Sophist: Jurnal Sosial Politik, Kajian Islam dan Tafsir
Vol. 8, No. 3, 2026.
Published by Fakultas Ushuluddin dan Studi Agama (FUSA), UIN Mataram
p-ISSN 2656-1220, e-ISSN 2745-8571, available online at https://sophist.or.id

WHEN THE VERDICT ISN'T THE END: RESTITUTION AND CONTENT REMOVAL AS THE STATE'S RECOVERY OBLIGATION TO OGBV VICTIMS UNDER INDONESIA'S TPKS LAW

Wince Wulandari, Marsi Carisa Amalia, Syakilah Triadiani, Dewa Apriyansyah

Faculty of Law, Universitas Bengkulu

wincewulandari04@gmail.com, marsicarisa@gmail.com,
triadianisyakilah@gmail.com, dewa.apriyansyah171@gmail.com

Abstract: Online gender-based violence (OGBV) causes harm that outlasts the judicial process, since sexual content can keep circulating long after a case closes. Indonesia's Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law) grants OGBV victims the right to restitution and content removal, reinforced by Government Regulation Number 29 of 2025 on the Victim Assistance Fund. This normative juridical study examines whether these two mechanisms, read together as a single state recovery obligation, meet five adequacy indicators: genuine compensation, certainty of implementation, speed, cessation of continuing harm, and access to information. Both mechanisms rest on a sound normative basis but fall short on several indicators: restitution lacks a method for calculating non-material and digital harm and clear fund-disbursement guidelines, while content removal has no time limit, no emergency procedure, and is rarely ordered alongside a court decision. The two mechanisms prove interdependent: swift content removal curbs continuing harm, and removal costs themselves become part of the restitution claim. Recovery is adequate only when circulation stops and harm is compensated. The study recommends Supreme Court guidelines for calculating harm, LPSK guidelines for fund disbursement, and an emergency content-removal mechanism.

Keywords: restitution; content removal; online gender-based violence (OGBV); TPKS Law; Victim Assistance Fund

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

INTRODUCTION

Throughout 2025, 376,529 cases of gender-based violence against women were recorded, an increase of 14.07% compared to the previous year. Data from Komnas Perempuan (the National Commission on Violence Against Women) recorded 1,846 cases of Online Gender-Based Violence (OGBV) in the same year, consisting of 755 cases in the personal sphere and 1,091 in the public sphere. (Komnas Perempuan, 2026) In electronic-based sexual violence, victims lose control over their digital footprint. Although entitled to request content removal, material that has already spread widely on social media is difficult to remove entirely. (Wijaya, 2026) As a result, the harm suffered by OGBV victims does not end when the case concludes, since the content used as a means of violence continues to circulate and remains accessible to anyone.

Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law) responds to this issue. This law prohibits and penalizes electronic-based sexual violence (Article 14), guarantees victims' rights to restitution and recovery services (Article 30), and obliges the state to provide compensation through the Victim Assistance Fund if the convict's assets are insufficient to pay restitution (Article 35). Victims are also entitled to have sexual content removed (Article 68 letter g and Article 70 paragraph (2) letter j), supported by the Central Government's authority to remove or block access to such content (Article 46) and the public prosecutor's authority to request a court determination (Article 47). (TPKS Law, 2022) Because Article 46 paragraph (2) delegates further regulation to a government regulation, on 18 June 2025 Government Regulation Number 29 of 2025 (GR 29/2025) on the Provision and Disbursement of the Victim Assistance Fund was enacted. (GR 29/2025, 2025)

The use of the term OGBV in Indonesian literature is not yet uniform, so its scope needs to be clarified. OGBV is understood as gender-based violence or sexual violence that utilizes technology and digital space, with physical, psychological, and sexual impacts on victims. (Salsabila & Susanti, 2023) The TPKS Law does not use the term OGBV; instead, it regulates Electronic-Based Sexual Violence (EBSV) under Article 14, which covers the unauthorized recording, transmission, and tracking of sexual content through electronic systems. Thus, EBSV is a sexual-natured subset of OGBV subject to specific criminal regulation, meaning that not every form of OGBV automatically meets the elements of EBSV.

The TPKS Law affirms that the fulfillment of victims' rights is the state's responsibility (Article 67 paragraph (2)). At the international level,

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

CEDAW Committee General Recommendation No. 35 recognizes that gender-based violence can occur in digital spaces and affirms the state's obligation to provide effective legal remedies and recovery. (CEDAW Committee, 2017) Building on this framework, the issue examined is whether the restitution and content-removal norms in the TPKS Law and its implementing regulations are consistent with the state's obligation to recover OGBV victims, or instead leave gaps that cause recovery to remain merely normative.

This gap is evident in practice. Research by Oktavia, Apriyani, and Wati on Bandung High Court Decision Number 86/Pid.Sus/2022/PT Bdg found that LPSK plays a role in filing and calculating restitution but lacks the authority to execute it, alongside the absence of adequate technical mechanisms, implementing institutions, and coordination among law enforcement agencies. (Endyka et al., 2026; Oktavia et al., 2025) On the other hand, the content-removal service provided by the Ministry of Communication and Informatics is considered to not yet respond quickly enough to victims' needs, and the right to be forgotten mechanism has not functioned effectively. Article 26 paragraph (3) of Law Number 19 of 2016 requires a court determination for the removal of irrelevant electronic information, whereas victims need swift removal to prevent revictimization, particularly since content can reappear through re-uploading. (Wijaya, 2026; Zaltina & Nurtjahyo, 2024)

GR 29/2025 fills part of this gap by providing the basis for the state to cover restitution not fulfilled by the perpetrator through the Victim Assistance Fund. However, civil society records indicate that recovery funding can only be disbursed after the restitution mechanism has been pursued, without a firm time limit for victims' access to it. (Institute for Criminal Justice Reform, n.d.) The Ombudsman of the Republic of Indonesia also notes that GR 29/2025 limits the disbursement of recovery funds to a maximum of 30 days from the issuance of the LPSK decision, but does not regulate the service period for obtaining that decision from the time the application is received. (Ombudsman Republik Indonesia, n.d.)

