



Beyond Legal Status: Protection Gaps in Child Maintenance Following Marriage Annulment in Indonesia

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ABSTRACT

Purpose of the study: This study aims to examine the legal considerations underlying judges' decisions to annul a marriage on the ground of a concealed prior marriage, and to analyze the legal consequences of marriage annulment for the status, custody, and maintenance rights of children born from the annulled union.

Methodology: This research employed normative-empirical legal research combining a statute approach and a case-study approach. The primary legal materials consisted of Law No. 1 of 1974 on Marriage, the Compilation of Islamic Law (Kompilasi Hukum Islam), Law No. 35 of 2014 on Child Protection, and Religious Court Decision No. 1446/Pdt.G/2017/PA.Mks. Secondary data were obtained through semi-structured interviews with a judge of the Religious Court Class 1A of Makassar and through documentary study of statutory instruments and prior scholarship. Data were analyzed descriptively-qualitatively.

Results: The judge's legal consideration in Decision No. 1446/Pdt.G/2017/PA.Mks was found to rest strictly on the juridical fact that the husband (Defendant I) was still bound by a valid, undissolved prior marriage at the time of contracting the second marriage, which constitutes an absolute ground for annulment under Article 24 of Law No. 1/1974. Pursuant to Article 28(1)(a) of Law No. 1/1974 and Article 75(b) of the Compilation of Islamic Law, the annulment was declared non-retroactive with respect to the children born from the annulled marriage, thereby preserving their civil status, nasab (lineage), and inheritance rights. However, the verdict (amar putusan) did not explicitly impose maintenance and custodial obligations on Defendant I, leaving Defendant II and the child without an enforceable, self-executing basis for support.

Conclusions: While Indonesian marriage law protects children born from an annulled marriage from retroactive loss of legal status, protection remains incomplete because judges are not statutorily compelled to specify the father's maintenance obligations in the operative part of the decision. Strengthening the integration of marriage-registration data among Religious Affairs Offices (KUA) and mandating explicit maintenance clauses in annulment verdicts are recommended to close this protection gap.

Keywords:

marriage annulment; child protection; legal certainty; Compilation of Islamic Law; Religious Court decision.

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INTRODUCTION

Contextual Framework and Global Issue

Marriage is a foundational social and legal institution through which human societies regulate reproduction, kinship, inheritance, and the protection of dependents. Across diverse legal systems, the validity of a marriage serves as an essential precondition for the legal certainty of the rights that flow from it, including the legal status of children. Legal systems often distinguish between divorce, which terminates a valid marriage, and annulment—the judicial nullification of a marriage based on a defect existing at its inception, such as bigamy, fraud, or the concealment of a prior undissolved union (Aisyah, 2018; Katarina et al., 2023). This distinction is critical; while divorce dissolves the bond prospectively, annulment challenges the very existence of the union, thereby creating an inherent tension between restoring legal order and protecting third parties, particularly children, who bore no responsibility for the initial defect (Zuhdi et al., 2025). This tension is a global issue; comparative family-law scholarship reveals that jurisdictions recognizing both divorce and annulment struggle to harmonize the retroactive logic of nullity with the "best-interests-of-the-child" principle enshrined in the United Nations Convention on the Rights of the Child (Zuhdi et al., 2025).

In Indonesia, Article 1 of Law No. 1 of 1974 on Marriage defines marriage as an inner and outer bond between a man and a woman aimed at forming an eternal and happy family based on belief in God, while the Compilation of Islamic Law further characterizes it as a "strong covenant" (mithaqan ghalizhan). When a marriage is annulled under Articles 22–28 of Law No. 1/1974—

for instance, due to an undissolved prior marriage—the law explicitly mandates under Article 28 that such annulment does not operate retroactively against children born from that union (Aisyah, 2018; Ramdhini et al., 2022; Sugiarto, 2023). This safeguard is reinforced by Article 75 of the KHI, which ensures that despite the formal nullification of the marital bond, the child's legal status, nasab, and inheritance rights remain intact (Sugiarto, 2023).

Despite these robust normative protections, empirical studies highlight a persistent gap between the law on the books and judicial practice (Darajat et al., 2025; Nasution et al., 2024). Research indicates that while Indonesian courts formally uphold the principle of non-retroactivity, they often fail to translate this protection into concrete, self-executing maintenance or custodial orders in the operative section of annulment decrees (Fahmi et al., 2025; Nasution et al., 2024). Maintenance obligations are frequently treated as separate civil matters rather than an inherent component of the annulment process, leaving the primary caregivers and children without an enforceable, proactive basis for support (Darajat et al., 2025; Nasution et al., 2024). This inconsistency underscores the necessity of analyzing how judicial interpretation and the formalistic nature of annulment proceedings—where the emphasis is often placed on the defect of the marriage itself—can inadvertently undermine the substantive protection of children, highlighting a critical intersection between formal legal certainty and the practical fulfillment of child rights (Katarina et al., 2023; Sugiarto, 2023).

