

Legal Protection for People with Disabilities in the Making of Authentic Notary Deeds

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Abstract. *Legal protection for persons with disabilities in the making of authentic deeds is an important issue in notarial practice in Indonesia. Although constitutionally every citizen has equal status before the law as specified in Article 28D paragraph (1) of the 1945 Constitution of the Republic of Indonesia, in practice persons with disabilities still face various obstacles in accessing legal services, particularly in the making of authentic deeds before a notary. These obstacles arise from regulatory, technical, and cultural aspects, especially concerning formal requirements such as signing the deed, the use of sign language interpreters for the deaf, and the reading of the deed for the blind. This research employs a normative legal research method. The approaches used are the statute approach, the conceptual approach, and the case approach by examining the Supreme Court Decision Number 121 K/Pdt/2016 as the main secondary legal material. The type of data used is qualitative with secondary data obtained through literature study, while data analysis was carried out descriptively and analytically. The results of the research indicate that the legal status of persons with disabilities in the making of authentic deeds has not been optimally protected due to normative gaps in the Notary Law, which does not explicitly regulate reasonable accommodation. Supreme Court Decision Number 121 K/Pdt/2016 affirms that physical limitations do not eliminate the legal capacity of persons with disabilities, thereby confirming their right to conduct legal acts. The decision has become progressive jurisprudence that provides substantive legal protection, promotes inclusive notarial practices, and aligns with Law Number 8 of 2016 on Persons with Disabilities, the principles of justice in Islam, and Social Justice as enshrined in Pancasila.*

Keywords: *Authentic; Disabilities; Legal; Protection.*

1. Introduction

The Unitary State of the Republic of Indonesia, as a state based on the rule of law based on Pancasila and the 1945 Constitution, places the principle of equality before the law on every citizen as a binding constitutional mandate. This principle requires the state not only to recognize citizens' rights at the normative level but also to ensure their concrete implementation in all legal services, including for persons with disabilities as a vulnerable group who often face social and structural barriers. In the increasingly complex dynamics of modern society, the intensity of civil legal relations is increasing and requires authentic written evidence to guarantee the certainty of the rights and obligations of the parties. Therefore, the state positions Notaries as public officials authorized to make authentic deeds, thus playing a central role in realizing protection, order, and legal certainty in society.¹

An authentic deed has perfect evidentiary power because its formation is required to meet strict formal requirements, namely that it is made before a Notary, read out, and immediately signed by the parties, witnesses, and the Notary as mandated by the Notary Law.² The signature in the minutes of the deed is a formal element that determines authenticity because it functions as the identity of the person appearing, proof of presence, and an expression of agreement with the contents of the agreement.³ Thus, negligence regarding the signature aspect has direct implications for the status and evidentiary power of a deed.

Problems arise when the party facing the dispute has a physical disability that makes it virtually impossible for them to sign, for example due to the loss of a hand or finger. On the one hand, persons with disabilities are still recognized as legal subjects with equal rights to perform legal acts as long as they meet the requirements for a valid agreement as stipulated in Article 1320 of the Civil Code, particularly agreement and capacity.⁴ This right is also affirmed in Law Number 8 of 2016, which guarantees the recognition of the legal capacity of persons with disabilities as legal subjects, and requires fair access to legal processes, including notary services.⁵ However, in practice, there is still a tendency for discrimination when physical limitations are misinterpreted as legal incompetence. In fact, legal capacity is not determined by physical perfection, but rather by the ability to understand the contents of a contract and express one's will freely. Even the concept of incompetence in Article 433 of the Civil Code must be read restrictively

¹Habib Adjie, *Indonesian Notary Law: Thematic Interpretation of Law No. 30 of 2004 concerning the Position of Notary*, Refika Aditama, Bandung, 2011, pp. 15–18.

²Law Number 2 of 2014 concerning the Position of Notary, Article 16 paragraph (1).

³*Ibid.*

⁴RF, "Legal Consequences of Reading and Signing Deeds Not Carried Out Before a Notary," *Lex Privatum*, Vol. X No. 2, 2022, pp. 3–6.

