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DOMESTIC VIOLENCE AS A CAUSE OF DIVORCE: A LEGAL ANALYSIS OF THE SIDIKALANG RELIGIOUS COURT IN LIGHT OF LAW NUMBER 23 OF 2004

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Abstract
Domestic violence is a prevalent issue within families, often leading to divorce and posing challenges for resolution. This research investigates the factors contributing to divorce due to domestic violence in the Sidikalang Religious Court, in relation to Law Number 23 of 2004 on the Elimination of Domestic Violence. The study aims to explore the causes of domestic violence, its impact on marriages, and efforts to mitigate its occurrence. Employing a descriptive qualitative methodology, data was collected through interviews with key informants and analyzed within the framework of empirical juridical research. The findings reveal that domestic violence is defined by Law No. 23 of 2004 as any act causing physical, sexual, psychological harm, or neglect, including threats or coercion within the household. Key factors contributing to domestic violence include the husband's temperamental behavior, infidelity, arranged marriages, and external influences such as alcohol and gambling. Efforts to minimize domestic violence involve legal reforms, preventive measures, and both legal and non-legal interventions. This research provides an empirical understanding of domestic violence within the context of Indonesian law and highlights the importance of comprehensive strategies for its prevention. The originality of this study lies in its focus on case study legal research at the Sidikalang Religious Court, contributing valuable insights into the intersection of law and social phenomena. The findings underscore the need for a multi-faceted approach to address domestic violence, with implications for legal reform and policy development.

Keywords: Domestic Violence, Divorce, Law Number 23 of 2004, Sidikalang Religious Court, Legal Analysis.

INTRODUCTION

Divorce, though meant to be a last resort, has become a prevalent issue in modern marriages.[1] The bond of marriage, which should ideally lead to a happy and eternal family, often ends prematurely due to various factors. [2]Divorce can occur in days, months, or years, breaking the union intended to be lifelong. The dissolution of marriage, or ṭalāq in Islamic law,[3] is a reality faced by many couples when conflicts become insurmountable. This reveals a critical social issue where marital expectations often fail to materialize.[4]

Islamic jurisprudence defines ṭalāq as the severing of the marital bond between husband and wife.[5] Derived from the term "ithlaq," meaning release or abandonment, ṭalāq is linguistically understood as dissolving or leaving a relationship.[6] Many scholars describe it as the legal termination of the marriage contract through specific pronouncements, reflecting the serious nature of this decision.[7] Ṭalāq plays a crucial role in Islamic family law, acting as a legal framework for the end of marital relationships.[8]

This research aims to explore the causes of domestic violence as a significant factor leading to divorce and its legal implications in Indonesia. Particularly, it analyzes how Law No. 23 of 2004 concerning the Elimination of Domestic Violence addresses various forms of abuse that contribute to marital breakdowns. The law defines domestic violence

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[1] Michael J. Higdon, "Polygamous Marriage, Monogamous Divorce," *Duke Law Journal* 67, no. 1 (2017): 79–143, https://www.jstor.org/stable/26671015.
[2] Dinda Difia Madina, Ahmad Rezy Meidina, and Anwar Zein, "The Dynamics of Polygamy and Divorce in Muslim Countries," *El-Aqwal : Journal of Sharia and Comparative Law* 2, no. 2 (2023): 135–48, https://doi.org/10.24090/el-aqwal.v2i2.9410.
[3] Muchammad Hammad, "Hak-Hak Perempuan Pasca Perceraian: Nafkah Iddah Talak Dalam Hukum Keluarga Muslim Indonesia, Malaysia, Dan Yordania," *Al-Ahwal: Jurnal Hukum Keluarga Islam* 7, no. 1 (2016): 17–28, https://ejournal.uin-suka.ac.id/syariah/Ahwal/article/view/1073.
[4] Toha Andiko and Fauzan Fauzan, "Dilema Perceraian Suami Muslim Pegawai Negeri Sipil Di Propinsi Bengkulu," *Al-Ulum* 19, no. 1 (2019): 103–28, https://doi.org/10.30603/au.v19i1.747.
[5] Alfitri, "Protecting Women from Domestic Violence: Islam, Family Law, and the State in Indonesia," *Studia Islamika* 27, no. 2 (2020), https://doi.org/10.36712/sdi.v27i2.9408.
[6] Susi Susilawati et al., "Manifestations of Gender Injustice in Divorced Marriages: The Kabalutan Tradition," *Jambura Law Review* 5, no. 1 (2023): 136–55, https://doi.org/10.33756/jlr.v5i1.17722.
[7] Cyra Akila Choudhury, "Between Tradition and Progress: A Comparative Perspective on Polygamy in the United States and India," *University of Colorado Law Review Volume* 83, no. 4 (2020): 76–85, https://doi.org/10.4324/9780429397868-17.
[8] Khawlah Hussein, "Marriage for The Purpose of Obtaining Citizenship and Its Effects from A Sharia and Legal Point of View," *Justicia Islamica* 16, no. 1 (2019): 175–92, https://doi.org/https://doi.org/10.21154/justicia.v16i1.1548.