Critical Examination of Existing Literature

Prior normative-legal studies have examined the legal consequences of marriage annulment from various angles (Atmadianti & Rizal, 2024). (Turatmiyah et al., 2015) analyzed the legal consequences of marriage annulment from the perspective of child and women's protection law in the Religious Courts of South Sumatra and found that judicial practice tends to prioritize the formal validity requirements of marriage over the substantive protection of dependents, often failing to address post-annulment socioeconomic consequences. Comparative work by (Mohamad et al., 2016) on *hadhanah* under Islamic family law in Thailand demonstrates that explicit statutory custody clauses substantially improve post-dissolution child welfare outcomes, a framework that contrastingly highlights the limitations in current Indonesian judicial practice. (Lestari & Adiyatma, 2020), writing on "Marriage Cancelled, What about the Rights for Children?", similarly argue that Indonesian courts frequently fail to translate the non-retroactivity principle into concrete, enforceable maintenance orders, often treating the maintenance obligation as a separate civil matter rather than an inherent component of the annulment decree. More recent normative studies on marriage annulment adjudicated by Religious Courts in Bandung and Sei Rambah continue to document profound inconsistency in how judges articulate the legal position of children in the operative section of their decisions, often exhibiting passive judicial attitudes where protective clauses are omitted unless specifically petitioned for (H. Nasution et al., 2024; K. Nasution & Nasution, 2021, p. 364). Furthermore, broader research on child maintenance enforcement indicates that even when maintenance is recognized as a normative obligation, the absence of standardized guidelines and reliance on judicial discretion contributes to fragmented enforcement across different Religious Courts (Alamsyah et al., 2025; Darajat et al., 2025; Fahmi et al., 2025).

Collectively, this literature confirms that while Indonesian statutory law formally protects children from the retroactive effects of marriage annulment, judicial practice remains uneven in operationalizing that protection through proactive, enforceable orders, highlighting a critical gap between normative legal commitment and practical, substantive protection for children.

Identification of Research Gaps

Despite the substantial body of normative literature on marriage annulment in general, few studies undertake an in-depth, single-case juridical analysis that combines statutory interpretation with direct judicial interviews to explain why a specific verdict omits explicit maintenance obligations, and what legal consequences follow for the child's civil status when such obligations are omitted. Decision No. 1446/Pdt.G/2017/PA.Mks — a case involving marriage annulment on the ground of a concealed, still-valid prior marriage and identity falsification — has not previously been examined in the scholarly literature, despite presenting a paradigmatic instance of the gap between the non-retroactivity principle and its incomplete judicial implementation.

Rationale for the Research

Given that marriage annulment directly affects the civil status, nasab, and inheritance rights of children, and that the operative text of judicial decisions is the primary enforceable instrument protecting those rights, it is necessary to examine, at the case level, how judges construct their legal reasoning and whether that reasoning is adequately translated into protective, enforceable orders. This case study is expected to contribute empirically grounded evidence to inform judicial guidelines and legislative refinement concerning the protection of children affected by marriage annulment.

Objectives

This study has two objectives: (1) to examine the judge's legal considerations in Religious Court Decision No. 1446/Pdt.G/2017/PA.Mks concerning the annulment of a marriage due to a concealed prior marriage; and (2) to analyze the legal consequences of that annulment for the civil status, custody, and maintenance rights of the child born from the annulled marriage.

MATERIALS AND METHODS

This research adopted a normative-empirical legal research design, combining doctrinal analysis of statutory and case-law materials with limited field data obtained through judicial interviews, consistent with the socio-legal approach commonly used in Indonesian legal scholarship (Ibrahim, 2006; Soekanto, 1981)

Location

The research was conducted at the Religious Court Class 1A of Makassar (Pengadilan Agama Kelas 1A Makassar), South Sulawesi, Indonesia, selected because it is the court of record for Decision No. 1446/Pdt.G/2017/PA.Mks, the object of this case study.

Types and sources of data

Primary data comprised the verbatim text of Decision No. 1446/Pdt.G/2017/PA.Mks and semi-structured interview data obtained

from a presiding judge of the Religious Court. Secondary data comprised Law No. 1 of 1974 on Marriage, the Compilation of Islamic Law, Law No. 35 of 2014 on Child Protection (amending Law No. 23 of 2002), relevant scholarly books, and peer-reviewed journal articles.

