there is still room for further research on the legal-political aspects and children's rights that have not been fully explored in previous studies, especially regarding child victims in future research.

Furthermore, research by Raodiah et al., in Sasi, explains that the legal-political frameworks of the two states, Indonesia and the Philippines, integrate customary law and children's rights as the basis for a normative framework for child handling. Indonesia integrates customary law implicitly through diversion mechanisms, while the Philippines integrates it explicitly by involving barangay tanod in the diversion process under the Juvenile Justice and Welfare Act of 2006 (RA 9344).[17] This research enriches the comparative discourse between Indonesia and the Philippines by examining the legal-political frameworks for handling children as criminal offenders through the lens of customary law and children's rights. Their findings emphasize how local values and customary law traditions in both states interact with human rights instruments in shaping policies for child offenders. However, this focus leaves a gap in the proactive child protection legal framework dimension aimed at mitigating impacts on children as victims. The novelty of this research lies in the shift in perspective from customary-formal law to the child protection legal framework framework (such as administrative regulations and state recovery policies), which specifically evaluates the extent to which the state positions victim protection as a top priority in its national legal system, rather than merely a complement to the legal process for offenders.

Both previous studies have provided a foundation on the legal-political aspects of juvenile justice and criminal responsibility in Indonesia and the Philippines, but both still place victims' rights as a supplementary element in the narrative of handling children as offenders. This research fills that gap by shifting focus exclusively on the contribution of specific child protection legal framework mechanisms dedicated to child victims, mechanisms

[15] Hazar Kusmayanti et al., "A Comparative Analysis of the Indonesian and Philippine Judicial Systems: Identifying the Role of Customary Courts," *Cepalo* 9, no. 1 (2025): 13–24, https://doi.org/10.25041/cepalo.v9n01.3677.
[16] Kadek Krisna Mahendra, "Tinjauan Perbandingan Hukum Pidana Antara Negara Indonesia Dengan Filipina Terkait Pertanggungjawaban Pidana Terhadap Anak Di Bawah Umur," *Jurnal Pacta Sunt Servanda* 6, no. 1 (2025): 13–21, https://doi.org/10.23887/jpss.v6i1.5375.
[17] Raodiah Raodiah et al., "Legal Politics of Handling Children as Perpetrators of Criminal Acts: A Comparison of Indonesia and the Philippines from the Perspective of Customary Law and Children's Rights," *SASI* 31, no. 4 (October 2025): 361, https://doi.org/10.47268/sasi.v31i4.3394.

that are often overlooked in discussions of customary law and diversion formalities. The novelty of this article lies in its sharp comparative analysis of technical variables, including access to legal aid, investigative procedures that mitigate secondary trauma, and the effectiveness of restitution and compensation mechanisms. Unlike descriptive overviews of legal systems, this research dissects the operationalization of inter-agency coordination and oversight accountability in both states to reveal the extent to which child protection legal framework instruments transform from mere normative tools into tangible, measurable protection services for child victims.

This research aims to describe and analyze the role of child protection legal framework in strengthening the protection of child victims of crime through a comparative study between Indonesia and the Philippines. It seeks to identify differences and similarities in the legal frameworks, enforcement mechanisms, and child protection policies of both states. Through a normative-comparative approach, this research is expected to uncover the factors that influence the effectiveness of child protection legal framework implementation for child victim protection. Additionally, this research focuses on identifying best practices that can be adapted to improve the child protection system. By analyzing the gap between legal norms and implementation, this research provides a basis for formulating more responsive and just policies. Ultimately, this research is expected to help strengthen the function of child protection legal framework as an instrument for protecting children's rights at the national and regional levels

Method

This research aims to analyze the role of child protection legal framework in strengthening protection for child victims of crime through a comparative study between Indonesia and the Philippines. To achieve this objective, the research employs a normative-comparative legal approach with a functional comparison model comparing how two different legal systems perform the function of protecting children as a state obligation within the child protection legal framework framework. Indonesia and the Philippines were selected because they share similar normative commitments to the Convention on the Rights of the Child, yet differ in institutional structures and implementation practices. This approach enables analysis that focuses not only on differences in norms but also on the effectiveness of the law's function across contexts.

Research data is entirely sourced from secondary data, selected selectively and systematically. Primary legal sources include key legislation and its derivatives, particularly the Child Protection Law of 2002 (amendment 2014 & 2016) and its implementing regulations in Indonesia, as well as Republic Act No. 7610 of 1992 and related policies in the Philippines. Additionally, this research uses selected court decisions related to child victim to identify patterns in law enforcement. Secondary legal sources include reputable international journal articles, official government reports, audit and monitoring reports from state institutions, and reports from international bodies and non-governmental organizations such as UNICEF and Human Rights Watch.

Data analysis is conducted using a qualitative-descriptive method through content analysis and cross-state comparisons. The effectiveness of child protection legal framework is measured by several key indicators: child victims' access to protection and recovery services, coordination among implementing agencies, sustainability of psychosocial support, and consistency of law enforcement. Implementation practices are analyzed by examining the alignment between legal norms and their implementation as reflected in policy documents, institutional reports, and court decisions. All findings are then evaluated based on the principles of the best interests of the child, social justice, and child protection legal framework accountability. Through this approach, the research is expected to identify structural and institutional gaps and formulate policy lessons to strengthen the child protection system in both states.

Discussion

1. The child protection legal framework in Indonesia and the Philippines

The conceptualization of child protection legal framework in the context of child protection positions the state as the main actor in ensuring the fulfillment of children's rights through just legal instruments and public policies. Child protection legal framework, which encompasses criminal, administrative, and constitutional law, functions to ensure the state's responsibility to prevent, address, and rehabilitate child victims of various forms of crime.[18] Child protection is understood not only as a moral responsibility but also as a legal obligation of a constitutional and international nature, as reflected in the Convention on the Rights of the Child, which has been ratified by both Indonesia and the Philippines. The principle of the best interest of the child serves as the primary foundation, requiring that all state policies and actions be oriented toward children's well-being. Additionally, child protection legal framework regulates the balance between enforcing justice against perpetrators and restoring victims' rights, ensuring that the legal process does not merely punish but also rehabilitates. Thus, the concept of child protection legal framework plays a dual role: as a regulatory tool that protects children from the threat of crime, and as a normative mechanism that binds the state to act actively in child protection.[19]

The child protection legal framework paradigm in Indonesia is reflected in the strengthening of the juvenile justice system and the authority of institutions such as the *Indonesian Child Protection Commission (Komisi Perlindungan Anak Indonesia - KPAI)*.[20] Meanwhile, the role of child protection legal framework in the Philippines is evident in the integration of child protection into the local government system through the *Barangay Council for the Protection of Children*.[21] Both states adopt a similar approach in positioning

[18] Uchenna Emelonye, "Theoretical and Normative Foundation of Child Rights," *US-China Law Review* 15, no. 1 (January 2018), https://doi.org/10.17265/1548-6605/2018.01.001.
[19] Yanuar Farida Wismayanti et al., "The Problematization of Child Sexual Abuse in Policy and Law: The Indonesian Example," *Child Abuse & Neglect* 118 (August 2021): 105–57, https://doi.org/10.1016/j.chiabu.2021.105157.
[20] Trimaya, "Pengaturan Perlindungan Khusus Bagi Anak Korban Kekerasan Dalam Undang-Undang Nomor 35 Tahun 2014 Tentang Perubahan Atas Undang-Undang Nomor 23 Tahun 2002 Tentang Perlindungan Anak (Arrangements for Child Protection as Victim of Violence in Law Number 35)."
[21] Eltimar T. Castro and Alexander A. Hernandez, "Developing a Predictive Model on Assessing Children in Conflict with the Law and Children at Risk: A Case in the Philippines," in *2019 IEEE 15th International Colloquium on Signal Processing & Its Applications (CSPA)* (IEEE, 2019), 243–48, https://doi.org/10.1109/CSPA.2019.8695984.

the state as the primary protector of children, but the challenge lies in how child protection legal framework norms are translated into effective administrative action and law enforcement. Therefore, the conceptualization of child protection legal framework must be understood not only from a normative perspective but also in terms of its actual effectiveness in guaranteeing the rights and safety of children as the most vulnerable citizens.

