

## **Marriage Dispensation Justifies the Exploitation of Underage Marriage**

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**Abstrak:** Penelitian ini bertujuan untuk mengetahui pelaksanaan dispensasi kawin yang menitikberatkan pada pertimbangan hakim terkait penerapan prinsip kepentingan terbaik bagi anak serta faktor-faktor yang memengaruhi dikabulkannya permohonan dispensasi kawin. Metode penelitian yang digunakan adalah metode penelitian hukum empiris. Penelitian ini menawarkan kebaruan dengan menampilkan data terbaru mengenai dispensasi kawin serta mengungkap adanya perubahan sosial, yaitu pergeseran inisiatif pengajuan dispensasi yang tidak lagi didominasi oleh orang tua, melainkan berasal dari anak sebagai pemohon. Fenomena ini merupakan temuan yang relatif baru dan masih jarang dibahas dalam penelitian sebelumnya. Hasil penelitian menunjukkan bahwa prinsip kepentingan terbaik bagi anak sebagai dasar utama dalam memutus permohonan dispensasi kawin dengan mempertimbangkan aspek kesehatan, psikologis, keberlanjutan pendidikan, dan perlindungan terhadap janin serta pertimbangan hubungan kedekatan para pemohon. Disamping faktor kehamilan di luar perkawinan, pertimbangan hakim juga dipengaruhi oleh faktor sosial dan budaya, seperti tekanan keluarga, stigma sosial, praktik perkawinan dini yang mengakar, serta pergeseran inisiatif pengajuan dispensasi. Hasil ini mengindikasikan adanya perbedaan praktik yang terjadi di UPTD PPA yang cenderung menempatkan kehamilan di luar nikah sebagai pertimbangan utama dalam pemberian surat rekomendasi nikah. Penelitian ini menyarankan agar hakim dan UPTD PPA dalam menangani perkara dispensasi kawin lebih memprioritaskan kepentingan terbaik bagi anak dengan memperhatikan dampak jangka panjang serta perlindungan terhadap janin jika terjadi kehamilan. Selain itu, diperlukan penjelasan yang lebih jelas mengenai kriteria “alasan mendesak” agar masyarakat memahami dasar pemberian dispensasi kawin dan dapat mencegah terjadinya perkawinan yang dipaksakan terhadap anak.

**Kata Kunci:** Dispensasi Kawin, Perkawinan Anak Dibawah Umur, Prinsip Kepentingan Terbaik Bagi Anak

**Abstract:** This study aims to determine the implementation of marriage dispensation that focuses on the judge's consideration regarding the application of the principle of the best interests of the child and the factors that influence the granting of marriage dispensation requests. The research method used is empirical legal research. This study offers novelty by presenting the latest data on marriage dispensations and revealing social changes, namely a shift in the initiative to apply for dispensations, which is no longer dominated by parents but comes from children as applicants. This phenomenon is a relatively new finding and has rarely been discussed in previous studies. The results of the study show that the principle of the best interests of the child is the main basis for deciding on marriage dispensation requests, taking into account aspects of health, psychology, educational continuity, and protection of the fetus, as well as the closeness of the relationship between the applicants. In addition to the factor of pregnancy outside of marriage, the judge's considerations are also influenced by social and cultural factors, such as family pressure, social stigma, deep-rooted practices of early marriage, and shifts in the initiative to apply for



*dispensation. These results indicate differences in practice at the UPTD PPA, which tends to place pregnancy outside of marriage as the main consideration in issuing marriage recommendation letters. This study suggests that judges and UPTD PPA in handling marriage dispensation cases should prioritize the best interests of the child by considering the long-term impact and protection of the fetus in the event of pregnancy. In addition, a clearer explanation of the criteria for “urgent reasons” is needed so that the public understands the basis for granting marriage dispensation and can prevent forced marriages of children.*

