

Legal Protection Onchildcivil Rightand Custody Rights after Parental Divorcethat Are Stipulated In the Decision of Syar'iyah Court Of Meulaboh and Syar'iyah Court Of Jantho

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Abstract:

Discussion: The termination of a marriage is regulated in Article 38 to Article 41 of the Law Number 1 of 1974 concerning Marriage. Article 14 to Article 36 of Government Regulation (PP) Number 9 of 1975, Article 199 of the Civil Code (KUHPerdata) and Articles 113 to Article 128 of Presidential Instruction (Inpres) Number 1 of 1991 concerning Compilation of Islamic Law. With regard to the position of maintaining children after divorce in marriage, the arrangements are contained in Articles 35 to 37 of the Law Number 1 of 1974 and Article 85 as well as Article 97 of Compilation of Islamic Law (KHI). According to Article 14 of the Law Number 35 of 2014 on amendments to the Law Number 23 of 2003 concerning Child Protection which states that "Every child has the right to be cared by his own parents, unless if there is a reason or legal rule that is valid indicating that the separation is for the sake of the best interests for the child and is the last consideration". After the divorce, the custody rights of the child then will be decided and given to a child's mother or father.

Research Method: The method used in this study is empirical juridical research. The approach taken in this study is a qualitative approach. Qualitative approach is a way of analyzing the research results that result the descriptive analysis data, that is the data stated by respondents in writing or verbally as well as real behavior, which is researched and studied as something that is intact. Data collection techniques were obtained from respondents, informants and interviewees. This research refers to the Law Number 1 of 1974 concerning marriage and the Law Number 35 of 2014 concerning child protection and Compilation of Islamic Law.

Conclusion: By the occurrence of the divorce between the parents, not only is the divorce founded but the child also becomes a victim. The rights of the child often become diminished, such as the right to be loved, the right to get proper education, the right to be cared and so on. For children who have not reached the age of 12 years, the court usually gives the custody rights to the child's mother unless there is something else determined by the court because of the closeness of the child and the father, thus custody will go to his/her father. Problems will arise when a child whose custody rights were granted to mother of the child but the child is taken away forcefully by his father without any rights. Mothers may fight for their right to take care of the child but there are often obstacles in its practice in order to take back custody rights of their child. Therefore, children's rights must be fought for their survival and for their bright future.

Keywords : Custody rights, Civil Rights, Child.

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I. INTRODUCTION

Marriage issues are regulated in Law No. 1 of 1974 concerning Marriage, which defines that marriage as an inner and outer bond between a man and a woman as husband and wife with the aim of forming a happy and eternal family (household) based on the One Almighty God.

In Islam, marriage is not merely a relationship or contract, but a marriage is the *sunnah* of the Prophet Muhammad. Marriage is the most suitable medium between Islamic religious guidelines and human biological instincts (*naluriyah*) and it also contains the meaning of worship as well as a very strong *aqad* and a solid agreement (*mitsaqan ghalidhan*) to obey the commands of Allah SWT and carry out the marriage is worship.¹

In general, it can be said that marriage is one of the civil law materials which has a complexity of problems. This legal event raises the issue of children, property, as well as termination of marriage and so on. In fact, sometimes the family or household formed by marital bond cannot be maintained by a variety of causative

¹Ahmad Rofiq, *Hukum Perdata Islam Di Indonesia*, Cet. 1, PT Raja Grafindo Persada, Jakarta, 2013, hlm. 53.

factors. Problems that often occur in the household become extraordinary when the solution is not found so that it results in the divorce.

According to Islamic rules, divorce is likened to a painful surgery, human who has a healthy mind must withstand the pain due to his wound, he is even able to be amputated to save other body parts so that they are not exposed to wounds or more severe infections. If the disputes between husband and wife do not also subside and reconciliation cannot be pursued, then divorce is a "painful" path that must be carried out. Termination of marriage because of the divorce can occur due to divorce (thalaq) or based on divorce suit. In the view of all Indonesians, divorce must be avoided as far as possible.²

In achieving a happy family, efforts are made according to the abilities of each family. However, many families fail in the effort to create their harmony, a nightmare will occur, namely the emergence of a clash "divorce" that they never expected.³

Divorce is generally the main cause in child parenting disputes, not a few cases of divorce with stories of very serious feud between husband and wife after divorce with various reasons that are made in order to be determined as a winner over the child custody holder. Although there are not a few children whose interests are neglected.

