

# Legal Implications of Keris Marriage on the Inheritance Rights of Balinese Women: A Human Rights Perspective

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HAM,  
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**Abstract.** This article analyzes the legal implications of keris marriage on the inheritance rights of Balinese women from a human rights perspective. The focus of the study is on how the legal consequences of implementing a keris marriage affect the inheritance rights of daughters in the Balinese customary civil law system; remembering that in this keris marriage, the position of the groom is replaced with a symbol in the form of a keris. Is this marital status legally giving inheritance rights to daughters, considering that Balinese traditional society adheres to patrilineal kinship? Apart from that, this article analyzes juridically how gender roles influence the distribution of inheritance in patrilineal families. By using a statutory approach, a conceptual approach, a case approach, a human rights approach, and a sociological approach, it can be concluded that even though in a keris marriage the position of the bridegroom is replaced with the keris symbol, according to Balinese customary law which has Hindu religious nuances, the marriage is legally deemed to fulfill the requirements. The validity of marriage provides legal certainty regarding the recognition of women's inheritance rights in balance with the inheritance rights of sons. This traditional Balinese marriage model significantly influences Balinese women's human rights, especially in the context of inheritance of family rights and responsibilities.

## 1. INTRODUCTION

The Republic of Indonesia as stipulated in the provisions of Article 2 of Law Number 39 of 1999 concerning Human Rights recognizes and upholds human rights and basic human freedoms as rights that are naturally inherent in and inseparable from humans, which must be protected, respected, and enforced for the sake of increasing human dignity, prosperity, happiness, intelligence and justice. Regarding the position of boys and girls in Bali up to the 21st century, even though we have entered the era of globalization and the discourse on law enforcement regarding Human Rights (HAM), the stigmatization of women's sexuality still shows a dichotomous view (I. P. W. M. Sujana & Camellia, 2023). In traditional Balinese culture, which has Hindu religious nuances, the patrilineal kinship system is strongly rooted in the succession of descendants better known as heirs, still viewing the position of men as dominant (Dewi, 2020). Meanwhile, the existence of women's human rights is still marginalized. The kinship system is a translation of the term *kinship systems* which is interpreted as: "*The social recognition and expression of genealogical relationship, both consanguineal and affinal*" (Soekanto, n.d.). In the sociology dictionary entitled *A Dictionary of Sociology*, the kinship system is defined as: "*..... Social relationship based on real, putative or fictive consanguinity; or on the model of consanguine relations*" (Soekanto, n.d.).

Although in anthropology the term kinship is usually used in the sense of kinship and marriage, the two things can be differentiated, where kinship is a blood relationship while marriage relationship is given the term *affinity*. Thus, parents and children are relatives while husband and wife are affines (Soekanto, n.d.). In most Balinese traditional communities, the absence of sons in family life is seen as empty and even considered incomplete, even though several daughters have been born in the family (Creese, 2016).

Having a son in a family is the dream of every married couple. This is motivated by the fact that it has been accepted from generation to generation that Balinese customs with Hindu religious nuances adhere to patrilineal kinship or male lineage (*sad*) (Bunga et al., 2024). The principles of the kinship system of purusa or fatherhood adopted by the Balinese Indigenous People are imbued with the teachings of Hinduism. The family system in Balinese traditional society concerns the drawing of lineages, ancestors, kinship relationships, and descendants. (I Gusti Ayu Jatiana Manik Wedanti et al., 2023)

Based on kinship lines *patrilineal* In this case, the male child is in the position of successor to the lineage, which is called the heir. This is in line with one of the purposes of holding a marriage, namely to carry out regeneration, so that the continuity of the people can continue to flow without stopping. The validity of a son as heir will be determined by the validity of his parents' marriage. Article 2 of Law Number 1 of 1974 concerning Marriage, hereinafter abbreviated to the Marriage Law, determines that marriage is valid if it is carried out according to the laws of each religion and belief. By referring to the provisions of this article, only children born from a valid marriage will be heirs, so that inheritance in the life of Balinese society is an important aspect, where inheritance rights are determined by familial relationships and local customs. A marriage that is entered into and declared valid will result in the child being born occupying the position of a legitimate child.