Indonesia's legal framework for the protection of child victims of crime shows significant development through the establishment of increasingly comprehensive and integrated regulations. Its legal basis is anchored in the Child Protection Law of 2022 (amendment 2014 & 2016) and affirms the responsibilities of the state, local governments, society, and families in guaranteeing children's rights. Additionally, the Juvenile Justice Law of 2012 marks a paradigm shift from a repressive approach to a restorative justice approach, which prioritizes victim recovery and perpetrator accountability without neglecting child protection.[22] This regulation is strengthened by Government Regulation Number 78 of 2021 concerning Special Child Protection, which explicitly regulates the handling of child victims of violence, exploitation, and human trafficking. The Law on Sexual Violence Crimes of 2022 expands the legal framework by affirming child victims' rights to restitution, rehabilitation, and safety guarantees. With these various regulations, Indonesia has established a more progressive child protection legal framework system in protecting child victims of crime from various dimensions of violence and exploitation.[23]

Indonesia's legal framework has become increasingly comprehensive over the years, yet challenges still arise in implementing these principles at the operational and institutional levels. Law enforcement often faces obstacles such as limited coordination among agencies, a lack of professional staff with a child-friendly perspective, and weak monitoring of policy implementation at the regional level. Additionally, the existence of various implementing regulations, such as the Minister of Women's Empowerment and Child Protection Regulation Number 2 of 2023 concerning Child Protection Service Standards, demonstrates the government's concrete steps to strengthen integrated service-based protection mechanisms.[24] However, its effectiveness still depends heavily on synergy among law enforcement officers, social institutions, and local governments in implementing legal norms consistently. Therefore, although Indonesia's legal framework has undergone substantial progress, optimizing the implementation and enforcement of child protection legal framework remains key to ensuring that child protection does not stop at the normative level but is truly realized in the practice of social justice and humanity.[25]

The examination mechanism for child victims in Indonesia reflects the integration of a proactive child protection legal framework function, which aims to minimize secondary trauma through the standardization of operational procedures. Based on the Juveline Justice

[22] Mavitia Humairah Ms, Heni Nopianti, and Ika Pasca Himawati, "Collaboration Between Women and Child Protection and Women's Crisis Center in Assisting Victims of Sexual Violence Against Children," *Journal of Law, Politic and Humanities* 5, no. 1 (November 2024): 540–53, https://doi.org/10.38035/jlph.v5i1.880.
[23] Yanuar Farida Wismayanti et al., "Child Sexual Abuse in Indonesia: A Systematic Review of Literature, Law and Policy," *Child Abuse & Neglect* 95 (September 2019): 104–34, https://doi.org/10.1016/j.chiabu.2019.104034.
[24] Ni Luh Putu Maitra Agastya et al., "Transformation of Child Welfare Institutions in Bandung, West Java: A Case of Deinstitutionalization in Indonesia," *Children and Youth Services Review* 159 (April 2024): 107545, https://doi.org/10.1016/j.childyouth.2024.107545.
[25] Luh Putu Maitra Agastya et al.

Law of 2012 and strengthened by the Law on Sexual Violence Crimes of 2022, the examination of child victims must be conducted in a non-intimidating atmosphere, generally carried out in a Special Service Room without the use of uniformed attire by law enforcement officers.[26] Indonesia's child protection legal framework adopts the principle of non-re-victimization, where the victim's testimony only needs to be taken once through electronic (audiovisual) recording that has valid evidential value in court to avoid the traumatic repetition of testimony.[27] Additionally, there is an obligation for cross-sectoral coordination involving multidisciplinary assistance from Professional Social Workers, the Probation Officer, and medical/psychological personnel from the Regional Service Unit for Women and Children Protection *(Unit Pelaksana Teknis Daerah Perempuan dan Perlindungan Anak – UPTD PPA)*. The accountability of this mechanism is emphasized by the investigator's obligation to integrate restitution rights from the early stages of investigation through coordination with the Witness and Victim Protection Agency *(Lembaga Perlindungan Saksi dan Korban - LPSK)*, indicating that child protection legal framework not only regulates formal judicial procedures but also guarantees victims' recovery rights as a state responsibility.[28]

The Philippines' legal framework for the protection of child victims of crime is built on a strong foundation through *Republic Act (RA) No. 7610 of 1992, or the Special Protection of Children Against Abuse, Exploitation, and Discrimination Act*. This law serves as the main pillar in providing special protection for children from physical, sexual, and economic violence, as well as other forms of exploitation. Furthermore, the existence of *Republic Act No. 9344 of 2006, or the Juvenile Justice and Welfare Act*, strengthens the protection system by emphasizing the principle of restorative justice for children in conflict with the law, both as victims and perpetrators.[29] R RA No. 9775 of 2009, the Anti-Child Pornography Act, and RA No. 9208 of 2003, the Anti-Trafficking in Persons Act, also form important parts of the legal framework that affirm the state's responsibility to protect children from sexual exploitation and human trafficking. Under Republic Act No. 7610 and its amendments, the Philippine government regulates the establishment of *the Barangay Council for the Protection of Children (BCPC)* as a grassroots institution tasked with monitoring, reporting, and following up on child violence cases at the community level. Thus, the Philippine legal system not only focuses on criminal matters but also on prevention and community involvement in ensuring children's safety.[30]

Recent developments indicate that the Philippines continues to strengthen its legal framework by adopting a child rights-based and social welfare approach. The implementation

[26] Prianter Jaya Hairi and Marfuatul Latifah, "Implementasi Undang-Undang Nomor 12 Tahun 2022 Tentang Tindak Pidana Kekerasan Seksual (Implementation of Law Number 12 of 2022 on Criminal Acts of Sexual Violence)," *Negara Hukum: Membangun Hukum Untuk Keadilan Dan Kesejahteraan* 14, no. 2 (October 2024): 163–80, https://doi.org/10.22212/jnh.v14i2.4108.

[27] Ardian Pratama, Opan Satria Mandala, and Ana Rahmatyar, "Analisis Implementasi Kebijakan Perlindungan Anak Korban Kekerasan Seksual Di Indonesia Dalam Undang-Undang Nomor 12 Tahun 2022 Tentang Tindak Pidana Kekerasan Seksual (UU TPKS)," *Indonesia Berdaya* 6, no. 3 (2025): 707–14, https://doi.org/https://doi.org/10.47679/ib.20251159.

[28] Biro Hukum dan Humas, "Optimalkan Implementasi UU TPKS Dalam Penanganan Hukum Kasus Kekerasan, KemenPPPA Libatkan Koordinasi Lintas Sektor," Kementerian Pemberdayaan Perempuan dan Perlindungan Anak, 2023.

[29] Castro and Hernandez, "Developing a Predictive Model on Assessing Children in Conflict with the Law and Children at Risk: A Case in the Philippines."

[30] Alexandra Mojica Pascua, "Post-Knutson Navigation: Analyzing Child Protection Laws in Light of the Application Crisis in Knutson v. Sarmiento-Flores," *Philippine Law Journal* 97, no. 1 (2023): 167–227.

of *Republic Act No. 11313 of 2019*, or the *Safe Spaces* Act,[31] expands protection for children from gender-based harassment in public and online spaces, adapting to the dynamics of modern crime.[32] The Philippine government has also integrated child protection policies into the *Philippine Plan of Action to End Violence Against Children* (2017–2022), which emphasizes cross-sectoral synergy among legal, education, and social welfare institutions.[33] However, although the Philippine legal system is relatively comprehensive, its effectiveness is often limited by resource constraints, weak inter-agency coordination, and uneven implementation in rural areas. These challenges indicate that strengthening the capacity of local institutions and training law enforcement officers remain urgent needs to ensure more just and child-sensitive law enforcement. Thus, the Philippine legal framework is normatively well-established, but still requires optimization to ensure that child protection principles are truly realized across all sectors of society.[34]