Children based on the law are very diverse. Based on several provisions in the legislation there is still no uniformity regarding a person's adult age. In Article 47 of Law No. 1 of 1974 concerning Marriage states that the children are those who have not reached 18 years. Article 1 number (5) of the Law No. 39 of 1999 concerning Human Rights states that can be said as a child for every human being under 18 (eighteen) years old and not married yet, including children who are still in the womb if it is for the sake of his interest. In Article 1 number (1) of the Law No. 23 of 2002 concerning Child Protection as last amended by the Law No. 35 of 2014 It is also said the child is someone who has not been 18 (eighteen) years old, including children who are still in the womb.

The struggle for the rights of child custody should not need to happen because child parenting after the parental divorce has been legally regulated. When a divorce occurs, in the marriage law (both in the Compilation of Islamic Law and in civil law) usually custody rights of the child under the age of 12 years is handed over to the mother, except if the mother behaves badly. In addition to that reason, there are other things that can cause custody rights not given to the mother, that is, if the judge sees that there is the closeness of the father to the child compared to the closeness to his/her mother.

Divorce that happens to parents often ends in a child parenting dispute. In the perspective of Islamic law, Child Parenting often known as "*hadhanah*" which is a form of *masdar* from the word *hadhnu ash-shabiy*, or caring for or nurturing the children. This *hadhanah* law is only implemented when a married couple divorces and has children who are not old enough to separate from their mothers. This is because the child still needs supervision, parenting, education, and do various things for the sake of child's interests. This is what is meant by guardianship (*waliyah*).

Maintaining the interests and survival of a child is the responsibility of parents who should not be ignored by both the mother and father.⁴ Parents are charged to maintain and educate the children, representing children in and out of court as well as protecting children's rights and property.⁵ Parents are given the obligation to care for children and a child custody right is determined after the divorce. Custody Rights is the authority of parents both husband and wife who get the right to care for children if the divorce happens, while child parenting is the maintenance, care and education of the child.⁶

Attention to children has long been in line with human civilization itself, which is growing day by day.⁷ Children are the sons of life, the future of the nation and state. Therefore, children need the development, special guidance so that they can develop physically, mentally and spiritually optimally.⁸ According to the marriage law, the civil rights of the child in its principle are inseparable from the authority of the parents over the child. As stated in Article 47 of the Marriage Law, it states:

1. Children who have not reached the age of 18 (eighteen) years old or have never entered into a marriage are under the authority of their parents as long as their authority is not revoked from them.

² Wilbert D. Kolkman dkk. "*Hukum tentang Orang, Hukum Keluarga dan Hukum Waris di Belanda dan Indonesia*." Pustaka Larasan: Denpasar, 2012.. Hlm. 173

³ Armansyah Matondang, 2014 "Faktor-faktor yang Mengakibatkan Perceraian dalam Perkawinan", *Jurnal Ilmu Pemerintahan dan Sosial Politik*, Vol.2 No.2, 2014, Hlm 141

⁴ Nur A. Fadhil Lubis, "*Hukum Islam dalam Kerangka Teori Fikih dan Tata Hukum Indonesia*", PT. Pustaka Widyarsana, Medan, 1995, hlm. 11

⁵ Iman Jauhari, 2012, "*Kewajiban Nafkah Hadhanah*", *Jurnal Ilmu Syariah dan Hukum*, Vol. 46. No.2, Juli-Desember 2012, hlm. 514

⁶ Lulik Djatikumoro, 2010, "*Hukum Pengangkatan Anak Di Indonesia*, PT Citra Aditya Bakti, Bandung., hlm.15

⁷ Iman Jauhari, 2012, "*Anak dan Perkembangannya Ditinjau dari Psikologis, Yuridis, dan hukum Islam*", Mizan, Vol. 2 No. 3, Februari 2012, hlm 2

⁸ Darwan Print, 1997 *Hukum Anak Indonesia*, Bandung: PT. Citra Aditya Bakti, hlm. 4

2. The parent represents the child regarding all legal actions inside and outside the court.

Civil law regulations in Indonesia which regulate the provision of protection for children are as follows:

1. The Law Number 1 of 1974 concerning Marriage
2. The Law Number 4 of 1979 concerning Child Welfare
3. Convention on the Rights of the Child ratified in 1990
4. The Law Number 35 of 2014 on amendments to the Law Number 23 of 2003 concerning Child Protection

Related to the position of caring for children after divorce in marriage, the arrangements are contained in Articles 35 to 37 of the Law Number 1 of 1974 and Article 85 and Article 97 of Compilation of Islamic Law (KHI). According to Article 14 of the Law Number 23 of 2002 concerning Child Protection which states that “Every child has the right to be cared for by his/her own parents, unless there is a legal reason or rule that is valid indicating that the separation is for the sake of the best interests for the child and is the last consideration”.

