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The Purpose of Criminal Punishment in Determining the Duration of Prison Sentences for Children as Perpetrators of Sexual Violence Crimes (Study of Decision Number 4054 K/Pid.Sus/2026)

Adam Tanzio Manggal[1)] & Hery Firmansyah[2)]
[1)]Faculty of Law, Universitas Tarumanagara, E-mail: adam.205230200@stu.untar.ac.id
[2)]Faculty of Law, Universitas Tarumanagara, E-mail: heryf@fh.untar.ac.id

Abstract. *This study aims to analyze the objectives of sentencing child sexual abuse perpetrators in a series of decisions up to Decision Number 4054 K/Pid.Sus/2026 and their suitability with the consideration of the length of imprisonment. The study uses a normative legal method with a statutory, case, and conceptual approach through literature study. The results of the study indicate that sentencing is oriented towards education, behavioral improvement, and specific prevention. The High Court emphasized the relative theory, while the Supreme Court maintained punishment based on the child's culpability and the adequacy of consideration. The court considered the victim's suffering, the perpetrator's circumstances, and the social research report. However, the relationship between the need for guidance and the choice of a four-year prison sentence has not been specifically explained. Thus, the orientation of guidance has been reflected, while the reasons for determining the length of imprisonment require strengthening arguments that link accountability, individual circumstances, the child's development, and the victim's interests in the case under study.*

Keywords: *Children; Imprisonment; Punishment; Sexual; Violence.*

1. Introduction

Children are legal subjects with rights and interests that must be protected. Their physical and mental growth and developmental stage differs from that of adults. Special protection is necessary to ensure this process takes into account their survival, growth, and rights (Bariah, Chairul et al. 2024).

Guarantees for children's rights are constitutionally based through Article 28B paragraph (2) of the 1945 Constitution of the Republic of Indonesia. This provision affirms the right of every child to survival, growth and development, as well as protection from violence and discrimination. Further regulations are contained in Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 concerning Child Protection. Article 1 number 2 positions child protection as an activity to guarantee the fulfillment of rights so that children can live, grow, develop, and participate in accordance with human dignity and honor.

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The need for protection must still be considered when a child is suspected of committing a crime. Case resolution is carried out through the Juvenile Criminal Justice System, which encompasses the process from investigation to post-sentence counseling. Under this system, a Child in Conflict with the Law is a child aged twelve but under eighteen who is suspected of committing a crime (Mubarok, Nafi'. 2022).

Law Number 11 of 2012 concerning the Juvenile Criminal Justice System, hereinafter referred to as the SPPA Law, regulates the principles of the best interests of children, survival and growth, guidance and mentoring, and proportionality. Article 2 also places deprivation of liberty and criminal punishment as a last resort. Furthermore, Article 81 paragraph (1) regulates the imposition of imprisonment in a Special Child Development Institution if the child's condition and actions will endanger society, while paragraph (5) emphasizes its use as a last resort. The direction of these restrictions is also reflected in the composition of the main penalties which places imprisonment at the bottom of the list, in contrast to previous regulations (Saputra, Trias. 2022).

Determining a child's sentence also requires consideration of the child's individual circumstances. Personal circumstances, family circumstances, social environment, and background provide context for assessing the child's actions and treatment needs. This information can be obtained through community research conducted by Community Guidance Officers. The differences in each child's circumstances highlight the importance of considerations related to the individual facing criminal punishment (Widowati. 2024). Thus, the reasons for using sanctions need to be linked to the child's condition and the purpose of the punishment.

This issue becomes even more complex in cases of sexual violence involving children as both perpetrators and victims. Protection of child victims requires attention, along with accountability and guidance for perpetrators. The seriousness of the act and its impact on the victim are part of the assessment, while the perpetrator's developmental needs also require attention (Yusrial, Alryena et al. 2025). This relationship raises the need to examine how courts explain the choice of prison and determine the length of sentences. The discussion focuses on the relationship between the basis of responsibility, individual circumstances, the interests of the victim, and the goals to be achieved through child sentencing.

