

Article Title

Law Enforcement against Perpetrators of Child Grooming Sexual Abuse at the Tebing Tinggi Police Resort: An Islamic Criminal Law Perspective

Author(s)

Anggi Ramadhani¹*Universitas Islam Negeri Sumatera Utara Medan***Ramadani Ramadani***Universitas Islam Negeri Sumatera Utara Medan*¹Correspondence Emailanggi0205201046@uinsu.ac.id

How to cite:

Ramadhani, A., & Ramadani, R. (2024). Law Enforcement against Perpetrators of Child Grooming Sexual Abuse at the Tebing Tinggi Police Resort: An Islamic Criminal Law Perspective. *Al-Ishlah: Jurnal Ilmiah Hukum*, 27(2), 453-473. <https://doi.org/10.56087/aijih.v27i2.516>



ABSTRACT

This study aims to identify cases of child grooming sexual abuse in Tebing Tinggi City, identify the types of sanctions that can be imposed on groomers from the perspective of Islamic criminal law, and examine the law enforcement efforts undertaken by the Tebing Tinggi Police Resort in handling these cases. This research employs a mixed-methods approach, combining field research and normative legal analysis. The collected data is then analyzed qualitatively to describe the issue and address the research objectives. The results show that child grooming cases at the Tebing Tinggi Police Resort fluctuated throughout 2019-2024, with a significant surge of 70 cases in 2023. The standard modus operandi involves establishing an emotional relationship and trust between the groomer and the victim, which the groomer then exploits to commit sexual abuse. From the perspective of Islamic criminal law, groomers can be subjected to hadd punishment if sexual intercourse occurs or ta'zir punishment if only sexual abuse without intercourse takes place. Simultaneously, the Tebing Tinggi Police Resort has carried out its law enforcement function both repressively, through the process of investigation, inquiry, and determination of suspects based on the provisions of Law Number 8 of 1981 and Law Number 23 of 2002, and preventively, through education and outreach programs. Therefore, it is recommended that the Tebing Tinggi Police Resort, the Tebing Tinggi City Government, community institutions, religious leaders, families, and parents enhance their efforts in preventing and handling child grooming comprehensively and continuously.

Keywords: Child Grooming; Groomer; Islamic Criminal Law; Law Enforcement; Sexual Abuse.

INTRODUCTION

Sexual crimes against children constitute a grave violation of human rights, resulting in profound and long-term traumatic impacts not only on the victims but also on their families and the social fabric of society (Firdaus & Iwan, 2024). Children, characterized by their vulnerability and ongoing physical and psychological development, are entitled to extra protection from all forms of violence and exploitation, including sexual abuse (Acharya, 2023). This protection must be guaranteed and realized by families, communities, and the state (Lira, 2023). Ironically, however, sexual abuse against children remains a concerning phenomenon in various parts of the world, including Indonesia. The perpetrators often exist within the child's close environment, such as family, neighbors, teachers, and even religious figures, further complicating the issue and demanding a comprehensive and integrated approach (Nasrullah, 2023).

The modus operandi of sexual abuse against children is also evolving and exhibiting increasingly worrisome trends. One of the most disturbing methods is child grooming, which involves the perpetrator gradually approaching and manipulating a child with the intent to carry out sexual harassment or exploitation (Jang & Suh, 2024). Perpetrators of child grooming sexual abuse, known as "groomers," typically possess the ability to control and influence a child's mind, often leaving victims unaware that they are being manipulated and exploited (Haryanto & Harefa, 2022). The tactics employed in child grooming vary widely, ranging from providing attention and gifts to

offering assistance and support (Jeglic et al., 2023). It renders child grooming a severe threat that must be recognized and addressed promptly.

Based on data from the Women and Children Protection Unit (PPA) of the Tebing Tinggi Police Resort, 241 cases of child grooming sexual abuse were recorded from 2019 to June 2024. This data underscores that child grooming is not an issue to be taken lightly. The high number of cases necessitates more severe and systematic prevention and handling efforts from law enforcement (Suparmin & Ramadani, 2022). Firm and fair law enforcement is a crucial pillar in protecting children from sexual abuse. Additionally, preventive measures through education and public awareness campaigns are critical to raising awareness and sensitivity toward the issue of child grooming.

Law enforcement efforts against perpetrators of sexual abuse against children in Indonesia are based on various legal regulations, one of which is [Law Number 23 of 2002](#)¹. This law mandates special protection for children as the nation's future generation and establishes severe criminal sanctions for perpetrators of crimes against children, including groomers (Alwafi & Sulchan, 2023). In addition to the national legal framework, the perspective of Islamic Criminal Law provides a foundation for prosecuting perpetrators of sexual crimes. Although the Qur'an does not explicitly address sexual abuse, such acts are considered close to adultery. As emphasized in [Q.S. Al-Isra' verse 32](#), Islam strictly prohibits approaching adultery as it is a vile act and the worst path. In this context, sexual abuse can be categorized as *jarimah ta'zir*, a criminal act whose punishment is left to the discretion of the judge or ruler (Hakim & Suparmin, 2024). Furthermore, scholars of Islamic Criminal Law agree that sexual abuse against children is a strictly forbidden form of sexual crime and is categorized as a major sin because it corrupts the child's nature and has profound negative impacts on their lives (Damanik & Romzi, 2023).

Based on the description above, this study aims to identify cases of child grooming sexual abuse in Tebing Tinggi City, identify the types of sanctions that can be imposed on groomers from the perspective of Islamic Criminal Law, and examine the law enforcement efforts undertaken by the Tebing Tinggi Police Resort in handling these cases. By thoroughly examining this issue, it is hoped that this research can contribute to the prevention and handling of sexual abuse against children, particularly those perpetrated through child grooming.

¹Law Number 23 of 2002 on Child Protection has been amended twice: by Law Number 35 of 2014 and Law Number 17 of 2016 (enacting Government Regulation in Lieu of Law Number 1 of 2016).