Prior studies can be grouped into two categories. The first group discusses the legal framework of OGBV and EBSV. Ramadhani, Rachmawati, and Kurnikova found that the Pornography Law and the ITE Law often fail to protect victims and even lead to their criminalization; Zaltina and Nurtjahyo, along with Wijaya, emphasize the importance of a swift and effective content-removal mechanism. The second group discusses restitution: Oktavia, Apriyani, and Wati found a legalvacuum in its

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

implementing mechanism, while Endyka et al. regard the seizure of the perpetrator's assets and the Victim Assistance Fund as a breakthrough whose success depends on implementing regulations and the integrity of law enforcement officials. (Ramadhani et al., 2026; Wijaya, 2026; Zaltina & Nurtjahyo, 2024) These studies discuss restitution and content removal separately. No study has yet placed both within a single framework of the state's recovery obligation and assessed its adequacy for OGBV victims, including after the enactment of GR 29/2025. This study fills that gap.

Based on the foregoing, this article formulates two problems. First, how is restitution for OGBV victims regulated under the TPKS Law and GR 29/2025 from the perspective of the state's obligation to provide recovery to victims? Second, how is the removal of sexual content in OGBV cases regulated under the TPKS Law and related regulations from the same perspective? Accordingly, this study aims to analyze the regulation of restitution for OGBV victims under the TPKS Law and GR 29/2025, as well as the regulation of sexual content removal in OGBV cases under the TPKS Law and related regulations, both from the perspective of the state's obligation to provide recovery to victims. (GR 29/2025, 2025; TPKS Law, 2022)

The novelty of this study lies in three aspects. First, restitution and content removal are not treated as two separate topics, but as two manifestations of the state's recovery obligation rooted in Article 67 paragraph (2) of the TPKS Law. Second, the adequacy of both forms of recovery is measured against the continuing nature of OGBV victims' harm caused by the ongoing circulation of content, rather than against sexual violence in general. Third, this study incorporates GR 29/2025 into its assessment, so that the results reflect the current state of regulation now that the Victim Assistance Fund has implementing regulations. (TPKS Law, 2022; Wijaya, 2026)

METHOD

This study is a normative legal study aimed at answering whether the regulation of restitution and removal of sexual content in the TPKS Law and its implementing regulations fulfills the state's obligation to provide recovery to victims of online gender-based violence (OGBV). (Benuf & Azhar, 2020) It employs statutory, conceptual, and case-based approaches; decisions retrieved from the Supreme Court Decision Directory are used as

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

illustrations, not as a basis for generalization. Primary legal materials include the 1945 Constitution of the Republic of Indonesia, the TPKS Law, Government Regulation Number 29 of 2025, Supreme Court Regulation Number 1 of 2022, the ITE Law, the PDP Law, the Law on the Protection of Witnesses and Victims, and the Law on the Ratification of CEDAW, together with CEDAW General Recommendation Number 35. (CEDAW Committee, 2017) Secondary materials consist of journal articles, collected through a literature study. The analysis is descriptive-qualitative and prescriptive in nature. (Marzuki, 2014) Norms are assessed using six indicators of recovery adequacy (genuine compensation for harm, certainty of implementation, speed, cessation of continuing harm, access to information, and platform accountability), rated as adequate, partial, not yet met, or unclear, with the final rating determined after the regulatory texts and decisions are analyzed. The ITE Law and the PDP Law are discussed as related regulations.

RESULTS AND DISCUSSION

Both mechanisms already rest on a clear normative basis, yet neither one by itself satisfies the state's recovery obligation. Restitution under the TPKS Law and Government Regulation Number 29 of 2025 compensates measurable losses but offers no settled method for valuing psychological or digital harm and no firm timeline for disbursing the Victim Assistance Fund when a perpetrator cannot pay. Content removal under Articles 46 and 47 of the TPKS Law and related electronic-information legislation can strip unlawful material from circulation, but lacks a statutory deadline, an emergency channel for urgent cases, and is seldom written into the court decision that grants restitution in the first place. Read together, the two mechanisms turn out to be interdependent rather than parallel: removing the content curbs the ongoing harm that restitution is meant to compensate, and the cost of removal itself belongs inside the restitution calculation.

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

This finding both confirms and extends earlier work. It confirms Oktavia, Apriyani, and Wati's (2025) observation that LPSK can calculate restitution but cannot execute it, and Ramadhani, Rachmawati, and Kurnikova's (2026) warning that content-removal channels remain too slow for victims who need content gone immediately. It extends Endyka and colleagues' (2026) view of the Victim Assistance Fund as a breakthrough by showing precisely where that breakthrough still falls short: disbursement guidelines and timelines. Where Zaltina and Nurtjahyo (2024) and Wijaya (2026) treat the right to be forgotten as a standalone fix, the results here show it functions only when paired with restitution, since removal addresses the harm's cause while restitution addresses its consequences.

