



## The Principle Of Justice In The Revocation Of Child Adoption Determination By Adoptive Parents (Study of Supreme Court Decision No. 31/Pdt.G/2022/PN Njk)

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**Abstract:** This research examines the revocation of a child's adoption order by highlighting aspects of justice, both for the child and the adoptive parents. The focus of the discussion is directed at the Nganjuk State Court Decision No. 31/Pdt.G/2022/PN.NJK, in which the judge granted the revocation of adoption on the basis of the best interests of the child. However, the decision raises issues because it does not pay attention to the rights and contributions of adoptive parents who have provided care for many years. The type of research used is Normative Juridical with a case approach, legislation, and comparison. Data sources come from primary legal materials in the form of laws and decisions, and are strengthened by literature as secondary legal materials. Analysis is carried out qualitatively through the study of doctrine and legal norms. The results of this study indicate that the judge's consideration is more in favor of child protection, but creates an imbalance for adoptive parents. Therefore, clearer legal arrangements are needed regarding the mechanism for revocation of adoption, so as to provide legal certainty as well as a sense of justice for all parties.

**Keyword:** Principles of Justice, Revocation of Adoption, Judges' Considerations.

### INTRODUCTION

The presence of children in a family is not only seen from a biological aspect, but also seen as a symbol of hope for the future of the family. In the Big Indonesian Dictionary, the term "child" is interpreted as offspring (Hanafi, 2022). Meanwhile, from a legal perspective, a child is understood as an individual born to a woman regardless of her marital status, (Maharani & Suseno, 2018) whose age has not exceeded 18 years and even includes babies who are still in the prenatal stage (in the womb) are also included in the definition (Erlandita, 2021). The existence of children is often seen as a long-term investment because they are expected to be able to make a positive contribution to the family and the country . Therefore, many couples try to obtain offspring, one of which is through the mechanism of adoption. Generally, adoption

is done out of a desire to have children, although sometimes it is just a means to motivate the presence of biological offspring (Balaati, 2013).

Fundamental rights are obligations that parents must fulfill for every child. However, the social reality shows that not all children get these rights properly due to unsupportive family conditions. Meanwhile, the growth and development of the child includes physical, psychological and social aspects, all of which must be protected from violence, discrimination and exploitation. This is in line with the mandate of Law No. 35 of 2014 on the amendment of Law No. 23 of 2002 on child protection which emphasizes the obligations of the state, society and family to provide comprehensive protection to children.

In Indonesia, child adoption is a legal mechanism, where a couple or individual accepts a non-biological child as part of their family with all the consequences of the role of biological parents. This process includes maintenance, education, and fulfillment of the child's life needs (Rais, 2016). This also applies to adoptions between Indonesian citizens and by foreigners which require a stipulation from a court decision to ensure protection and legal certainty for the child (Hulu, 2018). Regulations regarding adoption in Indonesia are contained in Law Number 23 of 2002, Government Regulation Number 54 of 2007, and Permendes Number 110/HUK/2009 (Nenogasu, 2024). The regulation is emphasized in the provisions of article 1 number 1 which reads "An adopted child is a child who is officially transferred from the family of origin to a new family through a court decision" (Mahmudah, 2019).

Although PP No.54/2007 has regulated the mechanism of child adoption, until now there has been no provision that explicitly regulates the mechanism for revoking the child adoption decision. This legal vacuum creates uncertainty for judges and parties regarding the process of canceling child adoption. Meanwhile, in practice, legal cases have arisen that propose the revocation of child adoption, which reflects the legal needs in Indonesia for such arrangements.

