

Harmonization of the Implementation of Restorative Justice in Indonesia in a Gender Perspective: A Normative Empirical Assessment of Legal Consistency and Effectiveness

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Abstract

This study analyzes the harmonization of the implementation of restorative justice in Indonesia through a comparative normative empirical approach involving five countries, namely New Zealand, Australia, Canada, South Africa, and Indonesia. The type of research used is normative-empirical legal research with legislative, conceptual, comparative law, and sociological legal approaches. Normative analysis of restorative justice regulations is combined with empirical data to assess legal consistency, institutional capacity, and integration of socio-cultural values in practice. Data collection was carried out through document studies of laws and regulations, institutional policies, and scientific literature, as well as in-depth interviews with law enforcement officials, restorative justice facilitators, and community leaders. The validity of the data is maintained through triangulation of sources and methods. Data analysis was carried out qualitatively using content analysis, comparative analysis between countries, and the Miles and Huberman interactive analysis model which includes data reduction, data presentation, and conclusion drawn. The results show that New Zealand has the highest level of effectiveness through a comprehensively integrated legislative framework, while Indonesia still faces sectoral regulatory fragmentation with limited implementation beyond children's cases. Comparisons show Indonesia scores lowest in system integration and institutional support, despite having strong potential in community-based mediation practices and customary values. The main challenges include weak legal harmonization and limitations in monitoring and evaluation systems. This study contributes to the development of a contextual and sustainable model of restorative justice implementation in a pluralistic legal system.

Keywords: Restorative Justice, Legal Harmonization, criminal justice reform, Indonesia, Comparative Law, normative empirical approaches.

INTRODUCTION

Restorative justice (RJ) has emerged as one of the most influential paradigms in contemporary criminal law reform, reshaping the relationship between law, society, and

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morality. Globally, RJ represents a paradigm shift from a retributive punishment system to an approach that prioritizes reconciliation, community participation, and victim recovery (Maffly-Kipp et al., 2021). This shift reflects a growing recognition that punitive measures often fail to achieve social harmony or long-term rehabilitation. In the common law and civil law traditions, RJ is increasingly prominent as states seek a more inclusive and effective justice system that balances prevention with compassion (Anggraeni & Amrullah, 2023; Bawono & Glaser, 2024). The transition to RJ underscores a moral and sociological rearrangement in legal thought, emphasizing human dignity, social beliefs, and collective healing as fundamental elements of justice.

In Indonesia, restorative justice resonates strongly with the constitutional and philosophical foundations rooted in Pancasila and the 1945 Constitution. The nation's legal ideals, especially aspirations for social justice and human rights, are inherently aligned with the values of balance, harmony, and mutual respect for RJ (Ismawansa et al., 2025; Philona & Listyaningrum, 2025). The principle of "Social Justice for All Indonesian People" in the fifth principle of Pancasila embodies the moral mandate for the justice system to heal rather than just punish. This ethical alignment positions RJ not as an imported legal innovation, but as an organic expression of Indonesian values. In addition, these constitutional ideals intersect with local wisdom, such as customary law traditions that emphasize reconciliation (deliberation) and social cohesion. As a result, the integration of RJ in Indonesia's legal structure is not just a procedural reform but a reaffirmation of national identity and cultural continuity (Abbas, 2024; Sukardi & Purnama, 2022).

In addition to the philosophical and institutional dimensions, restorative justice is also increasingly understood as a relevant framework for responding to structural inequalities in social relations, including in the context of employment, exploitation, social resilience, and equal access to justice. In conventional criminal justice practice, certain groups often experience disproportionate legal impacts due to unequal power relations, vulnerable economic conditions, or marginalized social positions. Restorative justice offers a more context-sensitive approach by opening up spaces for dialogue, acknowledging victims' experiences, and restoring just and dignified social relations. This approach allows the legal process not only to focus on violations of formal norms, but also on the social conditions behind the occurrence of conflicts, including exploitation in labor relations, violence based

on economic dependence, and weak social resilience of the community Aziz, M. F., Mubarak, M. Y., et-al 2025).

In the Indonesian context, this dimension is becoming increasingly important given the social structure that is still characterized by inequality of access to resources, decent work, and equal legal protection. Restorative justice practices that are responsive to such realities have the potential to strengthen the protection of vulnerable groups through mechanisms that emphasize restoration, empowerment, and substantive justice, rather than simply formal settlement of cases. Thus, the integration of restorative justice in the Indonesian legal system is not only relevant as an instrument of criminal law reform, but also as a normative strategy to strengthen equality, social resilience, and sustainable social justice. This perspective confirms that the effectiveness of restorative justice cannot be separated from its ability to respond to the dynamics of structural injustice that live in society.

Despite this philosophical consonance, the practical implementation of RJ Indonesia remains fragmented and inconsistent. Regulatory instruments ranging from Police Regulation No. 8 of 2021 to Prosecutor's Regulation (PERJA) No. 15 of 2020 and Supreme Court Regulation No. 1 of 2024 show a sectoral rather than systemic approach. These rules operate independently across institutions, resulting in differences in scope, feasibility, and execution. Although RJ has been effectively institutionalized in countries such as New Zealand and Australia through comprehensive legislation, Indonesia's framework still relies on discretionary interpretation rather than mandatory procedural law (Armstrong, 2021; Hamzani et al., 2025). Fragmentation undermines the consistency of RJ, especially in protecting victims and ensuring equal access to justice. Comparative evidence suggests that systems with codified national frameworks achieve higher levels of victim satisfaction and recidivism reduction, highlighting Indonesia's urgent need for a harmonious legal regime.

Thus, the research problem centers on the absence of an integrated legal basis for RJ in the Indonesian criminal justice system. The absence of codification of the law creates legal uncertainty and limits the potential for standardization across judicial institutions, prosecutors, and law enforcement. In addition, the limited scope of the eligible cases of most minor offenses limits RJ's transformative potential. Normatively, this separation reveals a gap between Indonesia's constitutional ideals and the operational reality of its judiciary. Empirically, differences emerge in institutional performance: police institutions show higher rates of RJ applications than prosecutors and courts, indicating institutional asymmetry

(Andini et al., 2023; Firdaus et al., 2023). Without a coordinated legal mechanism and institutional training, the RJ risks remaining a symbolic rather than substantive reform.