Restitution for victims of Online Gender-Based Violence (OGBV) is one form of recovery of victims' rights aimed at compensating for the harm caused by the criminal act. In the context of OGBV, the harm suffered by victims is not limited to material loss but may also include psychological suffering, reputational damage, loss of income, and social impacts arising from the dissemination of digital content that violates victims' rights and dignity. Restitution therefore plays an important role in restoring victims' condition while also acknowledging the harm they have suffered.

Specifically, the regulation of restitution for OGBV victims can be found in Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law), particularly Article 30. This provision affirms that victims of sexual violence are entitled to restitution and recovery services. Restitution is compensation imposed on the perpetrator or the responsible party, based on a court determination or decision, for the harm suffered by the victim.

Under Article 30 paragraph (2) of the TPKS Law, restitution may cover loss of wealth or income, suffering directly related to the criminal act, medical and/or psychological treatment costs, and other harm suffered by the victim. (TPKS Law, 2022) In OGBV cases, such harm may take the form of psychological counseling costs, loss of income, or other losses that can be

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

proven to result from the criminal act. Therefore, the assessment of harm must take into account the impact suffered by the victim, including the impact arising from the dissemination of sexual content in digital space.

Furthermore, Article 67 paragraph (2) of the TPKS Law affirms that the fulfillment of victims' rights is the state's responsibility. This provision is reinforced by Article 35 of the TPKS Law and Government Regulation Number 29 of 2025 on the Victim Assistance Fund for the Crime of Sexual Violence. The Victim Assistance Fund serves as the state's assistance mechanism when the convict's seized assets are insufficient to pay restitution under the applicable provisions. (GR 29/2025, 2025; TPKS Law, 2022) Thus, restitution is understood not only as the perpetrator's obligation to compensate for harm, but also as connected to the state's responsibility to ensure that victims' rights to recovery can be fulfilled.

Nevertheless, restitution and compensation are two distinct mechanisms. Restitution is essentially a payment of compensation that is the responsibility of the perpetrator or a third party, whereas compensation through the Victim Assistance Fund is a form of state responsibility under conditions determined by statutory regulations. This distinction shows that the state's obligation relates not only to the formulation of legal rules, but also to the provision of mechanisms ensuring that victims' rights can be fulfilled when the perpetrator is unable to provide adequate compensation.

Regarding the mechanism for filing, assessment, and implementation of restitution, the process is normatively based on Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law), Supreme Court Regulation Number 1 of 2022 on Procedures for Resolving Applications and Granting Restitution and Compensation to Victims of Crime, and Government Regulation Number 29 of 2025 on the Victim Assistance Fund for the Crime of Sexual Violence. These

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

three regulations have complementary functions. The TPKS Law provides the basis for victims' rights and the obligations of law enforcement officers, Supreme Court Regulation Number 1 of 2022 governs the procedures for resolving restitution applications, while Government Regulation Number 29 of 2025 governs the disbursement of the Victim Assistance Fund, including in cases where the restitution imposed on the perpetrator is not fully fulfilled.

The first stage concerns the filing of a restitution application, which should begin with identifying the harm suffered by the victim and collecting supporting documents. Victims may submit an application through the mechanisms available under statutory regulations, including with the assistance of the Witness and Victim Protection Agency (LPSK), as well as through the case examination process in accordance with the applicable provisions. Article 31 of the TPKS Law obliges investigators, public prosecutors, and judges to inform victims and LPSK of the right to restitution. This provision is important so that victims obtain information about their rights from the outset of the judicial process and do not lose the opportunity to seek compensation. (Supreme Court Regulation No. 1 of 2022, 2022; TPKS Law, 2022)

In OGBV cases that meet the elements of electronic-based sexual violence as regulated under Article 14 of the TPKS Law, the restitution application must take into account the nature of the harm caused by the use of digital technology. Victims' harm may arise from the non-consensual dissemination of intimate content, threats of content dissemination, extortion, loss of income, and the need to obtain medical or psychological services. Accordingly, the application

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

should be accompanied by a description of the connection between the perpetrator's act and the harm suffered by the victim, supported by available evidence such as treatment cost receipts, proof of lost income, psychological service documents, and other relevant expense evidence.

After the application is submitted, the next stage is to assess the type and amount of harm that may be claimed as restitution. Article 30 paragraph (2) of the TPKS Law covers loss of wealth or income, suffering directly related to the criminal act, medical and/or psychological treatment costs, and other harm suffered by the victim as a result of the criminal act.

In OGBV cases, the calculation of harm may include psychological consultation fees, medical treatment costs, loss of income because the victim is unable to work or must leave their job, and other costs that can be proven and are connected to the criminal act. In cases involving the dissemination of intimate content, the cost of content handling may also be relevant as long as the expenditure meets the restitution requirements and can be linked to the victim's harm. Meanwhile, non-material harm, such as trauma, fear, loss of a sense of security, and reputational damage, requires careful assessment so that the application has a basis that can be considered by the competent authorities.

LPSK plays an important role in helping victims identify and calculate the amount of restitution and prepare applications based on the available evidence. However, this assessment must be distinguished from the authority to decide; the determination of the amount of

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

restitution to be paid remains part of the judicial process in accordance with the law. (Oktavia et al., 2025)

Several actors also play a role in this process. Investigators play a role in the initial stage of case handling by providing information on the right to restitution, helping to ensure that victims' harm is documented, and processing the case within their authority. At this stage, gathering evidence on the perpetrator's acts and their impact on the victim is important to support the restitution application.