The case that is the object of this research was examined by the Sibuhuan District Court through Decision Number 2/Pid.Sus-Anak/2025/PN Sbh. The perpetrator in the case is a 17-year-old boy who is a student (Medan High Court, Decision Number 2/PID.SUS-Anak/2026/PT MDN). while the victim was a 15 year old girl (Sibuhuan District Court, Decision Number 2/Pid.Sus-Anak/2025/PN Sbh).

The child and the victim met through social media in 2023 and then began a relationship. According to the victim's child, three sexual encounters occurred around November 2024: twice behind the school and once at the child's house. The victim's child stated that the child promised to take responsibility by marrying her. Their relationship escalated into conflict on

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December 22, 2024, when the victim's child saw a photo of another woman on the victim's phone. Following the argument, the victim's child revealed the sexual encounters to her family. Attempts at family discussions failed to resolve the matter, so the family reported the case to the police on January 22, 2025.

During mediation at the police station, the victim's father demanded Rp100,000,000.00 in compensation, while the victim's parents offered Rp8,000,000.00. The victim's father explained that the request was made deliberately to prevent a settlement because the losses to the victim and family were considered incalculable. The mediation ultimately failed to produce an agreement. During the trial, the child denied having sexual intercourse or promising marriage, while the victim's child maintained his statement and explained that he was experiencing psychological pressure and was no longer attending school.

After assessing the evidence, the judge declared that the child was legally and convincingly proven guilty of committing a crime by intentionally persuading the child to have sexual intercourse with him as per the first alternative charge. The legal basis used was Article 81 paragraph (2) of Law Number 17 of 2016 concerning the Determination of Government Regulation in Lieu of Law Number 1 of 2016 concerning the Second Amendment to Law Number 23 of 2002 concerning Child Protection to Become a Law in conjunction with Article 64 paragraph (1) of the Criminal Code (KUHP). The series of actions was deemed to fulfill the elements of a continuous act.

The Community Guidance Officer recommended institutional counseling based on the results of a community research study. The community research report also stated that the child had no prior history of legal violations and that his parents were still capable of supporting him. The Public Prosecutor demanded three years in prison and six months of job training, along with Rp50,000,000.00 in restitution, in lieu of three months in prison if the fine was not paid. The court sentenced the child to four years in prison at the Medan Class I Special Child Development Institution and six months of job training. The job training was placed in lieu of a fine in the verdict. The judge attributed the choice of imprisonment to the severity of the crime, the victim's suffering, and the lack of parental supervision. Prison was viewed as a learning tool to improve the child's behavior. Restitution was not determined after the judge considered the failure to provide evidence of medical expenses and the financial limitations of the child's parents.

The request for compensation in mediation and the demand for restitution represent different parts of the case. The differences between the recommendations for guidance, the prosecutor's demands, and the verdict demonstrate the importance of examining the rationale for sentencing. Research focuses on the relationship between the educational goal, the child's individual circumstances, the impact of the act on the victim, and the determination of the length of imprisonment. This relationship needs to be interpreted through the court's considerations, which are then examined at the appeal and cassation levels.

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On appeal, the Medan High Court, through Decision Number 2/PID.SUS-Anak/2026/PT MDN, upheld the Sibuhuan District Court's decision. The High Court based sentencing on a relative or teleological theory, which directs punishment as a means of educating children to improve their behavior and prevent them from repeating crimes. The High Court adopted the considerations of the first court and deemed the length of the sentence to be fair and educational (Medan High Court, Decision Number 2/PID.SUS-Anak/2026/PT MDN). These considerations demonstrate the use of educational goals and behavioral improvement as a reason to maintain criminal penalties against children.

At the cassation level, the Supreme Court, through Decision Number 4054 K/Pid.Sus/2026, rejected the child's appeal. The objection regarding the severity of the sentence was considered related to the authority of the judicial magistrate to determine the severity of the sentence. The Supreme Court considered that the sentence was appropriate to the child's crime and that aggravating and mitigating circumstances had been adequately considered (Supreme Court of the Republic of Indonesia, Decision Number 4054 K/Pid.Sus/2026). Thus, the series of decisions upheld the four-year prison sentence and six months of job training. An examination of the basis for the sentencing requires a careful consideration of the relationship between the considerations of the first-instance court, the appeal court, and the cassation court.

