



Realization of the Implementation of Post-Divorce Child Support Obligations at the Purworejo Religious Court

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ARTICLE INFO	ABSTRACT
<p><i>Article History:</i> Received: 2023-08-13 Accepted: 2023-11-13 Published: 2024-01-10</p> <p><i>Keywords:</i> Realization; Child Support; Post-Divorce.</p>	<p><i>This research aims to find out how the implementation of child support obligations after divorce in the Purworejo Religious Court. And will also identify what factors influence it. The method used in this research uses a normative juridical approach. While this type of research is field research, which is taken from documents from the Purworejo Religious Court, direct observation and interviews with parties who have sued in court. The results showed that there are still many parents, especially fathers, who do not carry out their obligations in providing maintenance to their children. There are several influencing factors, including lack of legal awareness, lack of awareness of the obligations of a father, parents are too involved in the household, social factors and economic factors. Whereas the obligation to provide for children has been stated in the decision of the judge of the Purworejo Religious Court.</i></p>

A. Introduction

The high divorce rate in Purworejo Regency, based on the 2020 annual report of court cases, reached 2066 cases.¹ After the divorce, it shows that the provision of maintenance for children left behind is not realised, while in cases in the judge's decision in court, the provision of maintenance for children is an indicator that must be fulfilled by the parent (father). These divorce cases have two underlying factors, namely divorce and talaq, which are carried out by the husband.

Based on the study of the implementation of child maintenance after a religious court decision Alfi Bariroh² shows that based on a court decision the husband is obliged to provide maintenance for the child for his needs until he reaches adulthood. Similarly, a study was conducted Fatkhori Rahman³ bahwa ketidakpatuhan orang tua (bapak) pada putusan hakim terkait pemenuhan nafkah menjadi masalah utama. Namun, sisi lain, riset dilakukan Herman Kosasih⁴ that the problem of child maintenance after divorce sometimes judges only see one side of the problem without considering child maintenance in accordance with the actual facts so that the decision does not go according to the prosecution. Based on the tendency of the study that the provision of maintenance is not only the obligation of a father, but there are other considerations so that the decision is not realised, Andi Alaudin⁵ revealed that the limited income of parents (fathers) mostly also takes place due to divorce due to the husband's low socio-economic factors to meet the needs of his family, resulting in divorce.

Therefore, the purpose of this study is to reveal and analyse the realisation of child maintenance after divorce based on court decisions. So this research asks two fundamental questions how the realisation of maintenance based on the Purworejo court decision in 2020-2021 and the factors that influence so that the realisation of child maintenance does not take place in accordance with the Purworejo court decision.

This research is about the realisation of child maintenance as a result of divorce in the Religious Court, so this research has implications for the aspects of the process of ruling by judges by paying attention to the provision of maintenance and as well as conceptual implications for the legal awareness of post-divorce to be implemented in accordance with the points in the court's decision. However, in the verdict that there

¹ Pengadilan Agama Purworejo, "Arsip Dokumen Pengadilan Agama Purworejo Tahun 2020" (Purworejo, 2020).

² Alfi Bariroh, Aulia Muthiah, *Eksekusi terhadap Kewajiban Pemberian Nafkah Anak Pasca Perceraian Menurut Hukum Positif*, (2022): 85-86

³ Fatkhori Rahman, *Kewajiban Nafkah Anak Terhadap Anak Korban Perceraian*, (2018): 52-56

⁴ Herman Kosasih, *Pemberian Nafkah Mahdhiyah Dalam Kasus Cerai Talak Di Pengadilan Agama Tigaraksa Dan PTA Banten*, (2020): 51-53

⁵ Andi Alaudin, "Analisis Yuridis Tanggung Jawab Ayah Kandung Terhadap Nafkah Anak Setelah Perceraian," *Al-Ahkam: Jurnal Hukum Pidana Islam* 1, no. 1 (2018): 20.

needs to be other considerations can be a reference such as the socio-economic person (husband) to carry out the obligations in maintenance because the socio-economic status of the community has differences in their respective abilities.