**Keywords:** *Marriage Dispensation, Underage Marriage, Best Interests of the Child Principle*

## **A. DISCUSSION**

The existence of humans requires reciprocal relationships with others, as this occurs because humans live together and depend on one another, which is realized through the bond of marriage. Marriage aims to establish a household life based on the principles of *sakinah*, *mawaddah*, and *rahmah*—that is, tranquility, affection, and compassion in harmony, and love within a lawful union.[1] The formation of a household must be based on the principles of *sakinah*, *mawaddah*, and *rahmah*, which require psychological readiness, emotional maturity, and a relatively stable economic condition. Achieving these conditions demands that both prospective spouses have reached a mature age. In Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 on Child Protection, it is affirmed that a child is anyone under the age of 18. Therefore, marriage is normatively considered appropriate only after a person is no longer classified as a child, that is, upon reaching the age of 19. [2]

Law Number 1 of 1974 initially set the minimum marriage age at 16 for females and 19 for males. However, this provision was later amended through Law Number 16 of 2019, which equalized the minimum marriage age for both males and females at 19 years. The revision of marriage regulations was driven by the increasing practice of child marriage, which affects the physical and psychological development of children. [3] Furthermore, this change aligns with Indonesia’s commitment to the Convention on the Rights of the Child (CRC), an international treaty that ensures every child has the right to live, grow, and develop properly, access education and healthcare, and receive protection from violence, neglect, abuse, and various forms of exploitation.[4]

The implementation of the Convention on the Rights of the Child (CRC) was subsequently ratified by Indonesia through Article 1, point 2 of Law Number 35 of 2014. This article explains that child protection encompasses all efforts to ensure that the rights of children are fulfilled, so that they can live properly, grow and develop well, participate according to their age, and be protected from violence and discriminatory treatment. [5] Furthermore, both the Convention

on the Rights of the Child and Law Number 35 of 2014 equally affirm that children's rights are part of human rights that must be protected and fulfilled by parents, family, society, the state, and the government. [6]

Child marriage is an act that contradicts the principles of child rights protection and can be categorized as a form of violence and exploitation against children. This practice still occurs widely in society and is often not recognized as a violation of children's rights. [7]

According to Yohana Yembise, the change in the marriage age regulation was implemented so that marriages can occur in a healthy manner and bring about well-being. This policy aims to reduce the practice of child marriage, which can have negative impacts on children, families, and the quality of the population. In addition, the previous differences in the minimum marriage age were considered to contain elements of inequality or discrimination. [8]

Although legal provisions have raised the minimum marriage age, child marriage is still possible through marriage dispensation provisions. Article 7, paragraph (2) of Law Number 1 of 1974 continues to allow parents or guardians to submit a request if a prospective spouse does not meet the established age limit. Such a request may be granted by a judge if accompanied by reasons deemed important and urgent. [9]

The practice of marriage dispensation is often viewed as a legal loophole that could potentially legitimize child marriage. In response to this issue, the Supreme Court issued Supreme Court Regulation Number 5 of 2019, which serves as a juridical basis for judges in handling marriage permission requests. The substance of this regulation has the potential to protect children by prioritizing the principle that the child's best interests are the primary basis for decision-making, taking into account health, psychological, educational, and social conditions. This regulation also requires the direct presence of the child's parents as parties with legal standing, together with the child and the prospective spouse. Thus, the regulation serves not only a legal function but also a social one, ensuring that dispensation is required only as a last resort and not as a means of justifying child marriage. [10]

Data recapitulation shows that from 2020 to 2023, there were 130 cases of marriage dispensation submitted to the Religious Court of Makassar City. These requests were largely motivated by pregnancies outside of a lawful marriage, while economic factors and low education levels also served as determinants influencing the increased demand for dispensation.[11]

Several studies confirm that the existence of laws and Supreme Court regulations has provided normative guidelines in marriage dispensation cases. However, judicial practice shows that

judges face a dilemma. On one hand, judges are obliged to reject requests that do not meet the requirements in order to protect children, but on the other hand, they often face social, familial, and moral-religious pressures. This is evident in cases of pregnancy outside of marriage, where judges are often “pushed” to grant dispensation to preserve honor, even if it contradicts the principles of child protection. Furthermore, the application of the rules shows variation: some judges emphasize strict procedures supported by psychological evidence, while others prioritize social and religious considerations.