In connection with whether it can be asked about the choice of a child to join the child’s mother or father that had divorced whose age has not reached 12 years old yetas stipulated in Article 105 letter (a) Compilation of Islamic Law that: The maintaining of children who are not yet *mumayyiz* / has not reached yet 12 years old is their mother's right.⁹

Hadhanah(child parenting) is obligatory,because the children who still need parenting from their parents will get a danger if they do not get parenting and care, thus the children must be guarded so as not to endanger. In addition, they must also be given a living and be saved from all things that can damage them. However, in the case of this study, after a child who was supposed to be under the nurture of his mother is by force taken by his father without rights,the child was also treated badly. The child is indeed given education and a decent life but the child has never received love from his biological mother as custody rights holder. Not getting love from a biological mother can be said as a discriminatory act towards child.Taking the child from biological mothers without permission can also be said as violating Article 77 of Law No. 35 of 2014 regarding Child Protection.

Along with the development of the perspective of Islamic law, the legal provisions stipulated in the law also provide a way for the transfer of parenting authority towards the child,among the causes of the transfer of parenting authority from mother to father because they are influenced by factors of interest of the child who wants it. Among the blood relations, the most important is the blood relationship between children and parents.¹⁰

Basically, the determination of child parenting authority decided by the court is to reduce dispute tension by the two opposing parties in order to win custody rights. However, in the case of this decision, there are usually several decisions that cannot be accepted by certain parties so that it causes a long debate. That the determination to transferthe child custody rights can’t be easily done, because the child is not an item that can be easily transferred. However, any form of decision which is legal provisionsin its characteristics must continue to be carried out both sincerely and forced. Only the method of acceptance is what needs to be reviewed by related parties together.

Based on the data obtained from the decision of Syar'iyah Court,this has permanent legal force and must be implemented and if it is not implemented then there will be sanctions against people who violate the decision. The mother who has custody rights of the child can carry out the execution of herchild who was taken by force by the father,unless it is not disputed or contested so if the child lives with his father,it will not be a problem.

In some cases raised in this study,the children were picked up without the permission from the biological mother as custody rights holder.This can be categorized as carried out by force and the act violates existing regulations.Coercion makes the child feel discriminated and feel confused, considering the age of the child who is still under age, still unstable and still needs love from his mother. In addition to taking by force, the child is also not given access to meet his mother.

Here are some cases that set a divorce decisionand that is grant the custody rights to mother of the child but in fact the child isby forcetaken by his/her fathers and cause disputes:

Table. 1

NO.	LIST OF SYAR'YAH COURT	CASE NUMBER	Mother’s Name	Father’s Name	Child’s Name
1	AcehBarat (Meulaboh)	057/Pdt.G/2017/M S-Mbo.	NU	NA	FA

⁹*Op.Cit* , ImanJauhari, “*AnakdanPerkembangannyaDitinjaudariPsikologis, Yuridis, danhukum Islam*”

¹⁰Iman Jauhari, “*Cara-cara Menentukan Asal Usul Anak Menurut Hukum Islam*”, Mizan, Vol.1 No. 2, November 2011, hlm. 82

2	Aceh Besar (Jantho)	045/Pdt.G/2017/M S-Jth.	AG	AR	NZ
3	Aceh Besar (Jantho)	301/Pdt.G/2019/M S-Jth.	DW	MT	AZZ

Source :Primary Data

II. MATERIAL AND METHODS

The research method used in this study is empirical juridical research. This type of research referred to in this study is empirical or socio-legal legal research (Socio legal research) which is a model approach in examining law as an object of research, in this case, the law is not only viewed as a perspective and applied discipline but also empirical or legal reality. Data collection techniques were obtained from respondents or informants and interviewees, especially the completeness of the answers that are received if the researcher used a lot of energy in data collection.¹¹

III. RESULT

As mentioned above, this study was made to see what are the causes of the occurrence of obstacles in the implementation of the decision of Syar'iah Court of Meulaboh and Syar'iyah Court of Jantho regarding child custody and civil rights of the child that must be fulfilled so that it needs to be investigated about legal protection on civil rights of the child after the occurrence of divorce in which the location of this research is a Syar'iyah Court of Meulaboh and Syar'iyah Court of Jantho in Aceh Province.

