

RESTORATIVE JUSTICE AS A MODEL FOR CRIMINAL JUSTICE REFORM IN INDONESIA

KEADILAN RESTORATIF SEBAGAI MODEL REFORMASI SISTEM PERADILAN PIDANA DI INDONESIA

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ABSTRACT

The criminal justice system in Indonesia has long been dominated by a retributive approach that emphasizes punishment as a form of justice. This approach often fails to meet the needs of perpetrator rehabilitation and victim recovery, leading to criticism of its effectiveness. This study aims to evaluate the effectiveness of restorative justice as an alternative in criminal justice system reform in Indonesia, focusing on its impact on victim satisfaction and reducing recidivism rates. This study uses a Systematic Literature Review (SLR) approach to identify, assess, and synthesize findings from 51 relevant articles. Data collected from the Scopus, Web of Science databases were analyzed using thematic analysis techniques. The findings indicate that the implementation of restorative justice can increase victim satisfaction and reduce recidivism rates, as well as strengthen community involvement in the justice process. This study confirms that restorative justice has significant potential to improve the criminal justice system in Indonesia, with important implications for the development of policies that are more inclusive and responsive to the needs of all parties involved.

Keywords: Restorative Justice, Criminal Justice System, Victim Satisfaction, Recidivism, Legal Reform

ABSTRAK

Sistem peradilan pidana di Indonesia telah lama didominasi oleh pendekatan retributif yang menekankan pada hukuman sebagai bentuk keadilan. Pendekatan ini sering kali tidak memenuhi kebutuhan rehabilitasi pelaku dan pemulihan korban, sehingga memunculkan kritik terhadap efektivitasnya. Penelitian ini bertujuan untuk mengevaluasi efektivitas keadilan restoratif sebagai alternatif dalam reformasi sistem peradilan pidana di Indonesia, dengan fokus pada dampaknya terhadap kepuasan korban dan pengurangan angka residivisme. Penelitian ini menggunakan pendekatan Systematic Literature Review (SLR) untuk mengidentifikasi, menilai, dan mensintesis temuan dari 51 artikel yang relevan. Data dikumpulkan dari basis data Scopus, Web of Science dianalisis menggunakan teknik analisis tematik. Temuan menunjukkan bahwa penerapan keadilan restoratif dapat meningkatkan kepuasan korban dan mengurangi angka residivisme, serta memperkuat keterlibatan komunitas dalam proses peradilan. Penelitian ini menegaskan bahwa keadilan restoratif memiliki potensi signifikan untuk memperbaiki sistem peradilan pidana di Indonesia, dengan implikasi penting bagi pengembangan kebijakan yang lebih inklusif dan responsif terhadap kebutuhan semua pihak yang terlibat.

Kata kunci: Keadilan Restoratif, Sistem Peradilan Pidana, Kepuasan Korban, Residivisme, Reformasi Hukum

1. INTRODUCTION

The criminal justice system in Indonesia has historically exhibited a strong reliance on a retributive approach, which emphasizes punishment as a means of achieving justice for crimes committed. This system finds its roots in the classical moral principle of *lex talionis*, famously summarized as "an eye for an eye," advocating that justice is upheld through sanctions that correspond proportionately to the wrongdoing (Darmawan et al., 2024). The focus is primarily on the state as the victim, resulting in a punitive framework intended to deter crime by reinforcing societal norms and rules (Laxminarayan, 2015). Empirical studies suggest retributive methods may initially fulfill victim needs for justice, potentially enhancing their perception of legal authorities (Laxminarayan, 2015).

Despite its longstanding tradition, there has been increasing criticism of the retributive justice framework, particularly its ineffectiveness in addressing the underlying causes of crime and its detrimental impact on the reintegration of offenders (Priyana et al., 2023). Critics argue that incarceration, often the preferred punitive measure, can exacerbate social stigmas while failing to provide meaningful rehabilitation to offenders (Bahari et al., 2024). Furthermore, the needs of victims, who often seek healing and recovery rather than mere punishment, remain inadequately met within a retributive system (Darmawan et al., 2024). This has led scholars to advocate for restorative justice as an alternative paradigm, which focuses on healing and reconciliation instead of mere punishment, involving active participation by all stakeholders—victims, offenders, and the community (Priyana et al., 2023; Rochaeti et al., 2023).