METHOD

This research employs a mixed-methods approach, combining field research and normative legal analysis, to examine law enforcement against groomers at the Tebing Tinggi Police Resort from the perspective of Islamic criminal law. A qualitative approach with a field research method is applied to identify cases of child grooming sexual abuse and to understand the law enforcement efforts undertaken by the Tebing Tinggi Police Resort in handling these cases (Irwansyah, 2021). The selection of this location is based on indications of fluctuations in the number of child grooming sexual abuse cases from year to year. Meanwhile, the normative research method is used to analyze the types of sanctions for groomers based on the perspective of Islamic criminal law (Qamar & Rezah, 2020). This research utilizes both primary and secondary data sources. Primary data is collected through in-depth interviews with Assistant Investigators at the Women and Children Protection Unit (PPA) of the Tebing Tinggi Police Resort as key informants. Secondary data is obtained through a literature review of legal materials. Subsequently, the collected data is analyzed qualitatively to describe the issue and address the research objectives (Sampara & Husen, 2016).

RESULTS AND DISCUSSION

A. Child Grooming in Tebing Tinggi City: Case Identification and Analysis

The phenomenon of child grooming as a *modus operandi* in sexual abuse against children has become a serious concern worldwide, including in Indonesia. Child grooming is a process where a groomer deliberately builds an emotional connection with a child to gain their trust, with the ultimate goal of committing sexual abuse (Gill & Harrison, 2015). These groomers are sexual predators who are highly adept at concealing their malicious intentions. They often present themselves as kind, friendly, and caring individuals, making it easy to gain the trust of children and their parents (Collings, 2020). The tactics used in child grooming vary widely, ranging from giving attention and gifts and offering help and support to threatening and coercing. It makes child grooming a severe threat that must be recognized and addressed promptly.

Based on data obtained from the Women and Children Protection Unit (PPA) of the Tebing Tinggi Police Resort, 241 cases of child grooming sexual abuse have been handled from 2019 to June 2024. Details of the cases per year can be seen in the table below.

Table. Cases of Child Grooming Sexual Abuse in Tebing Tinggi City (2019-2024)

No	Year	Number of Cases
1.	2019	43
2.	2020	44
3.	2021	38
4.	2022	20
5.	2023	70
6.	2024	26*
Total		241

*January – June 2024

Source: PPA Unit Tebing Tinggi Police Resort, 2024.

The data in table above shows yearly fluctuations in the number of cases. In 2019 and 2020, the total number of cases reached 87. In 2021 and 2022, the cases decreased to 38 and 20, respectively. However, in 2023, there was a significant surge in cases, with 70 cases recorded. This increase in the number of cases indicates the need for an evaluation and improvement in the effectiveness of the preventive measures that have been implemented. Meanwhile, from January to June 2024, 26 cases were handled, indicating that child grooming remains a severe threat that needs attention from various parties, including the government, law enforcement agencies, community institutions, families, and individuals.

The chronology of child grooming cases typically encountered at the Tebing Tinggi Police Resort shows a relatively similar pattern. According to Brigadier Salomo Samosir, groomers, both those who are still students and those who are adults, tend to build emotional bonds with victims through various means.² Some common tactics include establishing romantic relationships, “friends with benefits” arrangements, or other close relationships. After successfully creating a sense of trust and dependence, the groomer will commit indecent acts or sexual abuse by exploiting the victim’s vulnerability (Utari et al., 2024).

From a criminological perspective, Sutherland (1947) states that deviant behavior, including sexual abuse, is learned through interaction with others in intimate groups. In the context of child grooming, groomers have learned manipulation techniques and tactics from their social environment or personal experiences. Furthermore, Sykes and Matza (2018) explain how individuals neutralize feelings of guilt and maintain a positive self-image despite engaging in deviant behavior. In this case, groomers use neutralization techniques, such as blaming the victim or considering their actions as a form of expressing affection, to eliminate guilt and justify their actions.

²Interview Results with the Assistant Investigator of the Women and Children Protection Unit at the Tebing Tinggi Police Resort. Brigadier Salomo Samosir, S.H., on June 11, 2024.

Furthermore, [Salamor et al. \(2020\)](#) categorizes three general stages underlying child grooming: manipulation, rapport building, and sexual context. The manipulation stage is carried out in various ways, such as giving compliments, gifts, or excessive attention to the victim, making the victim feel special and attached to the groomer. The rapport-building stage is done by adjusting the style of speech and finding out the victim's interests to create emotional closeness. Meanwhile, the sexual context stage is carried out by introducing the victim to things that are pornographic, talking dirty, seducing, or showing pornographic content to the victim ([Rivanie et al., 2021](#)).

The motives of groomers in Tebing Tinggi City also vary. Brigadier Salomo Samosir explains that some of the cases handled involve minor indecent acts such as kissing and touching, but some cases lead to sexual intercourse. Groomers often use lures or specific promises to persuade victims to comply with their wishes. In addition to physical sexual abuse, the modus operandi of child grooming can also take the form of verbal sexual abuse through online social media. Some examples of verbal sexual abuse that are often found include sexting, requests for voice recordings or video calls related to sexual activity, and sending messages or images that are pornographic ([Borj et al., 2023](#)).

The vulnerability of children to sexual abuse, primarily through child grooming, is exacerbated by several factors. The lack of knowledge and understanding of comprehensive sex education is a significant factor. Children who do not have sufficient knowledge about sexuality, boundaries in interacting with others, and ways to protect themselves will be more easily ensnared by groomers. This condition is aggravated by easy access to the internet and social media, where the Ministry of Communication and Informatics handled 9,228 child pornography content in the 2016-2024 period ([Ministry, 2024](#)).

The tendency of children to form excessive relationships with the opposite sex without being balanced with emotional maturity and adequate knowledge also increases their risk of being subjected to child grooming. Children who are not emotionally mature tend to be easily carried away by feelings and influenced by the groomer's seduction and manipulation. They perceive the attention and affection given by the groomer as a form of love and affection, so they do not realize that they are being manipulated for sexual purposes. Lack of parental supervision and social environment further exacerbates this situation. Busy parents and a lack of open communication between parents and children can create gaps for groomers to approach and manipulate victims. In addition, a social environment that is permissive of behaviors that lead to sexual abuse, such as verbal harassment, inappropriate physical touch, or sexual jokes, can also increase the risk of child grooming.

In this context, social disorganization theory can provide a relevant analytical framework. This theory states that high crime rates are associated with weakening social bonds and informal control in society (Antunes & Manasse, 2022). In environments with high levels of social disorganization, such as poverty, unemployment, and lack of community participation in positive activities, individuals tend to be more easily involved in deviant behavior, including child grooming. In addition, opportunity theory can also explain the phenomenon of child grooming. This theory emphasizes that crime occurs when there is a convergence between a motivated perpetrator, a vulnerable target or victim, and a lack of effective guardianship (Shola, 2022). In the case of child grooming, children who lack knowledge about sexuality and have unlimited access to the internet become vulnerable targets, while lack of parental supervision and social environment provides opportunities for groomers to commit crimes.