To address these structural deficiencies, comparative experience offers valuable insights. New Zealand's Youth Offenders Act, for example, mandates restorative conferences, ensuring procedural legitimacy and victim participation (Hamzani et al., 2025). Similarly, Australia's integrated Restorative Justice program focuses on community accountability, employing multidisciplinary facilitators to improve outcomes (Hobson et al., 2022; Koza et al., 2024). In Canada, the federal government's commitment to RJ has resulted in measurable results, including reduced re-crime and increased community satisfaction (Banwell-Moore, 2024). In contrast, South Africa's post-apartheid RJ system demonstrates the importance of contextual adaptation, in which cultural norms and rituals of reconciliation play an important role in restoring social balance (Murhula & Tolla, 2021). These comparative cases underscore the importance of institutional commitment, legal coherence, and elements of cultural resonance that are currently lacking in the framework of Indonesian RJ (Shem-Tov et al., 2024).

The existing literature provides a partial but significant solution to the inconsistency of RJ Indonesia. Scholars advocate the adoption of a codified national law that mandates the consideration of RJ in all criminal justice institutions and clearly defines eligibility criteria (Bawono & Glaser, 2024; Nashriana et al., 2023). Such codification will institute uniform procedures, protect the rights of victims, and minimize arbitrary decision-making. Furthermore, empirical research underscores the need for national accreditation and structured training for RJ facilitators to ensure professional competence and ethical neutrality (Kusworo et al., 2023). Establishing standard evaluation metrics that include restitution compliance, victim satisfaction, and recidivism will further increase transparency and accountability in implementation (Rochaeti, Prasetyo, Rozah, et al., 2023; Springs, 2022). By aligning legal mandates with institutional capacity, Indonesia can transform RJ from an aspirational concept to an operational reality.

Nevertheless, some studies highlight the ongoing challenges faced by RJ integration. Cultural resistance remains significant, especially among legal practitioners accustomed to the tradition of hostile justice. Public understanding of RJ also remains low, which hinders the legitimacy of the results (Mustika et al., 2023; Triasari et al., 2023). In this context, normative empirical analysis is important in bridging the gap between theoretical ideals and

practical reality (Molloy et al., 2023; Rochaeti, Prasetyo, Rozah, et al., 2023). The normative dimension ensures coherence with constitutional principles, while the empirical dimension evaluates institutional behavior and public perception. Together, they enable an evidence-based approach to legal harmonization, an essential prerequisite for sustainable RJ reform.

A number of previous studies on restorative justice (RJ) in Indonesia show significant implementation developments, but they are still dominated by sectoral and partial studies. Sujono (2024) researches the application of RJ in the authority of the Prosecutor's Office based on the Prosecutor's Regulation Number 15 of 2020 using a normative legal research method. This study found that RJ is effective as an instrument to reduce the burden of cases, but it has not been supported by facilitator accreditation standards and measurable performance evaluation mechanisms. The limitation of this study lies in the absence of empirical data related to victim satisfaction and the sustainability of post-settlement recovery. At the police level, Widiatmika (2023) and Asriadi (2024) used a normative-empirical approach to analyze the implementation of RJ based on Police Regulation Number 8 of 2021. Their findings suggest that the effectiveness of RJ is highly dependent on investigator discretion and local police organizational culture, resulting in high variation in practice between regions. However, the two studies have not developed quantitative indicators to measure the impact of RJ on the reduction of recidivism and the quality of the mediation process.

In the context of juvenile justice, research by Aripin et al. places RJ as part of the diversion mechanism in the SPPA Law with a case study method. This study confirms that diversion is able to prevent child stigmatization, but does not systematically examine victim satisfaction and institutional accountability. Meanwhile, a community-based study by Sukardi and Purnama (2022) highlights the power of customary mediation and deliberation as a restorative practice, but also notes weak integration with formal legal systems and the risk of inconsistency in rights protection. Internationally, comparative studies by Zehr (2015), Braithwaite (2016), and Sherman & Strang (2007) show that RJ effectiveness is measured through indicators of recidivism, victim satisfaction, and institutional legitimacy. However, the indicator approach has not been widely adopted in RJ research in Indonesia. The absence of an integrative study that connects normative design, institutional capacity, and effectiveness indicators is what emphasizes the urgency of this research.

Therefore, this study aims to harmonize the implementation of restorative justice in Indonesia by developing a normative-empirical assessment framework that evaluates legal consistency, institutional effectiveness, and cultural integration from 2010 to 2025. It hypothesizes that a codified national RJ law combined with mandatory accreditation, standardized training, and integrated monitoring will significantly improve implementation coherence, victim protection, and compliance. The study contributes to the field by bridging constitutional ideals with empirical reality, offering a comprehensive model that can be adapted to diverse legal and cultural contexts. Its novelty lies in synthesizing comparative legal analysis, policy mapping, and institutional evaluation to formulate a harmonious framework for restorative justice in Indonesia's evolving criminal justice landscape.

This study uses a qualitative normative empirical research design that integrates legal analysis of doctrine with empirical field validation. The methodological approach aims to bridge the normative foundations of restorative justice theory with the realities of institutional- and societal implementation. The normative component focuses on the interpretation of primary legal sources such as the 1945 Constitution, the Criminal Code, the Criminal Procedure Code (KUHAP), and the Juvenile Criminal Justice System Law (Juvenile Criminal Justice System Law) to evaluate the coherence of restorative justice (RJ) provisions within the framework of Indonesian law. In parallel, the empirical component captures the practical experiences of practitioners and community actors involved in the RJ process. This integration is in line with the approach described by (Abbas, 2024; Andriyani et al., 2024) who argue that normative empirical legal research allows for a holistic understanding of how legal norms operate in socio-institutional contexts.