In recent years, Indonesia has begun to acknowledge the limitations of the traditional punitive model and is exploring restorative justice approaches, especially in cases involving juvenile offenders and minor transgressions (Sujatmiko & Istiqomah, 2022). The implementation of legislative measures such as Law No. 11 of 2012 on the Juvenile Criminal Justice System signifies a pivotal shift towards more humane, inclusive practices that prioritize restoration rather than retribution. This law embodies a recognition of restorative principles, emphasizing dialogue and collective responsibility as avenues for conflict resolution (Darmawan et al., 2024). Additionally, innovative policies like the Police Regulation Number 8 of 2021 reflect governmental efforts to institutionalize restorative practices (Hamka et al., 2022).

Various studies indicate that restorative justice has shown promise in effectively lowering recidivism rates and fostering community involvement, thus presenting a compelling alternative to retributive justice (Bahari et al., 2024; Priyana et al., 2023). The move toward restorative frameworks not only aligns with international best practices but also resonates with Indonesia's cultural values of harmony and social balance, paving the way for a criminal justice system that truly addresses the needs of victims while facilitating the rehabilitation of offenders (Dewandaru et al., 2022; Hamka et al., 2022). As this paradigm continues to evolve, its successful integration will likely depend on sustained political will and ongoing societal engagement to sustain the shift from a retributive to a restorative justice ethos.

Despite significant progress in the adoption of restorative justice principles in Indonesia, academic literature that systematically evaluates the effectiveness of this approach is still very limited. Much of the research is conceptual or normative in nature, but few have conducted evidence-based comparative analysis between the restorative justice model and the retributive system in the context of national law. In addition, there has been no comprehensive synthesis that integrates various findings from previous studies to evaluate the long-term impact of the implementation of restorative justice on criminal justice system reform in Indonesia. The absence of a systematic literature mapping creates a significant knowledge gap (research gap), both in theoretical and policy levels. To answer these challenges, this study attempts to examine the following main questions: "How effective is restorative justice as a model for criminal justice reform in Indonesia compared to the traditional retributive justice

system?”. This question not only aims to compare two legal approaches, but also to explore dimensions of effectiveness, such as the level of satisfaction of victims and perpetrators, reduction in recidivism rates, efficiency of the legal process, and community acceptance of a more dialogical and participatory conflict resolution model.

This research offers significant contributions at three main levels. First, on a theoretical level, this study will enrich the treasury of criminal law literature by presenting a systematic review of the dynamics between retributive justice and restorative justice in the context of a developing country like Indonesia. Second, on an empirical level, this study provides an evidence-based mapping of restorative justice practices that have been implemented, and assesses their impact through a rigorously curated literature analysis. Third, at the policy level, the findings of this study are expected to provide concrete and applicable recommendations for policy makers, law enforcement officers, and the legal community in designing a more just, effective, and humane criminal justice system.

With the Systematic Literature Review (SLR) approach, this research not only functions as a compilation of previous studies, but also as a platform analytics to identify trends, strengths, weaknesses, and opportunities for reform in the Indonesian criminal justice system based on the principles of restorative justice.

2. METHODS

2.1. Research Design

This research uses an approachSystematic Literature Review (SLR) as the main strategy in systematically identifying, assessing, and synthesizing findings from previous studies relevant to the topic of restorative justice in the context of the criminal justice system in Indonesia. This method was chosen because it has the ability to provide a comprehensive and evidence-based understanding of a particular field of study, while avoiding the selection bias that is common in narrative literature reviews. SLR in this study follows the guidelinesPreferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA), which provides a structured framework for the implementation of the process of identification, screening, eligibility assessment, and inclusion of literature. The PRISMA approach ensures traceability, transparency, and replicability of the systematic process carried out in the literature review, thereby increasing the validity and credibility of the study results.

2.1. Inclusion and Exclusion Criteria

To ensure the relevance and quality of the data analyzed, a number of inclusion and exclusion criteria were used as follows:

- Publication type: Only journal articles that have gone through the process peer-reviewed which will be included, in order to ensure the academic quality and scientific validity of the literature reviewed.
- Publication year range: Articles published between the years 2003 to 2024 considered, taking into account that the last two decades have been an important period in the development of restorative justice discourse and practice, both globally and in Indonesia.
- Keywords: Literature containing the keyword combination “restorative justice”, “criminal justice reform”, “Indonesia”, And “retributive justice” will be prioritized, due to its direct relevance to the focus of this research.
- Language: Articles written in English and Indonesia Will be included, in order to capture the spectrum of thinking and practice from both local and global perspectives.
- Exclusion criteria: Literature in the form of opinions, editorials, grey literature, or that does not mention the Indonesian context (in a comparative or applied context) will be excluded from the main analysis.