Syar'iyah Court is one of the special courts based on Islamic Sharia in Aceh Province as a development of the Religious Courts. Syar'iyah Court consists of the Provincial Syar'iyah Court and Syar'iyah Court (Regency / City level). The power and authority of Syar'iyah Court of Meulaboh and the Provincial Syar'iyah Court are the power and authority of the Religious Courts and the Higher Religious Courts added with other power and authority related to community life in the field of Worship and Islamic Sharia stipulated in the Qanun. Syar'iyah Court of Meulaboh is located in the regency of West Aceh, the Syar'iyah Court of Jantho is located in Aceh Besar Regency.

To find out the implementation of legal protection for the civil rights of child after parental divorce in Syar'iyah Court of Meulaboh and Syar'iyah Court of Jantho, the next will be discussed about the origins of child custody or *hadhanah*.

Divorce is the end of a marriage bond, whether it is caused by the attitude of the husband or the attitude of the wife. Married couples who are no longer suitable to continue their household and have agreed to divorce, have had a negative impact not only on children but also including ex-husband or wife and on society.¹² The number of divorce cases in Aceh always shows an increase every year. The reasons are very diverse, starting from the incompatibility, domestic violence (KDRT), financial complaints, the difference in age, until the presence of a third person in the household. Parental divorce is a big problem for their children, especially for children who are still in elementary school, because children at this age still need the love from their parents to educate them.¹³

Parents are a family component that consists of father and mother, and is the result of a legal marriage relationship that can form a family. Parents have the responsibility to educate, to nurture and to guide their children to reach certain stages that deliver children to be ready in social life. Parents are also responsible for the welfare of life in the family. In this participation, parents should increase the expected guidance, considering the importance of education is a very important needs for a child in their lives in this world and the hereafter.¹⁴

Legal protection is the protection on the value (*harkat*) and dignity as well as the recognition of human rights possessed by legal subjects based on legal provisions from the authorities or as a collection of regulations or rules (*kaidah*) that can protect one thing from another.¹⁵ The protection for children must be fulfilled whether the custody rights is given the mother or the father. Parents also have the right to decide custody rights of children in the family way or through legal way.

Child civil rights are rights that must be obtained by every child in juridical normative manner, the principles of child protection are regulated by the provisions of the Convention on the Rights of the Child ratified by the Government of Indonesia through Presidential Decree Number 36 of 1990 which states about the general principles of child protection, namely non-discrimination, the best interests for child, survival as well as growth and development, and respect for children's participation. These principles are also contained in the

¹¹Mukti Fajar dan Yulianto Achmad, "Dualisme Penelitian Hukum Normatif dan Empiris", Pustaka Pelajar, Yogyakarta, 2009, hlm. 180

¹²Darmawati H, 2017, "Perceraian Dalam Perspektif Sosiologi", *Sulesana* Vol. 11 No. 1 Tahun 2017 hlm 64

¹³M. Yusuf, MY, 2014 "Dampak Perceraian Orang Tua Terhadap Anak", *Jurnal Al Bayan*, Vol 20, No 1, hlm 33

¹⁴Mohammad Roesli, Ahmad Syafi'i, Aina Amalia, "Jurnal Pendidikan, Komunikasi dan Pemikiran Hukum Isla" Vol. 9, No 2: (April 2018), hlm. 335

¹⁵Philipus M. Hadjon, "Perlindungan Bagi Rakyat di Indonesia", PT.Bina Ilmu, Surabaya, 1987, hlm. 25

provisions of the Law Number 35 of 2014 concerning Amendments to the Law Number 23 of 2002 concerning Child Protection established by the government so that rights of children can be implemented in Indonesia.

