

Euthanasia Acts from the Perspective of Criminal Law and Human Rights

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ARTICLE INFO	ABSTRACT
<p>Keywords : <i>Euthanasia, Criminal Law, Human Rights</i></p> <p>Submitted: 15-01-2024</p> <p>Last revised: 30-05-2024</p> <p>Accepted: 10-06-2024</p> <p>Published: 28-06-2024</p>	<p><i>Euthanasia</i> in positive criminal law regulations in Indonesia has not been regulated firmly and specifically. And according to human rights, the act of <i>euthanasia</i> is a violation of a person's right to life. The act of <i>euthanasia</i> itself occurs because of the unbearable suffering a person experiences due to a disease that has no hope of being cured. The patient or family will ask the doctor to carry out euthanasia because they have lost hope or the opportunity to be cured with other alternatives. Juridically, criminal law, the act of euthanasia is indirectly regulated in articles 304, 344 and 345 of the Criminal Code as well as articles 461 and 462 of Law number 1 of 2023 and in human rights the act of euthanasia is very contrary to a person's right to life, the emergence of the act of euthanasia It has become a demand that euthanasia is part of human rights, namely the right to die. This right to die is not regulated either in the 1945 Constitution, Law Number 39 of 1999, and the Universal Declaration of Human Rights. The new thing that can be stated is that the process of legislation and legal reform, especially regarding this action, must continue to be carried out based on Pancasila and the 1945 Constitution of the Republic of Indonesia, taking into account the religious and cultural norms that apply in Indonesian society.</p>

1. Introduction

Indonesia is a legal country based on law (Rest state), not based on mere power (power state). This understanding can be seen in article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia which reads "Indonesia is a country of law". The rule of law itself has certain characteristics, such as: recognition and protection of human rights, free and impartial justice, legality of state or government actions in the sense of actions of state officials that can be legally accounted for.¹

¹ Siska Elvandari, 2015, "Medical Dispute Resolution Law", Yogyakarta: Thafa Media, p. 5.2 Widyawati Boediningsih and Novi Prameswari Regina Dermawan, 2023, "The Development of Human Rights in Indonesia and Its Problems", Journal of Social Humaria and Education, p. 78.

Basically, Indonesia itself highly upholds human rights which originate from Pancasila as the philosophy of the nation and state. What we can see through the development of human rights in Indonesia in

Article 1 paragraph (1) of Law Number 39 of 1999 which provides an explanation of human rights "Human rights are a set of rights that are inherent in the nature and existence of humans as creatures of God Almighty and are His gift that must be respected and upheld. high and protected by the state, law, government and every person for the sake of honor and protection of human dignity.² As it known that human rights are rights inherent in humans naturally, universally and eternally as a gift from God Almighty, which include these fundamental rights, namely the right to life, the right to have a family, the right to develop oneself, the right to justice, the right to independence, and welfare rights which therefore must not be ignored or taken away by anyone. Therefore, humans have rights and responsibilities that arise as a result of the development of human life.

Among developments in human life, developments in science, especially in the medical field, are no less important than other sciences, with technological developments, especially in the medical field. Then things that are related and identical to a disease can be done and treated accurately, so that treatment can be carried out effectively. Progress in this field has had a huge influence on humans, bringing hope for a better life than before.³ In science there are 3 types of death one of which is euthanasia, is death that occurs with the help of a doctor or without a doctor's help. Case *euthanasia* This is still a problem that is closely related to ethics in the medical field. Because in medical ethics itself, a patient must be given maximum health services⁴.

Euthanasia comes from Greek which means action to reduce or alleviate the suffering of people who are facing death in other words "good death" or what is usually called with "merry killing". Reason for taking action euthanasia due to the patient's chronic, incurable illness and the economic situation of the family of the patient who is undergoing treatment for a comatose patient. Meanwhile, in Indonesia itself *euthanasia* it is not regulated expressly and specifically but is contained in articles 304, article 344, and article 345 of the Criminal Code (KUHP) and articles 461 and article 462 of Law Number 1 of 2023. For this reason, it is regulated in article 344 which reads "Whoever takes the life of another person at the person's own request which is clearly stated with sincerity, is threatened with imprisonment for a maximum of twelve years."

In order to be subject to the criminal threat of this article, the request to be killed must be mentioned with 'real and serious' (*ernstig*). and in article 345 which reads, "every person who deliberately encourages another person to commit suicide, helps him in that act or provides the means for that person to do so, if that happens, is threatened with a maximum prison sentence of four years." On the record, people who commit suicide cannot be punished, but people who deliberately incite, help, etc., other people to commit suicide can be punished as long as the other person actually commits suicide. Because if he does not die even if he has (attempted) suicide, the instigator cannot be punished.⁵ Although in Indonesia the action setting euthanasia not regulated expressly and specifically. However, case euthanasia This happened in Indonesia, namely in 2004 and 2005, where a husband filed a request

² Widyawati Boediningsih and Novi Prameswari Regina Dermawan, 2023, "The Development of Human Rights in Indonesia and Its Problems", Journal of Social Humaria and Education, p. 78.