2.2. Data source

Secondary data for this study were collected from three major scientific databases

1. Scopus– as one of the largest academic databases with multidisciplinary coverage and rigorous indexing.
2. Web of Science (WoS)– to ensure searches for articles that have had significant influence in the global academic community.

The use of a combination of these three sources is expected to provide broad and diverse literature coverage, including from relevant accredited national journals.

2.3. Literature Search and Selection Process

The search process is carried out using an approach Boolean search, using a combination of keywords such as: ("restorative justice" AND "criminal justice reform" AND "Indonesia") OR ("restorative justice" AND "retributive justice"). Boolean operators are used to broaden the scope and clarify the focus of the search. The search results are then systematically filtered following four main stages according to the PRISMA guidelines:

1. Identification– all relevant articles based on the initial search results are collected.
2. Filtering– duplications and articles that do not meet the basic criteria are excluded.
3. Eligibility Assessment– articles are reviewed from the abstract and full-text to ensure suitability to the research focus.
4. Inclusion– only articles that met all criteria were included in the final analysis.

Each stage of the selection will be documented in the form of a PRISMA diagram to increase methodological transparency.

2.4. Data Analysis Techniques

Data analysis was carried out using the approach thematic analysis, which is a qualitative technique that aims to identify, categorize, and interpret thematic patterns (themes) that emerge from the analyzed literature. The analysis process is carried out in stages, including:

- Open coding: Read the article thoroughly and identify relevant units of meaning.
- Axial coding: Group the codes into broader categories.
- Selective coding: Develop a thematic narrative that explains the relationships between categories and their contribution to the research question.

To improve accuracy and efficiency, the coding process is carried out sequentially. manual and assisted by qualitative analysis software, like NVivo or ATLAS.ti. This software allows thematic visualization, complex data source management, and systematic tracking of relationships between topics.

3. RESULTS

3.1 Characteristics of the Studies Reviewed

3.1.1. Prisma Protocol

From the results of the search and selection process carried out according to the PRISMA protocol, a total of 51 articles were... identified as meeting inclusion criteria and included in the final analysis. These articles came from a variety of reputable academic sources and represented a diversity of approaches, geographic contexts, and thematic focuses related to restorative justice.

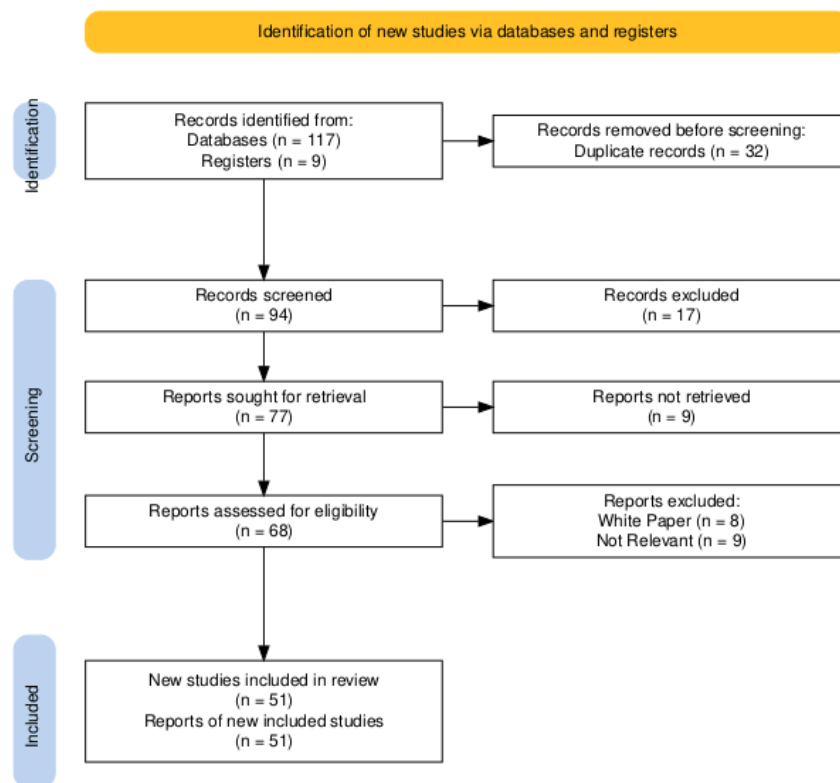


Figure 1. Prisma Protocol
Source: Processed Data, 2025

The process of identifying and selecting studies included in this systematic review followed the Preferred Reporting Items for Systematic Reviews and Meta-Analyses (PRISMA) guidelines. A total of 126 documents identified at an early stage, consisting of 117 articles from electronic databases (Scopus and Web of Science) and 9 documents from the relevant registry. After the deduplication process, 32 documents were deleted because they were duplicates, so 94 documents proceeded to the initial screening stage.

