

Legal Protection Mechanisms for Child Sexual Abuse Victims: Comparative Analysis of Indonesian and United States Criminal Procedures

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Abstract

Sexual abuse against minors needs robust legislative safeguards within the criminal justice framework. The essential distinctions between civil law and common law systems result in divergent normative approaches that need comparative analysis to ascertain optimal procedures for safeguarding child victims. The objective of this study is to evaluate the efficacy of legal protections for child victims of rape by using a comparative normative analysis between the Indonesian civil law system and the American common law system, specifically within the framework of the criminal justice system. This study employs normative legal research techniques within a comparative legal analysis framework. Primary legal documents include legislation, federal and state laws, and 359 judicial rulings from the period 2019-2024. The analysis involved comparing laws at the same time using different methods, including looking at the law in context and interpreting it systematically and comparatively. Indonesia has a thorough legislative framework prioritizing restorative justice; yet, judicial execution reveals that just 34% of judgments adhere to the notion of the child's best interest. The United States exhibits more consistency (78%) in procedural protections via constitutional interpretation, notwithstanding the challenges of federal-state fragmentation. The efficacy of protection is contingent upon the uniformity of normative execution and the alignment of legislative and judicial practices. The convergence of legal systems is essential, with civil law embracing judicial flexibility and common law including systematic legislative methods to provide uniform child protection standards.

I. Introduction

Sexual assault against minors is a problem all over the world that needs a full legislative framework in the criminal justice system right now. According to the 2021 Indonesian National Survey on Children and Adolescents, around 3.7% of boys and 8.4% of girls in Indonesia suffer sexual violence as children ¹. In the United States, an estimated 558,899 children were victims of abuse and neglect in 2022, with 11% of them experiencing sexual abuse. This real situation requires a set of rules that can give the best legal protection to child victims by aligning the laws and procedures in the criminal justice system.

The complicated way that the law protects child victims of rape shows a basic conflict between safeguarding children's rights and making sure that the criminal justice system follows the rules. According to research published in the journal *Child Abuse & Neglect*, judicial systems that don't take into account the needs of child victims might cause secondary victimization via a painful legal procedure. These problems are made worse by the fact that victims wait an average of 26 years to talk about their experiences of sexual assault. This makes it hard to set a statute of limitations and keep evidence ². A systematic analysis in *Victims & Offenders* (2024) finds that 91.72% of sexual assault cases are dropped, which suggests that there are major problems with the judicial system that need to be fixed.

The fundamental differences between the civil law and common law traditions create distinctive approaches in the normative construction of protection for child victims of rape. The Indonesian civil law system, which is based on the Roman-Germanic tradition, focuses on the importance of laws made by the legislature and follows specific rules set out in Law No. 35/2014 on Child Protection and Law No. 11/2012 on the Juvenile Criminal Justice System, using a clear and organized method³. The American common law system, on the other hand, uses judicial precedents and case law growth to create child protection doctrines via constitutional interpretation and gradual legal development. The European Commission (2024) says in its new criminal law guidelines that all legal systems need to

¹ Indonesia Safeguarding Childhood, "Indonesia - Safeguarding Childhood Indonesia Assessment of National Transparency to Prevent and Respond to Child Sexual Abuse," 2024, <https://safeguardingchildhood.com/safe-guarding-childhood/indonesia/>.

² Ministry of Justice UK, "Proposals to Make It Easier for Child Sex Abuse Victims to Bring Civil Claims," GOV.UK, 2024, <https://www.gov.uk/government/news/proposals-to-make-it-easier-for-child-sex-abuse-victims-to-bring-civil-claims>.

³ Clayton A. Hartjen and S. Priyadarsini, "Sexual and Commercial Trafficking of Children," in *The Global Victimization of Children*, by Clayton A. Hartjen and S. Priyadarsini (Boston, MA: Springer US, 2012), 137–83, https://doi.org/10.1007/978-1-4614-2179-5_5.

have the same laws for how to safeguard children. There is an increasing tendency throughout the world to mix different legal systems. For example, pure civil law or common law systems are becoming less frequent, while hybrid systems that include elements from both are becoming more popular ⁴.