The Philippines adopts a highly technical and protective child protection legal framework approach to examining children through the framework of RA No. 7610 and the Rule on Examination of a Child Witness. This mechanism emphasizes the concept of Live-Link TV or Videotaped Deposition, in which children can testify from outside the courtroom to avoid direct confrontation with the perpetrator,a standard that was implemented long before similar judicial systems developed at the regional level. Philippine child protection legal framework also introduces the role of a "Facilitator" or "Intermediary", i.e.,a professional tasked with translating complex legal questions into language appropriate to the child's developmental stage, to ensure accuracy without causing psychological pressure.[35] Additionally, under the mandate of RA 7610, every examination must be conducted under the supervision of *the Department of Social Welfare and Development* or special police units (Women and Children Protection Desks), with the primary focus on meeting immediate medical and psychosocial needs through integrated Child Protection Units in government hospitals. This system demonstrates the existence of a centralized yet grassroots-operational institutional coordination through the Local Council for the Protection of Children, which ensures accountability in monitoring cases from the reporting stage through to long-term recovery.[36]

Implementing institutions in Indonesia's child protection system play a central role in bridging the gap between child protection legal framework norms and policy implementation on the ground. The Indonesian Child Protection Commission *(Komisi Perindungan Anak Indonesia - KPAI)* has a constitutional mandate to oversee the implementation of child protection, provide policy recommendations, and ensure government institutions' compliance with child rights principles. Additionally, *the Ministry of Women's Empowerment and Child Protection (Kementerian Pemberdayaan Perempuan dan Perlindungan Anak)* serves

[31] Roy Enrico C. Santos and Raya Grace T. Tan, "'Safe Spaces Act' Increases Protections Against Sexual Harassment Online and in Workplaces in Philippines," Ogletree Deakins, 2020.
[32] Santos and Tan.
[33] Syaifuddin Zuhdi et al., "The Comparative Study of Child and Women's Rights Protection After Marital Dissolution in Indonesia and Philippines," *Sakina: Journal of Family Studies* 9, no. 2 (May 2025): 146–64, https://doi.org/10.18860/jfs.v9i2.14981.
[34] I Wayan Aryana, "The Reformulation of Restitution Concept in Juvenile Cases (A Comparative Study with Philippines and Thailand)," *Padjadjaran Jurnal Ilmu Hukum (Journal of Law)* 07, no. 03 (January 2021): 400–420, https://doi.org/10.22304/pjih.v7n3.a6.
[35] Andaya and Patricio, "Mapping Child Protection in the Philippines: A Scoping Review of Implementation, Best Practices and Challenges."
[36] Council for the Welfare of Children and Unicef, "Philippine Plan of Action to End Violence against Children," 2017.

as the executive body that formulates national policies, coordinates the implementation of cross-sectoral programs, and develops a One Stop Service-based system through the the Regional Service Unit. Collaboration between *the Commission* and *the Ministry* enables the integration of legal, social, and psychological aspects in handling child victims of crime. However, the effectiveness of this cooperation is often influenced by limited human resources, uneven cross-regional coordination, and overlapping mandates between institutions. The presence of these two institutions has strengthened children's position as protected legal subjects not merely policy objects and affirmed the state's commitment to the principle of the best interest of the child in child protection legal framework practice.[37]

The institutional structure for child protection in the Philippines places greater emphasis on community involvement through a combination of national and local mechanisms. *The Department* serves as the main institution responsible for implementing social and legal policies related to children, including the provision of rehabilitation services, psychosocial support, and coordination among law enforcement agencies. *The Barangay Council* functions as the frontline in the child protection system, with a mandate to detect cases of violence, coordinate rapid responses, and educate the community about children's rights. This model reflects the decentralization of child protection, which strengthens community participation and local responsibility.[38] However, constraints such as limited training for the Barangay Council members, insufficient funding, and slow bureaucracy often hinder implementation effectiveness. The combination of *the Department* and *The Barangay Council* shows that the Philippines has built a relatively adaptive and participatory institutional system, which can serve as an example for other states in integrating the role of child protection legal framework with community empowerment for the protection of child victims of crime.[39]

Both Indonesia and the Philippines share fundamental principles in child protection legal framework on child protection, namely positioning children as legal subjects with inherent human rights that must be guaranteed by the state. Both states adopt the principle of the best interests of the child as the main foundation in formulating regulations and public policies, and use international conventions such as the Convention on the Rights of the Child as a normative reference. Both regulate the state's responsibility to prevent, address, and rehabilitate child victims of crime through criminal justice mechanisms and social policies. Another similarity is evident in the recognition that child protection is not only a matter of criminal law but also part of good governance that requires multi-sectoral involvement. Both states emphasize that children are not merely objects of protection, but citizens entitled to justice, a sense of safety, and comprehensive recovery.[40]

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[37] Taufik Makarao and Quthub Al Faruqi, "Implementation of Child Protection Policies in Indonesia - A Comparison Study of the Effectiveness of Child Protection Institutions Performance," *Jurnal Hukum Jurisdictie* 5, no. 1 (July 2023): 61–84, https://doi.org/10.34005/jhj.v5i1.117.

[38] Marni A Pamposa and Adonis S Besa, "Barangay Council for the Protection of Children, Their Four Core Rights and Its Contribution To Barangay Good Governance," *Ignatian International Journal for Multidisciplinary Research* 3, no. 3 (2025): 1587–95, https://doi.org/https://doi.org/10.5281/zenodo.15149543.

[39] Pamposa and Besa.

[40] Gidion Arif Setyawan et al., "Urgency of Institutionalizing Collaborative Governance in the Legal System for the Protection of Children in Conflict with the Law," *Jurnal Hukum* 41, no. 2 (June 2025): 346–65, https://doi.org/10.26532/jh.v41i2.46413.

In addition to sharing similarities in child protection practices, Indonesia and the Philippines also exhibit striking differences in their institutional approaches and the implementation of these normative principles. Child protection in Indonesia is largely managed through a bureaucratic structure with a dominant role played by central government bodies such as *the Ministry* and *the Commission*, which oversee and set policy functions in a top-down manner. Meanwhile, the institutional system in the Philippines is more decentralized and emphasizes community participation through *the Barangay Council* . These differences reflect variations in how the two states interpret the principle of the state's responsibility for child protection: Indonesia focuses on strong national regulations and policies, while the Philippines emphasizes empowering local communities as the frontline of child protection. Additionally, in terms of policy integration, the Philippines tends to be more adaptive in linking child protection legal framework with social welfare policies.[41]

Both Indonesia and the Philippines have a strong public legal foundation for protecting child victims of crime, but the effectiveness of their implementation still depends heavily on inter-agency coordination and supporting institutional capacity. Normatively, regulations in both states have clearly defined the responsibilities of the state, law enforcement agencies, and victim recovery mechanisms.[42] However, in practice, there remains a gap between legal norms and implementation realities, especially in terms of integration among legal, social, and health institutions. Weak cross-sectoral coordination often results in partial, inconsistent handling of child victim cases, and sometimes leads to revictimization. Additionally, limited training of legal and social professionals with a child-protection perspective means the implementation of child-friendly justice principles is not yet optimal. Therefore, although the public legal frameworks in both states are adequate, their effectiveness still depends heavily on the institutions' ability to collaborate in a functional and consistent manner.[43]

Institutional capacity is a crucial factor that distinguishes between success and stagnation in the child protection system in both states. In Indonesia, the capacity of institutions such as *the Ministry, the Commission,* and *the Regional Service Unit* still needs to be strengthened in terms of budget, human resources, and cross-regional coordination mechanisms. Meanwhile, in the Philippines, although the community-based approach through the *Barangay Council* expands the reach of protection, limited funding and training at the local level often hinder rapid responses to child violence cases.[44] Both show that a good legal system does not automatically result in effective protection without adequate institutional capacity. These findings affirm that institutional reform, improved personnel competence, and integration of inter-agency information systems are key prerequisites for child protection principles in child protection legal framework to be truly realized. Thus, the core of effective child protection lies not only in the strength of written law but also in the

[41] Raodiah et al., "Legal Politics of Handling Children as Perpetrators of Criminal Acts: A Comparison of Indonesia and the Philippines from the Perspective of Customary Law and Children's Rights."
[42] Raodiah et al.
[43] Mavitia Humairah Ms, Heni Nopianti, and Ika Pasca Himawati, "Collaboration Between Women and Child Protection and Women's Crisis Center in Assisting Victims of Sexual Violence Against Children."
[44] Pamposa and Besa, "Barangay Council for the Protection of Children, Their Four Core Rights and Its Contribution To Barangay Good Governance."

state's and its institutions' ability to enforce it in a real, sustainable, and child rights-based manner.[45]