The research design emphasizes triangulation between three dimensions: legal texts (laws, decisions, and judicial regulations), institutional practices (police, prosecutors, and courts), and societal perspectives (facilitators, victims, and perpetrators). This triangulation ensures that doctrinal interpretations are supported by evidence based on field practice. Through this structure, this research not only illustrates inconsistencies but aims to synthesize a harmonious restorative justice model that aligns constitutional ideals with operational reality. The qualitative framework further allows inductive reasoning, drawing insights from participants' lived experiences to identify patterns of normative practical divergence and institutional gaps.

The research was conducted in three consecutive phases, each designed to build progressively on the previous stage. Phase 1 involves a doctrinal study that focuses on the collection and analysis of primary and secondary legal material. These materials include constitutional provisions (1945 Constitution), national Criminal Procedure Code (KUHP, KUHPA), and institutional regulations such as the Supreme Court Regulation on restorative justice (2022–2024). The aim is to examine how the statutory instrument reflects or deviates from the principles of the RJ.

Phase 2 consisted of empirical field verification through semi-structured interviews with 12 key informants: four police officers, three prosecutors, three judges, and two community facilitators. The purposive sampling method ensures that only respondents directly involved in the RJ case are selected, thus maximizing the relevance of the data.

Phase 3 entails coding the analytical synthesis and comparing the normative framework to field data to build a harmonized model. The analytical phase integrates deductive reasoning, based on legal doctrine, and inductive reasoning, which derives from empirical observation. The result is a conceptual framework for aligning Indonesian RJ policies and practices with constitutional mandates and international best practices.

Data were collected using three main techniques: document analysis, semi-structured interviews, and field observation. The document study examines legal instruments, institutional policies, and standard operating procedures (SOPs) across the institutions responsible for the implementation of the RJ. Interviews were conducted during sessions of 60-90 minutes each, allowing for an in-depth exploration of respondents' perceptions of implementation challenges, coordination mechanisms, and policy implications. Following the methodological standards noted by (Avieli et al., 2025; Hamzani et al., 2025), interviews prioritize open-ended questions to capture nuanced and context-sensitive insights.

Observations of six diversion sessions and three mediation meetings provide direct evidence of procedural variation and behavioral dynamics among participants. The research team documented detailed field records that included interaction patterns, facilitator behavior, and outcome negotiations. Data saturation was achieved after ten interviews and three observations, as no new thematic categories emerged beyond this point. The convergence of several of these data sources ensures the reliability and authenticity of the findings (Gude & Papic, 2018; Jones et al., 2023).

The data were analyzed using the interactive model of Miles and Huberman (1994), which included three interrelated processes: data reduction, data display, and conclusion drawn. During the reduction phase, the data is organized into thematic categories such as legal foundations, implementation barriers, coordination mechanisms, and outcome measures. Each category is manually coded using a structured matrix to maintain traceability and conceptual clarity. The next phase of the display involves visually mapping the relationship between legal provisions and observed practices, allowing the identification of structural inconsistencies.

Drawing conclusions requires repeated comparisons between doctrinal interpretation and empirical evidence. This process reveals areas where legal principles have failed to translate into effective practice, providing an analytical basis for developing a harmonized framework. To ensure validity, this study used cross-source triangulation (legal documents, interviews, and observations) and conducted peer briefings with two external reviewers experienced in restorative justice policy analysis. Their feedback is incorporated to reinforce analytical rigor and interpretive accuracy.

Through this methodological approach, this study anticipates the identification of overlapping regulations and institutional gaps that hinder the integration of RJ in the Indonesian criminal justice system. The analysis is expected to result in the formulation of harmonious standard operating procedures (SOPs) and facilitator accreditation criteria. Furthermore, this study aims to propose a national integration model that aligns RJ with constitutional principles, focusing on measurable indicators such as victim satisfaction, restitution compliance, and reduction of recidivism. The final outcome seeks to bridge normative ideals and empirical realities through actionable policy frameworks that can be tailored across jurisdictions.

The research was conducted by a multidisciplinary team. The Principal Investigator leads the doctrinal and comparative legal analysis, ensuring theoretical consistency with Indonesia's constitutional framework. Research associates are responsible for field data collection, transcription, and thematic coding, while field assistants coordinate logistics and respondent access. A statistician supports the descriptive presentation of non-parametric data (percentages and frequencies), allowing for a measurable visualization of qualitative patterns. This division of labor improves methodological coherence and operational efficiency.

RJ, revealing that countries with stronger legal integration tend to show greater consistency and legitimacy in its implementation.

Table 1. Analysis of the legal basis between countries

Country	Main Legal Basis	Regulation Level	Mandatory Scope	Considerations
Indonesia	Law Number 11 of 2012 (Juvenile Criminal Justice System)	Sectoral	Children & Limited	No
New Zealand	Children, Adolescents and Their Families Act 1989	National	Children & Adults	Yes (Child)
Australia	Juvenile Offenders Act (various states)	Federal/State	Children & Adults	Varies
Canada	Youth Criminal Justice Act 2003	Federal/State	Children & Adults	Yes (Child)
South Africa	Juvenile Justice Act 2008	National	Children & Adults	Yes (Child)

Source: Processed by researcher

According to **Figure 2**, the strength of the legal framework can be ranked as follows: New Zealand (4.0/4.0), Australia (3.7/4.0), Canada (3.7/4.0), South Africa (3.3/4.0), and Indonesia (1.7/4.0). This ranking illustrates that New Zealand has the most comprehensive RJ legislation, characterized by full statutory integration and a clear mandate for restorative conferences in juvenile cases. The country's legal system ensures that restorative principles are embedded in every stage of the criminal process, providing consistency from the investigation phase to sentencing and rehabilitation. Australia and Canada followed with fairly high scores, attributed to their flexible federal frameworks that allowed for national coordination and regional adaptation. South Africa, despite having unified legislation, still faces implementation gaps arising from resource limitations and uneven training across provinces.