⁵Subekti, *Contract Law*, Intermasa, Jakarta, 2001, pp. 17–22.

and in accordance with the principle of non-discrimination against disabilities as affirmed by the Constitutional Court.⁶

This gap between norms and practices is evident in the example of Supreme Court Decision No. 121 K/Pdt/2016, a brief chronology of which began when an illiterate elderly woman conducted a land sale and purchase transaction which was then outlined in a Deed of Sale and Purchase (AJB) before a Land Deed Official (PPAT). The deed-making process, according to information developed in notarial studies, fulfilled formal procedures: the parties were present, witnesses were presented, the deed was read/explained, and the seller's statement of intent was stated before a deed-making official. However, after the transaction was completed, the seller's heirs challenged the validity of the AJB on the grounds that the seller was legally incompetent due to his illiteracy and advanced age. The case progressed to the cassation level and the Supreme Court rejected the lawsuit, declaring the AJB valid because the terms of the agreement and the procedures for its creation were met. This illustration shows that even though procedural aspects have been met, people with disabilities or parties with certain limitations remain vulnerable to being sued based on the social assumption that physical limitations/literacy are synonymous with incompetence. This situation emphasizes the urgency of strengthening the paradigm that legal capacity must be measured through free will and understanding of substance, not just physical conditions.⁷

To overcome the conflict between the formal obligation of signature and the fact that there are appearing parties who cannot sign, notarial practice recognizes the surrogate mechanism, namely the statement of the appearing party which is recorded by the Notary explicitly at the end of the deed as a substitute for the signature. Surrogate is understood as a substitute that has the same evidentiary status as a signature, as long as it meets the provisions of Article 44 UUN: the reason for the inability to sign must come from the appearing party and be stated *expressis verbis* at the closing of the deed after the reading.⁸ Thus, surrogacy is not just a technical solution, but also part of a reasonable accommodation so that people with disabilities can still access authentic deed services equally.⁹

However, the UUN does not yet provide detailed regulations on surrogacy procedures, such as standard wording of clauses, the types of circumstances that qualify as "inability to sign," or the most appropriate will verification procedures for certain disabilities. This gap has given rise to variations in practice and concerns that the deed could be relegated to a private deed if the surrogate's procedures or

⁶Law Number 8 of 2016 concerning Persons with Disabilities, Article 9 letter b.

⁷Constitutional Court Decision Number 93/PUU-XX/2022.

⁸"Implementation of Surrogates as a Substitute for Signatures in Notarial Deeds," *Notarius*, Vol. 13 No. 1, 2020, pp. 45–48.

⁹PA, *The Validity of Surrogates as Substitutes for Signatures in Notarial Deeds* (Master of Notary Thesis, Hasanuddin University, 2022), pp. 52–57.

wording do not comply with Article 44.¹⁰This ambiguity risks undermining legal certainty and opening up the possibility of disputes, particularly in a society that still harbors biases against the legal capacity of persons with disabilities. Therefore, a study of the status of surrogates is crucial to clarify the normative basis, limits of application, and evidentiary implications, while also strengthening the notary's obligation to provide reasonable accommodations for the sake of substantive justice for persons with disabilities.¹¹

Thus, the issue of using surrogates as a substitute for signatures in notarial deeds cannot be viewed as merely a technical formality, but rather directly relates to guarantees of legal capacity and access to justice for persons with disabilities. The absence of detailed regulations in the UUJN has the potential to create inconsistent practices, vulnerability to disputes, and the risk of degrading the evidentiary power of deeds if Notaries do not apply procedures carefully. At the same time, case examples showing the persistence of the excuse of "incompetence" based on physical conditions confirm that socio-legal bias remains strong and can disadvantage vulnerable groups even if deed procedures have been met. Therefore, this study aims to comprehensively analyze the legal status of surrogates in authentic deeds, the limits of their application, and their evidentiary implications. It also emphasizes the obligation of Notaries to provide reasonable accommodations to ensure the free will and understanding of persons with disabilities. It is hoped that the results of this study will strengthen legal certainty, build inclusive notarial practices, and encourage the realization of substantive justice in accordance with the mandate of the constitution and the disability protection regime in Indonesia.

Based on the description above, it can be concluded that a surrogate is legally used as a substitute for a signature in a notarial deed as long as it meets Article 44 of the UUJN, and is also a form of reasonable accommodation for people with disabilities; however, because it has not been regulated in detail, the notary must be extra careful so that the authenticity of the deed is maintained and does not cause discrimination.