B. Method

This research includes field research with an analytical descriptive method that uses a qualitative paradigm. The research approach uses a normative juridical approach and legal sociology. To obtain data, researchers conducted participatory observation and direct interviews with research subjects, namely several divorced married couples in the jurisdiction of the Purworejo Religious Court, judges and attorneys who are lawyers in the Purworejo Religious Court. In addition, researchers obtained documentation from related institutions, namely the Purworejo Religious Court as a place of research which became a source of data in the form of cases that became the object of research. Data analysis used in the research applies 3 steps of analysis, namely data reduction, data presentation and conclusion drawing.

C. Finding and Discussion

1. Divorce in Purworejo Religious Court in 2020-2021

There have been fluctuations in divorce cases handled by the Purworejo Religious Court in recent years, where the uncertainty of the amount of data in a certain period of time is influenced by various factors including household disharmony which results in disputes and quarrels, economic factors, social media association factors and so on.⁶

Based on the data on divorce applications in the last two years, it shows a significant increase in both those who sue for divorce and / or divorce. The presentation of application cases from 2020-2021 is as follows:

Table 1: Plaintiff and divorce applications 2020-2021 at Purworejo District Court

Case Request	Year	Divorce	Talak Divorce
	2020 ⁷	1.575	491
	2021 ⁸	1.599	362

⁶ Interview with Nurul Huda, as admin of LBH Sakti Purworejo, 15 November 2021.

⁷ Pengadilan Agama Purworejo, "Arsip Dokumen Pengadilan Agama Purworejo Tahun 2020."

⁸ Pengadilan Agama Purworejo, "Arsip Pengadilan Agama Purworejo" (Purworejo, 2021).

These divorce cases show a high percentage and cause long-term problems for family harmony including their children. The results of an interview with the legal representative of one of the victims informed:

“Dampak perceraian menimbulkan persoalan hadhanah terkait pemberian nafkah pada keturunannya, sebagai besar mendapatkan haknya seperti biaya, kelangsungan Pendidikan dan tumbuh berkembang seperti dengan anak-anak pada umumnya”⁹.

Meanwhile, court decisions regarding the number of divorces for 2 years (2020-2021) show a significant increase. This is shown in the statistical data of the Purworejo Religious Court, among others:

Table 2: Presentation of Decisions of the Purworejo Religious Court in 2020-2021

Case Decision	Year	Divorce	Talak Divorce
	2020 ¹⁰	1.709	367
	2021 ¹¹	1.623	411

Ita Qonita, as a judge, informed that a number of people who filed for divorce and talaq divorce were only the ones who filed or 1% who filed for alimony from their ex-husband. Meanwhile, referring to Circular Letter Number 2 of 2019 concerning the Implementation of the Formulation of the Results of the Plenary Meeting of the Supreme Court in 2019 as Guidelines for the Implementation of Tasks for the courts regulates the achievers of justice, especially women in cases in pursuing their rights.¹²

Related to the filing of maintenance rights for children after divorce from 2020-2021 at the Purworejo Religious Court as follows:

Table 3: Presentation of Submissions on Post-Divorce Child Maintenance Rights at Purworejo Religious Court

⁹ Interview with Cahyo Subekti, as an Advocate who handles divorce cases at the Purworejo Religious Court, 16 August 2021.

¹⁰ Pengadilan Agama Purworejo, “Arsip Dokumen Pengadilan Agama Purworejo Tahun 2020.”

¹¹ Pengadilan Agama Purworejo, “Arsip Pengadilan Agama Purworejo.”

¹² Interview: Ita Qonita, Judge of the First Instance of Purworejo Religious Court, 15 November 2021. See: Mulyadi, Anggi. Implementation of Child Support by Divorced Civil Servants in Review of Positive Law and Islamic Law (Case Study No. 37/Pdt. G/2018 at Curup Religious Court). Diss. IAIN Curup, 2019.

Year	Number of Cases	Divorce		Talak divorce	
		Demanding Child Maintenance	No Child Support Demands	Demanding Child Maintenance	No Child Support Demands
2020	2.034	16	1.607	4	407
2021	2.076	17	1.709	3	367

Based on data related to divorce cases in 2020-2021, the filing of child maintenance is still relatively low. Meanwhile, in Book II related to the implementation of duties and administration of religious courts, the lawsuit for child support, wife, mut'ah, and 'iddah can be filed together with a divorce lawsuit. This can be referred to the Supreme Court decision Number 137 K/Ag/2007 which reads as follows:¹³

“wives who file for divorce against their husbands are not always punished as nusyuz. So ex officio nafkah iddah must still be given by the husband even though the wife has to undergo an iddah period which aims to istibra and concerns the husband's needs.”.