2. Implementation Gaps and Law Enforcement Challenges in Protecting Child Victims.

The implementation gap between legal norms and child protection practices in Indonesia and the Philippines reflects classic challenges in child protection legal framework enforcement in developing states. Although both states have comprehensive, child-rights-oriented legal frameworks, its implementation often does not align with the normative spirit set out in legislation. In Indonesia, this gap is evident in the weak implementation of restorative justice principles and the limited access of child victims to legal and psychosocial services, especially in remote areas. Many cases of violence against children stall at the reporting stage due to poor coordination among law enforcement institutions such as the police, social services, and child protection agencies.[46] A similar situation is found in the Philippines, where challenges arise from inconsistencies between national policies and implementation capacity at the local level. Although community institutions such as *the Barangay Council* exist, their implementation is often hampered by limited resources and poor training in handling child-related cases. As a result, there is a real gap between legal idealism and the effectiveness of protection experienced by child victims on the ground.[47]

Legal aid reveals fundamental differences in the degree of obligation and funding mechanisms between the two states. In Indonesia, under Article 43 of the Law on Sexual Violence Crimes of 2022 and Article 54 of the Juvenile Justice Law of 2022, legal assistance for child victims is mandatory and must begin from the investigation stage (when the first report is filed) through to trial. The responsibility for providing these services is hybrid: the state, through the Regional Service Unit and the Agency, is obligated to provide assistance, but operationally, the state funds lawyers through the legal aid budget mechanism at the Ministry of Law and Human Rights for low-income people, or through direct appointment by investigators with honorariums from the state budget. In contrast, in the Philippines, the obligation to provide legal assistance is strictly regulated in RA 7610 and RA 9344, where the Public Attorney's Office *(PAO)* under the Department of Justice has the primary mandate to provide free legal services automatically to child victims without undergoing strict material testing (financial capacity) at the initial stage. Funding in the Philippines is more centralized through the *PAO*'s national budget, while in Indonesia, it is more decentralized by involving collaboration between government institutions and accredited Legal Aid Organizations.

Regulations in Indonesia that affirm the state's responsibility for child protection have not been fully balanced by a strong evaluation system and oversight mechanisms, so many policies are implemented administratively without substantive results. Meanwhile, in the

[45] Islam, "Child Protection in South Asia: Assessing the Current Status, Progress, and Obstacles of the Legal Framework."
[46] Farhana Farhana et al., "Increasing Understanding of Legal Protection of Children'S Rights in the Perspective of Indonesian Positive Law," *International Journal of Community Care of Humanity (IJCCH* 2, no. 03 (2024): 302–8.
[47] Brian Ven Climaco Bag-ao, "'In Number There Is Strength': Multi-Agency Collaborative Strategies for Combating Online Sexual Abuse and Exploitation of Children (OSAEC) In Cagayan De Oro City, Philippines," *Socialinės Gerovės Tyrimai Social Inquiry* 23, no. 1 (2025): 26–57, https://doi.org/10.13165/SD-25-23-1-02.

Philippines, although there is an institutional structure involving the community, weak integration between central institutions and local units causes child protection policies to lose consistency. This situation shows that the gap between legal text and practice stems not only from technical factors but also from political, economic, and legal-cultural aspects. Without synergy between normative and implementative aspects, child protection legal framework will only function as a formal legal document, not as a real instrument of justice and child protection.[48]

Limited resources and weak inter-agency coordination are fundamental obstacles in the implementation of child protection legal framework related to child protection in Indonesia and the Philippines. In practice in Indonesia, although there are various institutions such as *the Ministry, the Commission,* and *the Regional Service Unit*, the distribution of human resources, budget, and facilities remains highly uneven across regions. Many child protection service units lack professional staff with adequate legal and psychological competence, so the process of assisting victims is often not optimal. Additionally, overlapping mandates between institutions lead to delays in case handling and ambiguity in accountability throughout the legal process.[49] A similar situation in the Philippines is seen in the limited capacity of *the Barangay Council*, which often lacks funding and technical training to handle complex cases such as sexual exploitation or child trafficking. This results in the child protection system in both states being unable to function in a responsive and integrated manner in line with the mandates of existing child protection legal framework.[50]

Coordination between law enforcement and social institutions is crucial aspect to implementation effectiveness, yet it has become a major weak point in on-the-ground practice. Synergy between the police, prosecutor's office, social institutions, and health services in Indonesia often operates in a sectoral manner, without integrated communication and reporting mechanisms. As a result, child victims frequently move from one institution to another without receiving comprehensive recovery support.[51] Decentralizing responsibilities to the local level in the Philippines has indeed expanded the reach of protection, but it has also created coordination gaps between the central and local governments. Another challenge is the lack of an adequate national information system to monitor child victim cases and evaluate policies in real time.[52] Thus, resource and coordination constraints are not merely administrative issues. There are also structural problems that require institutional reform, inter-agency system integration, and sustainable investment in human resources for child protection legal framework to truly function as an effective and just instrument for child protection.[53]

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[48] Froilan D. Mobo, "Strengthening the Child's Protection Program in the Philippines," *International Journal of Multidisciplinary: Applied Business and Education Research* 2, no. 12 (December 2021): 1384–86, https://doi.org/10.11594/10.11594/ijmaber.02.12.11.

[49] Ni Made Ita Ariani, Ni Putu Rai Yuliarti, and Dewa Gede Sudika Mangku, "Implementation of Law Number 11 of 2012 Concerning the Criminal Justice System for Children Against Theft Perpetrated by Children in Buleleng Regency (Case Study Number: B/346/2016/Reskrim)," *E-Journal Komunitas Yustisia* 2, no. 2 (2019): 100–112.

[50] Pamposa and Besa, "Barangay Council for the Protection of Children, Their Four Core Rights and Its Contribution To Barangay Good Governance."

[51] Kayla Dea Aosa, Rina Martini, and Supratiwi Supratiwi, "Evaluasi Pelaksanaan Peraturan Menteri Pemberdayaan Perempuan Dan Perlindungan Anak Nomor 18 Tahun 2019 Tentang Penyelenggaraan Forum Anak (Studi Kasus Penyelenggaraan Forum Anak Kota Semarang)," *Journal of Politic and Government Studies* 13, no. 3 (2024): 335–49.

[52] Aosa, Martini, and Supratiwi.

[53] Zuhdi et al., "The Comparative Study of Child and Women's Rights Protection After Marital Dissolution in Indonesia and Philippines."

Law enforcement for child victim cases in Indonesia still faces various systemic and structural constraints. One of the main issues is the weak sensitivity of law enforcement officials to the special needs of child victims, both during the investigation and trial processes. Although there are regulations that emphasize the need for a child-friendly approach, on-the-ground practices still show treatment that tends to be procedural and pays little attention to the emotional protection aspects of victims.[54] Many cases of child violence or exploitation stall at the reporting stage because the child or their family experiences psychological pressure and does not receive adequate support. Additionally, the limited number of professional support staff, such as social workers and forensic psychologists, exacerbates this situation, especially in areas with limited resources. As a result, the legal process often fails to achieve the main protection goals: comprehensive recovery for child victims and prevention of repeated violence.[55]

The absence of an integrated psychosocial support system is also a major obstacle to the effectiveness of child protection legal framework enforcement in Indonesia. Many child protection service institutions operate partially without effective coordination with legal authorities, so the victim rehabilitation process runs separately from the judicial process. In many cases, victims have to face the perpetrator directly in the courtroom without adequate psychological support, which risks causing secondary trauma. Additionally, not all law enforcement officials have received training on a trauma-informed approach in handling cases of violence against children.[56] This situation shows that although the legal system has recognized the importance of child protection, its implementation still fails to ensure substantive justice for victims. Therefore, systemic reform is needed to position psychosocial support as an integral part of the legal process, not merely an additional service, so that child protection legal framework can truly fulfill its function as a holistic protector of children's rights.[57]

The direct impact of weak child protection legal framework implementation on child victims of crime in Indonesia and the Philippines is evident in the phenomenon of revictimization when children experience further psychological suffering due to an unfriendly legal process. Children are often forced to repeat their testimony multiple times in front of different authorities without psychological support, which only exacerbates the trauma they have endured. The long and bureaucratic legal process also prolongs the period of uncertainty for victims, which not only affects their emotional state but also hinders their education and social reintegration.[58] Additionally, many cases show that child victims are actually stigmatized by society and even by law enforcement officials themselves, especially in cases of sexual violence. This situation indicates that a legal system that is supposed to provide