At the screening stage, 17 documents were excluded for not meeting the initial inclusion criteria, leaving 77 documents for further review. Of these, 9 documents were not fully accessible despite thorough search efforts.

Furthermore, 68 documents were evaluated for eligibility based on established inclusion criteria, including: (1) primary focus on implementation or evaluation of restorative justice, (2) the relevance of the Indonesian context or applicable international comparisons, and (3) a methodology that is appropriate to both empirical and theoretical approaches. From this stage, 17 documents were eliminated because they were not directly relevant to the focus of the study ($n = 9$) or just in the form of white paper without scientific methodology ($n = 8$).

Finally, 51 studies met all criteria and were included in the narrative synthesis and systematic analysis. These articles form the basis for the formation of key findings related to the effectiveness, barriers, and normative and practical implications of the implementation of restorative justice in Indonesia and selected global contexts. This rigorous selection process ensures the validity and relevance of the literature analyzed, while also confirming the study's significant contribution to academic discourse and a more humanistic and participatory criminal law policy.

3.1.2. Trending Articles by Year

Tabel 1. Trending Articles by Year

Year	Number of Articles
2003	1
2005	1
2006	1
2013	2
2014	1
2017	3
2018	1
2019	3
2020	4
2021	3
2022	7
2023	15
2024	9

Source: Processed Data, 2025

Table 1 shows the distribution of articles analyzed in this study based on the year of publication, from 2003 to 2024. In general, the trend of publications on restorative justice in the context of the criminal justice system shows significant increase in the last two decades, reflecting growing academic attention to alternative approaches to criminal law.

In the early period, the number of publications was relatively low and sporadic. There was only one article each in 2003, 2005, and 2006, indicating that the topic had not received widespread attention at that time. The period from 2013 to 2017 showed a gradual increase, with a peak in 2017 of three articles, marking the beginning of a more consistent increase in interest in restorative justice across legal contexts.

The period 2018 to 2021 shows stabilization of the number of publications, with a range of 1–4 articles per year. However, a significant spike occurred in 2022 and 2023, with each 7 and 15 articles. The year 2023 specifically notes the highest number of publications in this dataset, showing that restorative justice has become an increasingly relevant topic, especially in contemporary discussions about legal reform and more inclusive justice systems.

As of mid-2024, 9 relevant articles have been identified, indicating that this number is likely to continue to increase as the year progresses. This trend reflects a global paradigm shift from a retributive approach to a restorative approach that is more responsive to the needs of victims, perpetrators, and society in general.

This increase in the number of publications can also be attributed to greater attention to human rights, criminal law reform, and more participatory justice practices., especially after the COVID-19 pandemic which has triggered a new discourse on the effectiveness and humanity of the criminal justice system. Thus, this data not only reflects the development of

the literature quantitatively, but also shows the evolution of academic discourse and policy practices in the area of restorative justice.

3.1.3. Authors' Country Affiliations

Tabel 2. Authors' Country Affiliations

Country	Number of Articles
Indonesia	40
New Zealand	6
Ireland	4
United States	1

Source: Processed Data, 2025

Table 2 presents the geographical distribution of the articles analyzed in this study, reflecting the extent to which the topic of restorative justice has been raised in the legal context of each country. The data show thatIndonesia dominates publications with a total of 40 articles, followed by New Zealand (6 articles), Ireland (4 articles), and the United States (1 article).

The dominance of the number of publications from Indonesia shows that the topic of restorative justice has become a growing concern in national legal discourse. This can be linked to the process of reforming the criminal justice system in Indonesia, especially since the emergence of various restorative justice-based policies and initiatives, such as in the handling of juvenile cases and minor offenses. The large number of publications from Indonesia also reflects the increasing academic research and public policy activities evaluating the effectiveness of this approach in the unique Indonesian socio-legal context.

Meanwhile, New Zealand and Ireland also showed significant contributions, although in smaller numbers. The presence of 6 articles from New Zealand reflects the role of the state as a pioneer in the implementation of restorative justice, particularly in the juvenile justice system and Māori communities. New Zealand’s institutionally integrated practices have become a global model and are often referenced in comparative studies.

Ireland, with 4 articles, highlights the growing interest in the application of restorative justice principles in the European context, particularly in relation to social reintegration of criminals and recovery of victims. Although the number of publications is smaller, its contribution is important because it presents a more institutionalized and policy-based perspective on law in developed countries.