Data collection technique

Data were collected through (a) library research (studi kepustakaan), reviewing statutes, the KHI, and prior scholarship, and (b) field research, comprising a structured interview conducted on 16 August 2017 with a judge of the Religious Court Class 1A of Makassar, and documentary review of the case file.

Data Analysis

Data were analyzed using a qualitative-descriptive technique. Primary and secondary data were triangulated, compared against the applicable statutory framework, and presented as a descriptive account of the objective legal conditions identified in the case.

RESULTS

Chronology and Legal Considerations of Decision No. 1446/Pdt.G/2017/PA.Mks

The case originated from a petition filed by the first, lawful wife of Defendant I (the husband), seeking annulment of a second marriage her husband had contracted with Defendant II, registered under Marriage Certificate No. 533/99/V/2014 dated 6 May 2014 at the Office of Religious Affairs of Rappocini Sub-district, Makassar. The Panel of Judges attempted reconciliation at every hearing, as required by Article 82(2) of Law No. 7 of 1989 and Article 33 of Government Regulation No. 9 of 1975, but the Plaintiff maintained her petition. Table 1 summarizes the key procedural and substantive findings extracted from the verdict and the judicial interview.

Table 1. Summary of judicial findings in Decision No. 1446/Pdt.G/2017/PA.Mks.

Element	Finding	Legal Basis
Ground for annulment	Defendant I contracted a second marriage while still lawfully and validly married to the Plaintiff; identity was falsified before the KUA.	Art. 24, Law No. 1/1974
Reconciliation effort	Court attempted mediation at every session; reconciliation failed and the petition was maintained.	Art. 82(2), Law No. 7/1989; Art. 33, GR No. 9/1975
Verdict on marriage status	Marriage Certificate No. 533/99/V/2014 declared legally void (tidak berkekuatan hukum).	Art. 22–28, Law No. 1/1974
Effect on children	Annulment declared non-retroactive for the child born from the annulled marriage; civil status and nasab preserved.	Art. 28(1)(a), Law No. 1/1974; Art. 75(b), KHI
Maintenance / custody order	Not explicitly stipulated in the operative section (amar putusan); no express obligation imposed on Defendant I.	Gap identified relative to Art. 41(b)–(c), Law No. 1/1974

Interview data corroborate the documentary findings. The interviewed judge stated that the legal consideration underlying the annulment was, in his view, appropriate: a marriage contracted while a party remains bound by a prior, undissolved marriage is an absolute ground for annulment, and the primary avenue for protecting the disadvantaged party (Defendant II) is to hold Defendant I accountable for the child resulting from the union. He further observed that greater diligence by prospective wives in verifying a partner's marital status would reduce the incidence of such disputes.

Statistical and Documentary Profile of the Case

As this is a normative single-case study rather than a quantitative survey, no inferential statistics were computed. Table 2 nonetheless quantifies the distribution of statutory provisions invoked in the verdict, which indicates the relative weight given by the Panel of Judges to procedural versus substantive-protective considerations.

Table 2. Distribution of statutory provisions cited in the operative and consideration sections of Decision No. 1446/Pdt.G/2017/PA.Mks (documentary content analysis).

Category of legal basis cited	Number of articles cited	Proportion (%)
Procedural / evidentiary provisions	5	41.7
Substantive grounds for annulment	4	33.3
Child-protection / non-retroactivity provisions	3	25.0
Total	12	100.0

The documentary content analysis in Table 2 indicates that only one-quarter of the cited legal bases directly concerned child protection, while the plurality addressed procedural and evidentiary matters. This distribution is consistent with the qualitative finding that, although the decision correctly applies the non-retroactivity principle, it does not proportionally elaborate the protective and maintenance dimension of the child's position.

Key Findings

Three findings emerge as significant. First, the Panel of Judges correctly identified bigamy through concealment as an absolute statutory ground for annulment under Article 24 of Law No. 1/1974, consistent with the strict-liability character of this ground under Indonesian marriage law. Second, the decision correctly applied the non-retroactivity principle of Article 28(1)(a) to preserve the child's civil status and nasab. Third, and most significantly, the operative section of the decision did not explicitly translate this protective principle into an enforceable maintenance or custody order directed at Defendant I, leaving the practical realization of the child's economic welfare dependent on subsequent, separate legal action rather than on the annulment decision itself.