In contrast, Indonesia's legal landscape is still fragmented and operates primarily through sectoral regulations in the absence of an integrated national law or mandatory position in the criminal justice process. A number of studies show that restorative justice arrangements are scattered across various institutional regulations, such as Police Regulations, Prosecutor's Regulations, and judicial guidelines, without a codification framework that unifies principles, procedures, and performance indicators (Sujono, 2024; Hutabalian, 2025). This condition results in an intermittent policy environment, where the

police, prosecutors, and courts often apply different interpretations of restorative justice, resulting in inefficiencies and inconsistencies in the handling of cases (Widiatmika, 2023; Asriadi, 2024). The fragmentation of authority between the National Police, the Attorney General's Office, and the Supreme Court has been identified as a factor that limits cross-agency coordination and hinders the scalability of restorative justice programs nationally (Sukardi & Purnama, 2022; Abbas, 2024). As a result, restorative justice practices in Indonesia tend to be local and sporadic, relying on the discretion of the apparatus and internal policies of the institution, rather than being systemically and sustainably integrated. Furthermore, the absence of a binding legal basis weakens institutional accountability and makes it difficult to develop facilitator standards, monitoring mechanisms, and measurable evaluation of the effectiveness of restorative justice at the national level (Zehr, 2015; Braithwaite, 2016).

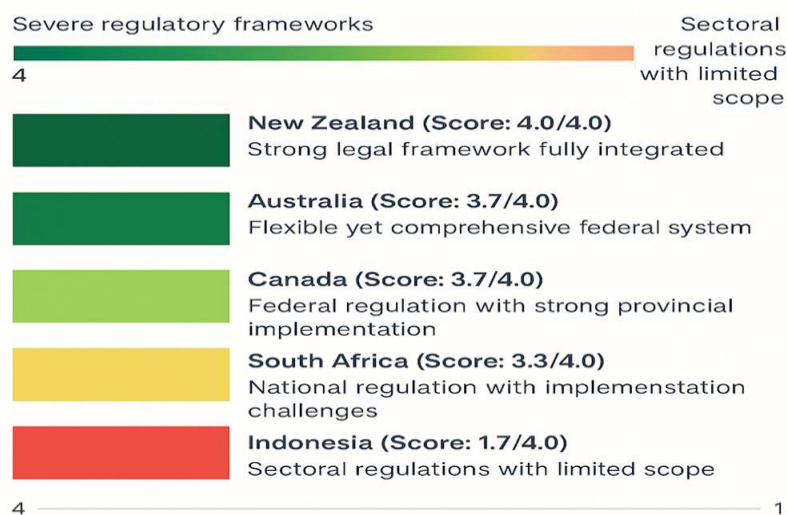


Figure 2. The Comparative Power of the Legal Framework of Restorative Justice

As emphasized by (Hamzani et al., 2025; Rochaeti, Prasetyo, Rozah, et al., 2023), Indonesia's Restorative Justice system remains anchored in a narrow legal corridor that focuses on juvenile cases based on Law No. 11/2012. It limits its application to a broader criminal context and fails to institutionalize RJ as a systemic alternative to sentencing justice. Comparatively, New Zealand's integrated approach derived from the Children, Adolescents and Their Families Act 1989 instills restorative principles across age categories, ensuring alignment between law, culture and practice (Hamzani et al., 2025). The contrast between these systems highlights that the sustainable implementation of RJ requires not only legislative coverage but also institutional synergy, public legitimacy, and cross-sectoral

coordination. The legal gap in five countries underscores the urgent need for Indonesia to establish a comprehensive RJ law that ensures procedural uniformity, strengthens the protection of victims' rights, and bridges the gap between normative ideals and empirical reality.

Descriptive Results and Restorative Justice Statistics

Comparison of Restorative Justice Implementation Models Between States

Cross-national comparisons identified different RJ implementation models, as depicted in **Figure 3** (heatmap) and **Figure 4** (lump diagram). This visualization depicts in more detail the diversity of RJ adoption rates across different models such as Family Group Conferences (FGCs), Victim-Offender Mediation (VOM), Circle Punishment, Community Conferences, and Police Diversion, showing how each country prioritizes certain practices based on its legal structure and cultural traditions. The heat map clearly shows how restorative frameworks are not evenly distributed, revealing, for example, that New Zealand and Australia are integrating several RJ mechanisms simultaneously, while Indonesia remains heavily concentrated on police-led initiatives. The bump chart further clarifies the shift in rankings in the implementation level, emphasizing comparative developments and specialization within each national system.



Figure 3. Heatmap adoption of restorative justice models across the country

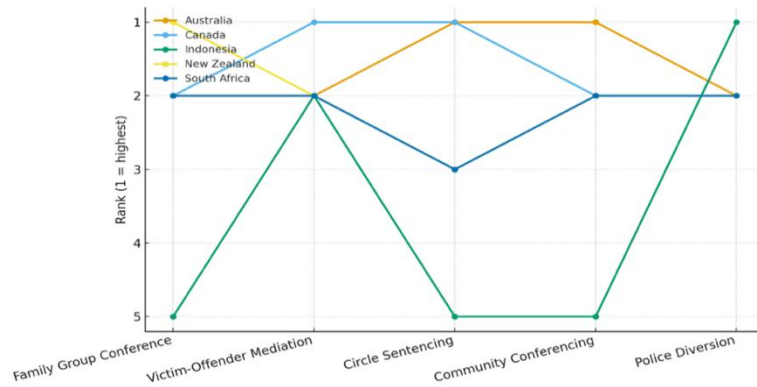


Figure 4. Lump Chart: Ranking of countries by model.

Figure 5 shows a bipartite network connecting the state (blue node) to the RJ model (green node). The thickness of the network shows the depth of adoption: Indonesia shows a strong tie only to Police Diversion, while New Zealand and Australia display extensive connections, representing multi-dimensional implementations that reflect institutional maturity and community participation. This visualization helps to conceptualize restorative justice not as a uniform concept but as a dynamic ecosystem of interrelated social programs, instruments, and practices. It underscores how cultural adaptability, institutional support, and historical experience collectively shape the depth and breadth of RJ adoption across the country.