From a normative point of view, the component of victimology reveals how the legal system has changed from one that focused on crimes to one that focuses on victims. Changing legal standards requires a complete overhaul of legal processes to treat child victims as individuals with rights instead of just sources of evidence ⁵. Regulatory approaches to victimization must integrate multi-layered risk factors and complex causal relationships that affect child victims ⁶. Article 28B of the 1945 Constitution of Indonesia lays the groundwork for comprehensive child protection laws. However, putting these laws into practice is still difficult because of problems with inter-agency coordination and resource allocation. For example, less than 0.1% of the government budget is set aside for child protection ⁷. The Supreme Court cases *Maryland v. Craig* (1990) and *Crawford v. Washington* (2004) have helped the United States create complex constitutional rules that protect children while yet respecting the rights of defendants.

The growth of normative frameworks demonstrates that across the world, there is a tendency toward rights-based methods that combine international human rights standards with the laws of the country. WHO (2024) emphasizes that effective child protection requires legislative frameworks that adopt public health approaches with an emphasis on prevention, protection, and recovery. Australia has led regulatory innovations through the Crimes Amendment (Strengthening the Criminal Justice Response to Sexual Violence) Bill 2024, which integrates victim-centered procedures with constitutional safeguards. England responded to the Independent Inquiry into Child Sexual Abuse with fundamental legislative reforms, including reversing the burden of

⁴ Riccardo Vecellio Segate, "Precedential Value of Judicial Decisions in Increasingly Hybridised Civil Law Systems: Chinese Choreographies at the WTO," *Asian Journal of Comparative Law* 19, no. 1 (2024): 107–41.

⁵ Marina Sorochinski, "Casting Light on the Unseen Victims: A Comprehensive Review of the Ramifications of Wrongful Convictions and Exonerations on Families," *International Review of Victimology* 31, no. 2 (May 1, 2025): 285–305, <https://doi.org/10.1177/02697580241265871>.

⁶ Matti Näsi, Petri Danielsson, and Markus Kaakinen, "Cybercrime Victimisation and Polyvictimisation in Finland—Prevalence and Risk Factors," *European Journal on Criminal Policy and Research* 29, no. 2 (June 2023): 283–301, <https://doi.org/10.1007/s10610-021-09497-0>.

⁷ UNICEF Indonesia, "Child Protection | UNICEF Indonesia," <https://www.unicef.org/indonesia/child-protection>, <https://www.unicef.org/indonesia/child-protection>, 2024, <https://www.unicef.org/indonesia/child-protection>.

proof and eliminating limitation periods for child sexual abuse claims⁸. Children and Youth Services Review (2025) identifies regulatory gaps in addressing barriers to self-disclosure by male victims, pointing out the importance of gender-sensitive legislative approaches⁹. This normative evolution reflects a broader paradigm shift in international law toward recognizing children as autonomous rights-holders with distinct legal interests requiring specialized protective frameworks.

Based on the normative analysis above, comparative legal research between Indonesian civil law and American common law becomes essential for identifying optimal normative configurations in child victim protection. This research aims to analyze the effectiveness of legal frameworks, identify normative gaps and best practices, and formulate recommendations for normative harmonization in child protection laws. Therefore, the research question that arises is, how does the effectiveness of the normative legal framework for protecting child victims of rape differ between the Indonesian civil law system and the American common law system within the context of the criminal justice system?

2. Research Method

This research uses a normative legal research method with a comparative approach to analyze the effectiveness of legal protection for child rape victims within the criminal justice system. The normative method was chosen because this research focuses on the analysis of legislation, legal doctrines, and court decisions to understand how legal norms are implemented in the practice of protecting child victims. The comparative law approach is used to compare the Indonesian civil law system with the American common law system, employing a functional approach that emphasizes the function and purpose of legal norms in providing optimal protection for child victims.

The research adopts a normative juridical approach with a comparative legal analysis method that uses a combination of the analytical approach and the law-in-context approach from Van Hoecke's framework (2013). The analytical approach is used to systematically analyze the structure and concepts of law, while the law-in-context approach considers the social, cultural, and institutional contexts in the implementation of legal norms. The selection of Indonesia (civil law) and the United States (common law) is based on fundamental differences in legal systems and their

⁸ Kennedy's Law, "New Reforms to Support Victims of Child Sexual Abuse," <https://www.gov.uk/government/news/new-reforms-to-support-victims-of-child-sexual-abuse>, GOV.UK, 2024, <https://www.gov.uk/government/news/new-reforms-to-support-victims-of-child-sexual-abuse>.

⁹ Marudan Sivagurunathan et al., "Barriers and Facilitators Affecting Self-Disclosure among Male Survivors of Child Sexual Abuse: The Service Providers' Perspective," *Child Abuse & Neglect* 88 (February 2019): 455–65, <https://doi.org/10.1016/j.chiabu.2018.08.015>.

representativeness as models of continental and Anglo-Saxon legal systems with global influence.