Public prosecutors play a role in advancing the case to trial and ensuring that victims' restitution rights are taken into account during the prosecution stage in accordance with the applicable provisions. Public prosecutors also play a role in the enforcement of decisions containing restitution payment obligations. Under Government Regulation Number 29 of 2025, a copy of the decision or determination containing restitution is delivered to the convict, the victim, and LPSK by the public prosecutor no later than seven days after the copy is received. (GR 29/2025, 2025)

Judges play a role in examining the application and evidence of harm and in determining restitution based on the facts of the trial and the applicable legal provisions. In considering restitution, judges must take into account the connection between the criminal act and the victim's harm, the adequacy of supporting evidence, and the relevant recovery needs. A decision containing restitution becomes the basis for the perpetrator's performance of the payment obligation.

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Meanwhile, LPSK plays a role in providing protection and assistance within its authority, helping with the filing and calculation of restitution, and participating in the implementation of the Victim Assistance Fund under Government Regulation Number 29 of 2025. LPSK's role in assisting the preparation of applications and the assessment of harm does not mean that the institution automatically replaces the perpetrator's obligation to pay restitution. Restitution remains compensation imposed on the perpetrator or a third party based on a court decision or determination, while the Victim Assistance Fund is a state assistance mechanism separately regulated by the TPKS Law and its implementing regulations.

The next stage concerns the implementation of restitution payment and the Victim Assistance Fund. After a decision or determination concerning restitution is received, payment must be carried out in accordance with the applicable provisions. Government Regulation Number 29 of 2025 provides that restitution must be paid no later than 30 days after the convict receives a copy of the court decision or determination. If restitution is not paid, the victim or their heirs may submit a written notification to the court. The court then issues a written warning, and if the obligation remains unfulfilled within the specified period, the public prosecutor may auction the collateral securing the restitution in accordance with the mechanism provided in the regulation. If the auction proceeds are insufficient, a notification process to LPSK may be carried out to follow up on the payment shortfall through the Victim Assistance Fund.

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Government Regulation Number 29 of 2025 provides the basis for LPSK to disburse compensation for restitution payment shortfalls through the Victim Assistance Fund. Disbursement is carried out no later than 30 days after LPSK receives the notification, with the possibility of extension until the end of the following budget year if the available funds are insufficient, in accordance with the provisions of the regulation. In addition, this Government Regulation provides for the possibility of victim recovery funding submitted in writing to LPSK for recovery needs not covered by restitution. Such applications are assessed based on the victim's needs, the possibility of fulfillment through relevant ministry or agency programs, and fund availability.

Although the legal framework for restitution is already in place, its implementation still faces a number of obstacles. First, the calculation of non-material and digital harm does not always follow a uniform method. The impact of OGBV may include prolonged trauma, reputational damage, loss of a sense of security, and recurring dissemination of content. Such harm is not always easily expressed in monetary terms, so victims may face difficulty when having to describe and prove the amount of compensation claimed.

Second, payment implementation may be hampered by the perpetrator's economic incapacity or the unavailability of adequate assets to satisfy restitution. A decision setting the amount of restitution does not necessarily result in full payment if the perpetrator lacks sufficient financial capacity. (Oktavia et al., 2025) Government Regulation Number 29 of 2025 has provided the Victim Assistance Fund mechanism to address payment shortfalls, but its effectiveness

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

still depends on procedural implementation, fund availability, and coordination among the public prosecutor, the court, and LPSK.

Third, the characteristics of OGBV harm demand recovery that does not stop at monetary payment. Digital content that remains in circulation can continue to cause psychological pressure, social stigma, and economic loss even after the judicial process has concluded. Restitution therefore needs to be linked with recovery services and the handling of unlawful content. Content removal does not replace restitution, just as restitution does not automatically stop the circulation of content.

The effectiveness of restitution for victims of Online Gender-Based Violence (OGBV) cannot be adequately assessed merely from the existence of a legal provision or the inclusion of compensation in a court decision. Restitution must actually be received by the victim and must be capable of helping to recover the harm suffered. Article 67 paragraph (2) of Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law) affirms that the fulfillment of victims' rights is a state obligation. Thus, the state is responsible not only for ensuring that the perpetrator is legally processed, but also for guaranteeing that the victim's right to recovery can be realized in practice.

From an economic perspective, restitution functions to compensate for the material harm suffered by the victim, such as lost income, medical costs, psychological assistance, and other costs related to the impact of the criminal act. In OGBV cases, victims may also suffer economic loss due to job loss or disruption of professional activities caused by the dissemination of sexual content. However, the effectiveness of restitution becomes limited if the value of harm is not calculated comprehensively or if the court decision

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

is not followed by payment. Endyka and colleagues find that the implementation of restitution still faces obstacles, particularly in standardizing the calculation of non-material harm and in coordination among law enforcement institutions. (Endyka et al., 2026) Therefore, the determination of restitution must take into account the forms of harm actually suffered by the victim and be supported by a payment mechanism that is enforceable.

From a psychological and social perspective, restitution payment can help victims obtain counseling services, mental health recovery, legal aid, and support to resume their social lives. OGBV victims face not only financial loss but also potential trauma, shame, stigma, loss of self-confidence, and social exclusion caused by content that continues to circulate. Restitution therefore has limitations if understood merely as a payment of money. Effective recovery needs to be accompanied by psychological and social rehabilitation services tailored to the victim's needs. In this context, restitution also needs to be combined with the removal or blocking of access to sexual content so that the impact of the violence does not keep recurring.