One concrete example that shows the urgency of regulating the revocation of a child's adoption is the case of Nganjuk State Court Decision No. 31/Pdt.G/2022/PN Njk. This case originated from the adoption of a child by a woman named Sakinah and her late husband in 2010 to a child named Binti Nur Cahyani. For more than a decade, the child had been cared for and educated like a biological child. However, after learning the identity of her biological parents, which had previously been kept secret by the adoptive parents because they had not disclosed it, she chose to leave home and return to live with her biological parents. This situation raises legal issues due to the absence of rules that clearly regulate the mechanism for revocation of adoption. This legal vacuum greatly reduces and degrades the principle of protection for children, as well as harming the adoptive parents. Therefore, a comprehensive regulation is needed so that the revocation of adoption remains based on the principle of the best interests of the child while ensuring justice for all parties.

## **METHOD**

The type of research used is Normative Juridical with a case approach, legislation, and comparison. Data sources come from primary legal materials in the form of laws and decisions, and are strengthened by literature as secondary legal materials (Nurhalimah et al., 2023). Analysis is carried out qualitatively through the study of doctrine and legal norms. The case approach was used by examining the Nganjuk District Court Decision No. 31/Pdt.G/2022/PN.NJK as the main material for analysis. Meanwhile, a comparative approach was used to compare the regulation of adoption revocation in Indonesia with other countries. In the research, legal materials are used which are divided into two, namely primary and secondary. Primary sources come from laws, court decisions, and international legal instruments. Secondary sources include various supporting references such as journals, books, and relevant research results. The research information is reviewed using the literature study method as a means of data collection. The analysis is carried out qualitatively, namely by

systematically examining the contents of regulations, doctrines, and decisions, then compiled so as to obtain answers to the formulation of the problem.

## RESULTS AND DISCUSSION

### How should the judge balance the rights of biological parents with the protection of children's rights in Supreme Court Decision No. 31/Pdt.G/2022/PN.Njk?

Child adoption is a process of transferring the obligations of biological parents who are transferred to surrogate parents, which is a form of child protection recognized in the legal system with the main objective of fulfilling the welfare of children such as care, maintenance of education, and the legal status of children (Tambunan & Siregar, 2020). Juridically, all of these obligations are transferred to adoptive parents as regulated in Article 1 point 9 of Law Number 35 of 2014 concerning Child Protection, which defines adoption as the transfer of responsibility for a child from adoptive parents through a court decision. However, in Indonesian legal practice the provisions regarding the mechanism for revocation of adoption decisions do not yet have clear arrangements (Adinda, 2024). Although it has been regulated in Government Regulation No. 54 of 2007 concerning child adoption procedures, the regulation has not yet outlined the procedures for revocation (Tanjung & Harahap, 2025). This legal vacuum creates uncertainty, both for the parties involved and the judge in resolving this case.

The legal vacuum concerning the revocation of adoption fundamentally compels judges to perform *rechtsvinding* or legal discovery. This judicial function allows a judge not merely to act as a mouthpiece of the statute (*bouche de la loi*), but to actively interpret and construct law based on principles of justice and expediency when facing a legislative void. In the case of Decision No. 31/Pdt.G/2022/PN.Njk, the judge's actions can be conceptualized as an application of *rechtsvinding*. The judge attempted to fill this vacuum by heavily relying on the overarching principle of "The Best Interest of The Child" as mandated by Law No. 35 of 2014 and various regulations (Dharma & Amar, 2024). However, the resulting decision reveals a partial and less-than-comprehensive legal discovery. The *rechtsvinding* performed did not adequately harmonize this principle with the principle of substantive justice for the adoptive parents, who had invested significantly in the child's upbringing for over a decade. Consequently, the legal solution created in this specific instance failed to achieve a proportional balance of rights and protections for all parties, thereby highlighting the inherent risk of disparate and potentially inequitable outcomes when judges fill a legal vacuum on an ad-hoc basis without clear statutory guidance (Fajriah & Ninggih, 2025).