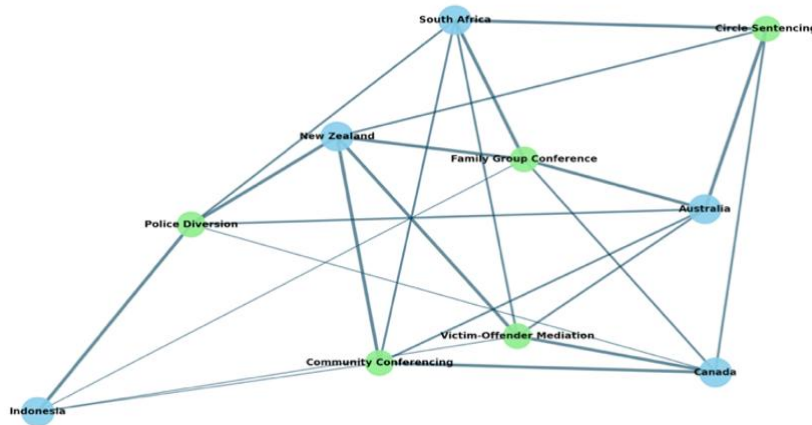


Figure 5. State Bipartite Networks and Restorative Justice Models.

Table 2. Comparative Model of Restorative Justice Between States

Country	Main models	Primary administrator	Case scope	Important notes
New Zealand	Family group conference,	Juvenile justice system, community services	Cases of children and adolescents,	Sources of inspiration and models of

	restorative conference		sometimes adults	institutionalized practice
Australia	Restorative conferences, circle punishment, VOM	Correctional institutions, communities, local courts	Juvenile and specific cases	Integrated implementation across multiple jurisdictions and robust evaluative research
Canada	Victim-perpetrator mediation, restorative community	Provincial/customary community institutions	Varies; strong in the case of communities and customs.	Diverse practices, integration of customs in several regions
South Africa	Formal and informal restorative programs, mediation	Courts, correctional institutions, community organizations	Cases of violence, criminal communities	Formal legislation and programs are available; Caution in serious cases
Indonesia	Police-led conferences, diversion (children), traditional mediation	Police, Prosecutor's Office, Courts, Customary Law	Small cases, adolescents; widespread local practice	Sectoral regulation but inconsistent implementation; Strong local customs base

Source: Processed by researcher

These findings confirm the previous literature that successful RJ systems depend on strong institutional support, cross-sectoral integration, and community participation (Mustika et al., 2023). Strong institutional collaboration, when supported by legislative commitment and adequate resources, allows RJ to function as a sustainable alternative to conventional sentencing models. In countries such as New Zealand and Australia, legislative frameworks mandate the use of RJ, ensuring predictability and inclusivity in the delivery of justice while fostering a culture of accountability and empathy between victims and perpetrators Musfiroh, M. R., & Mubarak, A. F. (2024). Consistency of implementation across agencies and regions demonstrates how a cohesive legal mandate can build long-term public trust and measurable improvement in justice outcomes.

In contrast, Indonesia's reliance on discretionary implementation results in uneven results and limited scalability. The lack of uniform policy direction leads to differences in

interpretation between law enforcement, prosecutions, and judicial institutions, creating a gap between policy intent and field execution. In many cases, the restorative process remains limited to small-scale pilot projects without systematic evaluation, limiting its potential to influence national reforms. The absence of state-supported monitoring mechanisms also reduces opportunities to learn from best practices. Therefore, while comparative evidence suggests that legal harmonization and structured implementation can substantially improve RJ outcomes, Indonesia's current framework highlights the urgency of developing coherent national legislation, standardized facilitator training, and integrated evaluation systems to achieve equitable and sustainable restorative justice in all jurisdictions.

Comparative Effectiveness of Restorative Justice

Figure 6 and Figure 7 illustrate the comparative effectiveness of RJ in four dimensions: System Integration, Victim Effectiveness, Offender Effectiveness, and Institutional Support. The results showed that New Zealand led in all dimensions (average score of 4.75/5), followed by Australia (4.0/5), Canada (4.0/5), South Africa (3.0/5), and Indonesia (2.5/5). These comparative findings not only reveal statistical differences but also reveal structural, procedural, and cultural determinants that influence the success of each jurisdiction. The high performance of New Zealand and Australia shows that sustained government commitment, systematic coordination, and a strong monitoring culture are directly correlated with program effectiveness. In contrast, Indonesia's lower score highlights the absence of institutional synergy, standardized evaluation tools, and cross-agency accountability frameworks that are essential for stable RJ operations.