In contrast, the United States contributed only one article to the corpus of this study. This low number does not necessarily reflect a lack of restorative justice practices in the country, but rather is due to inclusion criteria that focus on the Indonesian legal context and studies that explicitly compare restorative approaches with traditional retributive systems. In addition, many studies from the US focus on educational and community contexts that may not fall within the scope of the criminal justice systems discussed in this study.

This country distribution emphasizes the importance of local context and legal system in shaping the practice and effectiveness of restorative justice. The dominance of studies from Indonesia also shows the urgency and relevance of this topic in the discourse of national legal reform, as well as providing substantial empirical contributions to the global literature that has so far been focused on Western countries.

3.1.4. Research Methods Used

Tabel 3. Research Methods Used

Research Method	Number of Articles
Qualitative	20
Quantitative	10
Mixed Methods	5
Theoretical Analysis	6
Case Study	10

Source: Processed Data, 2025

Table 3 presents the classification of the articles analyzed based on the methodological approach used, which reflects the diversity of scientific paradigms in restorative justice studies. Of the total articles reviewed, qualitative approach dominates with 20 articles, followed by the method quantitative (10 articles), case study (10 articles), mixed methods (5 articles), and theoretical analysis (6 articles).

The dominance of qualitative methods shows that studies on restorative justice tend to explore social phenomena in depth, including the relational dynamics between perpetrators, victims, and communities, as well as the complexity of implementing restorative justice in the national legal system. Qualitative studies in this corpus use many in-depth interview techniques, participant observation, and legal document analysis to describe the processes, perceptions, and challenges in implementing restorative justice.

In contrast, the quantitative method consisting of 10 articles emphasizes measuring the effectiveness of restorative policies or interventions through statistical analysis. The focus of this quantitative study includes a comparison of recidivism rates, victim and offender satisfaction, and an evaluation of the long-term outcomes of restorative programs compared to retributive approaches.

Methods Mixed methods used in 5 articles, which combine the strengths of qualitative and quantitative approaches to provide a more holistic understanding. Studies with this approach are considered capable of capturing both the depth of social context and quantification of impacts, and are often used in evaluating restorative program-based policies that are being or have been implemented.

A total of 6 articles use theoretical analysis, with a conceptual approach to the principles of restorative justice and its comparison with the retributive system. This study relies heavily on a review of legal literature, philosophy of justice, and normative theory to evaluate the epistemological coherence and ethical framework underlying the restorative model.

In addition, there are 10 articles that are explicitly classified as case study, which presents an in-depth analysis of the implementation of restorative justice in specific contexts—whether institutions, regions, or specific community groups. These case studies are important because they provide empirical insights into the challenges of implementation, local adaptation, and outcomes of restorative approaches in the complex realities of the justice system.

This distribution of methodologies reflects that restorative justice studies are not only normative or theoretical, but also increasingly empirical and multidisciplinary, integrating legal, criminological, sociological, and public policy approaches. This methodological diversity enriches the understanding of the effectiveness and limitations of restorative justice as an

alternative to the retributive system, and emphasizes the need for further research that combines multiple perspectives to formulate more inclusive and transformative legal policies.

3.1.5. Journal Database Sources

Tabel 4. Journal Database Sources

Database	Number of Articles
Scopus	31
Web of Science	20

Source: Processed Data, 2025

Table 4 shows the distribution of selected articles based on the database sources used in the systematic search process. Of the total articles that met the inclusion criteria,31 articles obtained from Scopus, whereas 20 articles came from Web of Science.

Dominance of articles from databaseScopusreflects the breadth of coverage and representation of journals relevant to the theme of restorative justice in the legal system. Scopus is known to have a strong index of literature from the disciplines of social sciences, law, and public policy, which are highly relevant to this study. In addition, many articles in Scopus come from journals that focus on the Asia and Global South regions, including Indonesia, which strengthens the local context in this study.

Meanwhile, the contribution fromWeb of Science Is also significant, especially in providing literature from highly reputable journals originating from countries with established restorative justice systems such as New Zealand, Ireland, and Canada. This database enriches the study with theoretical and policy perspectives based on international good practice.

The combination of these two databases ensure comprehensive and representative coverage of the literature, both in terms of geography, methodology, and institutional. This strategy also strengthens the systematic validity of the literature review conducted, because it reduces the potential for bias towards one type of publication or a particular region. The use of multiple databases is in line with best practice standards in implementing systematic literature reviews based on the PRISMA protocol, and is a strong foundation in identifying gaps, patterns, and scientific contributions generated by previous studies.