[54] Ameylia Puspita Rosa Dyah Ayu Arintyas, Hakimul Ikhwan, and Muhadjir Darwin, "Protection Innovation Actions as an Effort to Fulfill the Social Rights of Children in Conflict with the Law: Case Study in Dki Jakarta and Di Yogyakarta," 2024, https://doi.org/10.2139/ssrn.4819137.
[55] Setyawan et al., "Urgency of Institutionalizing Collaborative Governance in the Legal System for the Protection of Children in Conflict with the Law."
[56] Arintyas, Ikhwan, and Darwin, "Protection Innovation Actions as an Effort to Fulfill the Social Rights of Children in Conflict with the Law: Case Study in Dki Jakarta and Di Yogyakarta."
[57] Kusmayanti et al., "A Comparative Analysis of the Indonesian and Philippine Judicial Systems: Identifying the Role of Customary Courts."
[58] Mary Grace C. Agcaoili, "Best Interests of the Child in Juvenile Justice: Analysis of Malaysia, Philippines, and Thailand," *Asia-Pacific Social Science Review* 24, no. 2 (June 2024), https://doi.org/10.59588/2350-8329.1533.

protection can instead become a new source of suffering for children if it is not implemented with a child-centered approach. This revictimization affirms that procedural justice without emotional protection cannot yet be called substantive justice for child victims.[59]

Delays in the legal process and inequalities in recovery services worsen the social and psychological conditions of child victims. The length of investigations and trials causes victims to lose motivation to continue with the legal process, while perpetrators often go unpunished or receive leniency. Inequalities are also evident in access to recovery services, for example, child victims in urban areas are more likely to receive counseling, rehabilitation, and legal aid compared to those living in remote areas. Psychosocial recovery services have not been fully integrated with the judicial system, so many children do not receive ongoing support after their case is closed. As a result, children's chances of returning to a normal life are drastically reduced. These inequalities reflect that child protection remains symbolic and has not yet become a substantive priority in public policy.[60]

A synthesis of the comparison between Indonesia and the Philippines shows that the implementation gap in child protection legal framework for the protection of child victims of crime follows a relatively similar pattern, despite occurring in different social and institutional contexts. Both states face the classic issues of weak inter-agency coordination, limited human and financial resources, and inconsistent on-the-ground law enforcement. This pattern indicates that the main problem lies not in the weakness of legal norms, but in their implementation, which is not yet effective and not fully oriented to children's needs. The gap pattern in Indonesia is more evident in excessive bureaucratization and delayed responses between institutions.[61] Meanwhile, in the Philippines, obstacles arise due to decentralization and uneven capacity across regions. Both of these contexts affirm that child protection legal framework can only function substantively if there is an adaptive, integrated, and child rights-sensitive institutional system.[62]

The similarity in the pattern of implementation gaps reflects the limitations of child protection legal framework transformation in bridging norms with social practice. Both Indonesia and the Philippines are still striving to shift the child protection paradigm from a reactive approach to a preventive and restorative one. While social, cultural, and institutional structural differences influence the nature of challenges, the core issue remains the same: the state's weak capacity to ensure the sustainability of child protection policies.[63] Therefore, an important lesson from this synthesis is the need to strengthen the integration between law and social policy so that child protection legal framework does not remain confined to the normative domain. In this context, both Indonesia and the Philippines have the opportunity

[59] Mubarak Rahamathulla, "Cyber Safety of Children in the Association of Southeast Asian Nations (ASEAN) Region: A Critical Review of Legal Frameworks and Policy Implications," *International Journal on Child Maltreatment: Research, Policy and Practice* 4, no. 4 (December 2021): 375–400, https://doi.org/10.1007/s42448-021-00087-5.
[60] Fumiko Shibuya et al., "Comparative Study on School-Based Mental Health Literacy in Three Asian States," *Tropical Medicine and Health* 53, no. 1 (June 2025): 86, https://doi.org/10.1186/s41182-025-00697-6.
[61] Makarao and Faruqi, "Implementation of Child Protection Policies in Indonesia - A Comparison Study of the Effectiveness of Child Protection Institutions Performance."
[62] Cruz, Navarro, and Villanueva, "Child Protection Interventions in the Philippines – A Scoping Review."
[63] Lesley Ann Atilano-Tang, "Local Government Assistance to Survivors of Child Sexual Abuse in the Zampen Region, Philippines: A Policy Analysis," *SSRN Electronic Journal*, 2023, https://doi.org/10.2139/ssrn.4518722.

to learn from each other through cross-state cooperation mechanisms to strengthen a human rights-based and responsive-governance child protection system.[64]

3. Child protection legal framework Strengthening Strategy to Achieve Effective Child Protection

Legal and institutional reform is urgently needed to strengthen a child protection system grounded in social justice in Indonesia and the Philippines. Although both states already have a fairly comprehensive legal framework, the substance of child protection has not yet been fully internalized in institutional practices and public policies. Legal reform must be directed not only at improving regulations but also at establishing child-friendly implementation mechanisms, recognizing children as legal subjects entitled to safety and comprehensive recovery. Updating institutional structures should ensure synergy among law enforcement, social, and health institutions through integrated coordination. In Indonesian practice, this means strengthening the roles of the Commission and the Ministry so that they function more as policy enforcers, not merely as supervisory bodies.[65] Meanwhile, in the Philippines, reform must focus on consolidating the role of the Barangay Council so that it is not merely administrative but also capable of playing a substantive role in preventing and handling of child cases. The urgency of legal and institutional reform is not just technocratic in nature, but part of a social transformation agenda to ensure justice that favors children as a vulnerable group.[66]

The reform approach must be oriented toward social justice, taking into account equal access, community participation, and inclusivity in every child protection policy. Social justice does not only mean equality before the law, but also includes the state's ability to provide tangible support for children from different socioeconomic backgrounds. Integration between the public legal system and social policy is a key element to ensure that child protection does not stop at the realm of formal law.[67] Institutional reform must also include strengthening the capacity of authorities, improving national child case data, and implementing child-sensitive governance mechanisms at all levels of government. Both Indonesia and the Philippines need to place children at the center of public policy, not merely as objects of legal protection. The child protection system can evolve from a mere legal instrument to a living and adaptive social justice system that ensures every child is protected from violence, exploitation, and structural injustice.[68]

Strengthening cross-sectoral coordination between legal, social, and education institutions is a key element in ensuring the effective implementation of a comprehensive and sustainable child protection system. Many child protection policies fail to achieve optimal results because each sector operates in isolation and lacks effective data integration and

[64] Rahamathulla, "Cyber Safety of Children in the Association of Southeast Asian Nations (ASEAN) Region: A Critical Review of Legal Frameworks and Policy Implications."
[65] Atilano-Tang, "Local Government Assistance to Survivors of Child Sexual Abuse in the Zampen Region, Philippines: A Policy Analysis."
[66] Lesley Ann Atilano-Tang, "Policy Analysis of the Administration of Child Protection Services in Zamboanga City, Philippines," *SSRN Electronic Journal*, 2023, https://doi.org/10.2139/ssrn.4518734.
[67] Mobo, "Strengthening the Child's Protection Program in the Philippines."
[68] Meida Rachmawati, "The Urgency of Legal Reform and Inter-Agency Synergy in Efforts to Eradicate Child Trafficking," *Jurnal Dialektika Keadilan* 1, no. 1 (2025): 1–12.

communication mechanisms. The legal sector often focuses on enforcement aspects, while social and education institutions prioritize rehabilitation and prevention, without a strong coordinating bridge between them.[69] Therefore, an integrated governance model is needed to enable joint workflows between institutions, including the development of an integrated referral protocol for handling child victims of violence. Cross-sectoral collaboration must also be accompanied by the establishment of a national task force or coordination forum that connects institutions such as *the Ministry, the Commission,* the police, social services, and educational institutions at the regional level.[70] Integration in the Philippines can be strengthened by optimizing the Barangray Council as a community coordination hub. Synergy between sectors is not merely administrative, but also substantive in ensuring that child protection takes place comprehensively from the prevention stage to recovery.[71]