B. Types of Sanctions for Groomers from the Perspective of Islamic Criminal Law

Islamic law, with its emphasis on morality and individual protection, does not explicitly elaborate on the modus operandi of child grooming sexual abuse. It is because, from an Islamic perspective, any form of sexual relationship outside a valid marriage contract is categorized as adultery (*zina*). The strict prohibition against adultery is enshrined in Q.S. Al-Isra' verse 32, which states:

وَلَا تَقْرَبُوا الزَّوْجَ إِتْنَهُ كَانَ فَاحِشَةً وَسَاءَ سَبِيلًا ﴿٣٢﴾

“And do not approach unlawful sexual intercourse. Indeed, it is ever an immorality and is evil as a way.”

This verse demonstrates the seriousness with which Islam regards the preservation of moral purity and the sanctity of individuals and society. The phrase “and do not approach unlawful sexual intercourse” not only prohibits the act of adultery itself but also all forms of *jarimah qurb az-zina* (acts approaching adultery). This encompasses various behaviors such as being alone with a non-*mahram*, gazing with lust, touching, and so forth. The act of adultery is categorized as an immoral act and an evil path because it disrupts the social order, destroys honor, spreads diseases, and leads to ambiguity in lineage.

Scholars from various schools of thought put their emphasis on defining *zina* (Thohari, 2018). Maliki scholars, for instance, emphasize the aspect of awareness and the absence of ownership rights in the sexual relationship, defining *zina* as sexual intercourse carried out by a mukallaf man with a woman's genitals (*faraj*) that he does not own, intentionally. Hanafi scholars focus on the aspect

of penetration and the absence of a valid ownership relationship, defining *zina* as sexual intercourse carried out by a man with a woman's genitals (*qubul*) who is not his slave and not within the context of doubt (*syubhat*). Shafi'i scholars emphasize the aspect of legality (*halal* or *haram*) and the element of lust in the act, defining *zina* as the act of inserting a man's genitals (*penis*) into a woman's genitals (vagina) that is carried out illegally (*haram*) and driven by lust. From these various definitions, it can be concluded that the essence of *zina* lies in the act of sexual intercourse carried out without a valid marriage contract. Meanwhile, the punishment for the perpetrators is stated in [Q.S. An-Nur](#) verse 2:

الزَّانِيَةُ وَالزَّانِي فَاجْلِدُوا كُلَّ وَاحِدٍ مِّنْهُمَا مِائَةَ جَلْدَةٍ وَلَا تَأْخُذْكُمْ بِهِمَا رَأْفَةٌ فِي دِينِ اللَّهِ إِنْ كُنْتُمْ تُؤْمِنُونَ بِاللَّهِ وَالْيَوْمِ الْآخِرِ وَلْيَشْهَدْ عَذَابَهُمَا طَائِفَةٌ مِّنَ الْمُؤْمِنِينَ ﴿٢﴾

“The [unmarried] woman or [unmarried] man found guilty of sexual intercourse - lash each one of them with a hundred lashes, and do not be taken by pity for them in the religion of Allah, if you should believe in Allah and the Last Day. And let a group of the believers witness their punishment.”

This verse explicitly describes the punishment for perpetrators of *zina*, which is one hundred lashes. This punishment demonstrates how seriously Islam views the act of adultery and its efforts to maintain social harmony. The assertion in the verse that the punishment must be carried out without pity indicates that justice must be upheld objectively, without being influenced by any subjective factors. This punishment aims not only to provide a deterrent effect for the perpetrator but also as a form of prevention so that society avoids the act of adultery. Thus, it creates a common good where individuals and society are protected from the negative impacts of adultery, both morally, spiritually, and socially.

On the other hand, there are *jarimah qurb az-zina* in the form of sexual abuse acts that generally do not reach the stage of sexual intercourse. However, there are cases of sexual abuse that culminate in sexual intercourse or *zina*. In this case, it is essential to note that a person who is forced to commit adultery cannot be subjected to *hadd* punishment as regulated in [Q.S. An-Nur](#) verse 2. This is because coercion eliminates intent (*qasd*) and the intention to violate the law (criminal intent), which is one of the conditions for applying *hadd* punishment. Consequently, only the perpetrator of sexual abuse can be subjected to *hadd* punishment for their act of *zina* (Wahyuni et al., 2022).

One relevant case example is child molestation, which results in sexual intercourse. In such a case, the child who is the victim of coercion cannot provide

adequate resistance, resulting in the act of *zina*. This principle is in line with the word of Allah SWT in Q.S. Al-An'am verse 145:

قُلْ لَا أَجِدُ فِي مَا أُوحِيَ إِلَيَّ مُحَرَّمًا عَلَى طَاعِمٍ يَطْعَمُهُ إِلَّا أَنْ يَكُونَ مَيْتَةً أَوْ دَمًا مَسْفُوحًا أَوْ
لَحْمَ خِنزِيرٍ فَإِنَّهُ رِجْسٌ أَوْ فِسْقًا أُهْلًا لِغَيْرِ اللَّهِ بِهِ فَمَنْ اضْطُرَّ غَيْرَ بَاغٍ وَلَا عَادٍ فَإِنَّ رَبَّكَ
غَفُورٌ رَحِيمٌ

"Say, "I do not find within that which was revealed to me [anything] forbidden to one who would eat it unless it be a dead animal or blood spilled out or the flesh of swine - for indeed, it is impure - or it be [that slaughtered in] disobedience, dedicated to other than Allah. But whoever is forced [by necessity], neither desiring [it] nor transgressing [its limit], then indeed, your Lord is Forgiving and Merciful"."

This verse excludes certain groups from the prohibition of consuming certain foods, including those who are forced to eat them. This principle is also reinforced by Al-Jauziyyah (2014), which recounts that Ali bin Abi Talib persuaded Caliph Umar bin Khattab by using Q.S. Al-An'am verse 145 to free a woman who was forced to commit adultery by a shepherd due to an emergency. In addition, in the hadith by Ibn Majah, it was narrated from Ibn 'Abbas that the Prophet Muhammad said, Allah forgave my nation for mistakes and forgetfulness, and what they were forced to do.