Previous research shows that various aspects are considered in granting marriage dispensation. Judges tend to feel a moral and juridical obligation to approve the request if the prospective female spouse is already pregnant. [12]

Meanwhile, a study analyzing Decision Number 54/Pdt.P/2021/PA.Bgr found that the judge granted the request due to the close relationship between the children of the petitioners, making it deemed necessary to marry them promptly to avoid actions that conflict with religious law or statutory regulations. In addition, the judge also considered the sociological dimension, noting that both prospective spouses were employed and understood the potential risks arising from the marriage.[13]

Furthermore, a study examined Decision Number 33/Pdt.P/2023/PA/LLG, which highlighted the judge’s rejection of a marriage dispensation request for a 15-year-old girl who was 32 weeks pregnant, with a prospective husband aged 14. The judge’s considerations were based on the principle of the child’s best interests, assessing the possibility of coercion in submitting the request. The judge concluded that the desire to marry did not entirely originate from the free will of both children, but was influenced by social pressure and customary norms that view marriage as a form of responsibility for the pregnancy. [14]

The Office for the Empowerment of Women and Child Protection (DP3A) is a regional government agency authorized to ensure the fulfillment and protection of the rights of women and children, including efforts to prevent the practice of child marriage. This task is carried out through the role of the Regional Technical Implementation Unit for the Protection of Women and Children (UPTD PPA), which functions as an extension of the office in the process of submitting marriage permit applications below the legal age. In practice, exemption requests require the completion of several documents, including a pregnancy examination result or an ultrasonography (USG) report of the prospective female spouse. These requirements represent the implementation of a memorandum of understanding (MoU) between the UPTD PPA and the Religious Court as well as the District Court. [15]

Thus, this study aims to address this legal gap by highlighting the disparity between normatively formulated legal provisions and their implementation in empirical reality. This paper presents a research novelty by combining a juridical-empirical approach to examine the relationship between marriage dispensation application data, judges' considerations, and the factors influencing the approval of marriage dispensation requests.

Based on the explanation above, the research questions posed are: (1) How do judges consider the best interests of the child in reviewing marriage dispensation requests?; (2) What factors influence judges' considerations in marriage dispensation applications?

## **B. RESEARCH METHOD**

Berdasarkan penjelasan di atas, pertanyaan penelitian yang diajukan adalah: (1) Bagaimana hakim mempertimbangkan kepentingan terbaik bagi anak dalam meninjau permohonan dispensasi kawin?; (2) Faktor-faktor apa saja yang memengaruhi pertimbangan hakim dalam permohonan dispensasi kawin?

## **C. DISCUSSION**

Based on the research problem outlined above, the author obtained empirical data or real-world observations as follows :

### **1. Judges' Considerations of the Best Interests of the Child in Granting Marriage Dispensation**

Judges of the Makassar Class 1A Religious Court are required to provide clear reasoning in every decision. This reasoning must be based on applicable laws and regulations, relevant articles, and other legal sources in force. This obligation aligns with Article 50, paragraph (1) of Law Number 48 of 2009 concerning Judicial Power and the principle of *ratio decidendi*, which mandates that judges explain the legal grounds of their decisions in a logical, rational, and accountable manner. [16]

#### **a. The Concept and Application of the Best Interests of the Child Principle by Religious Court Judges**

Within the framework of granting marriage dispensation for prospective spouses who have not reached the legal marriage age of 19 for both females and males, the principle of the best interests of the child serves as the primary parameter that judges must use as a reference when considering dispensation requests. Judges have an obligation to carefully assess that granting such dispensation is truly the measure that best ensures the protection of the child's fundamental rights and the continuity of their future.