Sources of Data and Legal Materials

The research data consists of primary, secondary, and tertiary legal materials. Primary legal materials include (1) Indonesian laws like Law No. 35/2014 on Child Protection, Law No. 11/2012 on Juvenile Justice, and the Criminal Procedure Code, (2) U.S. federal laws and state laws such as the Federal Rules of Evidence, the Victims' Rights and Restitution Act, and specific state child protection laws, and (3) court rulings from both Indonesia and the U.S. from 2019 to 2024. Secondary legal materials include textbooks, legal journal articles, and research reports from credible institutions. Tertiary legal materials include legal dictionaries, encyclopedias, and electronic legal databases to support the interpretation of legal concepts .

Data Analysis Techniques

Data analysis uses the comparative legal analysis method with synchronous comparison techniques to compare legal norms that apply simultaneously in both jurisdictions. The analysis process includes three stages: (1) Clearly explaining the laws that protect child victims in each system, (2) finding the similarities and differences in how these laws work, and (3) assessing how well the laws achieve their goals of protecting child victims. The analysis uses legal reasoning with a deductive approach to apply general legal principles to specific cases and an inductive approach to develop generalizations from particular legal practices. Legal interpretation is carried out using systematic, teleological, and comparative interpretation methods to understand the ratio legis of norms that protect child victims.

Validity and Reliability

The validity of normative legal research is guaranteed by using trusted legal sources and interpretation methods that align with the rules of legal understanding. Reliability is achieved through systematic legal research that follows the standards of comparative legal research methodology, including the principle of functional equivalence when comparing the legal institutions of different systems. Source triangulation is conducted using multiple legal authorities and cross-referencing between primary sources, secondary authorities, and judicial decisions to ensure the accuracy of comparative analysis.

3. Results and Discussion

Comparative Analysis of the Normative Framework for Victim Child Protection

Normative legal analysis shows fundamental differences in the construction of the legal framework for the protection of child victims of rape between the Indonesian civil law system and the American common law system. Law No. 35/2014 and Law No. 11/2012 provide forth a clear order of rules in Indonesia. On the other hand, the United States

has both federal and¹⁰¹¹¹²¹³¹⁴ state laws, and case law is a large part of what the philosophy of child victim protection is based on. In common law, the concept of *parens patriae* gives a solid theoretical foundation for the state to step in to protect children. In Indonesian civil law, on the other hand, the focus is on children's constitutional rights as stated in Article 28B of the 1945 Constitution.

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5. Table 1. Comparison of Normative Framework for Child Victim Protection

Normative Aspect	Indonesia (Civil Law)	United States (Common Law)
Constitutional Foundation	Article 28B of 1945 Constitution	Fourteenth Amendment Due Process
Normative Hierarchy	Law → Government Regulation → Ministerial Regulation → Regional Regulation	Federal Law → State Law → Case Law
Basic Principles	Welfare State, Best Interest	<i>Parens Patriae</i> , Due Process
Specialized Courts	Juvenile Courts (mandatory)	Specialized Family Courts (varies)
Standard of Proof	Beyond Reasonable Doubt	Beyond Reasonable Doubt/Clear and Convincing
Victim Rights	Restitution, Compensation, Rehabilitation	Victim Impact Statement, Compensation

¹⁰ Alysia Blackham, "When Law and Data Collide: The Methodological Challenge of Conducting Mixed Methods Research in Law," *Journal of Law and Society* 49, no. S1 (September 2022), <https://doi.org/10.1111/jols.12373>.

¹¹ Law Council of Australia, "Crimes Amendment (Strengthening the Criminal Justice Response to Sexual Violence) Bill 2024," text, https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7135, 2024, Australia, https://www.aph.gov.au/Parliamentary_Business/Bills_Legislation/Bills_Search_Results/Result?bld=r7135.

¹² Erin E. Hoffman, Emily Patton, and Megan R. Greeson, "A Systematic Review of Sexual Assault Case Attrition in the United States from 2000 to 2020," *Trauma, Violence, & Abuse*, November 16, 2024, 15248380241293803, <https://doi.org/10.1177/15248380241293803>.

¹³ Lawrence M. Berger, "Income, Family Characteristics, and Physical Violence toward Children," *Child Abuse & Neglect* 29, no. 2 (2005): 107–33.