The discrepancy between the recommendation for institutional guidance, the demand for three years in prison, and the verdict of four years in prison provides the basis for examining the relationship between the purpose of punishment and the determination of the length of the sentence. This discrepancy does not in itself indicate an error in the decision, but it does raise questions about the considerations underlying the choice of sanction. The reasons for choosing imprisonment must be distinguished from the reasons for determining the length of imprisonment. The statement that punishment is intended to educate needs to be examined in conjunction with the child's individual circumstances, the seriousness of the act, and the consequences experienced by the child victim.

To address these issues, this study utilizes the theory of the purpose of punishment to identify the orientation reflected in the court's considerations. The theory of individualization of punishment is used to analyze the relationship between the child's personal circumstances, guilt, consequences of the act, and the size of the sentence. Erik Erikson's theory of psychosocial development is used as a support to understand the relevance of children's developmental needs in sentencing considerations. The review is conducted through normative legal research with a statutory, case, and conceptual approach. Legal provisions, considerations in the three decisions, and literature are analyzed to explain the purpose of punishment in a series of decisions and assess their suitability with considerations in determining the length of imprisonment for children.

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2. Research Method

This research is a normative legal study that examines regulations, court decisions, concepts, and doctrines to address legal issues. Legal reasoning is used to construct arguments regarding the purpose of punishment and the determination of the length of imprisonment for children (Marzuki, Peter Mahmud. 2024). The approaches used include statutory, case, and conceptual approaches. The statutory approach is used to examine the provisions of child criminalization related to the case. The case approach is used to examine the legal considerations in the Sibuhuan District Court Decision Number 2/Pid.Sus-Anak/2025/PN Sbh, the Medan High Court Decision Number 2/PID.SUS-Anak/2026/PT MDN, and the Supreme Court Decision Number 4054 K/Pid.Sus/2026. The review includes the reasons for selecting sanctions and determining the length of the sentence. The conceptual approach is used to understand the views and doctrines underlying the objectives of punishment and the individualization of punishment. Both theories are used to assess the relationship between punishment orientation, child condition, and sanction size. Erik Erikson's Psychosocial Development Theory is used to support understanding the characteristics of child development. The research materials consist of primary legal materials in the form of regulations and court decisions, as well as secondary legal materials in the form of books, journals, and proceedings. The materials were collected through a literature review. The materials were selected based on their relevance to the problem and then analyzed by connecting them with legal provisions, judicial considerations, and applicable theories. The analysis aims to identify the objectives of sentencing within a series of decisions and assess their appropriateness in determining the length of imprisonment. The results of the analysis are used to develop arguments and conclusions that address the two research questions. The assessment is based on the facts and reasons stated in the decisions.

3. Results And Discussion

3.1. The Purpose of Criminalizing Child Perpetrators of Sexual Violence in a Series of Decisions Court

The Sibuhuan District Court bases sentencing on the child's guilt and the potential for improvement in their behavior. After declaring the child capable of taking responsibility, the judge directs sanctions to support their well-being and future. Imprisonment is chosen as a learning tool to help the child realize their mistakes and prevent similar behavior (Sibuhuan District Court, Decision Number 2/Pid.Sus-Anak/2025/PN Sbh). These considerations demonstrate that guilt is the basis for imposing punishment, while education is the goal. Thus, the court links responsibility for the act to the desired change in the perpetrator.

This relationship demonstrates a relative orientation in punishment. Relative theory explains punishment based on the benefits it aims to achieve, including deterrence and correction of the perpetrator, while absolute theory focuses on retribution for the crime (Chandra, Tofik Yanuar. 2022). The judge's statement regarding the prevention of similar acts points to specific deterrence because the target of the change is the convicted juvenile. Although the judge also

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mentioned appropriate punishment, this statement must be read in conjunction with the stated educational rationale. Therefore, the court's considerations should not be reduced to mere retribution.

The emphasis on the offender's future aligns with the specifics of juvenile justice. A welfare approach and opportunities for development are key considerations in case handling, as children are considered capable of being guided and educated (Mubarok, Nafi'. 2022). In this case, the perpetrator's status as a juvenile influences the direction of punishment imposed by the judge. Education serves as a foundation for maintaining the possibility of change after guilt is proven. Consequently, the existence of this goal must be interpreted in conjunction with the court's rationale for determining the form of treatment.