as physical, sexual, psychological harm, or household neglect, focusing primarily on the protection of women. By examining the implementation of this law, the research highlights the persistent issues surrounding domestic violence in the family structure.

Understanding the legal framework and social dynamics of domestic violence is crucial for addressing its role in marital dissolution. The complexity of domestic violence lies in the victim's awareness, societal norms, and the challenge of external intervention. With the backing of Law No. 23 of 2004, legal measures have been put in place, but broader efforts including preventive, legal, and social approaches are essential to fully address this issue. Strengthening legal and non-legal measures is key to reducing the incidence of domestic violence and its impact on family structures.

METHOD

This research employs a descriptive qualitative design to investigate the phenomenon of divorce due to domestic violence (KDRT). Qualitative research focuses on understanding social phenomena through detailed, in-depth analysis of real-world experiences. By adopting this approach, the study aims to describe and analyze divorce cases resulting from domestic violence using legal and social perspectives. Given the legal context of the study, it adopts an empirical juridical approach, focusing on case study research at the Sidikalang Religious Court. Data were collected through field research, primarily using interviews with key informants as the main instrument. This involved engaging with individuals directly involved in divorce cases at the Sidikalang Religious Court to gather firsthand information. The field research method allows for a thorough investigation into the specific factors contributing to divorce due to domestic violence, providing a concrete understanding of the issue. This approach is particularly valuable in capturing the complexities and nuances of real-life cases.

The collected data were analyzed using qualitative techniques to identify patterns and draw meaningful conclusions. In qualitative analysis, data is interpreted based on themes and trends that emerge from the interviews and other field data. The research examines how domestic violence, as defined under Law No. 23 of 2004, contributes to divorce cases and seeks to understand the broader legal and social implications. This

process enables the researcher to provide a detailed description and explanation of the link between domestic violence and divorce in the context of Indonesian law.

RESULT AND DISCUSSION

1. Divorce Due to Domestic Violence at the Sidikalang Religious Court

Violence refers to any action that causes harm. So far, harm has not been explicitly defined. If harm is considered the opposite of health, we can refer to the definition of health provided in the Health Law No. 23 of 1992. Health is defined as: "A state of well-being in body, mind, and social conditions that enables individuals to live productively both socially and economically." Meanwhile, according to the World Health Organization (WHO), "Health is a state of complete physical, mental, and social well-being and not merely the absence of disease or infirmity." This means there are four aspects of health: physical, mental, social, and economic. If an individual or a group fails to meet these health indicators, they can be considered unhealthy or ill. Therefore, harm encompasses these four aspects: physical, mental, social, and economic, including violence. This also applies to domestic violence.[9]

In Indonesia, domestic violence (KDRT) has been regulated by law since 2004. The purpose and mission of this law are to eliminate domestic violence in order to protect all family members involved. With the enforcement of this law, the state can take measures to prevent domestic violence, prosecute perpetrators, and most importantly, protect the victims. Before the enactment of this law, cases of domestic violence were rarely reported. This was not because there were fewer cases, but because there was no specific law addressing domestic violence. As a result, victims often did not know where to turn for help. Prior to this law, the Indonesian Penal Code did not recognize domestic violence, and even the term "violence" was not found in the Penal Code (KUHP). Cases of a husband hitting his wife or parents abusing their children were handled under general