The effectiveness of cross-sectoral coordination depends heavily on the existence of a communication system, the capacity of human resources, and sustainable institutional commitment. Each sector must understand its role in the child protection ecosystem and have a safe, child's best interests-oriented information exchange mechanism. For example, the education sector can act as a frontline in the early detection of violence through a child rights awareness-based curriculum and training for teachers as potential observers.[72] Meanwhile, the social sector must strengthen recovery services and the reintegration of children into safe environments, with support from legal institutions to ensure effective legal protection. This cross-sectoral integration also requires an integrated digital infrastructure for national-level reporting, case monitoring, and policy evaluation. With solid coordination strengthening, the child protection system can shift from a reactive response to an adaptive preventive system, where every institution works toward a single vision.[73]

Improving the capacity of authorities and legal professionals is a strategic step to ensure the effective implementation of child-friendly justice principles in the child protection system. These principles emphasize that every stage of the legal process, from investigation to recovery, must guarantee the comfort, safety, and non-discrimination of children. However, in practice in many developing states, such as Indonesia and the Philippines, authorities' understanding of a child-centered approach remains limited, so the legal process often causes new trauma for victims. Therefore, comprehensive training for law enforcement officials, social workers, and child support personnel is urgently needed. This training must cover not only technical legal aspects but also psychological approaches, empathetic communication, and child protection principles in line with the Convention on the Rights of the Child. By equipping authorities with child-rights-sensitive training, the judicial system can transform from a repressive mechanism to a humane and rehabilitative justice system.

[69] Zuhdi et al., "The Comparative Study of Child and Women's Rights Protection After Marital Dissolution in Indonesia and Philippines."
[70] Zuhdi et al.
[71] Pamposa and Besa, "Barangay Council for the Protection of Children, Their Four Core Rights and Its Contribution To Barangay Good Governance."
[72] Islam, "Child Protection in South Asia: Assessing the Current Status, Progress, and Obstacles of the Legal Framework."
[73] Rahamathulla, "Cyber Safety of Children in the Association of Southeast Asian Nations (ASEAN) Region: A Critical Review of Legal Frameworks and Policy Implications."

This will strengthen public trust in legal institutions while enhancing the effectiveness of child-friendly child protection legal framework enforcement.[74]

Capacity building must also be carried out institutionally to establish national standards for child-friendly justice that can be implemented consistently at all levels. In Indonesia, for example, this training needs to be integrated into the curriculum of legal education institutions, the police, and the judiciary, so that every prospective authority understands child protection principles from an early stage. Meanwhile, in the Philippines, collaboration between the Department of Social Welfare and Development, the Department of Justice, and legal education institutions can serve as a model for strengthening an interdisciplinary approach to training.[75] Regular evaluation of authorities' practices is also important to ensure that the implementation of these principles is not merely a formality, but becomes a work culture within the legal system. Collaboration with civil society organizations and international institutions such as the UNICEF can enrich training materials with global best practices. Strengthening the capacity of authorities not only improves the quality of law enforcement, but also ensures that children as legal subjects are treated with full respect, empathy, and substantive justice.[76]

Civil society and non-governmental organizations play a strategic role in strengthening the child protection system through advocacy, policy monitoring, and community empowerment. Amid the state's limitations in covering all aspects of child protection, civil society organizations serve as complementary actors,bridging the gap between formal policy and real on-the-ground needs. Various institutions in Indonesia, such as *the Commission* and the Indonesian Children's Welfare Foundation *(Yayasan Kesejahteraan Anak Indonesia - YKAI)*, play an active role in public awareness campaigns, case reporting, and victim support.[77] In the Philippines, NGOs such as the Child Rights Network and Save the Children Philippines play a similar role, focusing on legal advocacy and community-based policy reform. Their existence helps ensure that children's voices, especially those from marginalized groups, are not overlooked in the public policy-making process. Civil society also plays a crucial role in overseeing government transparency and accountability, so that the implementation of child protection policies does not remain a formality but truly impacts children's lives.[78]

Synergy between civil society and government is a key element in creating a participatory and socially just child protection system. Through collaborative work, they can provide research-based input, conduct training for local authorities, and help establish an independent monitoring system for the implementation of public policies. This approach has proven effective in driving policy improvements and accelerating the handling of child violence cases across various regions. Civil society organizations play a role in building social awareness to transform the permissive culture toward child violence by instilling protective

[74] Faradina, "Implementation of the Child Protection Act: Evaluation and Recommendations."
[75] Agcaoili, "Best Interests of the Child in Juvenile Justice: Analysis of Malaysia, Philippines, and Thailand."
[76] Raodiah et al., "Legal Politics of Handling Children as Perpetrators of Criminal Acts: A Comparison of Indonesia and the Philippines from the Perspective of Customary Law and Children's Rights."
[77] Rijadi, Febriana Mahmudah, and Jamil, "Comparative Legal Protection for Women and Child Victims of Sexual Violence in Southeast Asia: A Normative and Policy Gap Analysis."
[78] Castro and Hernandez, "Developing a Predictive Model on Assessing Children in Conflict with the Law and Children at Risk: A Case in the Philippines."

and empathy values from the family to the school level. Partnerships between local NGOs and international institutions also help strengthen cross-state advocacy and the exchange of best practices. The role of civil society is not merely that of a supervisor, but also as a driver of social and institutional change that ensures children's rights are protected comprehensively, sustainably, and fairly.[79]

Cross-state learning between Indonesia and the Philippines offers an important space to identify effective policy models and practices in strengthening the child protection system. Although they have different social and institutional backgrounds, both states face similar challenges, such as resource constraints and weak inter-institutional coordination. The Philippines can learn from Indonesia's efforts to build a comprehensive legal framework through the Child Protection Law of 2022 (amendment 2014 & 2016) and the establishment of special institutions such as the Ministry.[80] Meanwhile, Indonesia can adopt the Philippines' good practice in engaging local communities through the Burangray Council, which has successfully made child protection issues part of community governance. This community-based approach is effective because it strengthens the prevention of child violence from the grassroots level and speeds up the response to cases.[81] Synergy between a strong legal framework and a community-based approach is an ideal model that can be adopted to create a more inclusive and responsive child protection system in both states.

Cross-state learning also covers strengthening integrated data systems, monitoring, and evaluation in public policy. The Philippines has good experience in developing the Child Protection Information Management System, which enables real-time tracking of child victim cases, something that Indonesia can adapt to improve policy transparency and effectiveness.[82] Conversely, Indonesia's practice of promoting multisectoral participation, including education, health, and social institutions, can inspire the Philippines to expand the scope of child protection services. Cross-state collaboration also opens opportunities for the exchange of technical knowledge and the enhancement of the capacity of legal and social professionals. By leveraging best practices from each state, Indonesia and the Philippines can develop a complementary child protection approach based on a strong legal foundation, robust institutions, and active community participation. These efforts will not only strengthen national protection systems but also contribute to advancing the Southeast Asian regional agenda in achieving justice and well-being for children.[83]

Child protection legal framework needs to be transformed from a mere normative instrument into a responsive, collaborative, and just child protection system. This transformation demands a paradigm shift from a reactive approach to cases to a proactive system focused on preventing harm and rehabilitating child victims. The responsiveness of

[79] Raodiah et al., "Legal Politics of Handling Children as Perpetrators of Criminal Acts: A Comparison of Indonesia and the Philippines from the Perspective of Customary Law and Children's Rights."
[80] Trimaya, "Pengaturan Perlindungan Khusus Bagi Anak Korban Kekerasan Dalam Undang-Undang Nomor 35 Tahun 2014 Tentang Perubahan Atas Undang-Undang Nomor 23 Tahun 2002 Tentang Perlindungan Anak (Arrangements for Child Protection as Victim of Violence in Law Number 35)."
[81] Pamposa and Besa, "Barangay Council for the Protection of Children, Their Four Core Rights and Its Contribution To Barangay Good Governance."
[82] Raodiah et al., "Legal Politics of Handling Children as Perpetrators of Criminal Acts: A Comparison of Indonesia and the Philippines from the Perspective of Customary Law and Children's Rights."
[83] Shibuya et al., "Comparative Study on School-Based Mental Health Literacy in Three Asian States."