Sexual abuse acts that do not reach the stage of sexual intercourse are subject to *ta'zir* punishment, considering that such acts contain elements of crimes related to honor. Etymologically, *ta'zir* comes from the word 'azzara, which means preventing, rejecting, helping, and strengthening. Az-Zuhaili (2011) defines *ta'zir* as a punishment whose measure is not explicitly specified in sharia. The authority to determine the type and amount of *ta'zir* punishment is entrusted to the ruler or judge, considering various factors such as the severity of the act, the impact caused, and the condition of the perpetrator and the victim. Implementing *ta'zir* punishment aims to create a common good, protect society from crime, and establish a safe and controlled environment.

Ta'zir punishment can be appropriately implemented if it fulfills several essential elements (Irfan & Masyrofah, 2019). First, *Al-rukn al-syar'i*, which is the existence of a sharia prohibition accompanied by the threat of punishment based on the *nash* of the Qur'an and Sunnah. This element indicates that an act must first be established as a violation of sharia in order to be punishable. Second, *Al-rukn al-madi*, the act committed, must violate the law and result in a criminal act. This element emphasizes the aspect of a natural act contrary to the law. Third, *Al-rukn*

al-adabi, the legal subject to be punished must be a person who understands *taklif* (sharia obligations), in other words, the perpetrator is a mukallaf. This element indicates that punishment can only be imposed on a legally competent person who can be held accountable for their actions.

The legitimacy of implementing *ta'zir* punishment can also be found in the legal practices carried out by the Prophet Muhammad. He allowed temporary detention (*habs*) of suspects for the sake of public interest, such as preventing the perpetrator from escaping or destroying evidence. This was based on the narration of [Ath-Thabrani \(2015\)](#) about the Prophet's action in detaining a man suspected of stealing a camel. Although it was later proven that the man was innocent, the detention carried out by the Prophet shows that the imposition of *ta'zir* punishment, in this case temporary detention, is permissible in order to uphold justice and protect society ([Hamim, 2020](#)).

In the context of applying *ta'zir* punishment to groomers, it is enforced because the act of sexual abuse fulfills three elements ([Syarbaini, 2023](#)). *First*, the punishment is not explained in detail in the Qur'an. *Second*, it aims to provide a lesson for the perpetrator and prevent others from committing similar acts. *Third*, it is a form of disobedience that harms the victim and disrupts the public interest. Child grooming itself involves various forms of sexual abuse, such as touching, kissing, hugging, and other acts that violate the victim's honor.

Touching itself is an act of disobedience and is included in the cluster of disobedience committed by the hand. Sheikh Muhammad bin Salim Babashil in [Kurniawan \(2022\)](#) emphasizes that one of the acts of disobedience of the hand is touching one of the body parts of another woman (not a wife and not a *mahram*) if done intentionally. Such acts constitute a form of breach of trust and exploitation of a child who is still vulnerable. In cases of child grooming where the groomer commits acts of touching, kissing, or other indecent acts without reaching the stage of sexual intercourse, Islamic law stipulates *ta'zir* punishment, which can be in the form of lashes or imprisonment. This punishment has two main functions, namely as a form of moral education for the groomer and prevention so that they do not repeat their actions in the future.

It should be emphasized that punishment is only imposed on the groomer in cases of child grooming. The child who is the victim cannot be punished, considering that they do not yet have the full capacity to understand the consequences of their actions and do not have the power to refuse or resist the groomer's wishes. Although the act of abuse does not always result in fatal physical harm, the psychological impact experienced by the victim can be very detrimental and have long-term consequences. Therefore, law enforcement needs

to provide appropriate punishment for the groomer. The length of imprisonment can be adjusted to the severity of the act and the impact caused, for example, the act of disobedience of the hand committed by the groomer will be punished by imprisonment for 6 months.

C. Law Enforcement against Child Grooming Sexual Abuse Cases at the Tebing Tinggi Police Resort

Law enforcement, as a crucial instrument in maintaining order and justice, encompasses efforts undertaken to address violations of legal norms (Rahayu et al., 2020). In the context of handling child grooming sexual abuse cases, the Tebing Tinggi Police Resort carries out its law enforcement function through two approaches: repressive and preventive. The repressive approach manifests through actions taken against groomers by processing them according to the applicable criminal justice system (Wilson, 2020). This aims to provide a deterrent effect for groomers and protect society from the potential for similar crimes. Meanwhile, the preventive approach is carried out through various efforts such as counseling, information dissemination, and education to the public regarding the dangers of child grooming and ways to protect themselves and their children from this threat. Preventive efforts also include protecting victims of child grooming legally, psychologically, and socially (Ali et al., 2023).

1. Repressive Efforts

Repressive efforts in law enforcement against child grooming sexual abuse cases at the Tebing Tinggi Police Resort are carried out systematically, paying attention to the need for victim protection and recovery. Before initiating legal proceedings, the police, through the Women and Children Protection Unit (PPA) of the Tebing Tinggi Police Resort, implement a rehabilitative approach by taking the victim to a counseling room. Brigadier Salomo Samosir, Assistant Investigator in the PPA Unit, stated that this first step aims to provide an opportunity for victims to feel safe and comfortable when recounting their traumatic experiences. Counseling is also conducted by competent professionals experienced in handling child victims of sexual abuse. After counseling, the police gather information from the victim's parents and compile a case report before taking the victim to the hospital for a visit and report to support medical evidence in the investigation process.

Furthermore, it is crucial to exercise caution when obtaining information from the victim to ensure the process does not cause further psychological distress (Ilyasa, 2021). Brigadier Salomo Samosir also explains to the victim that the state provides follow-up counseling services through the PPA Service to support the victim's psychological recovery. This approach is relevant

because the psychological impact of sexual abuse is often more severe than the physical impact and can lead to post-traumatic stress disorder (Boumpa et al., 2024). To address this, Article 69A of Law Number 35 of 2014 stipulates special protection for child victims of sexual crimes, including education on religious and moral values, social rehabilitation, psychosocial assistance at every stage of the legal examination, and special assistance for victims during court hearings. By implementing these provisions, the Tebing Tinggi Police Resort strives to provide comprehensive protection for victims while ensuring that each stage of case handling adheres to legal principles that protect children.