Observing the definition of marriage as stipulated in the Marriage Law in the provisions of Article 1, it is stated that: "*marriage is 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 belief in the Almighty Godhead*"; Based on these provisions, it is clear that the main requirement for marriage is the presence of a groom as husband and a bride as wife. This is further specified in the provisions of article 3 paragraph (1) of the Marriage Law which stipulates that: "*Basically in a marriage a man can only have one wife, a woman can only have one husband*." This provision confirms that normatively the Indonesian Marriage Law adheres to the principle of monogamy (Moch. Isaeni, n.d.), although it is not absolute as is adhered to by Article 27 BW.

Even though the current era is an era of globalization, in the life of traditional communities in Bali which has a very strong Hindu religious feel, where the customs and culture of patrilineal kinship are very deeply rooted, the phenomenon of traditional

marriages carried out by one bride and not carried out by a bride is found. men, but the groom's position is replaced by a symbol in the form of a keris Switzy Sabandar, "Seeing the Uniqueness of Keris Marriages in Bali Protects the Rights of Women and Children", www.Liputan6.com., n.d.. So this is very contrary to the Marriage Law which requires that a groom act as a husband and a bride act as a wife.

Replacing the position of the groom during the wedding ceremony with the symbol of a keris can actually be accepted as appropriate according to Balinese custom. Balinese tradition views the Keris not only as an object that has artistic principles, but also has a function as part of the rituals of Balinese Hindus. (*The Spirit and Heritage of the Ancestors in the Balinese Keris*", n.d.) And one of them is used as a substitute symbol for the groom in a wedding procession ritual in the event that the prospective groom cannot be present when the wedding takes place. The existence of the use of the keris symbol as a substitute for the groom is motivated by an incident experienced by the prospective bride when the wedding ceremony procession was to be carried out and it turned out that the prospective groom was not present.

Looking at the background of this keris marriage, when analyzed normatively from the provisions of the Marriage Law, it is clear that this keris marriage is contrary to the provisions of article 1 and article 3 paragraph (1), because the marriage does not meet the subjective requirements, namely a groom with a bride. Empirically, it occurs and is accepted as appropriate in the lives of Balinese traditional communities. The phenomenon of holding keris weddings is actually considered a solution to protect the human rights of Balinese girls and children conceived by the prospective bride. And apart from that, keris marriage is seen as a form of marriage that is highly respected in Balinese tradition.

The phenomenon of this model of marriage is very interesting as a focus of study, because the legal implications of this model of marriage for the position of Balinese girls in inheritance have not been studied in depth, especially when viewed from the perspective of the Human Rights of Girls. This is in line with the special attention given by international institutions related to guaranteeing human rights, especially by the UN Committee which requires state parties to make special efforts to eliminate discrimination against women in all issues related to marriage and relationships. family. Therefore, in this article the focus of the study is how keris marriages affect the inheritance rights of girls in a patrilineal kinship environment which is associated with the enforcement of girls' human rights in the Balinese customary law system, especially the inheritance rights of Balinese girls in a borderline environment. patrilineal kinship. Does this marital status give Balinese girls higher inheritance rights? This research aims to reveal how keris marriages affect the position of girls in Balinese customary inheritance law in this era of globalization. (Westendorp, 2015).

## 2. METHOD

This article is an empirical legal study that focuses on the attitudes and behavior of individuals, groups, communities, institutions and countries (Asmah, 2024; Ausat et al., 2024; Irwansyah, 2022). By using a legislative approach, a human rights approach, a case approach and a sociological approach, to provide a more comprehensive picture of the phenomenon of keris marriage in relation to the enforcement of girls' human rights in patrilineal society. Primary data was obtained through direct interview techniques with selected sources and purposive sampling methods carried out in the customary law community area of Bali, Indonesia. Secondary data was obtained from primary legal sources such as the Marriage Law, human rights law, other laws related to marriage, child protection, and women's protection law. Other resources used include scientific articles, journals, books on marriage, legal dictionaries, and encyclopedias. Data was obtained through direct interviews with sources and literature searches. A search was carried out to study literature, laws and regulations related to the discussion of marriage using the keris symbol as a substitute for the position of the groom in the Balinese traditional community. Further analysis is carried out to produce a final argument in the form of an answer to the research question.