Similarly, SEMA Number 2 of 2019 has a breakthrough for the fulfilment of women's rights so that it has a positive impact. This can have a good impact on the fulfilment of women's rights due to divorce. Because what happens now is that many women no longer get mut'ah maintenance, 'iddah maintenance and child maintenance, due to the high cost of execution if the wife's rights due to divorce are not fulfilled voluntarily by her former husband.

Likewise, with the existence of Supreme Court Circular Letter (SEMA) Number 2 of 2019, a wife who sues her husband for divorce is allowed to demand child maintenance, mut'ah and iddah maintenance, surely the judge will easily grant the request if the claim has strong legal grounds, but most Plaintiffs (wives) only focus on their divorce case and put aside the demands for child maintenance, mut'ah and iddah maintenance in filing a lawsuit. Most of them are worried that the process

¹³Mahkamah Agung RI, “Putusan Mahkamah Agung RI Nomer 137K/AG/2007 Tentang: Istri Yang Menggugat Cerai Suaminya Tidak Selalu Dihukumkan Nusyuz. Meskipun Gugatan Perceraian Diajukan Oleh Istri, Tidak Terbukti Istri Telah Berbuat Nusyuz, Maka Secara Ex Officio Suami Dapat Dihukum,” JDIH Mahkamah Agung-RI, 2021, <https://jdih.mahkamahagung.go.id/index.php/beranda/database/3.-Yurisprudensi/Yurisprudensi-Terbitan-Lama/Agama/Tahun-2007/137K-AG-2007/>.

will become protracted (complicated) because of the possibility of resistance from the Defendant (husband).¹⁴

Based on the issuance of regulations governing wives' claims against husbands for child maintenance, it shows that from 2020-2021 only 4 people have claimed their rights at the Purworejo Religious Court:

Table 3: Court Decisions on Child Maintenance

Year	Verdict	Nafkah	Judgement	Ket
2020	359/Pdt.G/2020/PA.Pwj. ¹⁵	Rp. 600.000	Naik 10% Setiap Tahun	Cerai Gugat
2021	521/Pdt.G/2021/PA.Pwj ¹⁶	Rp. 500.000	Naik 10% Setiap Tahun	Cerai/Talaq
2021	233/Pdt.G/2021/PA.Pwj ¹⁷	Rp. 300.000	Naik 10% Setiap Tahun	Cerai/Talaq
2021	236/Pdt.G/2021/PA.Pwj ¹⁸	Rp. 1.500.000	Naik 10% Setiap Tahun	Cerai/Talaq

Because seeing the many phenomena of the non-implementation of child maintenance after divorce, the judge provides solutions including the following:

Firstly, if the verdict mentions a certain amount of rupiah to be paid by the defendant (father) to support his children, then the method of execution is as follows: (1) Judges usually take into consideration many parties starting from the mother, father, and children in deciding a case. Especially the income earned by the defendant (father), this is done so that no decision cannot be executed. Because every judge's decision must be related to one party to another. (2) In the history of the Purworejo Religious Court there has been no request from the applicant (mother) to execute a decision related to child maintenance. This is due to two possibilities, namely: first, the decision has been determined by the judge. Second, because the former husband is no longer demanded by the wife because the wife does not want to. Because in general, the wife has found her own happiness when she divorced her husband and the most important thing for her is the legal certainty of her marital status.

Secondly, if the verdict does not state how much the respondent (mother) wants, then in accordance with the principle of passive judges, namely the scope of the case may not be determined by the judge, the judge only conducts an

¹⁴Interview: Ita Qonita, Judge of the First Instance of Purworejo Religious Court, 15 November 2021.

¹⁵Pengadilan Agama Purworejo, "Arsip Dokumen Pengadilan Agama Purworejo Tahun 2020."

¹⁶ Pengadilan Agama Purworejo, "Arsip Pengadilan Agama Purworejo."

¹⁷Pengadilan Agama Purworejo, "Arsip Pengadilan Agama Purworejo."