In handling child grooming cases at the Tebing Tinggi Police Resort, the investigation and inquiry processes are carried out systematically by the provisions of Law Number 8 of 1981. Based on this law, these stages aim to uncover and gather evidence to clarify the crime and identify the responsible groomer. The stages commence when the police receive a report or complaint regarding an alleged crime. At this stage, the police must first ensure that the reported act fulfills the elements of a crime, which is done through an investigation process to assess whether there is sufficient initial evidence. If the initial evidence is sufficient, the case progresses to the inquiry stage, where the police can designate someone as a suspect.

Determining a suspect in a child grooming sexual abuse case is a step that requires careful consideration, given its impact on human rights and strict criminal law provisions. The police must have sufficient preliminary evidence to establish suspect status. Article 1 point 2 of Law Number 8 of 1981 explains that an inquiry is a series of actions by investigators to seek and gather evidence to clarify the crime and identify the perpetrator. This evidence consists of witness testimony, expert testimony, documentary evidence, clues, and the suspect's statement if they have been summoned for questioning.

If the collected evidence is sufficiently robust and points to one or more suspects, the police can arrest them to ensure the smooth progress of further legal proceedings and avoid the risk of the recurrence of the crime or the suspect fleeing. At this stage, the inquiry aims to gather complete evidence to be compiled into a comprehensive case file. In child grooming cases, this evidence includes digital evidence (e.g., electronic communication between the groomer and the victim), *visum et repertum* results indicating abuse, and statements from the victim and other relevant witnesses.

Once all evidence is collected and the case file is deemed complete, the police investigator will submit the file to the Public Prosecutor (JPU) for completeness review (Siswanto & Sudawan, 2023). This stage is known as the

P-21 stage, which signifies that the case file is declared complete and ready to be submitted to the prosecution stage. Legal responsibility for the suspect and evidence is transferred from the police to the prosecutor's office, as regulated in Article 110 of [Law Number 8 of 1981](#). After the JPU receives the P-21 file, the prosecution proceeds with the aim of proving the elements of the crime in court until the judge delivers an appropriate verdict according to applicable legal provisions.

From the perspective of the law governing punishment for perpetrators, Article 82 of [Government Regulation in Lieu of Law Number 1 of 2016](#) juncto Article 76E of [Law Number 35 of 2014](#) serves as the legal basis for taking action against groomers. This provision states that perpetrators of sexual abuse against children are threatened with imprisonment for 5 to 15 years and a maximum fine of Rp 5 billion. Furthermore, Article 76E reinforces the prohibition against anyone committing violence, deception, or persuasion, leading to indecent acts against children. In cases where the groomer has a family relationship or special closeness with the victim, the penalty can be increased by one-third of the established threat.

From the perspective of Islamic Criminal Law, cases of sexual abuse that do not reach the stage of sexual intercourse can be classified as a form of *jarimah qurb az-zina* or acts approaching adultery. According to this principle, groomers who commit sexual abuse against children are subject to *ta'zir* sanctions, which are punishments determined by the judge based on discretion and the level of danger of the act to prevent reprehensible behavior that approaches adultery. *Ta'zir* sanctions in child grooming cases are regulated only for the groomer because, in Islamic Criminal Law, the victim does not receive punishment; instead, the victim must be protected and their condition restored. The application of *ta'zir* as a sanction for groomers in Islamic law allows judges to determine appropriate punishment based on the circumstances of the case and the need to maintain the honor and morality of society.

By applying positive law and aligning with the perspective of Islamic Criminal Law, the Tebing Tinggi Police Resort has maximized repressive efforts in the stages of investigation, inquiry, and determination of groomer suspects. In addition, the Tebing Tinggi Police Resort also provides psychological assistance, in line with the principle of prevention and protection for victims, while gathering the necessary evidence to clarify the groomer's criminal acts. This integrated approach, encompassing positive law and Islamic legal values, is expected to provide a deterrent effect for groomers and provide optimal protection for children from the threat of child grooming sexual abuse.

2. Preventive Efforts

Preventive efforts in law enforcement against child grooming cases at the Tebing Tinggi Police Resort are carried out comprehensively and systematically, with the main focus on suppressing the rate of increase in the number of groomers and child grooming sexual abuse cases in Tebing Tinggi City. These preventive efforts are increasingly important, considering statistics show a significant surge in child grooming cases: from 20 cases in 2022 to 70 cases in 2023, while from January to June 2024, 26 cases have been recorded. This data illustrates the urgent need for more effective preventive approaches to stem and reduce the risk of these crimes that harm children.

Brigadier Salomo Samosir explains that these preventive measures play a crucial role in minimizing children's potential vulnerability to this modus operandi of sexual abuse, which is often difficult to detect. In implementing the preventive approach, the Tebing Tinggi Police Resort refers to several main aspects, including community education, increasing legal awareness, and fostering a conducive social environment for child protection. According to preventive law enforcement theory, a preventive legal approach protects society from the possibility of crimes through anticipatory actions, not just repressive ones ([Gundhus & Jansen, 2020](#)).

In preventing child grooming crimes, preventive efforts are carried out through counseling, information dissemination, and education activities involving various elements of society, both in schools, community organizations, and residential environments. These activities aim to equip the community with an understanding of behavioral characteristics that indicate child grooming and provide guidance on recognizing and avoiding this modus operandi. Based on this approach, the police act as facilitators in providing clear information regarding the adverse effects of child grooming and ways to report it if indications are found around them. Furthermore, the police collaborate with community leaders and schools to create a safe environment and protect children from the threat of sexual crimes. This step is in line with community policing theory, which emphasizes the importance of cooperation between the police and the community in crime prevention efforts, especially concerning the vulnerability of vulnerable groups such as children ([Ndukwe & Ogbonnaya, 2024](#)).

Moreover, preventive efforts against groomers at the Tebing Tinggi Police Resort also focus on an approach that involves monitoring at-risk behavior in the community. The police conduct mapping of areas and community groups vulnerable to child grooming sexual abuse, which often utilizes social media or

online spaces as a means to approach children. In this regard, the Tebing Tinggi Police Resort not only plays a role in providing education but also monitors social environments that have the potential to become places for groomers to carry out their actions. This effort is also made to suppress the potential for recurring crimes with the same modus operandi and involves a more specific preventive approach according to the characteristics and patterns of such crimes.