Based on an interview with Muhammad Fitrah, a judge at the Makassar Class 1A Religious Court, he explained that the principle of the best interests of the child is not only directed at prospective spouses who are still underage but also includes protection of the fetus in cases of pregnancy outside of marriage.

The assessment of marriage dispensation cases does not focus solely on legal regulations but must also consider comprehensive child protection at every stage of their life. This was conveyed by Munawwarah, another judge at the Makassar Class 1A Religious Court, who explained that in examining marriage dispensation cases, judges also take into account the psychological condition and mental readiness of the prospective spouses. This assessment is conducted through counseling services provided by PUSPAGA and psychological examinations by the UPTD PPA. The results of these two processes are used as an objective basis to evaluate the child's emotional maturity, ensuring that the decisions made align with efforts to protect and guarantee the child's well-being.

**Tabel 1. Marriage Dispensation Application Data**

Year	Case Type	Revoke	Granted	Rejected	Not Accepted	Dismissed
2023	Marriage Dispensation	-	11	-	1	-
2024	Marriage Dispensation	1	15	-	-	-
2025 (Jan-Jun)	Marriage Dispensation	-	10	-	1	1

*Source* : Makassar Religious Court *Class 1A, Year 2023-2025*

The table shows the number of marriage dispensation applications submitted to the Makassar Class 1A Religious Court from 2023 to 2025. In 2023, 11 cases were granted, and 1 case was not accepted because the applicant had not met the administrative or formal requirements, meaning the application could be resubmitted after being corrected. In 2024, 15 cases were granted, and 1 case was withdrawn at the request of the applicant. Furthermore, in 2025, 10 cases were granted, 1 case was not accepted, and 1 case was dismissed. The case that was dismissed occurred because the applicant did not appear in court despite being officially summoned in accordance with legal provisions.

b. The Role of UPTD PPA in Assessing the Best Interests of the Child

The protection of women and children is a crucial part of achieving equitable development in Indonesia. This effort is carried out through various policies and regulations supported by institutions at both the central and regional levels. One of the key institutions in handling violence against women and children is the Regional Technical Implementation Unit for the Protection of Women and Children (UPTD PPA), which operates under the coordination of the Office for the Empowerment of Women and Child Protection (DP3A).[17]

Normatively, Article 7 paragraph (2) stipulates that if there is a deviation from the minimum marriage age requirement, the parties may submit a dispensation request by attaching supporting evidence along with recommendations from the relevant authorities.

Based on the results of an interview with Muhammad Hajar, a legal consultant at the UPTD PPA, he explained that the marriage recommendation letter is issued based on a cooperation agreement (MoU) between the UPTD PPA and the Makassar Class 1A Religious Court. Generally, the urgent reason underlying the application for a marriage recommendation letter is pregnancy.

In submitting an application for a marriage recommendation letter, the applicant must complete several administrative requirements. The required documents include a rejection letter from the Religious Affairs Office (KUA), copies of the parents' identity cards, copies of the identity cards of each prospective spouse, photocopies of the educational certificates of both prospective spouses, and a health or pregnancy certificate issued by medical personnel.

The assessment conducted by the UPTD PPA is carried out through home visits to understand the family's condition, health examinations to evaluate the physical readiness of the prospective spouses, and psychological counseling at PUSPAGA (Family Learning Center) to assess emotional maturity and decision-making capacity. Based on the results of this assessment, the UPTD PPA objectively determines whether early marriage may be considered or instead poses risks to the child's growth, development, and well-being.

**Tabel 2. Marriage Recommendation Letter Application Data**

<b>NO</b>	<b>YEAR</b>	<b>ACCEPTED</b>	<b>REJECTED</b>
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1.	2020	59	9
2.	2021	76	14
3.	2022	50	13
4.	2023	29	10
5.	2024	19	1
6.	2025	22	7

Source : UPTD PPA Makassar City, Year 2020-2025

Based on the data, applications for marriage recommendation letters at the UPTD PPA of Makassar City during the 2020–2025 period fluctuated. The highest number of applications occurred in 2021, then declined until 2024, and increased again in 2025. A similar pattern can be observed in the number of rejections, which decreased after 2021, reached the lowest point in 2024, and then rose again in 2025. Rejections generally occur due to the absence of urgent reasons, such as pregnancy, although in principle the UPTD PPA of Makassar City still receives every application submitted.