The next important issue arises when the perpetrator is unable to pay restitution. Article 35 of the TPKS Law provides the basis for the state to provide compensation through the Victim Assistance Fund if the convict's seized assets are insufficient to pay restitution. This provision is further elaborated through Government Regulation Number 29 of 2025 on the Victim Assistance Fund for the Crime of Sexual Violence. (Mustika & Tellys, 2022) This arrangement is an important step because victims' recovery is not entirely dependent on the perpetrator's economic capacity. Research by Oktavia, Apriyani, and Wati shows that the implementation of restitution still faces obstacles, including the not-yet-optimal technical mechanisms and inter-institutional coordination, as well as LPSK's limited authority to execute restitution payments. (Basanta, 2025)

Nevertheless, the existence of the Victim Assistance Fund does not by itself guarantee that recovery will take place effectively. Government

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Regulation Number 29 of 2025 regulates the mechanism for disbursing funds through LPSK, including the requirements and review of applications. Articles 13 and 14 also regulate recovery funding based on applications submitted by the victim, family, or their representative, taking into account recovery needs, the possibility of fulfillment through ministry/agency or local government programs, and fund availability. (Yuningsih & Munawir, n.d.) Thus, a distinction exists between compensation for cases where the convict's assets are insufficient to pay restitution and recovery funding for victims' needs not included in the restitution calculation. Both mechanisms need to be properly understood so that victims' rights can be pursued through the appropriate channel.

The effectiveness of restitution for OGBV victims still needs to be strengthened through several steps. First, more measurable guidelines are needed to calculate material and non-material harm, including psychological and social impacts, as well as harm related to the dissemination of digital content. Second, coordination among investigators, public prosecutors, judges, and LPSK needs to be clarified from the filing stage through payment implementation. Third, access to the Victim Assistance Fund and recovery services must be accompanied by information and procedures that victims can easily understand. Fourth, the implementation of restitution needs to be integrated with rehabilitation services and content-removal mechanisms. This strengthening is consistent with the state's obligation to ensure that victims' rights do not stop at legal recognition or a court decision, but actually produce economic, psychological, and social recovery.

Beyond restitution, another crucial dimension of the state's recovery obligation concerns the removal of sexual content in cases of OGBV. Indonesia is a state based on law, as affirmed in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia, which states that "Indonesia is a state based on law." This provision shows that every act and conduct of both the public and state administrators must be guided by the applicable law.

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

The concept of a state based on law rests on the idea that the exercise of state power must be carried out on the basis of law that upholds justice and provides certainty in social, national, and state life. (Hardum, 2016)

Amid technological developments and the use of digital space, various forms of violence can also occur through electronic media, one of which is Online Gender-Based Violence (OGBV). One form of OGBV that can cause serious harm to victims is the non-consensual dissemination of sexual content. Such dissemination can not only harm the victim's honor and privacy but can also cause ongoing social, psychological, and legal impacts if the content continues to circulate in digital space. Legal regulation that provides protection for victims is therefore needed, including through the removal or handling of sexual content related to acts of sexual violence.

Protection of victims relates not only to stopping the dissemination of content but also includes efforts to recover the harm and impact suffered by the victim. In this regard, the state has an obligation to ensure that victims obtain protection and recovery through legal mechanisms that are clear and can be effectively implemented. The regulation of sexual content removal is important to examine because its implementation involves various parties, including the state, law enforcement officers, related institutions, and electronic system operators.

The regulation of sexual content removal in Indonesia has its legal basis in Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law). This regulation is closely related to the protection of victims from electronic-based sexual violence, which can cause harm to the victim's dignity, privacy, and security. Article 14 of the TPKS Law regulates electronic-based sexual violence, including recording or capturing images or screenshots of a sexual nature without the will or consent of the person who is the object thereof, and transmitting electronic information or documents of a sexual nature against the will of the recipient. Such an act is punishable by imprisonment of up to 4 (four) years and/or a fine of up to IDR 200,000,000. If committed

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

with the intent to extort, threaten, coerce, mislead, or deceive the victim, the penalty increases to imprisonment of up to 6 (six) years and/or a fine of up to IDR 300,000,000. Thus, Article 14 provides the basis for prosecuting acts related to the unauthorized production and dissemination of sexual content, while the removal of such content is specifically regulated under Articles 46 and 47 of the TPKS Law. (TPKS Law, 2022)

The scope of sexual content removal is regulated under Article 46 of the TPKS Law, which grants the Central Government the authority to remove and/or block access to electronic information and/or electronic documents containing the crime of sexual violence. This provision covers digital content related to the crime of sexual violence, including content disseminated through electronic media that has the potential to prolong the victim's suffering if it remains accessible to the public. Removal and blocking of access are two distinct forms of action. Removal aims to eliminate the content from its storage location, while blocking of access aims to restrict or prevent the public from accessing the content through electronic systems. Article 46 paragraph (2) further states that further provisions on such removal and/or blocking of access are regulated by a government regulation. This provision therefore serves as the legal basis for the government to handle electronic content containing the crime of sexual violence as part of victim protection efforts.

In addition to the Central Government's authority under Article 46, Article 47 of the TPKS Law regulates a content-removal mechanism for the public interest. Under this provision, the public prosecutor may submit a request to the chief judge of the district court to order the ministry responsible for government affairs in the field of communication and informatics to remove electronic information and/or electronic documents containing the crime of sexual violence. This provision shows that content removal is not merely an administrative act of the government but can also be pursued through a legal mechanism involving the public prosecutor and

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

the court. Thus, Articles 14, 46, and 47 of the TPKS Law are interrelated in addressing electronic-based sexual violence, namely through the determination of punishable acts, the granting of authority to remove or block access to content, and the provision of a removal mechanism based on the public interest. The application of these provisions is expected to limit the dissemination of content that harms victims while also supporting the protection of victims' dignity, privacy, and right to recovery.