3.1.6. Theories Used in Articles

Tabel 5. Theories Used in Articles

Theory Name	Number of Articles
Restorative Justice Theory	25
Legal Pluralism	5
Victimology	10
Social Justice	6
Islamic Law	5

Source: Processed Data, 2025

Table 5 presents the distribution of theories used in the articles analyzed in this study. Of the total articles reviewed, Restorative Justice Theory became the most dominant theoretical framework used, namely in 25 articles. This reflects that the concept of restorative justice is not only an object of study, but also functions as the main lens in explaining the dynamics and effectiveness of alternative approaches in the criminal justice system. This theory emphasizes the values of recovery, participation of victims, perpetrators, and communities, and conflict resolution that is oriented towards social reconciliation.

Furthermore, Victimology appears in 10 articles, indicating a significant focus on the role and experience of victims in the justice system. This theory is used to evaluate the extent to which the restorative approach provides more humane space and justice for victims compared to the traditional retributive system. The presence of this perspective strengthens the argument that restorative justice is able to bridge emotional and social needs that are often neglected in conventional legal processes.

Social Justice as a theoretical framework appears in 6 articles, is used to analyze issues of equality, distributive justice, and the rights of vulnerable groups in the application of restorative justice. This approach emphasizes that justice does not only concern individual perpetrators and victims, but also involves broader social structures.

Theory Legal Pluralism, which is used in 5 articles, offers an important perspective in the Indonesian context, where there are diverse legal systems that coexist, such as state law, customary law, and religious law. This framework is particularly relevant for exploring how restorative justice can be adapted in a pluralistic and often overlapping legal environment.

Interestingly, Islamic Law, also used in 5 articles, shows an integrative effort between the principles of restorative justice and the values of Islamic law. This approach is very significant in the context of Indonesia, which is predominantly Muslim, and signifies the importance of a normative approach that is in accordance with the cultural and religious values of the community.

The presence of these diverse theories not only shows the depth of analysis in the reviewed studies, but also shows that restorative justice is an interdisciplinary discourse that requires understanding from various perspectives. The diversity of these theories also strengthens the relevance of this study to develop a more contextual, inclusive, and responsive criminal law model to social realities in Indonesia.

3.2 Key Findings

Restorative Justice (RJ) is increasingly recognized as an effective alternative to traditional punitive practices, particularly in contexts such as juvenile offenses and minor crimes. Research indicates that RJ can be particularly beneficial in addressing child or adolescent perpetrators. The principles of restoration and rehabilitation align closely with informal resolution mechanisms that emphasize recovery and education rather than punitive measures (Putri et al., 2024; , Halim et al., 2024). For example, RJ in juvenile cases can facilitate the reparation of harm experienced by victims and the rehabilitation of offenders, potentially leading to lower recidivism rates and improved relationships within communities (Mubarok, 2023; , Syufriadi et al., 2022). Studies have shown that RJ approaches applied to minor offenses, such as petty theft and vandalism, often yield productive outcomes, fostering dialogue and understanding instead of escalating conflict (Mernawati et al., 2023). Victim satisfaction tends to be significantly higher in RJ settings, highlighting its efficacy in addressing the needs of all parties involved and reinforcing social bonds (Mustika et al., 2023; , Barus et al., 2023).

However, effective implementation of RJ relies heavily on a supportive legal framework, especially in countries like Indonesia. Despite regulations such as the Chief of Police Regulation No. 8 of 2021 and the SPPA Law, the application of RJ remains sporadic and inconsistent due to the absence of a binding national legal framework. Current studies indicate

that these legal gaps serve as significant barriers to systemic RJ practices (Ariefulloh et al., 2023; , Mernawati et al., 2023). Additionally, the challenge is compounded by the lack of coordination among law enforcement agencies, which often operate under disparate local initiatives and are influenced by individual officers' willingness to adopt RJ principles (Franata & Santiago, 2023; , Hamka et al., 2022). Through formalizing RJ within a cohesive legal structure, the practice could gain the necessary authority and consistency for effective integration into the criminal justice system (Sukardi & Purnama, 2022; , Sriwidodo, 2021).