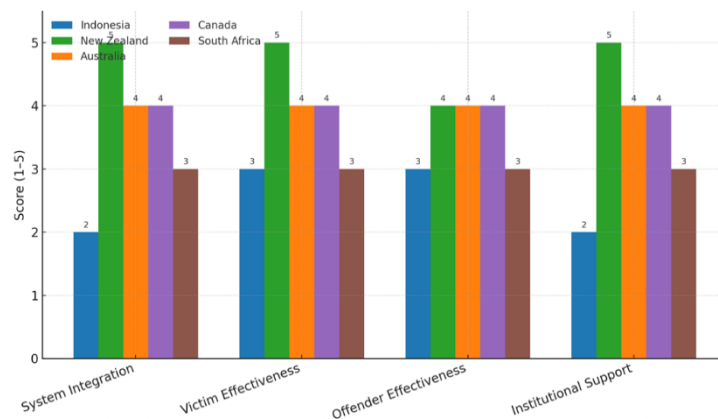


Figure 6. Comparative effectiveness scores by country

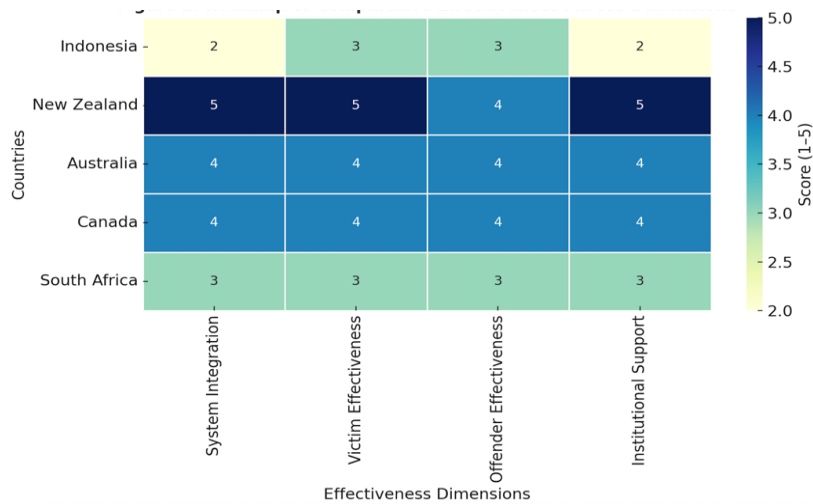


Figure 7. Heat maps of comparative effectiveness across dimensions

As noted by (Murhula & Tolla, 2020; Shem-Tov et al., 2024), indicators such as victim satisfaction and recidivism reduction are the most obvious measures of RJ success. Expanding on this, it becomes clear that countries with well-established feedback mechanisms between victims, perpetrators, and state institutions show higher levels of social trust and reintegration outcomes. New Zealand's comprehensive monitoring and evaluation system has resulted in sustained reductions in re-crime and higher victim confidence by linking performance evaluations with policy reform. This culture of continuous assessment allows authorities to identify weaknesses early, refine practices, and maintain transparency. Australia and Canada show similar trends, where collaborations with academic institutions and NGOs facilitate data-driven innovation.

However, Indonesia performs the weakest in the areas of System Integration and Institutional Support which are directly related to its fragmented legal architecture and limited inter-agency coordination. The country's score is also constrained by a lack of consistent data collection, limited facilitator certification, and low stakeholder awareness of the benefits of RJ. Addressing these shortcomings requires a robust governance framework capable of bringing together fragmented practices, setting clear performance indicators, and improving public understanding.

Figure 8 illustrates the average effectiveness in five countries. New Zealand's performance reflects a mature system that balances legal structure and cultural adaptability, while Indonesia's low average score demonstrates the need for systemic reforms. To improve outcomes, Indonesia should pursue inter-agency harmonization, allocate resources for

practitioner training, and adopt comprehensive evaluation tools that combine quantitative indicators and qualitative feedback from the community.

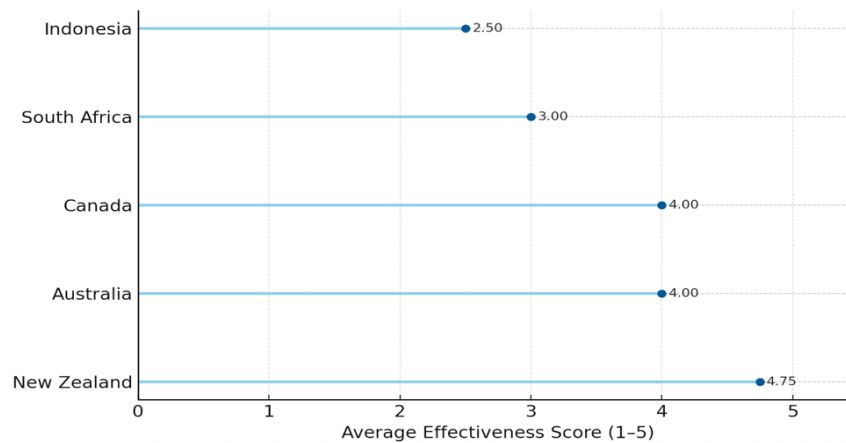


Figure 8. Average comparative effectiveness by country

These findings corroborate the statement by (Firdaus et al., 2023; Rochaeti, Prasetyo, & Park, 2023), emphasizing that Indonesia's fragmented regulations and inadequate training of practitioners undermine the effectiveness of RJ. National policies that integrate legal harmonization and professional capacity building remain essential to improve RJ outcomes, foster institutional resilience, and ensure that restorative justice is embedded as a basic approach rather than an extraordinary practice.

Challenges and Implementation of Restorative Justice

Figure 9-11 presents a detailed comparative analysis of the challenges of RJ implementation in five important dimensions: Legal Harmonization, Human Resource Capacity, Institutional Support, Public Awareness, and Monitoring & Evaluation. The grouped bar chart (Figure 9) highlights that Indonesia faces the highest level of challenges, especially in legal harmonization (2.0/5) and monitoring (2.0/5). These low scores show how fragmented regulations and inconsistent cross-agency policies hinder the creation of a unified approach. In contrast, New Zealand reported minimal barriers, signaling a well-coordinated system characterized by strong legislative alignment and high inter-agency collaboration that ensures policy coherence and program accountability. Australia and Canada occupy the middle position, showing stable yet evolving structures that are constantly adapting to regional needs.

The comparative heatmap (**Figure 10**) further deepens this analysis, showing that the challenges in Indonesia are more concentrated in the early stages of program institutionalization such as building a legal foundation, practitioner certification, and stakeholder engagement while the developed system focuses on improving monitoring and improving victim services. South Africa, despite having a coherent national framework, still struggles with disparities in the quality of implementation, largely due to unequal access to resources and a lack of national training initiatives. Meanwhile, New Zealand's nearly uniform low challenge score reflects the maturity of its integrated model, combining legal mandates, practitioner competence and strong community engagement.