The regulation of sexual content removal refers not only to Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law), but is also related to legislation in the field of electronic information and electronic system administration. One relevant regulation is the Electronic Information and Transactions Law (ITE Law), which regulates prohibited acts in the use of information technology and provides the legal basis for handling unlawful electronic information. (TPKS Law, 2022) In addition, Government Regulation Number 71 of 2019 on the Administration of Electronic Systems and Transactions regulates the obligations of electronic system operators as well as the removal and blocking of access to certain electronic information or documents. (GR 71/2019, 2019) These regulations complement the TPKS Law because they regulate not only the perpetrator's conduct but also the technical aspects of handling digital content and the responsibilities of electronic system operators.

Furthermore, Law Number 1 of 2024 on the Second Amendment to Law Number 11 of 2008 on Electronic Information and Transactions (ITE Law) prohibits the dissemination of electronic content that violates decency. Article 27 paragraph (1) of the ITE Law states, "Every Person who intentionally and without right broadcasts, exhibits, distributes, transmits, and/or makes accessible Electronic Information and/or Electronic Documents containing content that violates decency for public knowledge." Violation of this provision is subject to criminal sanctions under Article 45 paragraph (1) of the ITE Law. (Law No. 1 of 2024, 2024) Meanwhile,

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Government Regulation Number 71 of 2019 on the Administration of Electronic Systems and Transactions regulates the implementation of content removal and blocking of access, including the obligation of electronic system operators to block access to prohibited electronic information or documents. Its technical provisions are also regulated in Regulation of the Minister of Communication and Informatics Number 5 of 2020 on Private Scope Electronic System Operators, particularly regarding take-down requests and the obligations of electronic system operators in handling prohibited content. Thus, the ITE Law provides the basis for prosecuting the dissemination of content that violates decency, while its implementing regulations govern the technical mechanism for handling such content.

In addition, Law Number 27 of 2022 on Personal Data Protection (PDP Law) further complements the protection of victims whose personal data is disseminated through sexual content. Article 8 of the PDP Law states, "A Personal Data Subject has the right to terminate the processing, delete, and/or destroy Personal Data about themselves in accordance with the provisions of the applicable laws and regulations." This provision is relevant when sexual content contains the victim's personal data that is processed or disseminated without a lawful basis. Nevertheless, the right to erasure under the PDP Law does not automatically mean that all sexual content can be removed through the same mechanism, because its application depends on the characteristics of the data, the basis for processing, and the applicable legal provisions. (PDP Law, 2022)

The mechanism for removing sexual content related to Online Gender-Based Violence (OGBV) involves victims, the government, law enforcement officers, related institutions, and digital platform operators. The process may begin with a victim's complaint to the competent institution, such as the police or the ministry responsible for communication and digital affairs. This complaint serves as the basis for following up on the dissemination of content, conducting an examination within the relevant

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

authority, and pursuing the removal or blocking of access to unlawful content. In this regard, Articles 46 and 47 of Law Number 12 of 2022 on the Crime of Sexual Violence provide the legal basis for removing and/or blocking access to electronic information or documents containing the crime of sexual violence. The Central Government has the authority to carry out removal or blocking of access, while the public prosecutor may submit a request to the chief judge of the district court to order the relevant ministry to remove content in the public interest. On the other hand, digital platform operators play a role in following up on content reports in accordance with the applicable legal obligations. The lack of accountability of electronic system operators when content-removal requests are not followed up can be an obstacle to providing adequate protection for victims. (Sinaga & Lidya, 2024)

Content removal aims not only to stop the dissemination of sexual material but is also part of the effort to provide protection and recovery to OGBV victims. Victims are entitled to protection from the recurring dissemination of content, assistance, and recovery services according to their needs. Content removal is important because information that remains available in digital space can prolong the victim's suffering, damage their reputation, and cause psychological pressure. Hwian Christianto explains that the right to be forgotten can serve as a mechanism for fulfilling victims' rights through the removal of harmful electronic information. (Christianto, 2020) Nevertheless, content removal does not automatically recover all of the victim's harm, because the content may still be stored, copied, or redistributed through other platforms. Research by Argya Basanta also affirms that addressing OGBV is not sufficient through criminalization alone but must be oriented toward the protection and recovery of victims. Content removal therefore needs to be accompanied by psychological assistance, legal aid, protection of identity and personal data, and ongoing social support.

The regulation of content removal in the TPKS Law and related legislation has provided the legal basis for the state to address content

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

containing the crime of sexual violence. However, the effectiveness of this protection is determined not only by the existence of regulations, but also by the speed of complaint handling, the clarity of the division of authority, compliance by digital platforms, inter-institutional coordination, and the availability of recovery services for victims. Research by Nabila Putri Brusandi on the role of the public prosecutor's office in fulfilling the right to content removal in cases involving sexual violence shows obstacles in the application of Article 47 of the TPKS Law, including issues of provision interpretation as well as technical and structural barriers. Accordingly, an easily accessible complaint mechanism, handling that is responsive to victims' needs, clear coordination between the government and digital platforms, and periodic evaluation of content-removal implementation are needed, so that content removal is not merely a technical action but also becomes part of the fulfillment of victims' rights to protection, justice, and effective recovery.