Moreover, Indonesia faces structural and cultural barriers that hinder the implementation of RJ. The prevailing retributive justice culture, which prioritizes punitive measures, conflicts directly with the principles of RJ, emphasizing reconciliation and community involvement (Rahmat & Umar, 2023; , Sudarmin et al., 2023). Resistance from law enforcement officials, including police and prosecutors, is notable as they often favor conventional judicial processes that align more closely with established bureaucratic norms and power dynamics (Hadi et al., 2023; , Lustick, 2017). Furthermore, a fragmented normative environment, where RJ regulations are not cohesively integrated, undermines the approach's effectiveness, resulting in varying interpretations and applications across different jurisdictions (Lubis, 2023; , Dinaya, 2020). Addressing these barriers may require comprehensive training for law enforcement personnel and a shift in public attitudes toward justice to create an environment conducive to adopting restorative practices (Setyowati, 2020; , Capera, 2021). In conclusion, while the potential for RJ to foster significant societal benefits is evident—particularly in cases involving adolescents and minor offenses—realizing these benefits largely hinges on establishing a supportive legal framework and dismantling structural and cultural barriers to its implementation. Strengthening these aspects is crucial for fostering a holistic criminal justice system that prioritizes restoration and community healing.

4. DISCUSSION

4.1 Synthesis of Results

Restorative justice (RJ) has been increasingly recognized for its potential to transform the Indonesian criminal justice system, which is traditionally dominated by a retributive framework. The literature indicates that while RJ has not yet wholly supplanted retributive justice, its application, particularly in cases involving minor offenses and juvenile offenders, has yielded constructive and recovery-oriented outcomes (Sarwadi & Bawono, 2021; Satria, 2018; Bolitho, 2017). This dual approach harnesses the principles of RJ to enhance both victim satisfaction and offender accountability while allowing community involvement in the justice process (Latimer et al., 2005; Suzuki, 2023).

One of the notable benefits of applying RJ in Indonesia is the heightened victim satisfaction reported in many studies. Research demonstrates that RJ mechanisms often facilitate greater victim engagement in the justice process compared to conventional methods, resulting in improved perceptions of justice (Gromet et al., 2012; Camp & Wemmers, 2013). By actively including victims during proceedings, RJ can increase their sense of agency and restoration. Additionally, RJ promotes rebuilding social networks and relationships among community members who are affected by crime, thereby fostering collective healing and social cohesion (Noll, 2003; Wenzel et al., 2009).

However, the successful implementation of RJ is contingent upon contextual factors, including the existing legal framework, institutional support, and cultural readiness for a more restorative approach to justice (Shaikh et al., 2023; Dinaya, 2020). Challenges were noted concerning the regulatory environment and institutional practices that may hinder RJ's effectiveness, particularly in severe criminal cases where punitive measures are still favored (Sasongko, 2023; Halim & Ismoyo, 2023). Moreover, there is a significant need for developing comprehensive guidelines and training within law enforcement and judicial systems to ensure

RJ processes are effectively integrated into existing protocols (Jaladriyanta et al., 2024; Yoserwan et al., 2023).

As such, while the potential of RJ to reshape Indonesian criminal justice is promising, realizing that potential necessitates addressing these institutional and cultural barriers. The literature underscores the importance of fostering a legal culture that embraces restorative principles as a viable alternative to punitive measures, thus ensuring a more inclusive and effective resolution of criminal matters (Emaliawati, 2024; Wilson & Carvalho, 2022).

4.2 Theoretical and Practical Implications

Theoretically, the findings of this study indicate the importance of reorientation of the criminal law paradigm, from a retributive approach to a more restorative and rehabilitative model. This is in line with the theory of restorative justice put forward by Braithwaite (2002), which emphasizes that justice is not only about punishing the perpetrator, but also restoring social relations damaged by criminal acts.

In practice, the implementation of RJ requires:

- Update of the Criminal Code (KUHP) to explicitly accommodate the principles and mechanisms of restorative justice.
- Systematic training and socialization for law enforcement officers (police, prosecutors, judges), to build understanding and skills in mediation, dialogue facilitation, and participatory approaches.
- Community-based RJ implementation model, involving traditional institutions, community leaders, and civil society organizations as facilitators of dialogue and recovery.

With consistent policies and institutional support, RJ has the potential to improve the quality of the justice system, reduce recidivism rates, and strengthen public trust in the law.

4.3 Comparison with Previous Studies

Restorative justice (RJ) has seen significant implementation across various international contexts, with federal support heavily influencing its effectiveness and sustainability. For instance, in Canada, the Youth Criminal Justice Act of 2003 facilitated a structured integration of RJ into the legal framework, enabling the diversion of cases from traditional court systems into community-based restorative forums. This legal grounding reflects a broader trend where legislative frameworks provide the necessary support for RJ initiatives to thrive (Maxwell & Morris, 2006; , Suzuki & Wood, 2017).