## **2. Factors Influencing Judges' Considerations in Marriage Dispensation Applications**

In an interview with Kamaruddin, a judge at the Makassar Class 1A Religious Court, he explained that the concept of “urgent reasons” is interpreted as conditions that require priority handling, particularly in efforts to prevent actions that contradict religious norms. Based on the interview with the respondent, if behavior that violates religious provisions is allowed to continue without intervention, the potential for more serious violations will increase if the marriage is not promptly carried out. This explanation is consistent with the principle of *Dar'ul Mafasid Muqaddam*, which emphasizes the importance of prioritizing the prevention of harm. The factors considered by judges will be further explained in the following section :

### **a. Pregnancy Outside of Marriage**

Based on the petition dated February 6, 2025, which was registered at the Registrar's Office of the Makassar Religious Court and recorded in the case register under Number 92/Pdt.P/2025/PA.Mks, the petitioners submitted a marriage dispensation request with the intention of conducting the marriage in accordance with Islamic law and the applicable statutory regulations. In principle, all marriage requirements had been

fulfilled except for the minimum age requirement, as the petitioners' child had not yet reached the age of 19. Nevertheless, the marriage was considered urgent and necessary to be carried out immediately. The urgency of the marriage dispensation request was based on the fact that the prospective spouses had engaged in a relationship similar to that of a husband and wife, which resulted in a pregnancy with a gestational age of approximately 14 to 15 weeks.

The UPTD PPA institution firmly stated that pregnancy is the only basis that can be used as grounds for issuing a marriage recommendation letter. Meanwhile, the consideration of Judge Mohammad Ashri, who examined and adjudicated the marriage dispensation case, was based on efforts to prevent the emergence of various administrative problems in the future. The judge assessed that if the marriage were not carried out promptly, there would be a potential for administrative obstacles that could harm the parties involved. Therefore, granting the marriage dispensation was viewed as a preventive measure to ensure legal certainty and administrative order.

b. Socio-Cultural Factors and Family Pressure

In addition to the factor of pregnancy, there are several environmental and cultural influences that also encourage the submission of marriage dispensation requests, including:

1) Permissive or absent parenting patterns

Statements from the parents of Andini Putri Pratiwi and Dina Safitri indicating that they “do not live with their children” and “lack supervision over their social interactions” illustrate the weakness of the caregiving function within the family environment. This situation reflects the suboptimal role of the family as a primary protective factor, which should ideally provide adequate control, guidance, and support to prevent the occurrence of child marriage. The limited presence of parents in adolescents' daily lives and the low level of supervision over their social activities create opportunities for the emergence of risky behavior, including uncontrolled interpersonal relationships.

2) The Cultural Legacy of Early Marriage

The perception that marriage at a young age is something normal, acceptable, or even considered a solution to certain social problems—such as avoiding stigma or preserving family honor—becomes part of a cultural or familial habit that shapes their preferences and perspectives regarding the child's future. In other words, parents' experiences of early marriage form a normative preference framework that influences their decision-making, including giving consent to or encouraging the submission of marriage dispensation requests.

3) Psychological Factors and Maturity

Based on the marriage dispensation petition dated May 4, 2023, which was registered at the Registrar's Office of the Makassar Religious Court under case number 193/Pdt.P/2023/PA.Mks, the petitioners submitted a request for marriage dispensation on the grounds that, in principle, all marriage requirements under Islamic law and the applicable statutory regulations had been fulfilled, except for the minimum age requirement, as the petitioners' child had not yet reached the age of 19. Nevertheless, the petitioners considered the marriage to be in an urgent condition that required it to proceed.