2. Research Methods

The approach used in this research is normative juridical. The research specifications are descriptive and analytical. The data sources used are secondary data obtained from literature studies consisting of primary legal materials, secondary legal materials, and testier legal materials.

3. Results and Discussion

¹⁰AR, "Notary's Principle of Prudence in Making Surrogate Signatures," *Jurnal Hukum (Garuda)*, Vol. 9 No. 1, 2021, pp. 7–10.

¹¹Habib Adjie, *op.cit.*, pp. 80–84

3.1. Legal Protection for People with Disabilities in the Preparation of Authentic Deeds Before a Notary

Legal protection is the main foundation in organizing national and state life in Indonesia. The Constitution affirms Indonesia as a state of law through Article 1 paragraph (3) of the 1945 Constitution, and explicitly guarantees the right of every person to recognition, protection, and fair legal certainty and equal treatment before the law in Article 28D paragraph (1) of the 1945 Constitution. This principle implies that legal protection must not be symbolic or stop at the text of the law, but must be present in a real and functional manner for all citizens without exception. Within the framework of a modern state of law, the fulfillment of the rights of vulnerable groups—including people with disabilities—is an important measure of whether the law works for substantive justice. Thus, every public legal service instrument, especially those concerning citizens' civil rights, must be implemented in a non-discriminatory and accessible manner.¹²

From the perspective of Indonesian civil law, persons with disabilities are still recognized as legal subjects who can perform legal acts as long as they meet the requirements for a valid agreement as stipulated in Article 1320 of the Civil Code. The two subjective requirements in this article, namely agreement and capacity, are not determined by physical perfection, but rather by the existence of free will and the ability to understand the legal act being performed. Therefore, physical, sensory, or literacy limitations cannot be used as an automatic reason to eliminate legal capacity. Contract doctrine places capacity as a category that must be carefully proven, so the law must not simplify physical conditions as incapacity.¹³

The role of a notary is crucial in this context. Law No. 2 of 2014 concerning the Position of Notary (UUJN) states that a notary is a public official authorized to create authentic deeds. An authentic deed has perfect evidentiary power because it is deemed to contain external, formal, and material truth; consequently, the contents of the deed are binding on the parties and are considered true until proven otherwise in court. In notarial doctrine, a notary is positioned as a trust office that is obliged to maintain integrity, prudence, and high professionalism, because a notary's product is not merely an administrative document, but rather the basis for an agreement and the protection of public rights.¹⁴

To ensure preventative protection for persons with disabilities, the UUJN has provided an inclusive procedural mechanism. Article 16 paragraph (1) letter m of the UUJN requires a Notary to read the deed in the presence of the person appearing and witnesses. This obligation is of great significance for persons who

¹²The 1945 Constitution of the Republic of Indonesia, Article 1 paragraph (3) and Article 28D paragraph (1).

¹³Subekti, *Contract Law*, Intermasa, Jakarta, 2001, pp. 17–22.

¹⁴Habib Adjie, *Indonesian Notary Law: Thematic Interpretation of the Notary Law*, Refika Aditama, Bandung, 2011, pp. 15–18.

are blind, illiterate, or those who have certain communication barriers, as it ensures they understand the substance of the agreement before declaring their agreement. In addition, Article 44 of the UUJN requires the deed to be signed immediately after it has been read, but provides an exception if the person appearing is unable to sign; the reason for this inability must be stated clearly at the end of the deed. From this provision has developed the practice of surrogacy, namely, the statement of the person appearing that is recorded by the Notary in lieu of a signature. As long as the statement comes from the person appearing, is stated clearly, and all procedures for reading and closing the deed are followed, the surrogate is understood to have the same force as a signature and does not reduce the authenticity of the deed.¹⁵

Several notarial studies confirm that surrogacy serves as a form of legal accommodation so that people with physical disabilities, such as those without fingers or hands, can still exercise their civil rights. With surrogacy, the law avoids situations where the formal requirement for a signature becomes a source of discrimination. However, the research also emphasizes that notaries must be very careful in formulating surrogate clauses, because procedural omissions (such as the lack of adequate reading or the lack of a clearly stated reason at the end of the deed) can reduce the evidentiary power of the deed to an underhand deed.¹⁶