¹⁸Pengadilan Agama Purworejo, "Arsip Pengadilan Agama Purworejo."

examination and decides based on the request of the parties. In civil cases the judge is the mediator. However, in examining the case, the judge must be active in reconciling the parties and asking about the intentions of the parties in their lawsuit. As explained in SEMA RI N0. 1/2002 states that all judges hear all cases seriously by seeking reconciliation. Because the judge is active in the examination, even though it is not stated in the ruling of the petition, the judge can ask the parties about their intentions.

Third, that a briefing was held from the Central Java High Court of Religious Affairs to the heads of Religious Courts regarding the implementation of Supreme Court Regulation (Perma) No. 3 of 2017 on the interrelationship of women and the law, especially regarding childcare. Children should be sought to join anyone who can guarantee children's rights, including the right to child maintenance. Most judges do not pay attention to children's rights in their decisions, based on the explanation of the Religious High Court. If the Chairman of the local Religious Court still does so, he will receive a warning from the Religious High Court. Therefore, this issue is still being socialised as it is a new issue in the judiciary. Because in previous cases, child custody cases were included in the decision requested directly by the parties in the lawsuit or in the answer to the lawsuit contained in the counterclaim.

Fourth, if there is a determination of child custody or child maintenance that is *verstek* (without the presence of the defendant), then the judge is of the opinion that there must be a request from the parties and is not included as *ex officio*. What can be categorised as *ex officio* is *iddah* maintenance and *mahdiyah* maintenance (maintenance owed).

It is an absolute rule, namely the principle of the judge applying passively that the judge cannot give a decision beyond what is demanded by the Plaintiff in his *petitum*. However, based on the *ex-officio* right of the judge, which is the right that the judge has because of his position, the judge can impose an obligation on the husband to fulfil the rights of his ex-wife or children. In determining the amount of child maintenance, the judge refers to the husband's income at work, because the judge does not want the husband to be unable to provide child maintenance later. Therefore, this decision can be said to be toothless (cannot be executed).¹⁹

2. Realisation of child support obligations after divorce

¹⁹Interview: Abdurrahman, Judge of First Instance at Purworejo Religious Court, 18 November 2021.

Divorce by parents has a legal effect on the children of their marriage, the result of which is that the parents still have an obligation to take care of the child for the sake of the child's development and solely for the child's future. The father must take full responsibility for the child and bear all the costs of his maintenance and education, even if the child lives with the mother. If the father is unable to support the child, then the court can determine that the mother will share the burden of support. If both parents are unable to meet the needs of the child then the Religious Court has the authority to appoint one of the closest relatives to carry out the child's maintenance obligations.²⁰

From the results of an interview with one of the judges of the Purworejo Religious Court, Abdurrahman regarding the realisation of the implementation of child maintenance after divorce is as follows:

“A father has an obligation to take care of the child even though there has been a divorce between them (husband and wife), but in reality the decision in the Religious Court which explains that the father is still obliged to support the child even though they are divorced is only written in black on white paper. The reality in society is that many children are victims of their parents' divorce who have not received their rights properly, even though it is known that these children still have a long future. At this time it is very difficult to find a lawsuit for seizure of execution to the Religious Courts throughout Indonesia, this can be caused by economic factors.”²¹

In divorce cases that demand child maintenance, it is usually found in divorce cases, where the husband files a petition for divorce at the Religious Court. When the wife appears in court, she usually files a counterclaim (reconvention). Among the counterclaims filed by the wife include a request for child maintenance. In this case, the Religious Court has the authority to grant the request in accordance with the husband's income and the needs of the children. But in reality, almost all of the children of divorced parties who have been decided by the religious court live with their mother. And almost all of the children's living expenses are borne by the mother as well, whereas it should be the father who bears the financial obligations in accordance with what has been determined by the Judge of the Purworejo Religious Court.

From the 5 cases above, it was found that almost all of the former husbands (fathers) did not implement the decisions made by the Panel of Judges. As a result,

²⁰Waluyo Sudarmaji, “Pertimbangan Hakim Dalam Memutuskan Perkara Dispensasi Nikah Berdasarkan Analisis Masalah (Studi Penetapan Hakim No. 266/Pdt. P/2020/PA. Pwr Di Pengadilan Agama Purworejo),” *Al-Syakhsyiah: Journal of Law & Family Studies* 3, no. 1 (2021): 131–144.