The urgency of the marriage was based on the consideration that the prospective husband of the petitioners' child had already met the legal age requirement and stated that he was unable to wait until the petitioners' child reached the minimum age stipulated by law. The petitioners also expressed concern that if the marriage were not carried out immediately and the prospective husband chose to marry another woman, it could result in psychological impacts such as mental pressure or emotional distress for the petitioners' child, considering that their relationship had been established for a considerable period and was known within the family environment.

This consideration is in line with the reasoning presented by Judge Muhammad Arief, the judge who examined the marriage dispensation case, who assessed that postponing the marriage could potentially lead to negative consequences that were not desired by both families. Therefore, to avoid the possibility of social and psychological problems arising, the judge considered granting the dispensation request as a preventive measure.

Thus, psychological factors and the level of a child's maturity are closely related to socio-cultural factors and family pressure. This condition originates from feelings of shame and concern over social judgment, which may develop into potential psychological pressure, and consequently becomes one of the considerations in the submission and granting of marriage dispensation.

4) The Shift in the Pattern of Dispensation Applications from Parents to Children

Judge Muhammad Fitrah noted a shift in the pattern of marriage dispensation applications, which were initially dominated by parental initiatives around 2006 but have increasingly been initiated by the children or the prospective spouses themselves. This change indicates a growing autonomy among adolescents in

making life decisions, including marriage, even though they may not yet be fully prepared legally or psychologically.

This development indicates that the prevention of child marriage requires a shift in strategy from an approach focused on parents toward strengthening the capacity of adolescents as the primary actors. This can be realized through comprehensive sexual education, increased legal literacy, and the involvement of adolescents in positive social activities, as expected by the judges regarding the role of the UPTD PPA of Makassar City in building awareness and resilience among adolescents against the risks of early marriage.

#### **D. CONCLUSION**

This study finds that the examination of marriage dispensation applications must place the best interests of the child as the primary consideration. Therefore, judges should not only focus on the formal legal requirements but must also assess the long-term impacts on the child's welfare, education, and future, including protection for the fetus if a pregnancy is involved.

Accordingly, judges of the Makassar Religious Court Class 1A, together with the UPTD PPA of Makassar City, are expected to prioritize a comprehensive and child-centered assessment. In addition, clearer criteria regarding the notion of "urgent reasons" are necessary so that the public can better understand the basis for granting marriage dispensations and to prevent forced child marriages that contradict the objectives of child protection.

#### **E. REFERENSI**

- [1] M. Asrul, S. Nurfadillah, and Askahar, "Konsep Keluarga Sakinah dalam Al-Qur'an Studi Tentang Pernikahan dan Pembentukan Keluarga Harmonis Asrul," *Journal Riwayat*, vol. 9, no. 1, pp. 1202–1212, 2026, doi: <https://doi.org/10.24815/riwayat.v9i1.362>.
- [2] A. Widyanti and M. F. Nst, "KEBIJAKAN HUKUM KELUARGA TERHADAP PERKAWINAN ANAK DI BAWAH UMUR DI INDONESIA," *Jurnal Al-Waqfu*, vol. 04, no. 01, 2026.
- [3] Febrianti, R. B. Yoan, and R. B. R. Hendrasari, "TINJAUAN YURIDIS PEMBERIAN DISPENSASI HUKUM PADA PERKAWINAN ANAK DI BAWAH UMUR," *Jurnal Ilmu Hukum, Sosial, dan Humaniora*, vol. 4, no. 1, pp. 59–84, 2026.
- [4] A. A. Mercy, "GENDER AND ARMED CONFLICTS IN NIGERIA: EXAMINING ITS IMPACT ON THE RIGHTS OF WOMEN AND CHILDREN," *Journal of Private and Property Law*, vol. 3, no. 1, pp. 234–253, 2026.
- [5] D. Nazmi and S. Syofyan, "PENGATURAN PERLINDUNGAN HAK ANAK DI INDONESIA DALAM RANGKA MENGELIMINIR PELANGGARAN HAK ANAK,"