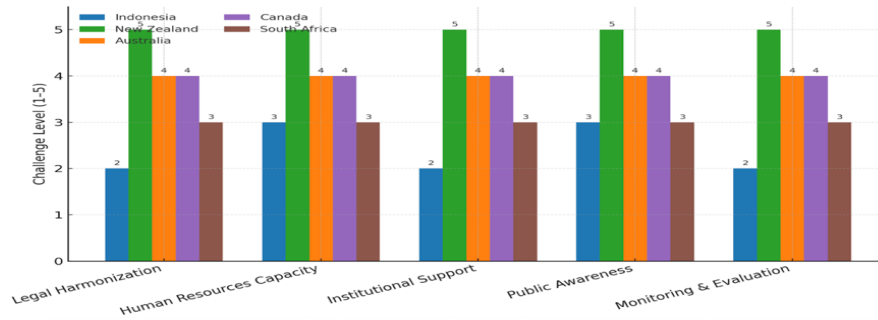


Figure 9. Comparative implementation challenges by country

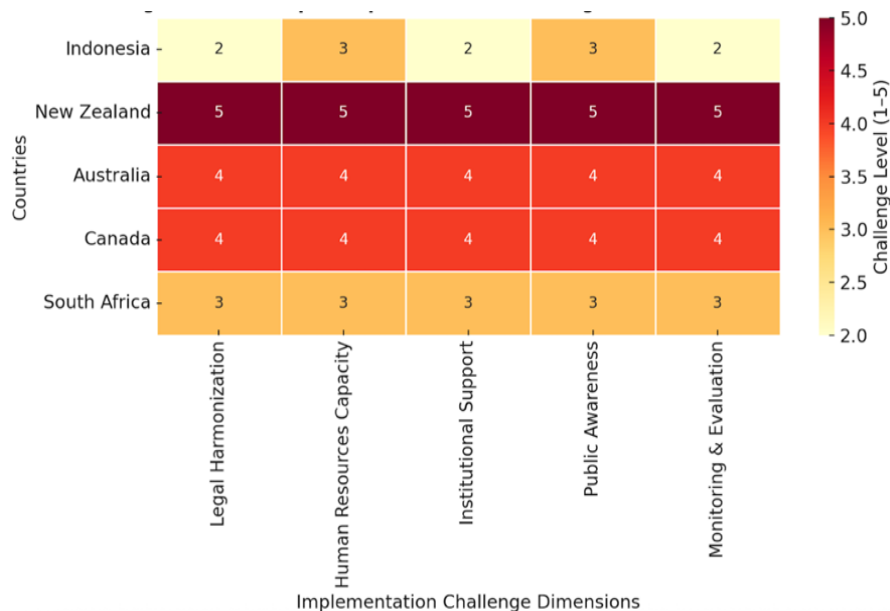


Figure 10. A heatmap of cross-dimensional implementation challenges

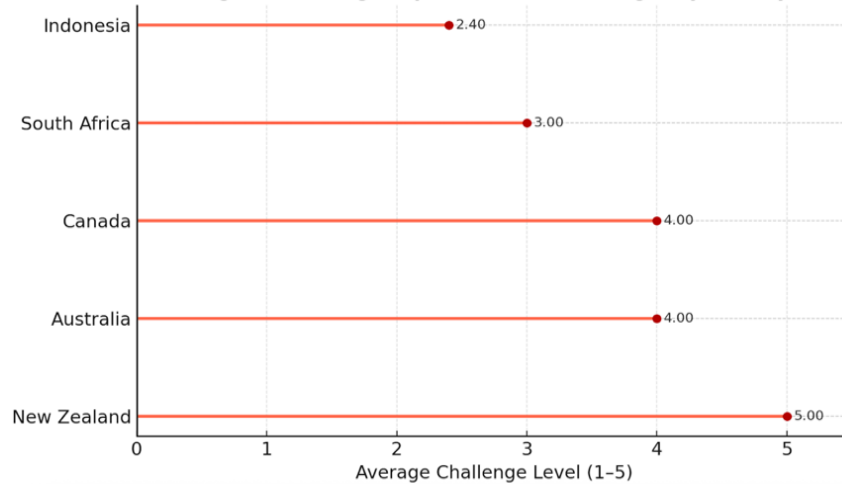


Figure 11. Implementation challenges average by country

According to (Heap & Paterson, 2019; Maglione et al., 2020), implementation difficulties often arise from fragmented legal frameworks, limited practitioner training, and low public awareness. These findings reflect the condition of Indonesia, where RJ remains misunderstood and underutilized outside of diversion cases. The lollipop graph (Figure 11) clearly visualizes Indonesia as facing the greatest implementation burden, while New Zealand remains a benchmark for preparedness. In addition, Indonesia's high challenge index illustrates the cumulative impact of weak regulatory harmonization, inadequate coordination between law enforcement and judicial agencies, and minimal participation from local communities. Addressing these gaps requires synchronized policy reforms and public engagement strategies that emphasize continuing education, transparency, and institutional synergy. Comprehensive national planning supported by empirical evaluation and long-term political will is critical to the transition of Indonesia's RJ system from fragmented initiatives to a cohesive evidence-based justice framework.

Restorative Justice Analysis in the Context of Children and Vulnerable Groups

The implementation of restorative justice has special relevance in handling cases involving children and vulnerable groups, given their often unbalanced position in the conventional criminal justice system. The retributive approach has been shown to tend to exacerbate the psychosocial impact on children and individuals who are in conditions of social and economic dependence, as well as increase the risk of secondary victimization (UNODC, 2020; Zehr, 2015). In this context, restorative justice offers a mechanism that is more responsive to the needs of long-term protection, restoration, and well-being through

structured dialogue and community participation (Braithwaite, 2016; Sherman & Strang, 2007).

International experience shows that the success of RJ in children's cases is largely determined by a legal framework that requires consideration of the *best interests of the child*, family involvement, and adequate professional support. The New Zealand model through *family group conferencing* has been empirically proven to be able to reduce recidivism rates and increase the satisfaction of victims and families of perpetrators (Maxwell & Morris, 2006; Daly, 2017). Similar approaches in Canada and Australia also emphasize the importance of certified facilitators and strict procedural standards to ensure psychological safety and substantive justice for children and other vulnerable parties (Latimer, Dowden, & Muise, 2005; Richards, 2011).