[9] Yulianto dan RB. Asyim, *Perilaku Konsumsi Obat Tradisional Dalam Upaya Menjaga Kesehatan Masyarakat Bangsawan Sumenep,* Jurnal Keperawatan, 2022, h. 2

assault laws, which often made it difficult to prove and, as a result, many cases were left unresolved.[10]

Domestic violence (KDRT) is a form of gender-based violence, which arises from gender assumptions in the relationships between men and women, as constructed by society. Domestic violence is not merely a quarrel or disagreement between spouses. Disagreements in a household are normal, as the meeting of two different individuals in one home inevitably brings differences in desires and expectations. This situation can lead to disputes. However, domestic violence is much worse than mere marital conflict. It stems from a worldview that devalues human dignity, unequal power relations, and rigid gender roles. As a result, domestic violence can happen to anyone living in a household, including wives, husbands, mothers, children, siblings, or domestic workers. However, women are more often victims due to the still-patriarchal nature of society.[11]

The divorce rate in Indonesia has steadily increased each year. Over the past six years (2017-2022), the number of divorces has risen significantly, with the highest rate recorded in 2022. According to data from the Central Bureau of Statistics (BPS), there were 516,344 divorce cases in 2022, an increase of approximately 15.31% compared to 2021, which had 447,743 cases. The author conducted a case study on domestic violence at the Sidikalang Religious Court.[12] According to information obtained from the court, there were 73 divorce cases in 2023, some of which were due to domestic violence.

Based on the data presented above, it can be observed that the number of divorces due to domestic violence (KDRT) at the Sidikalang Religious Court in 2023 totaled four cases. However, in an interview with the Deputy Registrar of the Sidikalang Religious Court, Mrs. Yusmidawarni Daulay, S.H., it was revealed that these four divorce cases resulting from domestic violence were specifically cases of physical violence. Of the four types of violence categorized under domestic violence, only physical violence was cited

[10]https://komnasperempuan.go.id/instrumen-modul-referensi-pemantauan-detail/menemukenali-kekerasan-dalam-rumah-tangga-kdrt
[11] Faqihuddin Abdul Kodir, *Referensi bagi Hakim Peradilan Agama tentang Kekerasan dalam Rumah Tangga,* (Jakarta: Komnas Perempuan, 2008), h. 31-33
[12] Neneng Annisa Rahmah, *Menyoal Kenaikan Angka Perceraian Di Indonesia*, 31 Desember 2023. https://www.kompas.com/konsultasihukum/read/2023/12/31/070435480/menyoal-kenaikan-angka-perceraian-di-indonesia?page=all

as the reason for the divorce petitions filed at the Sidikalang Religious Court. It was also disclosed that a significant portion of divorces caused by ongoing disputes and quarrels were actually due to domestic violence. When a divorce petition is filed on the grounds of domestic violence, several factors need to be proven. If the type of domestic violence results in physical harm or suffering, it must be substantiated with a medical examination report. Other types of domestic violence must also be supported by appropriate and valid evidence. Due to the difficulties in proving domestic violence in divorce cases, both the court and the plaintiff agreed to replace the reason for the divorce from domestic violence to continuous disputes or quarrels.[13]

The author also conducted a direct interview with a victim of domestic violence, who was also the plaintiff in a divorce case at the Religious Court, referred to here as Mrs. NB. The information provided by Mrs. NB is as follows: "What I know about domestic violence is that there are many forms, but what I experienced started with my husband's betrayal, which was extremely painful for me as a victim of domestic violence. From the beginning of the marriage, I had already experienced it, and it continued until November 2023, when I finally couldn't take it anymore because my mental state had been severely damaged. The violence I endured was not just my husband's infidelity; when I confronted him about it, instead of resolving the issue, he got angry. Instead of solving the problem, he shouted at me and eventually hit me. I chose not to fight back because I felt that doing so would only backfire on me. In the end, I accepted everything he did, but I knew that at some point, I would reach a conclusion or make a decision. Finally, in November 2023, divorce was the ultimate end to everything I had gone through. The violence, the hitting, had been going on for a long time, so even if a medical examination was conducted, there were no more visible marks. Thus, I agreed with the court's decision to change the reason for the divorce from domestic violence to continuous disputes and quarrels."[14]