The recognition and protection of the legal capacity of persons with disabilities has been strengthened since the enactment of Law No. 8 of 2016. This law affirms the right of persons with disabilities to be recognized as legal subjects and to receive fair legal services. This directly implies the obligation of the state and public officials, including notaries, to provide equal access through reasonable accommodations. At this point, the notary's obligation is not only to "enforce the articles of the UUJN" (National Law) but also to ensure that notarial procedures truly enable persons with disabilities to understand, agree to, and express their wishes without discriminatory barriers.¹⁷

Repressively, this protection is reflected in jurisprudence that corrects social biases regarding legal capacity. Supreme Court Decision No. 121 K/Pdt/2016 provides a notable example: an illiterate land seller was still declared competent to conduct a sale and purchase because his will was proven free and the deed procedures were met. The Supreme Court rejected the heirs' argument that equated illiteracy with incompetence, thus emphasizing that legal capacity cannot be revoked by physical limitations/literacy alone. This decision also demonstrates that the law

¹⁵Law Number 2 of 2014 concerning the Position of Notary, Article 16 paragraph (1) letter m and Article 44 paragraph (1)–(2).

¹⁶"Implementation of Surrogates as a Substitute for Signatures in Notarial Deeds," *Notarius*, Vol. 13 No. 1, 2020, pp. 45–48.

¹⁷Law Number 8 of 2016 concerning Persons with Disabilities, Article 9 letter b and Article 13.

must side with substantive equality, not with social assumptions that demean the capacity of vulnerable groups.¹⁸

From a legal protection theory perspective, all of the above mechanisms can be categorized into two forms of protection: preventive and repressive. Preventive protection is evident in the design of the UUJN procedures for reading deeds, the requirement for witnesses, and the provision of surrogates, which prevent disputes from arising from the outset by ensuring the parties' wishes are legally recorded. Repressive protection arises when disputes persist and are then resolved through the courts with a non-discriminatory paradigm, as exemplified by Supreme Court decisions. Hadjon's concept of these two facets of legal protection clarifies that protection for persons with disabilities must operate simultaneously at the normative and practical levels.¹⁹

However, various field studies have revealed gaps in implementation. Notaries still lack a full understanding of the obligation to provide reasonable accommodation, and the stigma that physical limitations equate to incompetence persists. Furthermore, the UUJN does not regulate surrogacy in detailed technical terms (e.g., standard wording or will verification standards), resulting in varied practices that can lead to legal uncertainty. Therefore, strengthening technical guidelines for surrogacy and professional training based on disability rights are necessary to transform normative legal protection into truly substantive protection in all notary services.²⁰

From the perspective of Islamic justice, this need for non-discriminatory protection has strong moral legitimacy. The command to record agreements in Surah Al-Baqarah: 282 contains the aim of safeguarding the rights of the parties and preventing disputes, which in the modern context is realized through authentic deeds. Notaries can be seen as *katib al-'aqd* (legal representatives) who must be trustworthy and fair, while the principle of human equality in Islam rejects discrimination based on physical condition. Thus, legal protection for persons with disabilities in the preparation of deeds is not only a positive legal obligation but also in line with the values of religious and social justice.²¹

3.2. Obstacles and Solutions to Legal Protection for Persons with Disabilities in Making Authentic Deeds Before a Notary

¹⁸Supreme Court Decision Number 121 K/Pdt/2016, legal considerations regarding the capacity of illiterate parties and the validity of AJB.

¹⁹Philipus M. Hadjon, *Legal Protection for the Indonesian People*, Bina Ilmu, Surabaya, 1987, pp. 20–25.

²⁰RF, "Legal Consequences of Reading and Signing Deeds Not Carried Out Before a Notary," *Lex Privatum*, Vol. X No. 2, 2022, pp. 3–6.

²¹AR & Team, "Implementation of Reasonable Accommodation for Persons with Disabilities in the Legal Process," *Journal of Law & Development (FH UI)*, Vol. 52 No. 2, 2022, pp. 201–206.