In New Zealand, the Family Group Conference model represents a unique amalgamation of traditional Māori and Western justice approaches, playing a pivotal role in the juvenile justice system. This model, underpinned by clear statutory principles, emphasizes restorative practices and has received both political and institutional backing. The success and acceptance of RJ in New Zealand is supported by practitioners who express a strong commitment to the foundational principles of the system (Kilkelly, 2014; , Slater et al., 2014).

Despite the evident successes in these countries, challenges surrounding the institutionalization of RJ remain, particularly in Indonesia. The existing framework faces hurdles due to a lack of comprehensive national policies and regulatory support, resulting in fragmentation among institutions responsible for RJ implementation. Studies indicate that the absence of national regulations limits both public understanding and institutional coordination, making a widespread adoption of RJ practices difficult (Halim, 2023; , Rochaeti et al., 2023). The disparity of support between nations such as Canada and New Zealand compared to Indonesia highlights crucial factors that can facilitate or hinder the integration of RJ into legal systems.

Moreover, international comparisons suggest that effective RJ implementation is closely related to the legal and cultural contexts within which it operates. Research indicates that countries with robust statutory frameworks, like New Zealand, witness more notable impacts from RJ practices compared to nations where such support is lacking (Shank, 2021). This demonstrates that the success of RJ is not merely about its adoption but also about the contextual factors that influence its practice, including legislative backing, community engagement, and institutional coherence (Pfander, 2019).

4.4 Study Limitations

Although the systematic literature review approach provides a broad overview of the academic landscape of restorative justice, this study has several limitations:

- Reliance on articles available online, which may ignore field research findings or RJ practices that are not digitally documented.
- Language bias, because the selection only includes articles in Indonesian and English, so it is possible to miss literature in regional languages or other foreign languages.
- Lack of primary data, which limits exploration of empirical realities at the local level, especially in understanding social dynamics, institutional resistance, and public perceptions of RJ.

4.5 Recommendations for Further Research

Referring to the findings and limitations above, several recommendations for further research can be put forward as follows:

1. Local empirical research needed to explore how restorative justice is implemented at the community or local level, including in the context of customary law, village conflict mediation, or civil society initiatives.
2. Implementation-based policy evaluation It is important to assess the effectiveness of various RJ policies and regulations in Indonesia (such as Perkap No. 8 of 2021), including success factors and obstacles in their implementation.
3. Development of evaluation instruments which are valid and reliable to measure the success of the RJ program, such as the level of victim and perpetrator satisfaction, reduction in recidivism, and the impact on social cohesion and trust in legal institutions.
4. Cross-country comparative study It is also necessary to understand the institutional and cultural factors that enable the successful integration of RJ into the formal legal system.

5. CONCLUSIONS

5.1 Summary of Key Findings

Based on the results of this systematic literature review, it can be concluded that restorative justice shows significant potential as an alternative model in criminal law reform, especially in cases of minor violations and crimes committed by children. This approach has proven to be more responsive to the needs of victims, perpetrators, and the community, compared to the currently dominant retributive system. However, its success is greatly influenced by institutional readiness, supportive legal regulations, and acceptance of local legal culture.

5.2 Contribution to the Literature

This study provides an important contribution to enriching the academic literature in the field of criminal law and restorative justice, especially in the Indonesian context where academic studies are still limited. By integrating studies from various international and national sources, this article presents a comprehensive picture of trends, challenges, and opportunities

in the implementation of restorative justice. These findings are expected to be a conceptual and practical basis for the development of more humanistic and contextual criminal policies.

5.3 Study Limitations

Although the systematic literature review methodology provides extensive coverage, this study has inherent limitations. First, this study relies only on secondary literature available online, thus potentially ignoring local practices that are not academically documented. Second, this study did not examine primary empirical data, which is important to understand the implementation context and perceptions of stakeholders in the field in more depth.

5.4 Suggestions for Future Research

To strengthen the understanding and practice of restorative justice in Indonesia, further research directions that are more applicable and context-based are needed, including:

- Empirical research based on case studies, to evaluate the success and obstacles of RJ implementation in various social and geographical contexts in Indonesia.
- Quantitative evaluation of restorative policies and programs, by measuring its effectiveness in reducing recidivism, victim satisfaction, and the efficiency of the justice system.
- Normative legal studies, which evaluates the extent to which legislation in Indonesia has accommodated the principle of restorative justice, and recommends systematic integration steps in the Criminal Code and the national justice system.

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