²¹ Interview: Abdurrahman, Judge of First Instance at Purworejo Religious Court, 18 November 2021.

the mother was forced to work hard to support her children. As expressed by the Respondent in Case Number 233/Pdt.G/2021/PA.Pwj, she said that she had to work as a tailor who was diligent and often worked overtime to meet the needs of her elementary school children. As a mother, she should only be in charge of educating and caring for her child, but because her ex-husband no longer cares, she must have additional duties to meet the needs of her child's living expenses. This phenomenon not only affects the child's living expenses and education, but will also have a negative impact on the psychological relationship between the child and his father, due to the lack of communication between father and child.

Based on the provisions that researchers have described above, if the husband does not carry out the implementation of maintenance in accordance with the decision that has been determined by the Purworejo Religious Court, then the court can make a unilateral decision that requires the applicant or defendant (former husband) to fulfil the contents of the Purworejo Religious Court's decision, here the mother has the right to request execution of the payment of maintenance costs to the Purworejo Religious Court. The court will then compel her ex-husband to execute the judgement. Usually this can only be done if the applicant or respondent (former husband) has assets that can be executed. In order for the execution to be fruitful, if the ex-husband has assets that are movable or immovable in nature, then these assets are entitled to be confiscated. In the case of confiscation of goods from the former husband, it is the authority of the clerk, bailiff, and also involves the auction office.²²

By being aware of her rights, a wife who is litigating a divorce can be moved to make legal efforts that can be taken so that the fulfilment of the rights of a wife and children after divorce can go well in accordance with the decision of the panel of judges, considering that the consequences arising after divorce have a huge impact on the lives of her children in the future. In terms of requests for execution, it has been regulated in detail in Law No. 7 of 1989 in Article 58 paragraph (1) and paragraph (2) concerning Religious Courts and Article 90 of Law No. 3 of 2006 concerning the details of the costs that are the obligations of the Execution Applicant.

The execution procedure is carried out in several stages. Firstly, The applicant for execution (who wins the case) submits a request to the President of the District Court so that the decision is executed, and the submission of the request occurs because the loser does not want to execute the decision voluntarily. Secondly,

²² Interview: Ita Qonita, Judge of the First Instance of Purworejo Religious Court, 15 November 2021.

on the basis of the application, the President of the District Court summons the losing party for an admonition (aanmaning) so that the loser fulfils the decision within 8 days (Article 196 HIR/207 RBG). Third, if the defeated party remains unwilling, the President of the District Court by virtue of his position gives an order for the confiscation of movable property and if it is not enough, the confiscation of fixed property in the amount of the value in the decision (Article 197 IR/208 RBG).²³

Execution as a system that aims to force the defendant to implement the decision to pay maintenance/child maintenance, but does not have the power to force the defendant. Currently, there is no regulation from the Religious Courts or criminal elements for husbands who fail to fulfil court decisions related to maintenance payments.²⁴ In this case, the plaintiff must have the initiative because the defendant is a passive party who only waits for a request for execution so that the request can be processed further by the court. Meanwhile, the plaintiff must go through a complex procedure to be able to fulfil his rights.²⁵

The husband's obligation is where there is a wife's right, and vice versa, whatever is the wife's obligation there is also the husband's right. If these rights and obligations can be carried out properly in a balanced manner, a peaceful life will be realised so as to create welfare and happiness together physically and mentally.

3. Factors Influencing the Non-fulfilment of Child Support Provision

a. Legal Awareness

One of the factors influencing the lack of claiming child maintenance rights when divorced is due to a lack of legal knowledge and legal basis in divorce. Lack of legal awareness after divorce that parents (fathers) do not fulfil their obligations in providing maintenance for children who are left behind. Then likewise with wives, most of them do not make demands for alimony to husbands for the continuation of the child's future, both future education and other needs. This shows that the husband in this case does not understand his obligations as clearly explained in Article 156 of the Marriage Law letter (d)

²³R. Suparmono, *Hukum Acara Perdata Dan Yurisprudensi* (Bandung: Mandar Maju, 2005), hlm. 194.