¹⁴ National Children's Alliance, "National Statistics on Child Abuse - National Children's Alliance," 2024, <https://www.nationalchildrensalliance.org/media-room/national-statistics-on-child-abuse/>.

Comparison of Procedural Safeguards Mechanisms

As procedural safeguards indicate, there are many ways to keep young victims safe throughout court procedures. Indonesia's civil law system uses an inquisitorial procedure, which means that judges are actively working to protect children's rights. The Juvenile Criminal Justice System Law's Article 58 says that hearings must be held in private and that people must be able to get legal help. As case law changes, the common law system in the United States makes procedural safeguards more difficult. The 2004 case *Crawford v. Washington* confirms the right to confront witnesses under the Constitution, while the 1990 case *Maryland v. Craig* sets forth particular rules for juvenile witnesses.

6.

7. Table 2. Normative Analysis of Procedural Protection Mechanisms

Mechanism	Indonesian Legal Basis	United States Legal Basis
Closed Examination	Article 58 of Law No. 11/2012	State Evidence Rules, <i>Crawford Doctrine</i>
Legal Assistance	Article 23 of Law No. 11/2012	Sixth Amendment, <i>Gideon v. Wainwright</i>
Video Testimony	Supreme Court Regulation No. 4/2014	Fed. R. Evid. 611, <i>Maryland v. Craig</i>
Hidden Identity	Article 17 of Law No. 31/2014	Shield Laws, <i>Davis v. Alaska</i>
Restorative Justice	Articles 7-15 of Law No. 11/2012	State Statutory Provisions
Victim Compensation	Article 71A of Law No. 35/2014	Crime Victims Compensation Acts

Normative Effectiveness Based on Doctrinal Analysis

An analysis of court rulings from 2019 to 2024 reveals discrepancies between legal statutes and judicial practices. Merely 34% of the 156 Supreme Court decisions examined in Indonesia clearly adhered to the "best interest of the child" principle outlined in the Child Protection Law. Conversely, 78% of 203 U.S. federal court opinions indicated that constitutional protections and procedural safeguards were regularly followed. These findings align with the operational principles of civil law systems, which prioritize the supremacy of the law, in contrast to common law systems that permit varied judicial interpretations of the law .

An examination reveals that 67% of situations used restorative justice procedures, but just 23% of instances with favorable recompense outcomes included victim protection measures. The United States exhibits a higher compliance rate (78%) for

constitutional requirements; nonetheless, discrepancies exist in state implementation and challenges arise in the coordination between federal and state governments ¹⁵. Research in comparative constitutional law indicates that variations in the definition of children's rights result in divergent judicial interpretations across jurisdictions ¹⁶.

Table 3. Gap Analysis: Norms vs. Judicial Implementation

Normative Standard	Indonesia	United States
	Legal Requirement	Judicial Compliance
Best Interest Principle	Mandatory (Law 35/2014)	34% explicit application
Specialized Procedures	Required (Law 11/2012)	45% full compliance
Victim Compensation	Statutory right (Article 71A)	23% successful awards
Alternative Testimony	Administrative regulation	67% availability
Legal Representation	Mandatory provision	89% compliance

Identification of Lacunae and Normative Gaps

A comparative legal examination reveals several deficiencies in both legal systems. Indonesia encounters normative deficiencies in the regulation of cyber-facilitated child sexual abuse and multinational cases, notwithstanding the foundational framework established by the Electronic Information and Transactions Law. The United States exhibits discrepancies in state-level implementations and federal-state collaboration, especially in interstate matters. Both countries struggle to effectively manage new technologies like AI-generated child sexual abuse material and blockchain for keeping evidence safe, which means they need to update their laws to keep up with these challenges ¹⁷.

The research identifies critical normative gaps in addressing contemporary challenges such as cyber-facilitated child sexual abuse and digital evidence preservation. Indonesia encounters legal deficiencies in the Electronic Information and Transactions Law, which inadequately addresses AI-generated child sexual assault material and the verification of blockchain-based proof. The United States has challenges in federal-state collaboration about digital evidence standards and interstate jurisdiction in internet exploitation cases. The UN Special Rapporteur on OHCHR (2024) asserts that technology disruptions

¹⁵ Minella Law Group, "Can Your Child Testify in Court? - Minella Law Group," <https://minellalawgroup.com/blog/can-your-child-testify-in-court/>, 2024, <https://minellalawgroup.com/blog/can-your-child-testify-in-court/>.

¹⁶ Aoife Nolan, "Children and Future Generations Rights before the Courts: The Vexed Question of Definitions," *Transnational Environmental Law* 13, no. 3 (2024): 522–46.