³ Alexandra Indrayanti, 2008, "Ethics and Health Law", Yogyakarta: Pustaka Book Publisher, p. 67.

⁴ Djoko Prakoso and Djaman Andi Nirwanto, 1984, "Euthanasia Human Rights in Criminal Law", Jakarta: Ghalia Indonesia, Cet. 1st, p.9.

⁵ Takdir, 2018, "Introduction to Health Law", IAIN Palopo Campus, Print I, p. 87.

for action *euthanasia* against his wife who was lying in a coma in hospital to the Central Jakarta District Court but the application was rejected.⁶

The reason the husband carried out this act of euthanasia was due to economic conditions and the family's feeling of compassion for the patient. However, this is still a matter of debate among various groups because it is considered to violate a person's right to life. In contrast to Indonesia, several countries act *euthanasia* permitted in the Netherlands, Belgium, Switzerland, and tolerated in the United States. On April 10, 2021, the Netherlands began publishing legislation authorizing the Euthanasia Action and on April 1 2002 the law came into effect. Where the Netherlands legalized the act of *euthanasia*. For patients who are chronically ill and have no hope of being cured, they are given the right to end their suffering. But you need to know that in the Dutch criminal code, formally, acts of *euthanasia* and ending assisted living are still maintained as a criminal offence.

In this case there is a lot of debate about the pros and cons of the act of *euthanasia*, if you look at it from a professional point of view, there are several things to consider. First, freedom of choice. What is meant here is that the patient should be able to choose according to his wishes, including the ending of his life. Second, people who witness how someone dies slowly support the action of euthanasia. Third, Beloved People, action euthanasia It is thought to help reduce the suffering and sadness of loved ones. Lastly, Humanity, letting someone with suffering that cannot be overcome anymore die is a form of humanity. Meanwhile, from a counter point of view, there are several arguments that become the problem. First, the Doctor's Duties. Medical personnel may not be willing to do this, especially if they remember that this is contrary to the doctor's oath to fulfill his obligation to save patients. Second, norms and religion. Certain beliefs assume euthanasia as a form of murder which is certainly morally unacceptable. and finally, the possibility of recovery, the diagnosis can be wrong and sometimes patients can recover miraculously.⁷

As said before, the path of various knowledge with the development of time becomes a contradiction in action *euthanasia* especially in Human Rights, where we know that human rights do not only concern global political, economic, social and cultural issues, even more than that, where human rights essentially concern individual issues. With this, when viewed from the perspective of criminal law and human rights, it is a solid foundation against the Action euthanasia regularly details, where up to now the regulation of this action has not been regulated firmly and specifically. Therefore How to Arrange Actions *euthanasia* based on positive criminal law in force in Indonesia? and how to setup Actions *euthanasia* in a human rights perspective?.

2. Method

This writing uses a type of normative research through a case approach, statutory approach, and conceptual approach as well as a comparative approach. Because this writing uses normative research, the data used is secondary data in the form of prime legal materials and secondary legal materials as well as testier legal materials obtained by library research (library research). The primary legal materials and secondary legal materials obtained were then analyzed qualitatively and presented descriptively.

⁶ Muhammad Yasin and Aida Mardhatillah, 2019, "Euthanasia in Indonesia, Legal Problems from Recorded Stories", <https://www.Hukumonline.com/berita/a/euthanasia-di-indonesia--problem-legal-dari-recorded-stories-lt5dd4f5e2ae4f7f/> accessed on 27 May 2024, at 00:33 WITA

⁷ Dyah Novita, 2022, "Euthanasia and its Pros and Cons", PT. Medika Communications Technology, Jakarta.

3. Result and Discussion

3.1. *Euthanasia* in Positive Criminal Law

Euthanasia comes from the Greek word "eu" means good and "thanatos" means death or dying, which when the two are combined means "a good death without suffering". Action *euthanasia* often referred to as "good death or easy death" or "merry killing". According to Hilman, Action *euthanasia* is killing without suffering carried out on sufferers of diseases whose cure is no longer medically possible.⁸ Action *euthanasia* appeared in the 19th century where its emergence became a debate in North America and Europe and in 1828 in the state of New York the anti-*euthanasia* which several years later was also implemented by several states. After the civil war, some advocates and doctors approved the treatment *euthanasia* voluntarily and groups supporting this action began to form in England in 1935 and in 1939 there were troops called Nazi Germany who carried out a controversial action called "Action T4" against children under 3 years of age who suffered from physical disabilities and retardation. mental or other disorders. after seeing the atrocities committed by the Nazis in carrying out their actions *euthanasia*, then in the 1940s and 1950s there was less support for action *euthanasia* especially for action *euthanasia* which is done involuntarily or caused by genetic factors. and in 1973 action *euthanasia* It was implemented by the Swiss state on the advice of doctors as long as the patient did not benefit from it.⁹

Legally action *euthanasia* This is not yet regulated in criminal law. Especially in Indonesia action *euthanasia* It has not been regulated in Indonesian positive law, including other laws, so there are no clear boundaries in regulating this action. However, in the explicit criminal law in Indonesia, namely in the Criminal Code, one of which is article 304 which reads "Whoever intentionally causes or leaves someone in a state of misery, even though according to the law that applies to him or according to an agreement, he is obliged to provide life, care or maintenance of that person, is punishable by a maximum imprisonment of two years and eight months or a maximum fine of four thousand five hundred rupiah. It is means that anyone, including the patient himself, who allows or takes someone's life is considered a crime and can be punished. In the formulation of this article, it is against taking action *euthanasia* passive.