Although the Notary Law (UUJN) stipulates the obligation for a Notary to read a deed in front of the person appearing and witnesses and to record the reasons if the person appearing cannot sign, this norm is still general in nature and does not provide clear operational guidelines. Article 16 paragraph (1) letter m of the UUJN only emphasizes the “obligation for reading by a Notary” without explaining accessible reading standards for various disabilities, while Article 44 of the UUJN provides space for a surrogate signature but does not specify the form, verification procedures, or standard wording model. As a result, the form of legal protection that should be definite has become partial and highly dependent on the initiative and sensitivity of the individual Notary.²²

The lack of technical guidelines poses a legal risk to the authenticity of the deed. In evidence law, an authentic deed requires strict formal requirements; if the procedures for reading, accompanying, or using a surrogate are not explicitly recorded, the deed is vulnerable to dispute and even degraded to a private deed. Several notarial studies emphasize that a surrogate is only as valid as a signature if the reason for the inability to do so comes from the party appearing, is explicitly stated at the closing of the deed, and the entire verification process is carried out perfectly.²³In other words, the lack of clarity in technical standards is not merely an administrative problem, but has direct implications for legal certainty for people with disabilities as parties to contracts.

The regulatory gap is even more apparent when compared to the justice sector. The judicial process already has guidelines for reasonable accommodations, as outlined in Government Regulation No. 39 of 2020, which mandates a personal assessment of disability needs, the provision of companions, and competent translators during legal proceedings.²⁴However, similar regulations do not yet exist in the notary domain, resulting in a systemic gap: people with disabilities receive structured accommodations when attending court, but do not receive the same standards when producing authentic evidence before a notary.

In practice, technical constraints are also evident in the limited understanding of the obligation to provide reasonable accommodation among some notaries. A key finding from field studies is the tendency to delegate the reading of deeds to staff, even though the UUJN requires the reading to be done directly by the notary. This delegation creates procedural flaws that threaten the authenticity of the deed,

²²Law Number 2 of 2014 concerning the Position of Notary, Article 16 paragraph (1) letter m and Article 44 paragraph (1)–(2).

²³AR, “Notary’s Principle of Prudence in Making Surrogate Signatures in Notarial Deeds,” *Jurnal Hukum (Garuda)*, Vol. 9 No. 1, 2021, pp. 7–10.

²⁴Government Regulation Number 39 of 2020 concerning Appropriate Accommodation for Persons with Disabilities in the Judicial Process.

particularly when the person appearing is blind or illiterate and relies entirely on the notary's reading to understand the contents of the deed.²⁵

Another obstacle arises for deaf persons. Several studies have shown that the UUJN does not explicitly regulate the obligation of sign language interpreters, so not all notaries provide certified interpreters; many rely on family or informal companions. This situation has the potential to create a conflict of interest and makes it difficult for notaries to ensure that the person appearing is truly understood and conveyed accurately.²⁶ Therefore, it is not only the "presence of the interpreter" that is important, but also the legitimacy and competence of the interpreter as part of the guarantee of the free will of the person appearing.

In addition to normative and technical constraints, socio-cultural barriers are also strong. The stigma that views people with disabilities as legally incompetent remains prominent, even influencing the attitudes of families and law enforcement. In notarial practice, this stigma often leads families to dominate the deed-making process, while people with disabilities are relegated to mere formalities. However, what should be central is the informed will of the person appearing, not the wishes of others. When social stigma is strong, notaries face an ethical and procedural dilemma: whether to follow family pressure or explore the authentic wishes of the person with disabilities.²⁷

Institutional barriers also arise from inconsistent views among law enforcement officials. Although the Supreme Court, through Decision No. 121 K/Pdt/2016, has emphasized that illiteracy or certain limitations are not synonymous with incompetence, there are still practices at the grassroots level that cast doubt on the legal capacity of people with disabilities based solely on their physical condition. This inconsistency makes authentic deeds involving people with disabilities vulnerable to challenge or annulment even if notarial procedures have been met.²⁸

Based on these constraints, the first fundamental solution is the establishment of derivative regulations under the UUJN, such as a Regulation of the Minister of Law and Human Rights or a binding Regulation of a Professional Organization that technically regulates reasonable accommodations in the preparation of deeds. These guidelines should at least include accessible reading standards (e.g.,

²⁵"Implementation of Article 16 paragraph (1) letter m of the UUJN concerning the Reading of Deeds," *Garuda Journal/Ministry of Education and Culture (study of reading practices by notaries)*, 2019–2023.

²⁶"Regulation of Sign Language Interpreters in the Preparation of Authentic Deeds by Notaries for Deaf Applicants," *journal article/comparative research*, 2023, pp. 2–6.