child protection legal framework is reflected in the ability of the state and relevant institutions to understand the needs of children as legal subjects with rights, not merely as objects of protection.[84] Cross-sectoral collaboration between legal, social, education, and civil society institutions is key to ensuring comprehensive and sustainable policy implementation. Furthermore, the principle of justice in the context of child protection must encompass substantive justice that prioritizes the best interests of the child in every legal process. By integrating the values of empathy, participation, and transparency into the public legal system, the state can achieve child protection that is not only administratively effective but also morally and socially just.[85]

Conclusion

Child protection legal framework in Indonesia and the Philippines has normatively recognized children as legal subjects with the right to special protection, yet the effectiveness of this protection varies at the level of regulatory design and implementation mechanisms. Child protection legal framework in both states exhibits different but complementary protective characteristics in technical dimensions. Based on procedural accountability indicators, Indonesia excels through the integration of restitution rights in Law on Sexual Violence Crimes of 2022, which mandates investigators to facilitate financial recovery from the early stages a more progressive model compared to the Philippines' still administrative compensation mechanism. Conversely, in terms of service accessibility indicators, the Philippines has an advantage through the decentralization of authority to the Local Council for the Protection of Children down to the Barangay level, ensuring more consistent grassroots state presence compared to Regional Service Unit model, which remains concentrated at the regency/city level. The effectiveness gap in both states persists not due to the absence of norms, but because of fragmented inter-institutional coordination and limited operational budgets for legal aid for victims.

This study recommends that Indonesia adopt the Philippines' LCPC institutional design by establishing village-based child protection task forces with the authority to manage public funds for early victim support. Additionally, the Philippines should adopt Indonesia's one-stop-shop evidence mechanism and restitution obligations in the criminal justice system as stipulated in the Law on Sexual Violence Crimes of 2022 to strengthen the certainty of victim recovery. Both states must also develop protocols for an independent monitoring mechanism involving human rights commissions and civil society to conduct regular audits of the quality of child-friendly services in the police force. The limitation of this study lies in its use of secondary data, requiring future empirical research to measure service response times and victims' satisfaction levels with the available public legal mechanisms.

[84] Agcaoili, "Best Interests of the Child in Juvenile Justice: Analysis of Malaysia, Philippines, and Thailand."
[85] Faradina, "Implementation of the Child Protection Act: Evaluation and Recommendations."

References

Agcaoili, Mary Grace C. "Best Interests of the Child in Juvenile Justice: Analysis of Malaysia, Philippines, and Thailand." *Asia-Pacific Social Science Review* 24, no. 2 (June 2024). https://doi.org/10.59588/2350-8329.1533.

Andaya, Eduardo J., and ROnhel S. Patricio. "Mapping Child Protection in the Philippines: A Scoping Review of Implementation, Best Practices and Challenges." *Journal of Academic and Research in Social Sciences* 1, no. 2 (2025): 70–88. https://doi.org/https://doi.org/10.5281/zenodo.15723234.

Aosa, Kayla Dea, Rina Martini, and Supratiwi Supratiwi. "Evaluasi Pelaksanaan Peraturan Menteri Pemberdayaan Perempuan Dan Perlindungan Anak Nomor 18 Tahun 2019 Tentang Penyelenggaraan Forum Anak (Studi Kasus Penyelenggaraan Forum Anak Kota Semarang)." *Journal of Politic and Government Studies* 13, no. 3 (2024): 335–49.

Ariani, Ni Made Ita, Ni Putu Rai Yuliarti, and Dewa Gede Sudika Mangku. "Implementation of Law Number 11 of 2012 Concerning the Criminal Justice System for Children Against Theft Perpetrated by Children in Buleleng Regency (Case Study Number: B/346/2016/Reskrim)." *E-Journal Komunitas Yustisia* 2, no. 2 (2019): 100–112.

Arintyas, Ameylia Puspita Rosa Dyah Ayu, Hakimul Ikhwan, and Muhadjir Darwin. "Protection Innovation Actions as an Effort to Fulfill the Social Rights of Children in Conflict with the Law: Case Study in Dki Jakarta and Di Yogyakarta," 2024. https://doi.org/10.2139/ssrn.4819137.

Aryana, I Wayan. "The Reformulation of Restitution Concept in Juvenile Cases (A Comparative Study with Philippines and Thailand)." *Padjadjaran Jurnal Ilmu Hukum (Journal of Law)* 07, no. 03 (January 2021): 400–420. https://doi.org/10.22304/pjih.v7n3.a6.

Atilano-Tang, Lesley Ann. "Local Government Assistance to Survivors of Child Sexual Abuse in the Zampen Region, Philippines: A Policy Analysis." *SSRN Electronic Journal*, 2023. https://doi.org/10.2139/ssrn.4518722.

———. "Policy Analysis of the Administration of Child Protection Services in Zamboanga City, Philippines." *SSRN Electronic Journal*, 2023. https://doi.org/10.2139/ssrn.4518734.

Bag-ao, Brian Ven Climaco. "'In Number There Is Strength': Multi-Agency Collaborative Strategies for Combating Online Sexual Abuse and Exploitation of Children (OSAEC) In Cagayan De Oro City, Philippines." *Socialinės Gerovės Tyrimai Social Inquiry* 23, no. 1 (2025): 26–57. https://doi.org/10.13165/SD-25-23-1-02.

Biro Hukum dan Humas. "Optimalkan Implementasi UU TPKS Dalam Penanganan Hukum Kasus Kekerasan, KemenPPPA Libatkan Koordinasi Lintas Sektor." Kementerian Pemberdayaan Perempuan dan Perlindungan Anak, 2023.

Castro, Eltimar T., and Alexander A. Hernandez. "Developing a Predictive Model on Assessing Children in Conflict with the Law and Children at Risk: A Case in the Philippines." In *2019 IEEE 15th International Colloquium on Signal Processing & Its Applications (CSPA)*, 243–48. IEEE, 2019. https://doi.org/10.1109/CSPA.2019.8695984.

Council for the Welfare of Children and Unicef. "Philippine Plan of Action to End Violence against Children," 2017.

Cruz, Maria Angela P., Isabelle Therese G. Navarro, and Frances Mae T. Villanueva. "Child Protection Interventions in the Philippines – A Scoping Review." *International Journal of Social Sciences, Language and Linguistics* 05, no. 02 (February 2025): 09–15. https://doi.org/10.55640/ijssll-05-02-02.

Faradina, Tasya. "Implementation of the Child Protection Act: Evaluation and Recommendations." *Jurnal Hukum Dan Keadilan* 2, no. 3 (2025): 56–67.

https://doi.org/https://doi.org/10.61942/jhk.v2i3.245.

Farhana, Farhana, Lisa Iryani, Tasmiati Emsa, Nurliana Nurliana, Kraugusteeliana Kraugusteeliana, and Wartiniyati Wartiniyati. "Increasing Understanding of Legal Protection of Children'S Rights in the Perspective of Indonesian Positive Law." *International Journal of Community Care of Humanity (IJCCH* 2, no. 03 (2024): 302–8.

Faulkner, Elizabeth A., and Conrad Nyamutata. "The Decolonisation of Children's Rights and the Colonial Contours of the Convention on the Rights of the Child." *The International Journal of Children's Rights* 28, no. 1 (March 2020): 66–88. https://doi.org/10.1163/15718182-02801009.

Grehenson, Gusti. "Psikolog UGM: Pelaku Kekerasan Anak Cenderung Punya Gangguan Kesehatan Mental." Berita Psikolog Universitas Gadjah Mada, 2024.

Hairi, Prianter Jaya, and Marfuatul Latifah. "Implementasi Undang-Undang Nomor 12 Tahun 2022 Tentang Tindak Pidana Kekerasan Seksual (Implementation of Law Number 12 of 2022 on Criminal Acts of Sexual Violence)." *Negara Hukum: Membangun Hukum Untuk Keadilan Dan Kesejahteraan* 14, no. 2 (October 2024): 163–80. https://doi.org/10.22212/jnh.v14i2.4108.

Islam, M. Rezaul. "Child Protection in South Asia: Assessing the Current Status, Progress, and Obstacles of the Legal Framework." *SN Social Sciences* 5, no. 4 (April 2025): 45. https://doi.org/10.1007/s43545-025-01082-0.

Kusmayanti, Hazar, Sonny Dewi Judiasih, Dede Kania, and Dewi Sulastri. "A Comparative Analysis of the Indonesian and Philippine Judicial Systems: Identifying the Role of Customary Courts." *Cepalo* 9, no. 1 (2025): 13–24. https://doi.org/10.25041/cepalo.v9no1.3677.