In Civil Decision Number 31/Pdt.G/2022/PN.Njk, it is known that the plaintiff and her late husband on February 13, 2010 agreed to adopt a child named Binti Nur Cahyani. Full affection and responsibility were given by the plaintiff and her husband to the child. However, after the adopted child learned the identity of her biological parents, which the plaintiff had not previously disclosed because it was considered premature, the child decided to return to live with her biological parents and no longer wanted to live with her adoptive parents for more than 2 (years). In examining the case, the panel of judges focused on the validity and legal consequences of the adoption of the child by the plaintiff, Sakinah, and her husband. The judge considered that the relationship between the adopted child and the adoptive parents experienced significant disharmony, marked by the child's decision to return to her biological parents. Therefore, the legal status of the adopted child needs to be re-evaluated. These considerations included not only juridical aspects, but also psychological and social aspects that affected the plaintiff as the adoptive parent.

To resolve the case, the judge has the obligation to thoroughly examine all relevant legal aspects before deciding to grant or deny the petition. In its consideration, the panel of judges considered that the facts of the trial showed a firm refusal from the child to return to live with the adoptive parents. This situation was deemed to have lost the purpose of adoption, which is

to establish a harmonious and sustainable family relationship and fulfill all the rights of the child properly. In the judicial process, the court will go through several stages, starting from summoning the parties, mediation, submission of the defendant's answer, to the evidentiary stage (Karomah & Yuniarlin, 2025). The judge also considers the psychological and social impacts that can arise if the legal relationship of adoption is maintained. Therefore, the decision taken must also consider the applicable legal basis and pay attention to all legal aspects in order to produce a fair and proportional decision.

However, the judge's consideration in this decision does not appear to have fully balanced the rights of the child, the rights of biological parents, and the rights of adoptive parents. The judge only emphasized the will and welfare of the child. In addition, the judges also noted that during the trial process the respondents were never present or sent legal counsel, so the case could be processed without their presence (verstek). This is an important factor in considering the validity of the lawsuit filed by Sakinah. In accordance with applicable legal dogma, if the defendant does not undergo the summons process and does not submit a defense, then a decision can be made based on the evidence and facts submitted by the plaintiff. In this case, the panel of judges finally granted the petition for revocation of adoption filed by the plaintiff (adoptive parents) on the grounds that there were legal facts that the adopted child (Binti Nur Cahyani) refused to return to the adoptive parents and preferred to be with the biological parents. The judge was of the opinion that, in order to protect the interests of the child's rights, the adoption order that had been in place since 2011 needed to be annulled. The legal basis used as a reference by the judge included Article 45 of the Marriage Law, Government Regulation No. 54/2007, and Minister of Social Affairs Regulation No. 110/HUK/2009, which broadly states that adoption aims for the welfare of the child. In addition, the judge also referred to SEMA No. 6 of 1983 which emphasized that child adoption was enacted for the welfare of the child.

However, there were weaknesses and irregularities in the judge's consideration. Firstly, the judge only based the decision on the will of the child without further examining whether the choice truly reflected the principle of the best interest of the child. Whereas at the age of 12 a child does not yet have the full legal capacity to determine his or her future, so that decisions can be made that are influenced by emotional factors, the environment, or even pressure from biological parents. Secondly, the judge did not conduct a thorough assessment of the socio-economic conditions of the biological parents. Meanwhile, it is very clear that Government Regulation No. 54/2007 emphasizes that the welfare of the child is the main requirement for adoption. Ignoring these two aspects leads to the assumption that returning to biological parents is automatically better for the child, despite the fact that this is not necessarily the case.

The author argues that the rationale of the judge in Supreme Court Decision No. 31/Pdt.G/2022/ Pn. Njk is not in line with the principles of child protection. Law No. 35 of 2014 on protection and the Convention on the Rights of the Child (ratified through Presidential Decree No. 36 of 1990) emphasize that the main benchmark in every policy must be based on the best interests of the child. This principle cannot be reduced only to the child's will, but must include aspects of health, education, economy, and the child's growth and development environment. In addition, normatively, adoption has a permanent character. It is affirmed in Government Regulation No. 54/2007 that child adoption is the transfer of responsibility of biological parents to adoptive parents (Angraini & Peggy Rizka, 2022). By granting revocation of adoption only for reasons of relationship disharmony, the meaning of permanence of adoption becomes fragile. This decision also has the potential to set a negative precedent, where biological parents can at any time take back a child who has been adopted after the child grows up, so that the adoptive parents are disadvantaged even though they have raised the child with full responsibility since infancy.