In this preventive approach, the Tebing Tinggi Police Resort also incorporates religious education as an essential part of efforts to instill strong moral and ethical values in children from an early age. The perspective of Islamic law is highly relevant in supporting this effort. Q.S. *Al-Isra'* verse 32, which prohibits "approaching adultery," contains a preventive principle that prohibits not only the act of adultery itself but also all forms of behavior that can lead to adultery, known as *jarimah qurb az-zina*. In Islamic law, actions approaching adultery include various forms of behavior, such as being alone with a non-*mahram*, gazing with lustful intent, and impermissible physical contact. This prohibition demonstrates the importance of prevention in maintaining the sanctity of relationships between individuals, especially in protecting children from the threat of child grooming, which has the potential to damage their mental and moral well-being. With this approach, the Tebing Tinggi Police Resort recognizes the importance of a solid religious understanding in children and encourages the integration of moral education into formal and non-formal education systems in the community.

From a formal legal perspective, the preventive efforts undertaken by the Tebing Tinggi Police Resort are also based on Article 13 of [Law Number 2 of 2002](#), which stipulates that the police must maintain public security and order, uphold the law, and provide protection, patronage, and service to the community. Referring to this provision, the police are obligated to carry out comprehensive preventive measures to protect children from various forms of sexual crimes, including child grooming. In this effort, the Tebing Tinggi Police Resort implements active counseling methods through print media and social media to alert the public about potential crime modus operandi. This activity is intended to educate and raise collective awareness in the community so that they can recognize and immediately report suspicious actions that can endanger children.

Furthermore, the strategy implemented by the Tebing Tinggi Police Resort for child grooming prevention reflects routine activity theory, which states that crime can be minimized by reducing opportunities for groomers to launch their criminal acts ([Hayes & Maher, 2024](#)). By conducting outreach in

strategic locations and ensuring that the public understands how to protect their children, the Tebing Tinggi Police Resort seeks to reduce opportunities for groomers to approach victims. The police also encourage parental participation in supervising their children's activities, both at home and in the digital space, considering that child grooming cases often involve introductions through social media. This approach is a form of proactive and comprehensive law enforcement that pays close attention to preventive efforts in dealing with cases of sexual crimes against children.

By implementing these preventive measures, the Tebing Tinggi Police Resort demonstrates its commitment to safeguarding the safety and well-being of children from sexual crimes. Continuous outreach is expected to foster a culture of legal awareness among the public so that not only the police are active in handling cases, but the community also participates in supporting child protection efforts. These ongoing preventive efforts are part of the police strategy to create a safe environment and protect children from the threat of child grooming while upholding legal principles and relevant moral values in creating social and mental resilience in the community.

CONCLUSIONS AND SUGGESTIONS

Based on the results and discussion, it can be concluded that child grooming sexual abuse cases at the Tebing Tinggi Police Resort demonstrate a fluctuating pattern from 2019 to 2024, with the number of cases varying each year. The significant surge in cases in 2023 indicates the need for increased vigilance and more comprehensive handling efforts. The typical modus operandi of child grooming involves establishing an emotional relationship and trust between the groomer and the victim, which the groomer then exploits to commit sexual abuse. From the perspective of Islamic criminal law, the act of sexual intercourse committed in the context of child grooming is categorized as *zina* and is subject to *hadd* punishment as regulated in [Q.S. An-Nur](#) verse 2. Meanwhile, acts of sexual abuse without intercourse are classified as *jarimah qurb az-zina* and are subject to *ta'zir* punishment. *Ta'zir* punishment is flexible and can be adjusted according to the severity of the act and the impact caused, for example, imprisonment for 6 months for groomers who commit acts of disobedience with their hands. Furthermore, the Tebing Tinggi Police Resort has carried out its law enforcement function both repressively and preventively. Repressive efforts are carried out by taking action against groomers through investigation, inquiry, and determination of suspects based on the provisions of [Law Number 8 of 1981](#). The threat of punishment for groomers as regulated in [Law Number 23 of 2002](#) is imprisonment and fines, which can be increased if the groomer has a family relationship or special closeness with the victim. On the other hand, preventive efforts are carried out through community

education programs, increasing legal awareness, and fostering a conducive social environment for child protection, as mandated in Article 13 of [Law Number 2 of 2002](#).

Based on the above conclusions, it is recommended that the Tebing Tinggi Police Resort intensify law enforcement efforts against groomers by prioritizing a holistic approach that encompasses both repressive and preventive measures. Strengthening the repressive aspect is emphasized through firm, measured actions oriented towards victim recovery by applicable legal provisions. The preventive aspect can be carried out by optimizing the function of Binmas (Community Development) in disseminating information about child grooming and actively involving the community in prevention efforts. The Tebing Tinggi City Government needs to optimize its role in protecting children by issuing specific policies and programs focused on the prevention and handling of child grooming, as well as ensuring accessibility to assistance and rehabilitation services for victims. Community institutions are expected to develop innovative programs to increase public awareness and participation in child grooming prevention, such as training for parents and teachers regarding early detection and handling of child grooming cases. Religious leaders have a strategic role in conveying religious values that uphold the dignity and worth of children and emphasizing that child grooming is a form of crime that contradicts religious teachings. Families and parents should build emotional closeness with their children, create a safe and comfortable family environment for children, and provide sexual education according to the child's developmental stage to enhance the child's ability to protect themselves from the threat of child grooming.

REFERENCES

- Acharya, M. (2023). Rights and Safeguarding of Children: A Qualitative Investigation in Arghakhanchi. *Orchid Academia Siraha*, 2(1), 42-52. <https://doi.org/10.3126/oas.v2i1.65601>
- Al-Jauziyyah, I. Q. (2014). *Buku Pintar Memutuskan Perkara: Dari Rumah Tangga, Peradilan, sampai Negara* (Trans. by M. M. Anasy). Pustaka Al-Kautsar.
- Ali, S., Haykal, H. A., & Youssef, E. Y. M. (2023). Child Sexual Abuse and the Internet—A Systematic Review. *Human Arenas*, 6(2), 404-421. <https://doi.org/10.1007/s42087-021-00228-9>
- Alwafi, M. R., & Sulchan, A. (2023). Penegakan Hukum Perkara Tindak Pidana Pelecehan Seksual Terhadap Anak (Studi Kasus: Perkara Nomor: 540/Pid.B/2016/PN.Smg). *Jurnal Ilmiah Sultan Agung*, 2(1), 1-10. Retrieved from <https://jurnal.unissula.ac.id/index.php/JIMU/article/view/31235>
- Antunes, M. J. L., & Manasse, M. (2022). Social Disorganization and Strain: Macro and Micro Implications for Youth Violence. *Journal of Research in Crime and Delinquency*, 59(1), 82-127. <https://doi.org/10.1177/00224278211004667>