The rationale for choosing prison was particularly evident when the judge rejected the recommendation for institutional care. Lack of parental supervision was used to justify placement in a Special Juvenile Development Institution, while the victim's suffering served as the basis for assessing the severity of the offense. The judge noted that the victim had suffered physical and psychological harm and still needed recovery. These consequences also placed a burden on the family, who supported and funded the victim's treatment after the incident at issue. The two reasons served different purposes. The family's circumstances explained the environment, which was perceived as not providing adequate supervision, while the impact on the victim demonstrated the seriousness of the offense. The court then reconciled the two in deciding to use prison as a learning environment for the child.

Attention to victims can be explained through the development of a theory of punishment that takes into account the interests of the perpetrator, victim, and society (Rivanie, Syarif Saddam et al. 2022). In this decision, the victim's losses are considered in the type of sanction, while the perpetrator's improvement is the expected benefit. This relationship demonstrates an effort to place reparation alongside responsibility for the consequences of actions.

Based on this analysis, the stated objectives at the first level primarily involve education and specific prevention. This orientation can be identified by the behavioral change targets, while the choice of means is influenced by assessments of the family and the consequences of the crime. These findings serve as a basis for comparing the appellate court's considerations, particularly regarding the sustainability of the sentencing orientation maintained in this case.

The Medan High Court emphasized the orientation of punishment through the use of a relative or teleological theory. The court positioned punishment as a means of educating children to change their behavior and prevent them from repeating crimes. Following the considerations of the first court, the High Court upheld the punishment, which it deemed sufficiently just and educational (Medan High Court, Decision Number 2/PID.SUS-Anak/2026/PT MDN). The takeover demonstrates continuity of purpose, while maintaining the assessment of the offender's circumstances and the victim's suffering that underlies the choice of imprisonment.

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The use of relative theory explains that the value of punishment is linked to its expected benefits. At the appellate level, the stated measure of benefit is education and prevention of reoffending by the child. However, the assessment of justice and education has different functions. Justice relates to the assessment of sanctions in a case, while education refers to the desired change in the perpetrator. The use of both demonstrates the court's effort to maintain accountability without neglecting the child's future. Education is aimed at changing attitudes, while specific prevention aims to ensure that the experience of serving a sentence reduces the child's likelihood of reoffending.

In the development of criminal theory, the interests of the perpetrator, victim, and society can be interrelated considerations (Rivanie, Syarif Saddam et al. 2022). This framework helps understand the strengthening of the appeal decision as an acceptance of the entire reasoning for the first instance conviction. Although the term "relative" is emphasized, the victim's suffering remains a key consideration. Therefore, the educational orientation of this decision does not mean that the victim's interests are disregarded. The issue is rather how the court connects responsibility for the harm with efforts to reform the perpetrator through sanctions.

At the cassation level, the Supreme Court examined the child's objection, which questioned the severity of the sentence and requested a lighter sentence in the form of probation. This objection was deemed not to be a reason for cassation as stipulated in Article 253 paragraph (1) of the Criminal Procedure Code. The Supreme Court also stated that the previous court had applied the law correctly (Supreme Court of the Republic of Indonesia, Decision Number 4054 K/Pid.Sus/2026). This reasoning demonstrates that the cassation hearing is directed at objections within its jurisdiction. In reading the purpose of sentencing, the cassation considerations strengthen the position of error as a basis for maintaining sanctions. This consideration complements the educational description previously stated by the court.

The Supreme Court further stated that the punishment commensurate with the child's guilt and that the aggravating and mitigating circumstances had been adequately considered. The severity of the punishment rests with the discretion of the judex facti, with exceptions if it exceeds the limit or is not accompanied by sufficient consideration. This assessment upholds the sentencing outcome through the sufficiency of legal reasoning. Unlike the appellate court, which cited a relative theory, the Supreme Court emphasized culpability and completeness of the reasoning. This difference in emphasis explains that the continuity of the decision does not always involve repeating the objective statement at each level of examination.

This series of decisions demonstrates that the specific goals of education and prevention were stated at the first instance and reinforced on appeal. The child's guilt and the victim's suffering remain a key consideration in the sentencing process. The Supreme Court then upheld the decision by assessing the application of the law and the adequacy of its considerations. Thus, the orientation of development goes hand in hand with accountability for actions.