## 3. RESULTS AND DISCUSSION

### 3.1. The Existence of Keris Marriages in Legislation

Moving on from the definition of Article 1 of the Marriage Law, it is clear how strong the "religious nuance" is. (Moch. Isnaeni, n.d.) coloring the marriage laws made by the Indonesian government. This choice is based, among other things, on the fact that the Indonesian nation, which is based on Pancasila, really must be used as the basis when making legal regulations, including when drafting the Marriage Law, where the first principle explicitly states that the purpose of marriage is to form a family (household). happy and eternal based on the Almighty Godhead. This is very different from that adhered to by BW (*Civil Code*) which views marriage only from a civil perspective, this is in accordance with most opinions in the world of argumentative doctrine, for example:

*".....while marriage is often termed by text writers and decisions of courts as a civil contract, generally to indicate that it must be founded upon the agreement of the parties, and does not require any religious ceremony for its solemnization, it is something more than a mere contract"*

The BW marriage law chooses to view marriage only from a civil perspective, whereas from the beginning the Marriage Law has had a strong religious nuance coloring its provisions. It is proven that Article 1 of the Marriage Law, as the initial body of the law, has shown its format to always rely on the foundation of the legal principles of the Indonesian nation that the religious element will always be its essence. On the other hand, the existence of a Marriage Law with a figure like that will give rise to prolonged debate from various circles, which will be difficult to resolve. One of the reasons for this prolonged debate is regarding the validity of marriage as intended by the provisions of Article 2 of the Marriage Law.

The strong religious nuances regarding the validity of marriage in Indonesia have to this day never been resolved, because the provisions of Article 2 Paragraph (1) of the Marriage Law editorially determine that "Marriage is valid if it is carried out according to the laws of each respective religion and belief". Indonesia, as a country inhabited by various religions, each has its own way of carrying out marriages according to its sharia. Adherents of one religion will definitely be different from adherents of other religions. Like the phenomenon of keris marriages that occur in the kinship environment of the Balinese traditional community which has Hindu religious nuances.

The existence of keris marriages or traditional marriages by replacing the groom's position with the symbol of a keris in the context of Indonesian law is not regulated in any statutory regulations, however its existence in the Balinese traditional community is actually accepted as appropriate and is even used as a solution in the Hindu religion to respecting the sacredness of a marriage institution in the event that the groom is not present when the marriage procession takes place. "Keris marriage" in Bali is a

marriage related to symbols of Balinese Hindu customs, culture or beliefs, as one solution to maintain harmony between the "world of sekala" (real world) and the "world of niskala" (world of the afterlife) for actions breaking the promise made by the prospective groom to the prospective bride who has experienced pregnancy outside of marriage. In order to prevent cuntaka (the birth of illegitimate children) in the local traditional village area, a solution is sought that is acceptable and justified according to Hindu custom and religion.

Legally, as outlined in the provisions of Law no. 1 of 1974 concerning Marriage, which was later amended by Law no. 16 of 2019, which is the main basis for marriage law in Indonesia, it turns out that the phenomenon of holding "keris marriages" is not regulated at all. Article 1 of the Marriage Law states, "*Marriage is 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 Almighty Godhead.*" Meanwhile, in the provisions of Article 27 BW. Mention: "*At the same time a man is only allowed to have one woman as his wife, a woman only one man as her husband.*" Referring to these statutory regulations, normatively it is clear that the subjective requirements for the validity of a marriage, namely the presence of a bride and groom in a marriage bond consisting of a man as husband and a woman as wife, are not fulfilled. On the other hand, Balinese traditional law applies empirically using interpretation or hermeneutic method has interpreted the keris symbol as a substitute for the male gender. The use of the keris symbol is in order to provide legal certainty regarding the existence of the groom to be side by side with the bride in a marriage procession. The replacement of the groom's position with the keris symbol is not regulated at all, so keris marriages are legally considered invalid.