²⁷M. Purwaningsih et al., "Legal Protection for Disabled Applicants in the Notarial Deed Making Process," *Asian Journal of Legal Research*, Vol. 3 No. 2, 2023, pp. 112–116.

²⁸Supreme Court Decision Number 121 K/Pdt/2016, legal considerations regarding the capacity of illiterate parties and the validity of deeds.

interactive reading for the blind/illiterate), the requirement to provide a certified sign language interpreter for the deaf, a standard surrogate format for persons with physical disabilities, and the requirement to explicitly record accommodations at the closing of the deed. Without technical standards, legal protection will stop at the declaration level and will not address potential disputes.²⁹

The second solution is strengthening professional capacity. The Indonesian Notaries Association (INI) needs to include modules on inclusive services, accessible communication, and free will verification techniques in its continuing education curriculum. Such training is relevant because disability issues involve more than just formal legal issues, but also communication skills and an understanding of the diverse needs of individuals.

The third solution relates to changing society's legal culture. Public education must emphasize that people with disabilities are full legal subjects with legally recognized capacities; acts of domination or suppression of their will not only violate the 1945 Constitution and Law 8/2016 but also negate human dignity. This shift in perspective is crucial because social stigma is often stronger than legal text.

The fourth solution is judicial. Progressive Supreme Court decisions, such as No. 121 K/Pdt/2016, need to be positioned as reference jurisprudence to serve as uniform guidelines at all levels of the judiciary, so that law enforcement no longer assesses competence solely on physical appearance.³⁰

All of these obstacles and solutions can be more clearly understood through the Pancasila Theory of Justice. The Second Principle demands dignified humane treatment for everyone, while the Fifth Principle affirms social justice as the ultimate goal of national law. From a distributive justice perspective, providing special accommodations to people with disabilities is not a privilege, but rather a correction of inequality to achieve equality. Pancasila justice is contextual: treating different parties equally can actually lead to injustice; what is just is providing differential treatment to the extent necessary to achieve substantive equality.³¹ Thus, reasonable accommodation in the preparation of authentic deeds is not a luxury service, but rather a fundamental right of persons with disabilities and an obligation of the state through Notaries as public officials.

4. Conclusion

Based on the results of the research and discussion, it can be concluded that legal protection for persons with disabilities in the preparation of authentic deeds

²⁹"Fulfillment of Verlijden Requirements in Making Authentic Deeds for Deaf Disabled Applicants," *Ranah Research Journal*, 2024, pp. 4–7.

³⁰*Ibid.*

³¹Kaelan, *Pancasila Education, Paradigma*, Yogyakarta, 2013, pp. 152–160

before a Notary has been normatively established through the obligation to read the deed, the inclusion of reasons for inability to sign, and the recognition of legal capacity in the Disability Law, but its implementation still faces multiple obstacles. Normative obstacles arise because the UUJN does not yet provide technical guidelines for reasonable accommodation, so that standards for accessible reading, the use of certified sign language interpreters, and surrogate formats still depend on the individual policies of Notaries and have the potential to give rise to variations in practices that disrupt legal certainty. On the technical-professional side, there is still a lack of understanding among Notaries regarding the obligation for reasonable accommodation, including the practice of delegating the reading of deeds to staff and using family companions as informal translators who are vulnerable to conflicts of interest, thus threatening the authenticity of the deed and the truth of the will of the person appearing. Socio-cultural barriers are also strong because the societal stigma that equates disability with legal incompetence leads to family domination and obscures the genuine will of persons with disabilities, while institutional constraints are evident in the inconsistency of law enforcement officials in assessing competence, even though Supreme Court jurisprudence has emphasized that physical limitations or illiteracy do not automatically eliminate legal capacity. Therefore, the solution offered must be integrated: the establishment of derivative regulations of the UUJN that regulate standards for reasonable accommodation and surrogates in detail, strengthening the capacity of the Notary profession through inclusive service education and training, changing the legal culture of society through public education on equal legal capacity, and strengthening progressive jurisprudence as a uniform guideline for law enforcement. Using the Pancasila Theory of Justice analysis, all of these steps are understood as a manifestation of substantive justice, proportional different treatment to achieve equal results so that reasonable accommodation is not a privilege, but a fundamental right of persons with disabilities and an obligation of the state to realize inclusive, dignified, and non-discriminatory notarial services.

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