[13]Yusmidawarni Daulay, Panitera Muda Hukum Pengadilan Agama Sidikalang, *Wawancara* oleh Penulis di Pengadilan Agama Sidikalang, 28 Desember 2023
[14] Nb, Korban kekerasan dalam rumah tangga, *wawancara* oleh penulis di rumah korban, Sidikalang 18 September 2024

This statement illustrates the complexities faced by victims of domestic violence, where even when the violence is present, the difficulty of providing evidence often leads to a different legal outcome. The change in the stated cause of the divorce reflects the challenges in pursuing justice within the current legal framework.

2. Factors Contributing to Domestic Violence in the Sidikalang Religious Court

Based on the author's interview with Mrs. Yusmidawarni Daulay, S.H., a junior legal clerk at the Sidikalang Religious Court, it was revealed that "domestic violence occurring in Sidikalang, Dairi Regency, is caused by numerous factors and various reasons. Domestic violence can be triggered by two factors: external and internal factors. External factors include infidelity by the husband with another woman, low education, arranged marriages, the husband frequently gambling, and being under the influence of alcohol, which leads to domestic violence. Internal factors include economic issues, jealousy, the husband's harsh treatment, and his short temper. The severity of the problems faced depends on how the couple perceives and resolves these issues. Many couples feel that their marriage can no longer be sustained and eventually decide to end their marriage through divorce."[15]

The author also conducted a direct interview with a domestic violence victim, Mrs. NB. From her statement, Mrs. NB shared, "The cause of the domestic violence I experienced was my husband's infidelity. When I asked for clarification, he became angry and, instead of resolving the issue, yelled at me, which escalated into physical violence."[16]

Divorces due to domestic violence have various contributing factors. As the interviewees noted, these factors include the husband's alcoholism, gambling, infidelity, temperamental behavior, jealousy, selfishness, and financial issues. The primary cause of divorce due to domestic violence is the husband's frequent drinking, which triggers ongoing conflicts and disputes, weakening the marriage. Husbands who frequently drink alcohol often become obsessed with other women, leading to infidelity. Additionally,

[15] Yusmidawarni Daulay, Panitera Muda Hukum Pengadilan Sidikalang, *Wawancara* oleh Penulis di Pengadilan Agama Sidikalang, 27 Mei 2024
[16] Nb, Korban kekerasan dalam rumah tangga, *wawancara* oleh penulis di rumah korban, Sidikalang 18 September 2024

temperamental behavior or short-temperedness, even over small matters, can lead to domestic violence. In conclusion, domestic violence stems from a lack of awareness regarding self-control in family relationships. One of the ways to resolve domestic violence cases, particularly for the wife, is to separate (divorce) through the Religious Court. Women are more often victims of domestic violence due to their physical vulnerability and dependence on their husbands. This shows that achieving harmony and peace in a household heavily depends on the quality of behavior and self-control of each family member.[17]

3. Efforts to Minimize Domestic Violence

In an interview with Mrs. YS, a domestic violence victim in Sidikalang, she shared several steps that victims (wives) can take to minimize domestic violence:[18]

a. **Being Assertive**

The first step Mrs. YS took was to be assertive in addressing her husband's actions. Initially, she remained silent and was afraid to fight back when she experienced domestic violence. However, after the third incident of violence, Mrs. YS became assertive and resisted her husband's actions. She demanded an apology and responsibility for the violence inflicted on her.

b. **Seeking Help from Community Leaders and Religious Figures**

Mrs. YS admitted that she still loved her husband and decided to try to save her marriage. She sought advice and suggestions from community and religious leaders in her area, asking for their opinions on whether her marriage should be maintained or resolved through the Religious Court.

c. **Consulting with Family**

Next, Mrs. YS consulted with her family, particularly her parents, about the best course of action. She also sought advice from close relatives, such as uncles, aunts, and