Lafont, Cristina. "Are Human Rights Associative Rights? The Debate between Humanist and Political Conceptions of Human Rights Revisited." *Critical Review of International Social and Political Philosophy* 25, no. 1 (January 2022): 29–49. https://doi.org/10.1080/13698230.2020.1859221.

Luh Putu Maitra Agastya, Ni, Sarah Wise, Margaret Kertesz, and Santi Kusumaningrum. "Transformation of Child Welfare Institutions in Bandung, West Java: A Case of Deinstitutionalization in Indonesia." *Children and Youth Services Review* 159 (April 2024): 107545. https://doi.org/10.1016/j.childyouth.2024.107545.

Mahendra, Kadek Krisna. "Tinjauan Perbandingan Hukum Pidana Antara Negara Indonesia Dengan Filipina Terkait Pertanggungjawaban Pidana Terhadap Anak Di Bawah Umur." *Jurnal Pacta Sunt Servanda* 6, no. 1 (2025): 13–21. https://doi.org/10.23887/jpss.v6i1.5375.

Makarao, Taufik, and Quthub Al Faruqi. "Implementation of Child Protection Policies in Indonesia - A Comparison Study of the Effectiveness of Child Protection Institutions Performance." *Jurnal Hukum Jurisdictie* 5, no. 1 (July 2023): 61–84. https://doi.org/10.34005/jhj.v5i1.117.

Mavitia Humairah Ms, Heni Nopianti, and Ika Pasca Himawati. "Collaboration Between Women and Child Protection and Women's Crisis Center in Assisting Victims of Sexual Violence Against Children." *Journal of Law, Politic and Humanities* 5, no. 1 (November 2024): 540–53. https://doi.org/10.38035/jlph.v5i1.880.

Mobo, Froilan D. "Strengthening the Child's Protection Program in the Philippines." *International Journal of Multidisciplinary: Applied Business and Education Research* 2, no. 12 (December 2021): 1384–86. https://doi.org/10.11594/10.11594/ijmaber.02.12.11.

Pamposa, Marni A, and Adonis S Besa. "Barangay Council for the Protection of Children, Their Four Core Rights and Its Contribution To Barangay Good Governance." *Ignatian International Journal for Multidisciplinary Research* 3, no. 3 (2025): 1587–95. https://doi.org/https://doi.org/10.5281/zenodo.15149543.

Pascua, Alexandra Mojica. "Post-Knutson Navigation: Analyzing Child Protection Laws in Light of the Application Crisis in Knutson v. Sarmiento-Flores." *Philippine Law Journal* 97, no. 1 (2023): 167–227.

Pratama, Ardian, Opan Satria Mandala, and Ana Rahmatyar. "Analisis Implementasi Kebijakan Perlindungan Anak Korban Kekerasan Seksual Di Indonesia Dalam Undang-Undang Nomor 12 Tahun 2022 Tentang Tindak Pidana Kekerasan Seksual (UU TPKS)." *Indonesia Berdaya* 6, no. 3 (2025): 707–14. https://doi.org/https://doi.org/10.47679/ib.20251159.

Rachmawati, Meida. "The Urgency of Legal Reform and Inter-Agency Synergy in Efforts to Eradicate Child Trafficking." *Jurnal Dialektika Keadilan* 1, no. 1 (2025): 1–12.

Rahamathulla, Mubarak. "Cyber Safety of Children in the Association of Southeast Asian Nations (ASEAN) Region: A Critical Review of Legal Frameworks and Policy Implications." *International Journal on Child Maltreatment: Research, Policy and Practice* 4, no. 4 (December 2021): 375–400. https://doi.org/10.1007/s42448-021-00087-5.

Raodiah, Raodiah, Dian Eka Kusuma Wardani, Nurmiati Muhiddin, and Princess Alyssa D. Tee-Anastacio. "Legal Politics of Handling Children as Perpetrators of Criminal Acts: A Comparison of Indonesia and the Philippines from the Perspective of Customary Law and Children's Rights." *SASI* 31, no. 4 (October 2025): 361. https://doi.org/10.47268/sasi.v31i4.3394.

Rijadi, Prasetijo, Anis Febriana Mahmudah, and Jamil Jamil. "Comparative Legal Protection for Women and Child Victims of Sexual Violence in Southeast Asia: A Normative and Policy Gap Analysis." *Remittances Review* 10, no. 10 (2025): 181–87.

Rivaldi, Ahmad. "Legal Protection and Children's Rights Based on the 1945 Constitution in the Dynamics of Government in Indonesia." *Jurnal Hukum Keluarga* 1, no. 01 (June 2024): 1–8. https://doi.org/10.63731/jhk.v1i01.2.

Roche, Steven, and Catherine Flynn. "Local Child Protection in the Philippines: A Case Study of Actors, Processes and Key Risks for Children." *Asia & the Pacific Policy Studies* 8, no. 3 (September 2021): 367–83. https://doi.org/10.1002/app5.332.

Santos, Roy Enrico C., and Raya Grace T. Tan. "'Safe Spaces Act' Increases Protections Against Sexual Harassment Online and in Workplaces in Philippines." Ogletree Deakins, 2020.

Setyawan, Gidion Arif, Andy Fefta Wijaya, Hermawan Hermawan, and Yurizal Yurizal. "Urgency of Institutionalizing Collaborative Governance in the Legal System for the Protection of Children in Conflict with the Law." *Jurnal Hukum* 41, no. 2 (June 2025): 346–65. https://doi.org/10.26532/jh.v41i2.46413.

Shibuya, Fumiko, Masahide Usami, Marian Danille Santillan, Cut Warnaini, Ernesto Gregorio, Naoko Satake, Crystal Amiel Estrada, et al. "Comparative Study on School-Based Mental Health Literacy in Three Asian States." *Tropical Medicine and Health* 53, no. 1 (June 2025): 86. https://doi.org/10.1186/s41182-025-00697-6.

Trimaya, Arrista. "Pengaturan Perlindungan Khusus Bagi Anak Korban Kekerasan Dalam Undang-Undang Nomor 35 Tahun 2014 Tentang Perubahan Atas Undang-Undang Nomor 23 Tahun 2002 Tentang Perlindungan Anak (Arrangements for Child Protection as Victim of Violence in Law Number 35)." *Jurnal Legislasi Indonesia* 12, no. 3 (November 2018): 1–22. https://doi.org/10.54629/jli.v12i3.407.

Uchenna Emelonye. "Theoretical and Normative Foundation of Child Rights." *US-China Law Review* 15, no. 1 (January 2018). https://doi.org/10.17265/1548-6605/2018.01.001.

Wismayanti, Yanuar Farida, Patrick O'Leary, Clare Tilbury, and Yenny Tjoe. "Child Sexual Abuse in Indonesia: A Systematic Review of Literature, Law and Policy." *Child Abuse & Neglect* 95 (September 2019): 104–34. https://doi.org/10.1016/j.chiabu.2019.104034.

Wismayanti, Yanuar Farida, Patrick O'Leary, Clare Tilbury, and Yenny Tjoe. "The

Problematization of Child Sexual Abuse in Policy and Law: The Indonesian Example." *Child Abuse & Neglect* 118 (August 2021): 105–57. https://doi.org/10.1016/j.chiabu.2021.105157.

Yulianingsih, Sri, Rengga Kusuma Putra, and Titi Christiana. "Aspek Hukum Penanganan Kekerasan Berbasis Gender Di Ruang Digital Studi Perbandingan Antara Indonesia Dan Negara-Negara Di ASEAN." *Jaksa: Jurnal Kajian Ilmu Hukum Dan Politik* 2, no. 4 (2024): 19–30. https://doi.org/https://doi.org/10.51903/jaksa.v2i4.2267.

Zuhdi, Syaifuddin, Ma Daphnee Alaba, Marisa Kurnianingsih, Andria Luhur Prakoso, and Fahmi Fairuzzaman. "The Comparative Study of Child and Women's Rights Protection After Marital Dissolution in Indonesia and Philippines." *Sakina: Journal of Family Studies* 9, no. 2 (May 2025): 146–64. https://doi.org/10.18860/jfs.v9i2.14981.