Therefore, judges should conduct more comprehensive considerations, including assessing the ability of biological parents to ensure the welfare of the child as well as paying attention to the sacrifices of adoptive parents. Thus, the decision rendered not only emphasizes the interests of the child, but also fulfills the principle of substantive justice for all parties.

### **How should the revocation of a child adoption order provide justice for the child and adoptive parents?**

The legal system of adoption in Indonesia has, in principle, prioritized the principle of the best interests of the child as the main orientation. However, the existing arrangements still have a fundamental weakness, namely the absence of provisions that specifically regulate the mechanism of revocation or annulment of adoption. This legal vacuum creates uncertainty, because the revocation process so far can only be done through judicial channels without clear normative guidelines. Therefore, legal reform is needed by referring to Government Regulation No. 54/2007 on the implementation of child adoption which emphasizes the procedures and conditions for revocation of adoption, so as to provide fair legal protection and clarity for both parties.

Unlike in Indonesia, European countries such as the Netherlands and France have regulations that specifically govern the revocation of child adoption. In the Netherlands, the colonial influence on the legal system in Indonesia was quite significant, including in the aspect of family law. The civil law system that prevailed during the colonial period was pluralistic, where each class of the population had different legal rules (Pandika, 2022). This certainly influenced the practice of child adoption that existed at that time. In the beginning, Dutch society did not recognize the concept of child adoption because it prioritized blood lineage (Tambunan & Siregar, 2020). In 1956, with the passing of the Burgelijk Wetboek (BW), adoption was officially recognized and regulated in Dutch law. Along with social development, Dutch society began to realize the importance of providing a family for children who had not been properly cared for by their parents until the child became neglected (Ardiyati et al., 2014). In 1956, with the passing of the Burgelijk Wetboek (BW), adoption was officially recognized and regulated in Dutch law. Along with social development, Dutch society began to realize the importance of providing a family for children who had not been properly cared for by their parents until the child became neglected (Roliana & Jaelani, 2023).

Under Dutch family law, the rules concerning the annulment of adoption are set out in several provisions. Article 231 stipulates that an adopted individual may request the annulment of the adoption order before the district court, and such a request can only be approved if it is clearly in the best interests of the adoptee and if the court is firmly persuaded that the annulment is justified (Sudiono, 2023). Furthermore, the petition must be submitted not earlier than two years after, and no later than five years from, the date on which the adoptee attains legal adulthood. Article 232 provides that once an adoption is annulled, the lawful family connections are terminated between the adoptee (including their descendants) and the adoptive parents along with the adoptive parents' blood relatives (Zahara et al., 2023). At the same time, any lawful kinship ties that were previously dissolved because of the adoption are reinstated following the annulment. Article 230 declares that the rules concerning adoption apply correspondingly to annulment proceedings.

In France, initially adoption was also heavily influenced by Roman law, where adoption was only practiced by the elite in order to maintain the continuity of bloodlines and certain goals. One of the goals was for families who adhered to the patriarchal system and had no male offspring to preserve the family name (Fulchiron & Murat, 1988). This was based on the provisions of Roman family law which did not recognize a woman's right to retain her family name after marriage. French law was then codified through the Code Napoleon in 1804 and came into official force in 1807 (Maliha, 2020), which became one of the first civil law

codifications in the world to regulate family relationships and adoption in detail. Adoption in the French legal system grants legal status to adopted children under strict conditions, which have been adjusted in line with social developments, including a strict evaluation process by social agencies (Aide Sociale à l'Enfance) and court supervision, as well as opening adoption opportunities for single individuals or unmarried couples with more relaxed requirements in the latest regulations. The top priority in French adoption law is the protection of the best interests of the child, especially for older or special needs children (Fajri, 2017).