The same assessment from the aspect of Islamic law also states that the traditional wedding procession / nganten keris is not in accordance with Islamic law, because it includes *urf fasid* who do not fulfill the requirements for a valid marriage due to the absence of the groom in the implementation process. (Sulistyaningsing, 2022) However, the fact of the matter is that marriage unites two human beings, a man and a woman. According to Islamic law, marrying a keris causes more harm than good because there is no legal recognition of a marriage between a keris. This is in accordance with the rule of jurisprudence that rejecting damage takes precedence over attracting benefits. (Sulistyaningsing, 2022)

However, based on the results of interviews with traditional leaders in Bali, It can be found that there are marriages that use the keris symbol as a replacement for the groom's position in a traditional marriage procession, where a marriage using the keris symbol is an alternative marriage in the event that the prospective groom cannot attend a traditional wedding ceremony, where the prospective The bride is already very pregnant. Even though normatively there is no groom, in order to avoid the birth of illegitimate children which traditionally will have implications for imbalance in the traditional village environment, traditional and religious leaders with the approval of the bride's family will continue to carry out the marriage even without the presence of the groom but with a replacement symbol in the form of a keris. Traditional norms here are an alternative solution for respecting the human rights of women and children who will be born. Norms are rules that regulate, guide and direct people to behave and behave ideally in life together (Asshiddiqie, 2023).

Based on the research results, it was found that there were several factors causing the groom's absence, including:

- a. The groom's party had broken his promise to the prospective bride who would act as a sentana rajeg, but after the prospective bride was heavily pregnant, it turned out that the prospective groom did not want to get married immediately, so the prospective bride and her family continued to carry out the wedding procession by changing the position of the groom's side with a symbol in the form of a keris;
- b. The prospective groom suddenly died before the religious ceremony could be carried out, so that the wedding procession was not between a man and a woman, but between a woman and the groom's symbol in the form of a keris. This type of marriage is often called a keris marriage
- c. The prospective groom is currently abroad and is still working, but the prospective bride is already heavily pregnant, so to avoid the birth of children out of wedlock, according to current Balinese custom (in the global era) with the consent of the male and female families women's wedding processions are still carried out via online media, where the groom's position is replaced by using a symbol in the form of a keris;

The phenomenon of keris marriages that occur in patrilineal kinship environments such as in Bali is actually part of respect for the human rights of women and children. This is in line with the provisions of Article 3 of Law Number 39 of 1999 concerning human rights which determines that:

- a. Every person is born free with equal and equal human dignity and is gifted with reason and conscience to live in society, nation and state in a spirit of brotherhood;
- b. Everyone has the right to recognition, guarantee, protection and fair legal treatment and to get legal certainty and equal treatment before the law.

Based on direct interviews with Balinese traditional leaders and Hindu religious leaders, It turns out that their views are very progressive in solving the problem of the birth of children without fathers. Even though there are no statutory regulations that regulate the issue of keris marriages, where the groom is replaced with the symbol of a keris, Hindu religious leaders in Bali have implemented very progressive thoughts such as those put forward by Satjipto Rahardjo, who stated that law is for humans. and not vice versa. (Rahardjo, 2004) Traditional leaders and Hindu religious leaders in Bali have practiced traditional law which has developed progressively and has tried to find laws to overcome the large gap between *law in a books* with *law in action* as well as the failure of the law to respond to problems that occur in the Balinese traditional community, such as the phenomenon of keris marriages.

According to them, keris marriages in the kinship environment of the Balinese traditional community are an alternative solution to avoid the birth of children without recognition from a father. So by making a legal breakthrough, we can avoid the birth of illegitimate children which according to Balinese customary law are called bebinjat children (I. N. Sujana, 2012). Judging from the legislation, there are no direct regulations governing marriage using the keris symbol, but it is still required that there be a bride and groom. Meanwhile, in reality, in the kinship environment of Balinese society, the phenomenon of keris marriage is part of customary law as a solution to prevent the birth of children without a religious ceremony.

This is in line with the spirit of the Marriage Law which emphasizes that marriage is valid if it is carried out according to the laws of each religion and belief. And it continues that every marriage is recorded according to statutory regulations as outlined in the provisions of Article 2 paragraph (1) and paragraph (2) of Law no. 1/1974. Even though Indonesian positive law does not directly regulate marriages with traditional or traditional symbols such as the "keris," in local customary practices, it is often integrated into legal marriage processions according to religion. As long as the traditional procession does not conflict with applicable legal principles and norms, cultural symbols, including the keris, can still be accommodated as part of local traditions.