- Ath-Thabrani, I. (2015). *Al Mu'jam Al Kabir* (Trans. by M. Misbah & A. Murtadho). Pustaka Azzam.
- Az-Zuhaili, W. (2011). *Fiqh Islam Wa Adillatuhu* (Trans. by A. H. Al-Kattani, et al., Volume 4). Gema Insani.
- Borj, P. R., Raja, K., & Bours, P. (2023). Online Grooming Detection: A Comprehensive Survey of Child Exploitation in Chat Logs. *Knowledge-Based Systems*, 259, 1-21. <https://doi.org/10.1016/j.knosys.2022.110039>
- Boumpa, V., Papatoukaki, A., Kourti, A., Mintzia, S., Panagouli, E., Bacopoulou, F., Psaltopoulou, T., Spiliopoulou, C., Tsolia, M., Sergentanis, T. N., & Tsitsika, A. (2024). Sexual Abuse and Post-Traumatic Stress Disorder in Childhood, Adolescence and Young Adulthood: A Systematic Review and Meta-Analysis. *European Child & Adolescent Psychiatry*, 33(6), 1653-1673. <https://doi.org/10.1007/s00787-022-02015-5>
- Collings, S. J. (2020). Defining and Delimiting Grooming in Child Sexual Exploitation. *Child Abuse Research in South Africa*, 21(1), 1-9. <https://hdl.handle.net/10520/EJC-1d473f7b39>
- Damanik, D., & Romzi, A. (2023). Distorted the Facts an Act of Sexual Harassment the Perspective of the Ulama's Interpretation (A New Approach and Direction in Understanding Facts). *Jurnal Ushuluddin*, 31(2), 241-266. <https://doi.org/10.24014/jush.v31i2.19626>
- Firdaus, M. A., & Iwan, I. (2024). Custody Determination for a Child Born as a Result of Rape: A Maqashid al-Sharia Perspective. *Al-Ishlah: Jurnal Ilmiah Hukum*, 27(2), 406-426. <https://doi.org/10.56087/aijih.v27i2.512>
- Gill, A. K., & Harrison, K. (2015). Child Grooming and Sexual Exploitation: Are South Asian Men the UK Media's New Folk Devils? *International Journal for Crime, Justice and Social Democracy*, 4(2), 34-49. <https://doi.org/10.5204/ijcjsd.v4i2.214>
- Government Regulation in Lieu of Law of the Republic of Indonesia Number 1 of 2016 on the Second Amendment to Law Number 23 of 2002 on Child Protection (State Gazette of the Republic of Indonesia of 2016 Number 99, Supplement to the State Gazette of the Republic of Indonesia Number 5882). <https://peraturan.go.id/id/perppu-no-1-tahun-2016>
- Gundhus, H. O., & Jansen, P. T. (2020). Pre-crime and Policing of Migrants: Anticipatory Action Meets Management of Concerns. *Theoretical Criminology*, 24(1), 90-109. <https://doi.org/10.1177/1362480619873347>
- Hakim, F. K., & Suparmin, S. (2024). The Crime of Body Shaming in Indonesia from the Perspective of Islamic Criminal Law. *Al-Ishlah: Jurnal Ilmiah Hukum*, 27(2), 304-319. <https://doi.org/10.56087/aijih.v27i2.504>
- Hamim, K. (2020). *Fikih Jinayah*. Sanabil.

- Haryanto, K. A. P., & Harefa, B. (2022). The Urgency of Child Grooming Regulation in the Legal System in Indonesia. *Al Daulah: Jurnal Hukum Pidana dan Ketatanegaraan*, 11(2), 75-91. <https://doi.org/10.24252/ad.vi.32250>
- Hayes, B. E., & Maher, C. A. (2024). A Systematic Review of Lifestyle-Routine Activity Theory in the Context of Direct-Contact Sexual Victimization. *Trauma, Violence, & Abuse*, 25(1), 369-392. <https://doi.org/10.1177/15248380231153864>
- Ibn Majah. (n.d.). *Divorce of One Who Is Compelled, and of One Who Is Forgetful* [2045]. Sunnah. Retrieved June 1, 2024, from <https://sunnah.com/ibnmajah:2045>
- Ilyasa, R. M. A. (2021). Legal and Victimological Perspective on Sexual Violence against Children Cases in Indonesia. *The Indonesian Journal of International Clinical Legal Education*, 3(3), 281-300. <https://doi.org/10.15294/ijicle.v3i3.48269>
- Irfan, M. N., & Masyrofah, M. (2019). *Fiqh Jinayah*. Amzah.
- Irwansyah. (2021). *Penelitian Hukum: Pilihan Metode & Praktik Penulisan Artikel* (Revision Edition). Mirra Buana Media.
- Jang, Y., & Suh, Y. (2024). Cyber Sex Crimes Targeting Children and Adolescents in South Korea: Incidents and Legal Challenges. *Social Sciences*, 13(1), 1-15. <https://doi.org/10.3390/socsci13110596>
- Jeglic, E. L., Winters, G. M., & Johnson, B. N. (2023). Identification of Red Flag Child Sexual Grooming Behaviors. *Child Abuse & Neglect*, 136, 1-13. <https://doi.org/10.1016/j.chiabu.2022.105998>
- Kurniawan, A. (2022, June 26). *Hukum Begal Payudara dalam Islam*. NU Online. Retrieved June 1, 2024, from <https://nu.or.id/bahtsul-masail/hukum-begal-payudara-dalam-islam-gbcYc>
- Law of the Republic of Indonesia Number 8 of 1981 on the Code of Criminal Procedure (State Gazette of the Republic of Indonesia of 1981 Number 76, Supplement to the State Gazette of the Republic of Indonesia Number 3209). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/755>
- Law of the Republic of Indonesia Number 2 of 2002 on the State Police of the Republic of Indonesia (State Gazette of the Republic of Indonesia of 2002 Number 2, Supplement to the State Gazette of the Republic of Indonesia Number 4168). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/299>
- Law of the Republic of Indonesia Number 23 of 2002 on Child Protection (State Gazette of the Republic of Indonesia of 2002 Number 109, Supplement to the State Gazette of the Republic of Indonesia Number 4235). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/322>
- Law of the Republic of Indonesia Number 35 of 2014 on Amendment to Law Number 23 of 2002 on Child Protection (State Gazette of the Republic of Indonesia of 2014 Number 297, Supplement to the State Gazette of the Republic of Indonesia Number 5606). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/1617>
-