In France, two forms of adoption are recognized, namely Adoption simple and Adoption Pleniere. Only adoption simple can be legally revoked, while adoption pleniere is permanent. The provisions for revocation of adoption are regulated in article 370 of the Civil Code, which states that revocation can be filed if there are serious reasons, the adoption of a child can be canceled at the request of the person who was adopted the child is experiencing a crisis condition that makes it unable to be properly cared for by the adoptive parents and vice versa, the revocation application filed by the adoptive parents can only be accepted if the adopted child is over fifteen years old, if the adopted child is still a minor then the biological father and mother or members of the family of origin up to the first cousin, can also file a revocation application.

In the context of justice, revocation of adoption must consider legal, moral, and protection of the rights of all parties, especially the adopted child. However, in practice, there are no clear regulations in Indonesian law regarding the validity of the reasons and mechanisms for revocation of adoption, which creates legal uncertainty for judges in deciding the case. The principle of justice demands that the main consideration in every decision be taken based on the best interests of the child, whether to maintain or cancel the adoption relationship. Based on Civil Decision Number 31/Pdt.G/2022/PN.Njk, the panel of judges has considered the principle of The Best Interest Of The Child as the main basis for the decision. The judge considered that although the adoption process initially had good intentions, if the relationship between the two parties was in conflict, maintaining the adoption status could actually harm the child. In this case, the judge decided to grant the petition for annulment of adoption for the welfare of the adopted child.

According to the author, although in the end the lawsuit filed by the plaintiff was granted, it was felt that there was injustice for the adoptive parents and felt very disadvantaged, because they had cared for, raised, and provided for the adopted child for 12 years. The judge only looked at and considered the side of the adopted child. However, in this case, financial compensation in the form of a return of alimony or maintenance costs to the adoptive parents is very likely to occur because during the adoption of the child from 2010 to 2022, the adoptive parents have fully borne the costs of caring for the child, starting from alimony, education, health, and social needs. A court decision that does not consider this aspect of the child's upbringing is unfair, as it is as if the great efforts and costs that the adoptive parents have incurred never existed. Even though it is not stipulated in the decision, because the maintenance provided is considered an obligation and a form of affection while the adopted child is adopted, the sense of justice for the adoptive parents is not right and they feel disadvantaged in this case, seeing that the adoptive parents have raised and looked after the child for 12 years.

Thus, a fair adoption revocation should consider the balance of interests of the child, birth parents and adoptive parents. Judges should not only favor the interests of the child, but also need to evaluate the ability of biological parents and provide appropriate protection or compensation for adoptive parents. This strongly reflects the principle of substantive justice and prevents abuse of children's rights in the future.

## CONCLUSION

Based on the results of the analysis that has been carried out, two main conclusions can be drawn. First, the Nganjuk District Court Decision No. 31/Pdt.G/2022/PN.NJK shows that the judge prioritized the principle of the best interests of the child. This can be seen from the granting of revocation of adoption even though adoption is basically intended as a permanent transfer of responsibility of biological parents to adoptive parents. The judge's consideration focused on the child's desire to return to his biological parents, without giving a balanced portion to the position of the adoptive parents.

Secondly, in terms of justice, the decision still leaves problems. This is because the adoptive parents who have provided for, raised and cared for the child for more than a decade did not receive adequate recognition in the judge's consideration. This reflects an injustice between child protection and respect for the rights and sacrifices of adoptive parents.

Therefore, legal arrangements regarding adoption revocation in Indonesia need to be formulated more clearly and thoroughly. In this case, Indonesia can also emulate the practices in the Netherlands and France, which have special regulations regarding adoption revocation, so that the revocation mechanism is not only based on the interests of the child alone, but proportional legal protection and guarantees of justice are also provided for all parties involved. The regulation is expected to be able to provide legal certainty as well as a balanced sense of justice, both for both parties.

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