The aspect of civil rights of the child in the perspective of child protection, children are the gift from the one Almighty God which is in their selves it is inherent the value (*harkat*), dignity as their human rights which must be respected and entitled to the protection from various threats / treatments for the sake of education, welfare, security, growth of future children. Various aspects of civil rights on child protection are stated in various laws and regulations related to child protection, namely the Law Number 35 of 2014, Pancasila and the 1945 State Constitution of the Republic of Indonesia give meaning which mentions the aspect of individuality (personal), aspect of sociality (social), aspect of non-discrimination, aspect of equality before the law for children as holders of civil rights that need to be protected and is influential in their life.¹⁶

In Article 47 of Law No. 1 of 1974 concerning Marriage, it is explained that the child is those who has not reached the age of 18 years old. In Article 1 number 5 of the Law No. 39 of 1999 concerning Human Rights it said to be a child for every human being who is under 18 years old and has not married yet.

The struggle for child custody as a consequence of divorce should not need to happen because parenting after the parental divorce has been legally regulated. When a divorce occurs, in marriage law (both in the compilation of Islamic law and in civil law) usually custody of the children under the age of 12 years is handed over to the mother. Unless the mother behaves badly. In addition to these reasons, there are other things that can cause custody rights of the child is not given to the mother, including if the judge sees that there is the closeness of the father to the child compared to the closeness to child's mother.

How to regain the rights of a child that has been decided by the court but the child is taken without rights by another party is by the way of never influencing the child to choose who becomes the foster parent, parents should prioritize the child over all matters because the child needs love from both mother and father (parents). Then the mother who has custody rights of the child in accordance with the court's decision must gather witnesses and the documents related to her relationship with the child.

In the majority of people of Aceh who embrace Islam, the custody of children in divorce is called *hadhanah*, which means caring for, parenting and maintaining the children. *Hadhanah* is associated with efforts to care for, to do parenting and to nurture the children who are under-age (less than 12 years old) who have not been able to distinguish and sort out the good and bad things that happen in their life.

The law of child parenting is a must in Islam. Both parents must take care for their child and fulfill all the needs of the child, starting from clothing, food, education costs and so on. According to the teachings of Islam, mother is the parent who are most entitled to get custody of children. This is because usually the mother is the closest figure to the child, which starts from conceiving, giving birth, breastfeeding, caring, and raising the child. This is what judges usually use when deciding the case of divorce and transferring custody rights of the child to the mother. Not infrequently also, when child custody rights has fallen to the mother but the child is taken by force and without rights by his father so that it raises new problems that are not only related to civil matters but it can also turn to the criminal field.

In Islam, both mother and father are entitled to get custody rights on the children, if they have free time and financial conditions that support all the needs of children. Religious experts also encourage mothers or fathers to conduct a family discussions to determine the custody rights of the child in order to fulfill the rights of the child. The mother get full custody of the child if the child is still under-age or under 12 years old. However, fathers can also get the right to care for children if the mother is considered to have bad behavior that endanger the child. Meanwhile, if the child has been *baligh* or an adult (over the age of 21), he has the right to choose to live with his father, mother, or live alone.

After the decision on divorce and child custody, then educating and caring for children is still a joint task between mother and father even though the child no longer lives under the same roof with his mother and father. Every holder of child custody rights wants to maintain his parental rights, because most of every divorce couple wants to live with the children and educate them.

Based on the Compilation of Islamic Law (KHI) in Article 105 paragraph (a) which said that "the care of the child who is under the age of 12 years old or what is called as *mumayyiz*, is their mother's right". This shows that if the parental divorce occurs when the age of the child is under 12 years old, custody rights of the child will be directly owned by the mother. Furthermore, in Article 105 Paragraph (b), it states that "The care of a child who is old enough or *mumayyiz* will be handed to the child to choose between his father or mother as the holder of his right to care. The age limit that is mentioned is 21 years, according to the rules that is written in Article 98. In addition, according to the contents of the Article 105 Paragraphs (c) and (d) in the Compilation of Islamic Law (KHI), all costs for the child's life will be the responsibility of the father until the child marries and has his/her own life but this must also be adjusted to his/her father's abilities. On the other hand, if the mother's treatment towards the child shows a negative treatment, then the father can propose to become a

¹⁶ Rifki Septiawan Ibrahim, Dientje Rumimpunu, dan Firdja Baftim, 2018, "Hak-Hak Keperdataan Anak Dalam Perspektif Undang-Undang Nomor 35 Tahun 2014 Tentang Perlindungan Anak", *Lex Privatum*, Vol 6, No 2 (2018), hlm 59

foster parent. As written in the Compilation of Islamic Law (KHI) Article 156 Paragraph (c) which mentions that: "If the holder of *hadhanah* apparently cannot guarantee the physical and spiritual safety of the child, even though the cost of living has been fulfilled, then at the request of relatives, the Religious Court can transfer custody rights of the child to other relatives".