When referring to special regulations regarding "kris" in the context of marriage, use reasoning *Argument by Analogy* (Mertokusumo, n.d.), then the keris symbol is expanded to mean not only that it is a weapon but is actually the embodiment

of the bridegroom. This analogy is also called extensive interpretation (Prakoso, 2023). This is more connected to customary provisions or procedures in several regions, which are not always regulated in national legislation, but in local customary law. The uniqueness of Keris Marriage in the context of Indonesian national civil law, marriage is regulated in Law no. 1 of 1974 concerning Marriage, which requires a marriage bond between a man and a woman. Keris marriages, where the man is replaced by the keris symbol, are clearly not in accordance with this provision.

Referring to several statutory provisions, both national, BW and Islamic law, it is clearly found that there is a novelty from this research, namely that there is a discrepancy between Balinese customary law and national civil law, and also Islamic law, however keris marriages are still recognized in Balinese traditional community even though they do not meet the formal requirements for marriage according to civil law. This shows the duality of the legal system that still exists in Indonesia, where customary law and national law often conflict.

### 3.2. The Implications of the Keris Marriage Law on the Position of Daughter's Inheritance Rights in a Human Rights Perspective

Human Rights (HAM) are a global social order as a form of institutionalizing freedom so that everyone can use all their human potential to the maximum. Human rights are values as well as norms that guarantee and recognize that every person can enjoy the basic rights and freedoms inherent in their essence and existence as human beings. (Sochmawardiah, n.d.) Human Rights (HAM), whether directly or indirectly, have influenced the development of family law in Indonesia (Kharlie, 2013). Including in the case of the occurrence of the "keris marriage" phenomenon that is carried out in the kinship environment of the Balinese traditional community. Keris marriage has actually existed since the time of the old kingdom, and is even carried out until now. In this keris marriage, Balinese customary law has placed a woman in the position of a man or "kepurusa". Although the world of globalization has gone so fast, but the kris marriage culture in Bali is indeed very unique as if it has never been left behind by the changing times. This can be seen from the still existing implementation of this model of marriage which is not owned by other regions in Indonesia or even in the world. During the time of the old kingdom, this keris marriage was actually a solution ordered by the high-caste king who married a low-caste woman, where it was forbidden to side by side in the process of the wedding ceremony. This inter-caste marriage until now is strictly prohibited. So, when the king wanted to propose to a girl with a lower caste, to be a concubine or a wife, it was wise to replace the king's position with his dagger as a symbol in his wedding procession. (Widana, 2021)

The keris in the Balinese Hindu system is a symbol of male virility or what is called kepurusa. When the king marries a girl who is considered inappropriate (different caste), then what is married is not the rough form of the king, but his symbol in a keris, from there this method is widely adapted by current Balinese etiquette and is used as awig-awig for special occasions, such as pregnancy outside of marriage. In Balinese customary law, inheritance traditionally follows patrilineal descent, where sons are considered the main heirs of the family. However, developments over time and social changes have given rise to various interpretations regarding the role of daughters in inheritance. The keris marriage, as a symbol of marriage that is considered sacred, often has certain legal implications for the division of inheritance, especially if it is related to the marital status of the parents.

Based on the research results, there are several factors that influence inheritance in Balinese customary law, including:

- a. Parents' marital status: In a keris marriage, the marital status is considered higher than an ordinary marriage, which affects the children's rights in inheritance.
- b. Position of children in the family: Boys often have greater inheritance rights than girls.
- c. Local village customs: Local customs play an important role in determining inheritance rules.

This shows that keris marriages have a significant impact on the position of girls' human rights in inheritance. From the results of qualitative interviews, it was found that in several Balinese traditional communities, although Balinese customs are very strong in the "patrilineal" or "kepurusa" line of inheritance, the existence of distribution of inheritance for heirs must be fair and reflect a sense of justice. (*The Great Child of the Great Wife The Meaning of Purusa and Predana in the Judge's Decision Regarding the Balinese Traditional Inheritance Dispute*, 2016) In a marriage using the keris symbol, the mother whose children are born from a keris marriage is considered to have greater inheritance rights than children born from an ordinary marriage. This is especially true for sons, who remain the primary heirs in a patrilineal inheritance system. However, there are also indications that several traditional villages through traditional elders have thought progressively in inheritance, because they have placed equal human rights on children without distinguishing between male and female genders. This is in line with the views of progressive law initiator Satjipto Rahardjo who stated that *rule breaking* very important in the law enforcement system. (Suteki, 2015) According to Satjipto Rahardjo there are three ways to do this *rule breaking*, that is: *First* by using spiritual intelligence to wake up from adversity and not let ourselves be bound by old ways; *second*, searching for deeper meaning should become a new measure in implementing the law and having a legal state; *third*, the law should be implemented not according to logical principles alone, but with feelings of care and involvement (*Compassion*) to weak groups. (Suteki, 2015).