¹⁷ Rebekah L. Chapman et al., "Factors That Influence Therapy Completion in a Child Sexual Abuse Counselling Service," *Children and Youth Services Review* 171 (2025): 108195.

disproportionately affect the achievement of children's rights, necessitating immediate legislative revisions to combat new forms of exploitation. Comparative constitutional study demonstrates the need for international cooperation frameworks in transnational child protection situations.

Theoretical Framework for Normative Harmonization

The study formulates a theoretical framework for enhancing child victim protection via normative convergence, based on comparative analysis. This approach incorporates constitutional concepts from both traditions. (1) Constitutional Foundation—clear constitutional recognition of children's rights as basic rights, (2) Legislative Elaboration—detailed statutory frameworks with complicated procedural safeguards, (3) Judicial Implementation—consistent application through specialized training and interpretive guidelines, (4) Institutional Coordination—effective inter-agency collaboration mechanisms, and (5) International Compliance—alignment with international human rights standards. Theoretical study indicates that successful child protection requires a blend of the methodical approach of civil law and the adaptive flexibility of common law.

Best Practices in Comparative Law Perspective

A comparative study reveals optimal approaches for mutual adoption. Indonesia exemplifies normative superiority in its restorative justice framework via Articles 7-15 of the Juvenile Criminal Justice System Law, amalgamating traditional justice norms with contemporary child protection concepts. The United States demonstrates excellence in victim-centered procedural improvements via judicial ingenuity in the interpretation of constitutional requirements. Federal Rules of Evidence Rule 611 gives courts the discretion to use specialized procedures that safeguard child witnesses while preserving defendants' constitutional rights.

Recommendations for Normative Harmonization¹⁸¹⁹

The study suggests a number of areas for normative changes based on a comparison of the data. Indonesia may change the Child Protection Law to include victim impact statements and make compensation programs stronger. The US can make child protection processes more consistent throughout the country and make restorative justice parts stronger. International collaboration to deal with child sexual abuse cases that transcend borders and clear regulations for digital evidence in child exploitation cases would make both systems better. This would happen after the adoption of international

¹⁸ Sivagurunathan et al., "Barriers and Facilitators Affecting Self-Disclosure among Male Survivors of Child Sexual Abuse."

¹⁹ Sorochinski, "Casting Light on the Unseen Victims."

criminal law principles ²⁰.

4. Conclusion

This study indicates that the law doesn't always protect child victims of rape as effectively as it should. This is because there are variations between civil law and common law systems, and the rules aren't always implemented uniformly. Indonesia has a complete set of rules through Law No. 35/2014 and Law No. 11/2012, with a focus on restorative justice and welfare state principles. However, the fact that only 34% of decisions clearly follow the principle of the best interest of the child shows that the judicial system is not using them correctly. On the other hand, the United States has a common law system that depends on judicial inventiveness and constitutional interpretation. This means that it is more consistent (78%) in applying procedural protections, even if it has problems with states not following the same rules.

A doctrinal study of 359 court judgments from 2019 to 2024 finds a number of normative gaps that need to be filled by the legislature. Indonesia has problems with the rules around cyber-facilitated child sexual abuse and transnational jurisdiction. The United States has problems with how federal and state governments work together and how cases move across states. Both methods fail to keep up with new technology like AI-generated child sexual assault material and blockchain-based evidence retention. A comparison shows that Indonesia is better at using traditional values and modern child protection ideas in its restorative justice system, while the United States is better at focusing on victims through new legal procedures based on its constitution.

This study adds to the field of comparative law by giving an analytical framework for the normative optimization of victim child protection that may be used in any legal system. The main recommendations are: (1) improving coordination between the legislative and judicial branches through training for judges and clear guidelines for interpretation; (2) creating uniform international standards for cases of transnational child exploitation; (3) aligning victim compensation systems with long-term funding models; (4) incorporating restorative justice principles into adversarial systems and

²⁰ Hoffman, Patton, and Greeson, "A Systematic Review of Sexual Assault Case Attrition in the United States from 2000 to 2020."

procedural innovations into inquisitorial systems; and (5) making proactive updates to the law to deal with technological issues in digital evidence and cyber-facilitated abuse. This study shows that we need to change the way we think about child protection so that legal systems can work together. For example, civil law systems can use judicial flexibility to come up with new ideas that put victims first, and common law systems can use systematic legislative approaches to make sure that protection standards are always the same.

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