²⁴Fatimah Khairun Inauah Aliah dan Lomba Sultan, "Implikasi Dalam Pemberian Nafkah Iddah Dan Mut'ah Pada Perkara Cerai Talak Di Pengadilan Agama Makassar Kelas IA," *Jurnal Al-Qadau* 8, no. 2 (2021): 99.

²⁵Meivanza Dwi Aurellia dan Abdul Halim, "Urgensi Pembentukan Lembaga Eksekutor Terhadap Pemenuhan Hak Perempuan Dan Anak Pasca Perceraian," *Jurnal USM Law Review* 6, no. 2 (2023): 761.

that all costs of hadhanah and child maintenance are the responsibility of the father until the child has the ability to take care of himself (21 years).²⁶

Ignoring the obligation to provide maintenance for their children after divorce is only a moral action and responsibility as a father and social responsibility is not fulfilled. Although the court decision has determined the nominal amount, it does not have a significant legal impact if a father provides maintenance. Therefore, legal awareness regarding the fulfilment of child maintenance after divorce is only limited to moral actions and the responsibility of a father towards his descendants.

b. Socio-economics

Regarding alimony, the outline of the divorce process is that it is categorised as the wife suing and the husband making talaq through the legal process in court. However, the substantial demands for maintenance in the divorce process must certainly be seen contextually that the causal factors and the economic status of a father before making a decision. The economic ability of a father can be a measure that the fulfilment of maintenance can be decided objectively. Because divorce mostly occurs due to the factor that the economic needs of a wife are not met due to financial limitations and other factors as the main cause. So in making decisions about maintenance it is very important to review and consider contextually their lives both socio-economic status and occupation first. Because this social status has various levels of income with a father's work index, so that the decisions of judges in court can provide objective justice and the limits of ability in providing maintenance for children as a parental responsibility and as well as social and moral responsibilities.

D. Conclusion

The fulfilment and implementation of child maintenance after divorce needs to be considered. Children are assets of the country that are needed by the progress of this country where they must study as high as possible. However, if children become victims of divorce from parents who do not want to fulfil their needs, then this can interfere with their growth and education. The data shows that there are still a lot of parents, especially fathers, who do not carry out their obligations to provide child support with several factors including lack of legal awareness, lack of awareness of a father's obligation to provide for children, too much involvement of parents in the

²⁶Republik Indonesia, "Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan," *Lembaran Negara Tahun*, no. 1 (1974).

household, social factors, and economic factors. Many of them are only the mother of the child (ex-wife) who fulfils the needs of the child after divorce, although later it is assisted by the parents of the mother's side jointly, by means of the mother working, having a business, as a wage labourer, trading or something else. However, when viewed in the Compilation of Islamic Law on marriage child maintenance in article 156 (d) in the event of divorce "All hadhanah and nafkah costs are the responsibility of the father according to his ability, at least until the child is an adult and can take care of himself (21 years)".

Reference

- Abdullah, Abdul Gani. 1994. *Pengantar Kompilasi Hukum Islam Dalam Tata Hukum Indonesia*. Gema Insani.
- Afrinal, Ardi Darmawan. (2022). "Pemenuhan Nafkah Anak Pasca Perceraian." *Sakena: Jurnal Hukum Keluarga* 7, no. 1: 64.
- Alaudin, Andi. (2018). "Analisis Yuridis Tanggung Jawab Ayah Kandung Terhadap Nafkah Anak Setelah Perceraian." *Al-Ahkam: Jurnal Hukum Pidana Islam* 1, no. 1: 20.
- az-Zuhaili, Wahbah. *Fiqh Islam Wa Adilatuhu Juz 10*. Suriah: Dar AL-Fikrbi Damsyiq, n.d.
- Fatimah Khairun Inauah Aliah dan Lomba Sultan. (2021). "Implikasi Dalam Pemberian Nafkah Iddah Dan Mut'ah Pada Perkara Cerai Talak Di Pengadilan Agama Makassar Kelas IA." *Jurnal Al-Qadau* 8, no. 2: 99.
- Fauzan, Faisal. (2021). "Peran Pranata Keuangan Dalam Eksekusi Nafkah Anak Perceraian Pegawai Negeri Sipil." *El-Usrah: Jurnal Hukum Keluarga* 4, no. 1: 174.
- Heppy Hyma Puspytasari dan Firman. (2021). "Perlindungan Hukum Dalam Pembayaran Nafkah Anak Sebagai Akibat Perceraian." *Jurnal Pendidikan Tambusai* 5, no. 2: 3610–11.
- Indonesia, Republik. "Undang-Undang Nomor 1 Tahun 1974 Tentang Perkawinan." *Lembaran Negara Tahun*, no. 1 (1974).
- Mahkamah Agung RI. *Pedoman Pelaksana Tugas Dan Administrasi Peradilan Agama*. Revisi 2010 ed. Jakarta: Perpustakaan Mahkamah Agung, 2011.
- Mahkamah Agung RI. "Putusan Mahkamah Agung RI Nomer 137K/AG/2007 Tentang: Istri Yang Menggugat Cerai Suaminya Tidak Selalu Dihukumkan Nusyuz. Meskipun Gugatan Perceraian Diajukan Oleh Istri, Tidak Terbukti Istri Telah Berbuat Nusyuz, Maka Secara Ex Officio Suami Dapat Dihuku." JDIH Mahkamah Agung-RI, 2021.