- Pdfs.Semanticscholar.Org*, vol. 7, no. 2, pp. 284–293, 2023, doi: <https://doi.org/10.31933/ujsj.v7i2>.
- [6] S. Lubisa and P. halomoan Hasibuan, “Peran Hukum Perkawinan Dalam Optimalisasi Perlindungan Hak Anak,” *Jurnal Kajian Hukum Dan Kebijakan Publik* | E-ISSN: 3031-8882, vol. 3, no. 2, pp. 468–472, 2026.
- [7] A. Fathur Rozi and Muh. Jufri Ahmad, “Anak Menjadi Korban Eksploitasi (Perkawinan Paksa) Oleh Orang Tua,” *Journal Evidence Of Law*, vol. 2, no. 3, pp. 183–191, 2023, doi: 10.59066/jel.v2i3.418.
- [8] R. Karyadi, “Hukum Perkawinan Menurut Undang Undang No 16 Tahun 2019 Perubahan Atas Undang-Undang Nomor 1 Tahun 1974 Pasal 7 Ayat 1 Tentang Batas Usia Perkawinan,” *Journal Pusat Studi Pendidikan Rakyat*, vol. 2, no. 16, pp. 9–23, 2022.
- [9] S. W. Bachtiar, M. Hafidz, and D. S. Busthami, “Permohonan Dispensasi Perkawinan Setelah Berlakunya Undang-Undang Nomor 16 Tahun 2019 Perubahan Atas Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan,” *Journal of Lex Generalis*, vol. 2, no. 3, pp. 1162–1174, 2021.
- [10] M. N. Ahmad and R. M. Zainul, “PUTUSAN HAKIM MAHKAMAH AGUNG TENTANG DISPENSASI KAWIN,” *Jurnal of Sharia*, vol. 02, pp. 161–183, 2024.
- [11] F. Yanti, Kamsilaniah, and Juliati, “Legal Analysis of the Consequences of Underage Marriage in Makassar City,” *Journal of Law*, vol. 22, no. 1, pp. 125–133, 2024.
- [12] M. Assagaf, “Pertimbangan Hakim pada Perkara Dispensasi Nikah di Lingkungan Pengadilan Agama Tutuyan,” *Al-Mujtahid: Journal of Islamic Family Law*, vol. 3, no. 1, p. 36, 2023, doi: 10.30984/ajifl.v3i1.2540.
- [13] Fitriyani and L. Sudirman, “Pertimbangan Hakim dalam Penetapan Dispensasi Nikah di Pengadilan Agama Bogor: Tinjauan Aspek Filosofis, Yuridis,” *Al-Mizan*, vol. 19, no. 1, pp. 105–120, 2023, doi: <https://doi.org/10.30603/am.v19i1.3294>.
- [14] Suriadi, “PENOLAKAN HAKIM TERHADAP PERMOHONAN DISPENSASI KAWIN WANITA HAMIL (ANALISIS PUTUSAN PENGADILAN AGAMA NO. 33/Pdt.P/2023/PA/LLG),” *tesis*, vol. 32, no. 3, pp. 167–186, 2021.
- [15] I. Fachridini, “Putus Sekolah Sampai KDRT : Marak Perkawinan Anak di Sulawesi Selatan, Anak Perempuan Jadi Korban,” *Konde.co*. [Online]. Available: <https://www.konde.co/2025/06/putus-sekolah-sampai-kdrt-marak-perkawinan-anak-di-sulawesi-selatan-anak-perempuan-jadi-korban/>
- [16] A. Darania, *Hukum Acara Peradilan Agama*. Indramayu: Adab, 2024.
- [17] Wulandari, F. Umar, and N. K. Hanafi, “Efektivitas Penanganan Kasus Kekerasan Seksual Terhadap Perempuan Di Unit Pelaksanaan Teknis Daerah Perlindungan Perempuan Dan Anak (UPTD PPA) Kota Makassar,” *HISTORICAL: Journal of History and Social Sciences*, vol. 2, no. 2, pp. 64–78, 2023.