Academics of Sharia and Law Faculty of UIN (State Islamic University) Syarif Hidayatullah, Mesraini explained that based on the Compilation of Islamic Law, a child may choose to live with his father or mother if he/she has reached 12 years old of her age or older. However, if the child is not 12 years old yet, then the custody rights of the child goes to the mother. But this rule is not without the exception. If the care of his/her mother has the possibility of harming the child, then *hadhanah* may be transferred to relatives. For example, grandmother of the mother. The facts in its practice show that child custody is not always directly given to the relatives of the mother if the mother is unable to guarantee the growth and development of the child. There are many cases and court decisions that show custody rights of the children given by the judge to the father of the child. According to Mesraini, when the mother does not hold the mandate of *hadhanah*, the next stage should be the mother's relatives straight up. In its practice, the judge often decides to give the mandate of *hadhanah* directly to the father. Because judges have their own considerations, for example there is the emotional closeness of the child with the father, or other considerations. Mesraini saw that giving child custody to fathers was often caused by mothers who are working. But that reason is essentially not strong enough. Philosophically, custody rights of children which are given to the mothers are based on justice. In Islam, the husband has full responsibility in providing a living for his wife and children. Woman or wife (mother), positioned as a person who is supported by, so that economically dependent on her husband.¹⁷

Not only in terms of religion, the issue of child custody in Indonesia also has a legal basis stipulated in the Law No. 1 of 1974 concerning Marriage in Article 45 Paragraph (2) which mentions that "Parents are obliged to maintain and educate their children as well as possible until the child marries or can be independent, and that obligation continues despite the marriage between the two parents was terminated." The rules explained that the child is the responsibility of both parents, not just one of the parties, until the child is old enough to determine the best choice for himself/herself.

IV. DISCUSSION

The legal protection of the child's civil rights and custody rights after parental divorce stipulated in the Decision of Syar'iyah Court of Meulabohand Jantho must be highly considered. This is because children are the responsibility of both parents (the mother and father) not just one of them. When a divorce occurs, child custody rights falls to one parent and this condition often creates injustice for children who need the right to get love, the right to education and the right to get a decent life.

V. CONCLUSION

The causes of parental divorce have a variety of reasons. In the case of the occurrence of divorce, not only are both parties harmed but the child born from the marriage is also affected. Especially for children under the age of 12 years as stipulated in the law they have the rights to get protection and the right to be cared by their parents because even if the marriage is terminated but the relationship between children and parents cannot be separated. When the court decided to give custody rights of the child to the mother or father then that means the judge had thought about the consequences. Usually children who have not reached the age of 12 years / *mumayyiz* then the court gives the custody rights to the mother, unless there is something else determined by the court because of the closeness of the child and his/her father, the custody rights will go to his father. Problems will arise when a child whose custody rights were granted to mother of the child but the child is taken away forcefully by his father without any rights. The Mothers may fight for their right to take care of the child but there are often the obstacles in its practice in order to take back custody rights of their child. Therefore, children's rights must be fought for their survival and for their future. Usually children who are not yet mature need supervision and education from their mother and father, but not infrequently when mothers and fathers separate, the conflict raised from this case can also separate children from one of their parents.

According to Article 14 of the Law Number 35 of 2014 on amendments to the Law Number 23 of 2003 concerning Child Protection which states that "Every child has the right to be cared by his own parents, unless if there is a reason or rule legal that is valid indicating that the separation is for the sake of the best interests for the child and is the last consideration". Child custody rights can be given to the father or mother. However, it is certainly not easy for one of the parties who did not win the case decision in the custody rights if his wishes were not in accordance with the reality.

¹⁷<https://www.hukumonline.com/lt5b1fa3dce96d9/perkawinan-retak--hak-asuh-anak-diperebutkan/> (diakses pada 18 April 2020)

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