[17] Nurul Jihan Tribuana, dkk, *Perceraian Akibat Kekerasan Dalam Rumah Tangga (Studi Kasus Pengadilan Agama Barru Kelas II),* QADAUNA: Jurnal Ilmiah Mahasiswa Hukum Keluarga Islam, Volume. 3, Nomor. 3, Agustus 2022, h. 691

[18] Wawancara dengan Ys, *Korban Kekerasan Dalam Rumah Tangga,* tanggal 29 juni 2024 di Sidikalang

siblings, to compare different perspectives and make the right decision. She believed they had more life experience.

d. **Making a Decision**

After trying various approaches without success, the final step the wife took was to file for divorce at the Religious Court. Divorce was not the wife's preferred option, but she could no longer tolerate her husband's unchanged behavior, which had become increasingly violent and excessive. In addition to physical abuse, the husband also inflicted verbal abuse with vulgar and harsh words.

To prevent domestic violence, several measures can be taken, including:

1. Strong faith, good character, and adherence to religious values to prevent and resolve domestic violence with patience and understanding.
2. Establishing harmony and peace within the family, as religion teaches love and respect for parents, siblings, and others. This fosters mutual respect for each family member's opinions.
3. Effective communication between husband and wife is essential to creating a harmonious household. Lack of harmony and peace can lead to domestic violence.
4. Mutual trust, understanding, and respect among family members are crucial. A family built on trust can function smoothly, while a lack of trust can lead to excessive jealousy and suspicion.
5. A wife should be able to manage the family's finances, so if there is a shortage of income, she can handle the economic situation effectively.[19]

Domestic violence by husbands against wives has become increasingly common in recent years, turning it into a social issue that demands serious attention from all parties. The rising number of domestic violence cases in Indonesia requires special attention, particularly from the government, as the consequences of domestic violence can be devastating to family harmony.

When a wife experiences domestic violence, the steps she should take include:

a. Confiding in a Trusted Person

[19] Anton F. Susanto, *Beberapa Aspek Sosiologi Hukum*, (Bandung: Raja Grafindo Persada, 2004), h. 98

Sharing family issues with a close friend, relative, or neighbor is not about exposing shame but alleviating psychological pressure. Confiding in a trusted person can relieve some of the emotional burdens.

b. Reflecting on Advice from Parents

Confiding allows those trusted individuals to understand and intervene. If they offer advice or alternatives, take the time to reflect on their suggestions and consider the positive aspects.

c. Suggesting Counseling for the Husband

If the husband frequently commits domestic violence, it is important to encourage him to seek counseling and therapy. Choose an appropriate time to make this suggestion.

d. Making a Decision

If the violence continues, the wife should make a decision in the best interest of herself and her children.

These steps are intended to help the wife seek justice for any criminal acts committed by the husband and to obtain protection and fairness. Early intervention and preventive measures are necessary to address domestic violence cases. In tackling domestic violence, both penal and non-penal approaches must be supported by increased legal awareness within the community.

CONCLUSION

The findings of this research, which analyzed divorce due to domestic violence under Law No. 23 of 2004 on the Elimination of Domestic Violence, indicate that domestic violence encompasses acts that cause physical, sexual, psychological, or economic suffering, particularly for women. In the case of divorces at the Sidikalang Religious Court, the primary causes of domestic violence were identified as temperamental behavior from husbands, infidelity, arranged marriages, and external factors such as substance abuse, gambling, and interference from parents. These factors were highlighted as significant triggers leading to the dissolution of marriages. The strength of this study lies in its comprehensive analysis of Law No. 23 of 2004, which provides a clear

legal framework for addressing and reducing domestic violence. Additionally, the study highlights the importance of social and legal awareness within the community, emphasizing the need for effective law enforcement and public education to mitigate domestic violence. This research successfully brings to light the critical role that legal and cultural interventions play in reducing the prevalence of domestic violence, thereby contributing to the broader discourse on family law and social justice. However, this study has certain limitations. While it focuses on the legal implications and social dynamics of domestic violence, it lacks an in-depth examination of the psychological and economic factors that contribute to these issues. Moreover, the study's reliance on interviews from a single court jurisdiction may limit the generalizability of its findings. Future research could benefit from a broader geographical scope and a deeper exploration of the psychological impact of domestic violence on victims and their families.

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