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3.2. Suitability of Considerations in Determining the Length of Imprisonment Sentences for Children with Purpose of Criminalization

Determining the length of a child's prison sentence is part of the individualization of punishment. This approach places the offender's guilt and circumstances as the basis for adjusting the sanction, so that the size of the sentence is linked to the characteristics of the person serving the sentence (Wijanarko, Dwi Seno and Fransiska Novita Eleanora. 2023). In this case, the appropriateness of a four-year prison sentence is assessed by the court by considering the child's circumstances, the consequences of the actions on the victim, and the goals of rehabilitating the child. This assessment is directed at the rationale underlying the sanction, after the educational orientation has been identified in the previous discussion.

Individualization pays attention to the background, motivation, and personal conditions of the perpetrator in relation to the act (Kenedi, John. 2017). Based on this framework, individual circumstances are meaningful when used to inform sentencing decisions. Information about the child's life can influence the assessment of treatment needs, while the facts of the offense provide the basis for assessing culpability and consequences. Therefore, analysis of decisions requires attention to how these two sets of circumstances are weighed in determining the length of imprisonment.

The Sibuhuan District Court listed several aggravating circumstances. The child's actions were deemed detrimental to the victim and her family, causing deep trauma, ruining the victim's future, and disrupting her social life. The judge also considered that the child was not forthright, the acts were repeated, and the victim and her family had not forgiven her. A mitigating circumstance was that the child had no prior criminal record. After considering these circumstances, the judge sentenced her to four years in prison and six months of job training (Sibuhuan District Court, Decision Number 2/Pid.Sus-Anak/2025/PN Sbh). This arrangement shows that the impact on the victim receives great attention in assessing the severity of the crime.

Aggravating circumstances provide grounds for assessing the seriousness of the case. Trauma and disruption to social life indicate that the consequences of the act extend beyond the sexual intercourse itself. Repeated acts also demonstrate that the judge's assessment encompasses the series of actions found proven. Meanwhile, the fact that the child has never been convicted provides information about the child's criminal history. However, the inclusion of these circumstances does not yet demonstrate the weight of each in selecting a four-year prison sentence. The relationship between the facts considered and the size of the penalty still requires clarification in the sentencing argument.

The discussion of sentencing guidelines takes into account the life history, socio-economic conditions, and the impact of the crime on the future of the perpetrator along with the consequences of the act against the victim (Yulianti, Wulan Dwi. 2021). This framework extends the assessment from the seriousness of the offense to the consequences of the use of sanctions. In the case of children, these concerns relate to education, family relationships, and

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opportunities for social reintegration. Thus, individualization does not diminish recognition of the victim's suffering, but rather requires a careful consideration of the perpetrator's circumstances and the consequences of the act.

Based on the available considerations, the court has provided a basis for understanding the gravity of the offense and the reasons for imposing a sentence. The remaining issue is how these considerations explain the appropriateness of the term to the child's developmental needs. The presence of numerous aggravating circumstances cannot be treated as an automatic calculation for the length of imprisonment.

The community research report provided information that broadened the assessment of the child's situation. The report stated that the child had no history of delinquency or previous violations of the law, and his parents were deemed capable of guiding him. Lack of family supervision was identified as a contributing factor. Based on the research findings, the Community Guidance Officer recommended institutional guidance (Sibuhuan District Court, Decision Number 2/Pid.Sus-Anak/2025/PN Sbh). This information shows that there are possible treatments that are considered based on the child's environment and behavioral history, not only based on the crime committed.

The judge considered the recommendation and then rejected it, considering the seriousness of the offense and the lack of parental supervision. Imprisonment was chosen to provide learning and encourage behavioral change. The supervisory factor thus appears in both the report and the judge's deliberations, but is associated with different treatment options. The difference lies in the assessment of the appropriate means. The recommended institutional guidance is also a structured treatment option, so its rejection must be understood in light of the judge's reasoning for choosing prison as the preferred means of guidance.

Article 60 paragraph (3) of the SPPA Law requires judges to consider community research reports before issuing a verdict. The discussion of recommendations in this case indicates that the report received a response. However, the obligation to consider the report is not the same as the obligation to follow its recommendations. The next issue is the relationship of individual information to the length of the sanction. A history of behavior that does not indicate previous violations and the family's ability to raise the child are circumstances that can be weighed together with weaknesses in supervision. Consideration of these circumstances has not been explained as to their influence on the choice of four years' imprisonment.