In Indonesia, the principle of restorative justice has been adopted normatively in the Juvenile Criminal Justice System through Law Number 11 of 2012, especially through the diversion mechanism. However, various studies show that its implementation still faces obstacles in the form of limited capacity of the apparatus, weak professional assistance, and variations in the understanding of law enforcement at the local level (Aripin et al., 2021; Sujono, 2024). In addition, socioculturally evolving customary and community mediation practices often do not fully guarantee consistent protection of the rights of children and vulnerable groups, especially in hierarchical and patriarchal social structures (Sukardi & Purnama, 2022; Abbas, 2024).

Therefore, this analysis confirms that the development of restorative justice in Indonesia must explicitly include the protection dimension of children and vulnerable groups as an integral part of national policy and institutional design. The integration of rights protection standards, facilitator certification, and clear oversight mechanisms will strengthen the legitimacy and effectiveness of restorative justice as an inclusive, accountable, and sustainable justice instrument (UNICEF, 2019; Decker et al., 2022).

Lessons Learned and Best Practices

Comparative lessons from five countries reveal diverse pathways to success, offering a rich spectrum of institutional arrangements, policy frameworks, and sociocultural adaptations. The New Zealand model exemplifies systemic integration driven by

comprehensive legislation, standardized facilitator training, a robust evaluation system, and unwavering political support (Hamzani et al., 2023). Beyond its legal codification, New Zealand exhibits a strong culture of restorative ethics embedded in education, the correctional system, and the structure of society, making RJ an intrinsic part of its social governance. The Australian model reflects an adaptive federalism that aligns RJ with the needs of local communities, supported by strong research practice relationships and consistent collaboration between universities, courts and correctional agencies (Wailling et al., 2025). Its flexibility allows diverse regional programs to thrive while maintaining a shared national vision of inclusive justice.

The integration of Canada's indigenous justice traditions demonstrates the potential of culturally based models that strengthen legitimacy and reconciliation (Muhammad, 2018). Circle Punishment and community-led mediation embody reconciliation not only as a legal resolution but as a healing process for victims, perpetrators, and their broader communities. South Africa added another dimension by institutionalizing restorative practices into post-conflict social reconstruction, highlighting how RJ can bridge historical injustices through formal and informal mechanisms. In contrast, Indonesia's progress is notorious for its diffusion from the bottom up through police-led diversions and customary mediation, which signifies an embrace of restorative principles. However, these promising developments require codification, institutional consolidation, and systematic policy alignment to transform isolated initiatives into cohesive national frameworks. Strengthening inter-agency collaboration, instilling facilitator certification, and ensuring cultural legitimacy will be critical to elevating Indonesia's RJ model to the same level of institutional maturity observed in comparative jurisdictions.

Development of Restorative Justice for Indonesia

Based on comparative insights, Indonesia's path towards harmonious RJ reform involves three main dimensions that must be addressed simultaneously and strategically. First, comprehensive legislation is essential, integrating the principles of the RJ into the revised Criminal Code and Criminal Code while being strengthened by an independent Restorative Justice Bill that mandates explicit consideration in appropriate cases. Such legislation should outline procedural standards, facilitator qualifications, and victim

protection mechanisms to institutionalize RJ as an equal complement to sentencing justice. The codification process should involve multi-stakeholder engagement that includes the judiciary, law enforcement, academia, and civil society to ensure that the law is technically sound and socially valid.

Second, an integrated information system that includes a national case database, electronic reporting platform, and interactive monitoring dashboard should enable policymakers to track compliance and outcomes in real time. Beyond data collection, the system will serve as a tool for evaluation, transparency, and interagency communication. It can incorporate analytics to identify trends, measure recidivism rates, and assess victim satisfaction, thus providing an empirical basis for future policy refinement. Building this infrastructure will not only support evidence-based decision-making but also build public trust by ensuring cross-agency accountability.

Third, the development of local models rooted in Indonesian culture, such as "Restorative Villages", hybrid family group conferences, or customary reconciliation forums, can strengthen community ownership and sustainability. These locally inspired models can act as pilot initiatives that demonstrate how RJ is aligned with the values of deliberation (deliberation) and gotong royong (gotong royong). They will enable communities to play a direct role in the settlement process, helping to reduce backlogs of cases and promoting participatory justice that resonates with local customs (Decker et al., 2022).

These strategies resonate with (Konradt et al., 2020; Lodi et al., 2021) which advocates legal harmonization and community participation as the dual pillars of the success of RJ. As reinforced by (Amarini et al., 2024; Rochaeti, Prasetyo, & Taman, 2023), local wisdom must be the normative foundation for RJ adaptation in Indonesia. Strengthening these mechanisms requires not only cultural sensitivity but also institutional consistency, ensuring that restorative practices remain legitimate within the formal legal order. Integrating customary deliberation traditions in formal legal mechanisms will ensure cultural legitimacy and procedural justice, thus fostering a restorative, inclusive, and contextual-based justice system capable of providing long-term social reconciliation and legal transformation.

CONCLUSION

The study shows that the implementation of restorative justice (RJ) in New Zealand, Australia, Canada, South Africa, and Indonesia reveals different levels of legal coherence, institutional readiness, and cultural adaptation. Among them, the New Zealand model stands as the most integrated and effective, supported by comprehensive legislation, mandatory implementation, and ongoing monitoring. In contrast, Indonesia's RJ framework remains fragmented, anchored in sectoral regulations, and reliant on discretionary enforcement resulting in inconsistent implementation and limited measurable impact. The empirical findings underline that Indonesia's greatest challenge lies in legal harmonization and institutional coordination, while its strength lies in local wisdom and community-based mediation practices.

This research contributes to the field by developing a normative empirical model that harmonizes the legal and practical dimensions of RJ, offering a structured path to national integration. Its findings advocate for comprehensive legislation, facilitator accreditation, and an integrated monitoring system to ensure consistency and accountability. Theoretically, this research enriches the global RJ discourse by emphasizing the role of cultural legitimacy in improving justice outcomes in a plural legal system. Future research should further explore the longitudinal impact of RJ reforms on victim satisfaction, recidivism, and community resilience, especially in developing jurisdictions that adapt global frameworks to local realities.

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