In relation to the legal issue studied in this article, namely regarding the legal implications of carrying out a keris marriage on the inheritance rights of Balinese girls as a result of the prospective groom breaking his promise during the wedding ceremony, then in fact the bride who is heavily pregnant clearly experiences a burden. psychologically very heavy, as well as children who have been born who are often bullied as bebinjat children (children without fathers). Obviously this will be the subject of bullying from the surrounding indigenous community. However, by paying attention to human rights, traditional village officials have acted progressively to provide justice to women who experienced broken promises from their future husbands. The real manifestation of the Principles of Just and Civilized Humanity has been implemented through the recognition of equal degrees of equality of rights and equality of obligations between fellow human beings so that human values have been upheld. (*Pancasila in Meaning and Actualizatio*, 2015) This is also the case with the position of illegitimate children, even though they were born without recognition from their biological father, they have begun to provide more equal inheritance rights to daughters, especially in terms of rights to personal property and not just family inheritance. The progressive legal steps taken by traditional leaders in Bali show respect for women's human rights in inheritance. In this case, it is in line with Satjipto Rahardjo's statement which states that law is for humans, so law is not for itself, but for something wider and greater. (Atmasasmita, 2012) In the event of a pregnancy case involving a Balinese woman who was abandoned by her prospective husband, who previously wanted to marry according to Balinese custom, it turns out he was denied it. In the event that such a case occurs, in order to achieve legal certainty regarding the birth of the unborn child, the solution taken is to marry off the pregnant woman by replacing the groom's position with a keris. In this case, the law works for humans, not vice versa. So that these women have the same rights as heirs as men born from



ordinary marriages. This is where it is proven that there are laws that are pro-justice.

Quantitative results show that around 70% of respondents admit that the keris' marital status gives female children a stronger position in inheritance claims.

Influencing Factors include:

- a. Local Customary Values.
- b. Social Change.
- c. Family Economic Status.

Based on several factors above and using responsive legal theory as proposed by Philippe Nonet and Philip Selznick, the marital status of the keris is a solution to respond to the values of justice in inheritance for Balinese women in a patrilineal society. It is a very fair attitude to give equal status to boys or *kepurusa*. The step of providing balanced inheritance rights for Balinese women is a higher stage of evolution compared to autonomous law and repressive law. According to him, responsive law creates great institutional competence in efforts to achieve justice. (Selznick, 2013) Local customary values have a very strong influence on decision making regarding inheritance, in addition to social changes, although customary law is still very dominant, there have been changes in several communities that have begun to recognize the rights of daughters in inheritance. Likewise, the economic status of the family is very influential, moreover, the bride's economic status from a richer family tends to follow customary rules more strictly, while families with lower middle economic status are more flexible in dividing inheritance.

#### 4. CONCLUSION

Keris marriages have significant legal implications for the position of children in inheritance according to Balinese customary law. Although Balinese customary law traditionally prioritizes sons as primary heirs, there have been changes in some communities that have begun to give daughters more equal rights. Keris marriages, which are considered higher in status, tend to strengthen the position of children in inheritance, both sons and daughters, especially in families that are more traditionally conservative.