DISCUSSION

The findings indicate a partial rather than complete realization of child protection within the annulment framework. On the one hand, the judge's application of Article 28(1)(a) of Law No. 1/1974 and Article 75(b) of the KHI is doctrinally sound: it prevents the child from being rendered illegitimate or losing inheritance rights merely because of a defect attributable exclusively to the

parents. On the other hand, the absence of an explicit maintenance clause in the amar putusan means that the protective principle remains declaratory rather than executory. In Indonesian civil procedure, only the operative section of a decision (amar putusan) is directly enforceable (executable); considerations (pertimbangan hukum), however sound, do not by themselves create an enforceable obligation. This distinction is central to understanding why the child in this case remains formally protected in status but practically unprotected in terms of guaranteed support (Garrison, 1998, p. 72; Kilkelly, 2020, p. 250; Lewis & Levy, 1966, p. 763)

Evaluation in Relation to Antecedent Studies

This finding aligns with Turatmiyah et al., who identified a systemic pattern of incomplete operative protection in the Religious Courts of South Sumatra (Turatmiyah et al., 2015). Their analysis highlights that judicial focus frequently centers on the formal validation or annulment of the marital status, often at the expense of comprehensive post-dissolution financial arrangements for children. This echoes the broader critique by Lestari & Adiyatma (2020), who argue that Indonesian judicial practice has not yet standardized the inclusion of specific, enforceable maintenance clauses in annulment verdicts, despite the clear legal capacity of judges to do so (Fahmi et al., 2025; Marbun & Simamora, 2025). Recent scholarship suggests this inconsistency persists partly because the determination of child support often remains reliant on the judge's *ex officio* authority rather than mandated, uniform judicial guidelines, leading to significant variations in outcomes across different courts (Alamsyah et al., 2025).

It also resonates with comparative findings by Mohamad et al. (2016) in the Thai Islamic family-law context, where explicit custody and maintenance stipulations were shown to correlate with higher compliance rates and reduced post-dissolution litigation, underscoring the importance of prescriptive operative sections. Where the present case diverges from typical findings—such as those by Turatmiyah et al.—is in the explicit presence of identity falsification before the Office of Religious Affairs. This element highlights a critical administrative vulnerability: the lack of an integrated, real-time population database frequently forces religious courts to become reactive arbiters of administrative failures rather than proactive enforcers of protective norms (Fatimah & Purba, 2025; Tumiwa et al., 2025). Consequently, the underlying dispute is not merely a matrimonial one, but a symptom of systemic weaknesses in marriage-data verification that remain a preventable, yet significant, cause of legal instability.

Ramifications of the Findings

The ramifications are twofold. Legally, the absence of an explicit maintenance order shifts the burden onto Defendant II to initiate separate proceedings to secure child support, imposing additional cost, delay, and evidentiary burden on the party the law intends to protect. Administratively, the case illustrates a systemic vulnerability: because Offices of Religious Affairs (KUA) do not maintain an integrated, nationwide marriage registry, an already-married individual can register a second marriage in a different jurisdiction using falsified information. This administrative gap directly enables the substantive legal problem that the court was later asked to resolve.

Limitations of the Research

This study is subject to several limitations. First, as a single-case, normative-empirical study, its findings are analytically generalizable to similar cases sharing comparable facts but are not statistically generalizable to the population of all Indonesian marriage-annulment decisions. Second, interview data were obtained from a single judicial informant, which may not capture the full range of judicial reasoning across different panels or courts. Third, the study did not follow the case beyond the issuance of the decision, and therefore cannot report whether Defendant II subsequently pursued separate maintenance proceedings or their outcome. Future research employing a multi-court, multi-year documentary sample would be valuable to test the generalizability of the protection gap identified here.

CONCLUSION

This study set out to examine the legal considerations underlying Decision No. 1446/Pdt.G/2017/PA.Mks and to analyze its consequences for the legal position of the child born from the annulled marriage. The evidence shows that the Panel of Judges properly grounded the annulment in the absolute statutory prohibition against bigamy through concealment, and properly applied the non-retroactivity principle to preserve the child's civil status and nasab, confirming the hypothesis advanced in the Introduction that Indonesian marriage law formally shields children from the retroactive effects of a void marriage. At the same time, consistent with the research gap identified at the outset, the study confirms that formal protection does not automatically translate into an enforceable maintenance order, since the operative section of the decision omitted an explicit obligation directed at the father.

These findings matter because they demonstrate that legal certainty for children affected by marriage annulment depends not only on the correct application of substantive doctrine but also on the precision of the operative text that judges produce, and on the administrative integrity of the marriage-registration system that allows such disputes to arise in the first place. Strengthening both dimensions — through judicial guidelines requiring explicit maintenance clauses in annulment verdicts, and through an integrated national marriage-data system linking all Offices of Religious Affairs — would substantially narrow the gap between declared and realized child protection.

The author welcomes further scholarly and practical input on this subject and suggests that future studies test the proposed integrated-registry and mandatory-maintenance-clause recommendations across a broader sample of Religious Court decisions, and that policymakers consider codifying an explicit requirement that annulment verdicts specify parental maintenance obligations in their operative section.

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CONFLICT OF INTERESTS

The author declares no conflict of interest regarding the publication of this article.

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