- Mahkamah Agung RI. "SEMA Nomor 2 Tahun 2019." Bawas, 2019.
- Meivanza Dwi Aurellia dan Abdul Halim. (2023). "Urgensi Pembentukan Lembaga Eksekutor Terhadap Pemenuhan Hak Perempuan Dan Anak Pasca Perceraian." *Jurnal USM Law Review* 6, no. 2: 761.
- Pengadilan Agama Purworejo. "Arsip Dokumen Pengadilan Agama Purworejo Tahun 2020." Purworejo, 2020.
- Pengadilan Agama Purworejo. "Arsip Pengadilan Agama Purworejo." Purworejo, 2021.
- Peraturan Pemerintah RI. Izin Perkawinan Dan Perceraian Bagi Pegawai Negeri sipil (1983).
- R. Suparmono. 2005. *Hukum Acara Perdata Dan Yurisprudensi*. Bandung: Mandar Maju.
- Rianto Adi. 2007 *Peranan Lembaga Perlindungan Anak Dalam Advokasi Hak-Hak Anak*. Jakarta: Pengayoman.
- Saipudin dan Rofi'atul Hasanah. (2022). "Studi Komparatif Hukum Islam Dan Hukum Positif Terhadap Kewajiban Anak Menafkahi Orang Tua." *Al-Gharra: Jurnal Hukum Keluarga Islam* 1, no. 2: 58.
- Sari, Eni Putri. (2022). "Pemenuhan Hak Nafkah Anak Akibat Perceraian Di Kecamatan Ulu Talo Kabupaten Seluma Perspektif Hukum Islam." *Qiyas* 7, no. 1: 21.
- Soraya Devi dan Doni Muliadi. (2019). "Pertimbangan Hakim Dalam Menetapkan Nafkah Anak Pasca Perceraian (Studi Putusan Hakim Nomor 0233/Pdt.G/2017/MS-MBO)." *E-I-Ussrah: Jurnal Hukum Keluarga* 2, no. 1: 123–24.
- Sudarmaji, Waluyo. (2019). "Kesepakatan Para Pihak Sebagai Upaya Mencapai Putusan Verstek Dalam Perkara Perceraian." *Isti'dal: Studi Hukum Islam* 6, no. No. 2: 101–16.
- Sudarmaji, Waluyo. (2021). "Pertimbangan Hakim Dalam Memutuskan Perkara Dispensasi Nikah Berdasarkan Analisis Masalah (Studi Penetapan Hakim No. 266/Pdt. P/2020/PA. Pwr Di Pengadilan Agama Purworejo)." *Al-Syakhsyiyah: Journal of Law & Family Studies* 3, no. 1: 131–144.
- Widiyani, Rita. (2019). "Tinjauan Hukum Islam Dan Hukum Positif Terhadap Status Nafkah Anak Pasca Perceraian Tanpa Melalui Keputusan Hakim PA (Pengadilan Agama)." *Syakhsia: Jurnal Hukum Perdata Islam* 20, no. 2: 461–92.