- Law of the Republic of Indonesia Number 17 of 2016 on Enactment of Government Regulation in Lieu of Law Number 1 of 2016 on the Second Amendment to Law Number 23 of 2002 on Child Protection Into Law (State Gazette of the Republic of Indonesia of 2016 Number 237, Supplement to the State Gazette of the Republic of Indonesia Number 5946). <https://jdih.dpr.go.id/setjen/detail-dokumen/tipe/uu/id/1680>
- Lira, M. A. (2023). The Father's Responsibility for the Fulfillment of Child Support Post-Divorce. *SIGn Jurnal Hukum*, 5(2), 276-291. <https://doi.org/10.37276/sjh.v5i2.291>
- Ministry of Women's Empowerment and Child Protection of the Republic of Indonesia. (2024, 2 June). *Marak Konten Pornografi Anak, Kemen PPPA Siapkan Peta Jalan Perlindungan Anak di Ranah Daring*. <https://www.kemenpppa.go.id/page/view/NTIzMQ>
- Nasrullah, N. (2023). The Escalation of Child Trafficking in Makassar: A Criminological Analysis. *SIGn Jurnal Hukum*, 5(1), 182-194. <https://doi.org/10.37276/sjh.v5i1.284>
- Ndukwe, C., & Ogbonnaya, N. (2024). Community Policing and Crime Reduction in Ebonyi State: A Study of Nigeria Police Force, Ebonyi State Command, Abakaliki. *Journal of Policy and Development Studies*, 16(2), 69-103. <https://doi.org/10.4314/jpds.v16i2.5>
- Qamar, N., & Rezah, F. S. (2020). *Metode Penelitian Hukum: Doktrinal dan Non-Doktrinal*. CV. Social Politic Genius (SIGn).
- Qur'an Kemenag. (2022). *Al-An'am* [6]. Ministry of Religious Affairs of the Republic of Indonesia. Retrieved June 1, 2024, from <https://quran.kemenag.go.id>
- Qur'an Kemenag. (2022). *Al-Isra'* [17]. Ministry of Religious Affairs of the Republic of Indonesia. Retrieved June 1, 2024, from <https://quran.kemenag.go.id>
- Qur'an Kemenag. (2022). *An-Nur* [24]. Ministry of Religious Affairs of the Republic of Indonesia. Retrieved June 1, 2024, from <https://quran.kemenag.go.id>
- Rahayu, D. P., Faisal, F., Sari, R., & Satrio, N. (2020). Law Enforcement in the Context of Legal Culture in Society. *Law Reform*, 16(2), 276-289. <https://doi.org/10.14710/lr.v16i2.33780>
- Rivanie, S. S., Komuna, A. P., Putra, A. A., Utama, P. F., & Muzakkir, A. K. (2021). Protection of Children as Perpetrators of Criminal Act Stimulated by Pornography Based on Indonesian Laws. *Musamus Law Review*, 4(1), 1-15. <https://doi.org/10.35724/mularev.v4i1.3759>
- Salamor, A. M., Mahmud, A. N. F., Corputty, P., & Salamor, Y. B. (2020). Child Grooming sebagai Bentuk Pelecehan Seksual Anak melalui Aplikasi Permainan Daring. *Sasi*, 26(4), 490-499. <https://doi.org/10.47268/sasi.v26i4.381>
- Sampara, S., & Husen, L. O. (2016). *Metode Penelitian Hukum*. Kretakupa Print.

- Shola, A. T. (2022). Crime of Opportunity? A Theoretical Exploration of the Incidence of Armed Banditry in Nigeria. *Insight on Africa*, 14(2), 174-192. <https://doi.org/10.1177/09750878221079807>
- Siswanto, E., & Sudawan, Y. (2023). Juridical Analysis of Implementation of Investigations on the Criminal Action of Abuse and or Ability of Children. *Journal Indonesia Law and Policy Review (JILPR)*, 4(2), 79-87. <https://doi.org/10.56371/jirpl.v4i2.120>
- Suparmin, S., & Ramadani, R. (2022). Reconstruction of Maqâshid al-Syarî'ah as an Approach to Constitutional Law in Overcoming Crime in Indonesia. *Madania: Jurnal Kajian Keislaman*, 26(1), 41-50. <https://doi.org/10.29300/madania.v26i1.3792>
- Sutherland, E. H. (1947). *Principles of Criminology* (Fourth Edition). J. B. Lippincott Company.
- Syarbaini, A. (2023). Konsep Ta'zir Menurut Perspektif Hukum Pidana Islam. *Tahqiqqa: Jurnal Pemikiran Hukum Islam*, 17(2), 37-48. <https://doi.org/10.61393/tahqiqqa.v17i2.167>
- Sykes, G. M., & Matza, D. (2018). Techniques of Neutralization: A Theory of Delinquency. In T. G. Blomberg, et al. (Eds.), *Delinquency and Drift Revisited: The Criminology of David Matza and Beyond* (Volume 21, pp. 33-41). Routledge. <https://doi.org/10.4324/9781315157962>
- Thohari, F. (2018). *Hadis Ahkam: Kajian Hadis-Hadis Hukum Pidana Islam (Hudud, Qishash, dan Ta'zir)*. Deepublish.
- Utari, I. S., Arifin, R., & Ramada, D. P. (2024). Exploring Child Grooming Sexual Abuse through Differential Association Theory: A Criminological and Legal Examination with Constitutional Implications. *Volksgeist: Jurnal Ilmu Hukum dan Konstitusi*, 7(1), 69-88. <https://doi.org/10.24090/volksgeist.v7i1.9564>
- Wahyuni, F., Azmi, M. R., Ayu, R. K., & Herdiansyah, H. (2022). Criminal Responsibility for Pedophilia under General, Traditional and Islamic Laws. *Kanun: Jurnal Ilmu Hukum*, 24(1), 149-169. Retrieved from <https://jurnal.usk.ac.id/kanun/article/view/36346>
- Wilson, T. J. (2020). Collaborative Justice and Harm Reduction in Cyberspace: Policing Indecent Child Images. *The Journal of Criminal Law*, 84(5), 474-496. <https://doi.org/10.1177/0022018320952560>