#### REFERENCES

- Asmah, A. (2024). Procurement tender fairness: MSME, business competition law, and SIKaP application. *Athena: Journal of Social, Culture and Society*, 2(3), 373–377. <https://doi.org/10.58905/athena.v2i3.312>
- Asshiddiqie, J. (2023). Legal norm hierarchy.
- Atmasasmita, S. R. in R. (2012). Integrative legal theory reconstruction of development theory and progressive legal theory.
- Ausat, A. M. A., Muhammad Aqib Shafiq, Doaa Wafik, & Norma Angélica Santiesteban López. (2024). The role of transformational leadership in improving employee psychological wellbeing: A review. *Apollo: Journal of Tourism and Business*, 2(1), 148–157. <https://doi.org/10.58905/apollo.v2i1.239>
- Bunga, D., Segara, I. N. Y., & Tus, D. S. A. K. (2024). Spotlighting the neglect of Balinese women's and children's rights in custody court decisions. *Udayana Journal of Law and Culture*, 8(2), 233–263. <https://doi.org/10.24843/UJLC.2024.v08.i02.p05>
- Creese, H. (2016). The legal status of widows and divorcees (*janda*) in colonial Bali. *Indonesia and the Malay World*, 44(128), 84–103. <https://doi.org/10.1080/13639811.2015.1100862>
- Dewi, Y. P. (2020). Gendering adat law: Women's rights activists in Balinese customary affairs. In *Gender and Sexuality Justice in Asia: Finding Resolutions through Conflicts* (pp. 31–44). Springer Singapore. [https://doi.org/10.1007/978-981-15-8916-4\\_3](https://doi.org/10.1007/978-981-15-8916-4_3)
- I Gusti Ayu Jatiana Manik Wedanti, I Putu Adi Saskara, & I Made Sugita. (2023). Eksistensi purusa dan pradana dalam pewarisan menurut hukum adat Bali. *Widya Duta Jurnal Ilmiah Ilmu Agama Dan Ilmu Sosial Budaya*, 18(1), 80–96. <https://doi.org/10.25078/wd.v18i1.2017>
- Irwansyah. (2022). Legal research selected article writing methods & practices. Mirra Buana Media.
- Kharlie, A. T. (2013). *Indonesian family law*. Sinar Graphics.
- Mertokusumo, S. (n.d.). *Getting to know the law: An introduction*. Cahaya Atma Pustaka.
- Moch, Isnaeni. (n.d.). *Indonesian marriage law*. PT.Refika Aditama.
- Prakoso, A. (2023). *Legal reasoning*. LaksBang Justitia.
- Rahardjo, S. (2004). Progressive law (Exploration of an idea).
- Sabandar, S. (2023). "Seeing the uniqueness of keris marriages in Bali protects the rights of women and children". [www.liputan6.com](http://www.liputan6.com)
- Selznick, P. N., & P. (2013). *Responsive law*.
- Sochmawardiah, H. A. (n.d.). *Racial discrimination in human rights law: A study of discrimination against ethnic Chinese*. Genta Publishing.
- Soekanto, C. W. in S. (n.d.). *Indonesian customary law*.
- Sujana, I. N. (2012). The legal status of illegitimate children in the perspective of Constitutional Court Decision Number 46/PUU-VIII/2010. Aswaja Pressindo.
- Sujana, I. P. W. M., & Camellia, C. (2023). Gender equality of Balinese women as a manifestation of equality citizens. *Bhineka Tunggal Ika: Kajian Teori Dan Praktik Pendidikan PKn*, 10(1), 126–133. <https://doi.org/10.36706/jbti.v10i1.21098>
- Sulistyaningsing, V. (2022). Keris wedding procession as purusa family's responsibility for the status of women and their children for interfaith marriage couples review of Islamic law. State Islamic Institute (IAIN).
- Pancasila in meaning and actualization, (2015) (Testimony of Ngadino Surip).
- Suteki. (2015). The future of progressive law.
- The great child of the great wife: The meaning of purusa and pradana in the judge's decision regarding the Balinese traditional inheritance dispute. (2016).
- The spirit and heritage of the ancestors in the Balinese keris. (n.d.). [www.liputan6.com](http://www.liputan6.com)
- Westendorp, I. (2015). Personal status law and women's right to equality in law and in practice: The case of land rights of Balinese Hindu women. *Journal of Human Rights Practice*, 7(3), 430–450. <https://doi.org/10.1093/jhuman/huv013>
- Widana, I. M. N. (2021). "Implementation of Law Number 1 of 1974 concerning marriage in the implementation of keris marriages in the Beratan Samayaji traditional village". *Kertha Widya Law Journal*, 9.