From Erik Erikson's psychosocial development perspective, adolescence is concerned with identity formation through individual experiences and social relationships. Role exploration and mentoring are crucial for adolescent development (Hikmandayani et al. 2023). In this case, the framework helps explain the relevance of education, family, and social environment when judges assess sentencing consequences. The lack of family supervision indicates a support issue that needs to be addressed in the correctional process. However, developmental theory does not prove that children experience identity confusion and does not provide a calculation

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for the length of sentence. Its use is limited in understanding developmental needs related to the treatment of children.

The study of sexual violence between children also emphasizes attention to children's rights in the imposition of sanctions and discusses criminal options and actions in the juvenile justice system (Firmansyah, Hery and Lionitya Herfiana. 2022). This view supports the notion that developmental protection remains relevant after guilt has been proven. In the case studied, the issue of family supervision may explain the need for guidance, but it does not explain why that need warranted a four-year prison sentence. The relationship between the child's environment and sanctions would be clearer if considerations were made to address the guidance aspects intended to be addressed through the placement.

Thus, the societal report and the developmental perspective provide complementary information. The report provides the perpetrator's concrete circumstances, while the theory helps explain the significance of those circumstances for the child's development. Both reinforce the need to balance accountability, development, and the consequences of deprivation of liberty in determining punishment. The impact on the victim remains a crucial part of this consideration.

The criminal limits in the SPPA Law provide a framework for assessing the imposition of prison sentences on children. Article 81 paragraph (2) stipulates that the maximum prison sentence is one-half the maximum prison sentence for adults. Article 79 paragraph (3) also confirms that the minimum prison sentence does not apply to children. These provisions limit the authority to impose sentences, but do not produce a single term that is automatically appropriate for all cases. Therefore, compliance with the criminal limits and the adequacy of the reasons for choosing the length of imprisonment are two related issues.

In this case, the Public Prosecutor demanded three years in prison, while the court sentenced them to four years. Both were also sentenced to six months of job training (Sibuhuan District Court, Decision Number 2/Pid.Sus-Anak/2025/PN Sbh). The one-year difference reflects a difference in assessments of the appropriate sentence. However, the charges are not the sole basis for assessing the appropriateness of a sentence. Attention is drawn to the court's consideration of the act and the perpetrator. The impact on the victim and aggravating circumstances determine the severity of the case, while the choice of a fixed term requires a rationale linked to educational goals.

This relationship is important because the context of rehabilitation extends beyond the length of time spent in an institution. Studies of the rehabilitation of juvenile sexual offenders place psychological and educational aspects as key components of behavioral improvement (Putri, Andara Hafzha Gustria. 2025). This perspective helps assess the claim that prisons are used for education. In the case under study, the need for behavioral change was mentioned, but the considerations cited did not specifically link that need to the four-year prison sentence. Thus, the stated goal still requires a clearer link to the sanction.

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This requirement does not mean that the decision must specify all the details of the criminal program. The issue is that the reason for sentencing can indicate circumstances requiring treatment and their impact on the length of the deprivation of liberty. Education and support are relevant aspects in understanding the consequences of imprisonment on a child's future. At the same time, the victim's suffering remains the basis for assessing the seriousness of the act. Weighing both provides a more focused basis for using educational reasons in determining punishment.

At the cassation level, the Supreme Court stated that the punishment was appropriate to the child's guilt and that consideration of aggravating and mitigating circumstances was adequate (Supreme Court of the Republic of Indonesia, Decision Number 4054 K/Pid.Sus/2026). The assessment upheld the decision based on the legal reasons examined in the appeal. However, the appropriateness of the punishment to the offense and its appropriateness to the needs of the correctional institution differ. The former emphasizes accountability for the act, while the latter examines the relationship of sanctions to changes in the child's behavior and development.

Based on this description, the educational orientation has been stated and the circumstances of the case have been considered. The limitations lie in explaining the relationship between individual circumstances and development needs and the chosen timeframe. The differences between the charges and the verdict highlight the importance of the rationale for determining the sentence, without making these differences the sole evidence of inappropriate sentencing.