CONCLUSION

Conclusion

In answer to the first research question, restitution for victims of Online Gender-Based Violence (OGBV) is a form of fulfilling victims' rights to compensation and recovery under the TPKS Law and Government Regulation Number 29 of 2025. Restitution covers economic harm, psychological treatment costs, and other harm resulting from the criminal act. However, the effectiveness of its implementation still faces obstacles, such as the difficulty of calculating non-material harm, the perpetrator's inability to pay, and suboptimal inter-institutional coordination. The state therefore needs to strengthen the implementation of restitution through the Victim Assistance Fund in accordance with the applicable provisions, improve access to psychological and social rehabilitation services, and support the removal of unlawful digital content. Thus, victims' recovery does not stop at a court

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

decision, but genuinely helps restore the harm suffered and protect victims' rights and dignity.

In answer to the second research question, the regulation of sexual content removal in cases of Online Gender-Based Violence (OGBV) is an important part of the state's obligation to provide protection and recovery to victims. Law Number 12 of 2022 on the Crime of Sexual Violence (TPKS Law), the ITE Law, Government Regulation Number 71 of 2019, and other related regulations provide the legal basis for addressing the dissemination of unlawful content. However, content removal alone is not sufficient to recover all of the harm suffered by victims. The state therefore needs to ensure swift complaint handling, effective coordination between law enforcement officers and digital platform operators, and the provision of legal aid, psychological assistance, and personal data protection. Thus, content removal is not merely a technical action to stop the dissemination of information, but also becomes part of the effort to achieve justice and fully recover the rights of OGBV victims.

Recommendation

It is recommended that the government and law enforcement officers optimize the implementation of the restitution right for victims of Online Gender-Based Violence (OGBV) through accessible filing procedures, accurate harm assessment, and effective enforcement of decisions. Coordination among law enforcement officers, the Witness and Victim Protection Agency (LPSK), and related institutions needs to be strengthened so that victims obtain legal certainty and adequate recovery. In addition, the government needs to ensure the implementation of the Victim Assistance Fund in accordance with the provisions of Government Regulation Number 29 of 2025 when restitution cannot be satisfied from the perpetrator's assets, subject to the applicable requirements. Thus, restitution becomes not only the perpetrator's legal obligation but also part of the state's

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

effort to guarantee the comprehensive fulfillment of OGBV victims' rights, justice, and recovery.

This study is limited to the normative text of the TPKS Law, Government Regulation Number 29 of 2025, and a small set of illustrative court decisions; it does not measure how restitution and removal actually function across a larger caseload. Future research should test the interdependency identified here empirically, for instance by tracking how often courts pair restitution with a removal order and how long LPSK takes to disburse the Victim Assistance Fund once a shortfall is reported. Comparative work against jurisdictions with a working emergency-removal procedure would also help specify what Indonesia's missing time limit should look like in practice. For policymakers, the implication is direct: closing the gap identified here needs the Supreme Court's harm-calculation guidelines and LPSK's disbursement guidelines to arrive together, not as separate reforms, since this study shows the two mechanisms were never truly separate to begin with.

REFERENCES

Undang-Undang Dasar Negara Republik Indonesia Tahun 1945. (1945). The 1945 Constitution of the Republic of Indonesia.

Adkiras, F., Zubarita, F. R., & Fauzi, Z. T. M. (2021). Konstruksi pengaturan kekerasan berbasis gender online di Indonesia. *Lex Renaissance, 6*(4), 781–798. https://doi.org/10.20885/jlr.vol6.iss4.art10

Astoto, S. S. (2016). Eksistensi viktimologi dalam penyelesaian ganti rugi. *Jurnal Hukum IUS QUIA IUSTUM, 8*(18), 212–224. https://doi.org/10.20885/iustum.vol8.iss18.art15

Basanta, A. (2025). Karakteristik korban dan pelaku dalam kasus Kekerasan Berbasis Gender Online (KBGO) di Purwokerto. *Soedirman Law Review, 7*(3), 205–227. https://doi.org/10.20884/1.slr.2025.7.3.16125

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Benuf, K., & Azhar, M. (2020). Metodologi penelitian hukum sebagai instrumen mengurai permasalahan hukum kontemporer. *Gema Keadilan, 7*(1), 20–33. https://doi.org/10.14710/gk.2020.7504

CEDAW Committee. (2017). General recommendation No. 35 on gender-based violence against women, updating general recommendation No. 19 (UN Doc. CEDAW/C/GC/35).

Christianto, H. (2020). Konsep hak untuk dilupakan sebagai pemenuhan hak korban revenge porn berdasarkan Pasal 26 Undang-Undang Informasi dan Transaksi Elektronik. *Mimbar Hukum, 32*(2), 175–192. https://doi.org/10.22146/jmh.51110

Dewantary, Z. R., & Endut, N. (2022). States responsibility to eradicate violence against women through the due diligence framework in human rights: A review of protection and punishment in the case of Indonesia. *Indonesian Journal of International Law, 19*(4), 567–598. https://doi.org/10.17304/ijil.vol19.4.3

Endyka, D. C., et al. (2026). Efektivitas Undang-Undang TPKS dalam menjamin hak restitusi korban kekerasan seksual. *ULIL ALBAB: Jurnal Ilmiah Multidisiplin, 5*(6), 1268–1275.

GR 29/2025. (2025). Peraturan Pemerintah Nomor 29 Tahun 2025 tentang Dana Bantuan Korban Tindak Pidana Kekerasan Seksual.

GR 71/2019. (2019). Peraturan Pemerintah Nomor 71 Tahun 2019 tentang Penyelenggaraan Sistem dan Transaksi Elektronik.

Hardum, S. E. (2016). *Perdagangan manusia berkedok pengiriman TKI*. Ar-Ruzz Media.