4. Conclusion

The Purpose of Criminalization in a Series of Court Decisions. The purpose of sentencing child perpetrators of sexual violence, in a series of decisions up to Decision Number 4054 K/Pid.Sus/2026, demonstrates an orientation toward education, behavioral improvement, and specific prevention. The Sibuhuan District Court places guilt as the basis for accountability, linking the implementation of punishment to the child's well-being and future. Imprisonment is chosen as a learning tool so that the child realizes his mistake and does not repeat his actions. This choice is accompanied by consideration of the victim's suffering and lack of parental supervision. The Medan High Court emphasized this orientation through a relative or teleological theory. By adopting the considerations of the first court, the High Court upheld the just and educational nature of punishment. Education is the intended benefit of punishment, while specific deterrence is directed at changing the behavior of children undergoing punishment. Meanwhile, the Supreme Court upheld the verdict based on the assessment that the punishment was appropriate to the child's crime and that aggravating and mitigating circumstances were adequate. The cassation hearing emphasized the application of the law and the adequacy of the considerations, without separately addressing educational objectives. Thus, the continuity of the sentencing outcome is accompanied by an emphasis on different reasons at each level of the hearing. The orientation of development is stated at the first level and emphasized on appeal, while the fault and consequences of the actions remain the basis of the assessment. This sequence demonstrates that concern for the perpetrator's future goes

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hand in hand with responsibility for their actions and recognition of the child victim's suffering. Suitability of Considerations of the Length of Prison Sentences with the Purpose of Punishment. The considerations in determining the length of imprisonment for juveniles have demonstrated a focus on developmental goals, but the relationship between the juvenile's individual needs and the choice of four years' imprisonment has not been specifically explained. The court considered the seriousness of the act, the victim's suffering, recurrent offenses, and aggravating and mitigating circumstances. These circumstances provide a basis for understanding the gravity of the case. However, the rationale for choosing the term does not yet demonstrate how these circumstances are weighed together with the juvenile's developmental needs and future. The community research report was discussed in the decision. The judge rejected the recommendation for institutional counseling, considering the consequences of the actions and the lack of parental supervision. Therefore, the discrepancy between the recommendation and the decision does not indicate that the report was ignored. The limitations of the judgment lie in the relationship between available individual information and the length of the sentence. The child's behavioral history and the family's ability to provide counseling were not explained as influencing the decision to sentence him to four years in prison. The difference between a three-year sentence and a four-year sentence does not automatically prove the sentence is inappropriate. Similarly, the criminal limit in the Juvenile Justice and Child Protection Law provides a framework for authority, but does not automatically establish an appropriate timeframe for each case. The appropriateness of the sentence remains dependent on the court's reasoning regarding the culpability, consequences of the act, the perpetrator's circumstances, and the goal of rehabilitation. The affirmation of the decision on appeal and the rejection of the cassation appeal maintain the sentencing outcome, while explanations regarding the need for rehabilitation during that period remain limited. The victim's interests provide the basis for assessing the severity of the case. Trauma, disruption to social life, and the impact on the victim's future explain the seriousness of the consequences. However, recognition of these consequences must be linked to the perpetrator's circumstances when determining the length of imprisonment. Increasing the sentence does not, in itself, explain the form of necessary correction or rehabilitation the victim will receive. Therefore, informed consideration needs to demonstrate how responsibility for the act is implemented through a sanction that takes into account the child's development. This explanation allows the interests of the perpetrator and victim to be weighed in a coherent manner, without either being merely a general justification for maintaining the chosen sentence. Therefore, the appropriateness of the considerations is evident in the educational orientation and attention to the circumstances of the case, while the basis for determining the length of imprisonment requires strengthening individual arguments. Explanations regarding the need for supervision, education, and support, as well as the consequences of deprivation of liberty, can clarify the relationship between the goals of development and the size of the sanction. A psychosocial development perspective supports attention to the developmental needs of children, without becoming the basis for diagnosis or criminal calculations. This strengthening still places the victim's suffering and the perpetrator's responsibility as part of

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the considerations. Thus, the goals of development gain a more concrete basis in the rationale for determining the sentence, along with protection of the interests of the victim and society.

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