Institute for Criminal Justice Reform. (n.d.). [Rilis koalisi] Catatan krusial terkait PP 29/2025 tentang Dana Bantuan Korban Tindak Pidana Kekerasan Seksual. https://icjr.or.id/catatan-krusial-terkait-pp-29-2025-tentang-dana-bantuan-korban-tindak-pidana-kekerasan-seksual/

Komnas Perempuan. (2026). *CATAHU 2025: Menguatkan data, mengatasi kerentanan, mendesak negara bersikap untuk keadilan korban*. Komnas Perempuan.

Kurniawan, D. P., & Prawitasari, N. Y. (2026). Perlindungan hukum dan pemulihan korban tindak pidana kekerasan seksual (Studi kasus Putusan Nomor: 52/Pid.Sus/2023/PN.Tar). *Iqtishaduna: Jurnal Ilmiah Mahasiswa Hukum Ekonomi Syariah, 7*(4), 6126–6135. https://doi.org/10.24252/iqtishaduna.v7i4.72190

Law No. 1 of 2024. (2024). Undang-Undang Nomor 1 Tahun 2024 tentang Perubahan Kedua atas Undang-Undang Nomor 11 Tahun 2008 tentang Informasi dan Transaksi Elektronik.

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Marzuki, P. M. (2014). *Penelitian hukum: Edisi revisi*. Kencana.

Muhammad, F. N. M., & Indawati, Y. (2026). Perlindungan hukum bagi korban tindak pidana pornografi balas dendam (Revenge porn). *Jurnal Ilmiah Muqoddimah: Jurnal Ilmu Sosial, Politik dan Humaniora, 10*(2), 1589–1598. https://doi.org/10.31604/jim.v10i2.2026.1589-1598

Mustika, S., & Tellys. (2022). Family communication and resilience on women victims of online gender-based violence. *Jurnal Komunikasi Pembangunan, 20*(1), 14–26. https://doi.org/10.46937/20202238826

Oktavia, D. P., Apriyani, R., & Wati, A. (2025). Tanggung jawab LPSK dalam pelaksanaan restitusi korban kekerasan seksual oleh pelaku yang tidak mampu atau terpidana mati. *Referendum: Jurnal Hukum Perdata dan Pidana, 2*(3), 61–69. https://doi.org/10.62383/referendum.v2i3.1127

Ombudsman Republik Indonesia. (n.d.). Menanti realisasi Dana Bantuan Korban Tindak Pidana Kekerasan Seksual. https://ombudsman.go.id/artikel/r/pwkinternal--menanti-realisasi-dana-bantuan-korban-tindak-pidana-kekerasan-seksual

PDP Law. (2022). Undang-Undang Nomor 27 Tahun 2022 tentang Pelindungan Data Pribadi.

Ramadhani, E. R., Rachmawati, A. R., & Kurnikova, R. H. (2026). Creating internet safe for women in Indonesia: A challenge to gender equality (A study of online gender-based violence concerning women's rights from Indonesian law perspective). *Journal of Feminism and Gender Studies, 6*(1), 44–56. https://doi.org/10.19184/jfgs.v6i1.53702

Salsabila, D. H., & Susanti, R. (2023). Kekerasan seksual berbasis gender online dalam perspektif Undang-Undang Nomor 12 Tahun 2022 tentang Tindak Pidana Kekerasan Seksual. *UMPurwokerto Law Review, 4*(2), 269–280. https://doi.org/10.30595/umplr.v4i2.16398

Sinaga, D., & Lidya, I. (2024). Perlindungan hukum dan pertanggungjawaban tindak pidana revenge porn berdasarkan UU No. 11 Tahun 2008 tentang Informasi Transaksi Elektronik (ITE) dan UU No. 12 Tahun 2022 tentang Tindak Pidana Kekerasan Seksual (TPKS). *Padjadjaran Law Review, 12*(1). https://doi.org/10.56895/plr.v12i1.1644

Supreme Court Regulation No. 1 of 2022. (2022). Peraturan Mahkamah Agung Nomor 1 Tahun 2022 tentang Tata Cara Penyelesaian

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.

Permohonan dan Pemberian Restitusi dan Kompensasi kepada Korban Tindak Pidana.

TPKS Law. (2022). Undang-Undang Nomor 12 Tahun 2022 tentang Tindak Pidana Kekerasan Seksual.

Wijaya, M. (2026). Karakteristik dan perlindungan hukum kekerasan seksual berbasis elektronik. *The Juris, 10*(1), 59–65. https://doi.org/10.56301/juris.v10i1.2223

Yuningsih, H., & Munawir. (n.d.). Efektivitas restitusi dalam perlindungan korban kekerasan seksual di Indonesia: Analisis yuridis dan implementasi praktis. *Ranah Research: Journal of Multidisciplinary Research and Development, 7*.

Yusuf, A. T., & Mangesti, Y. A. (2026). Pelindungan korban tindak pidana kekerasan seksual berdasarkan hak (Right to be forgotten). *Journal of Artificial Intelligence and Digital Business (RIGGS), 5*(2), 14295–14309. https://doi.org/10.31004/riggs.v5i2.11126

Zaltina, P. E., & Nurtjahyo, L. I. (2024). Right to be forgotten as a legal protection for the victims of electronic sexual violence cases. *The Indonesian Journal of Socio-Legal Studies, 3*(2), Article 4. https://doi.org/10.54828/ijsls.2024v3n2.4

© 2026 The Author(s). Published by Sophist: Jurnal Sosial Politik Kajian Islam dan Tafsir, Faculty of Ushuluddin and Religious Studies, Universitas Islam Negeri Mataram. This is an open access article under the CC BY-SA 4.0 license.