Article 344 states, "Anyone who takes another person's life at that person's own request, which is clearly stated with sincerity, is threatened with imprisonment for a maximum of twelve years" Note: In order to be subject to the criminal threat of this article, the request to be killed must be stated 'real and serious' (serious). in the formulation of this article against the existence of action *euthanasia* active.

And in article 345 which reads "Anyone who deliberately incites another person to commit suicide, helps him in that act or provides him with the means for it, is threatened with a maximum prison sentence of four years if that person commits suicide." With the record people who commit suicide cannot be punished but people who deliberately incite, help, etc., other people to commit suicide can be punished as long as the other person actually commits suicide. Because if he does not die even if he has (attempted) suicide, the instigator cannot be punished.¹⁰

Next action update *euthanasia* in law Number 1 of 2023, namely in article 461 which reads, "every person who takes the life of another person at the person's own request which is clearly stated with sincerity, shall be sentenced to imprisonment for a maximum of 9 (nine) years." The provisions in this

⁸ Rospita A Siregar, 2020, "Euthanasia Viewed from the Perspective of Human Rights and Article 344 of the Criminal Code in Indonesia", Yure Humano Journal, Vol. 4, p. 47. <https://www.klikdokter.com/info-sehat/berita-kesehatan/pro-kontra-euthanasia> accessed on 27 May 2024, at 01:54 WITA

⁹ Rospita A Siregar, 2015, "euthanasia and human rights", Journal of Law, Vol. 1.

¹⁰ *Op.Cit*

article regulate actions *euthanasia* active, which can be carried out by the person concerned who expresses sincerity, but the action is still punishable by criminal law. This is based on considerations because the act is considered to be contrary to religious morals. Apart from that, to prevent undesirable possibilities, for example by the perpetrator of a criminal act, a situation is created in such a way that a request arises to take the life of the person concerned. This threat is not shown to a person's life, but rather shows respect for human life in general, even though the person's condition is suffering greatly both physically and spiritually, so the motive of the perpetrator is not relevant to be considered in a criminal act.

Article 462 which states "everyone who encourages, helps, or provides means for another person to commit suicide and that person dies due to suicide, shall be punished with a maximum imprisonment of 4 (four) years. The provisions contained in this article are that if a person who is encouraged, assisted or provided with the means to commit suicide does not die, the person who encouraged, assisted or provided the means to commit suicide will not be punished. This is based on the consideration that suicide is not a criminal act. Therefore, attempting to commit suicide is not punishable by crime.

Meanwhile, in Indonesia there are several cases that have submitted requests for action *euthanasia* to the Central Jakarta District Court, including:

1. The case occurred in the name of Mrs. Again Isna Nauli, who was unconscious after giving birth, on August 20 2004. Mrs. Again gave birth to her child via cesare surgery led by Dr. Gunawan Mahmud, S.OG. at RSI, where the condition experienced by Mrs. Again, she was in a coma and suffered permanent child damage, allegedly due to malpractice so that Mrs. Again, Hasan Kusuma submitted a request for determination of action *euthanasia* for his wife to the Central Jakarta District Court, the family was accompanied by the Head of the Health Legal Aid Institute, Iskandar Sitorus, but the request was rejected.
2. The case that occurred in the name of Mrs. Sitti Julaeha, who was lying in a coma with a level of consciousness below that level, Mrs. Sitti underwent surgery at Pasar Rebo Regional Hospital with a diagnosis of ectopic pregnancy, when after the operation there was fluid around the uterus. However, there was no doctor or management at Pasar Rebo Regional Hospital who was responsible for Mrs. Sitti. On January 20 2005, Rubi Hartono together with medical colleagues and the Health Legal Aid Institute brought Mrs. Sitti to the Cipto Mangunkusumo Hospital (RSCM) in Central Jakarta. However, at RSCM Mrs. Sitti underwent treatment which showed no signs of improvement, in fact her condition was getting worse and the RSCM did not even carry out respiratory assistance. On January 20 2005, East Jakarta Hospital was reported to have committed malpractice in obstetric surgery. The operation carried out by the doctor stated that Sitti was pregnant outside the womb which ultimately made Sitti unconscious again because during the operation oxygen did not flow to the nerve center of the brain for 20 minutes, causing damage to the brain stem. And in February 2005 the Sitti family officially submitted a request for action *euthanasia* to the Central Jakarta District Court, but the application was rejected.

Based on this, even though it is not expressly and clearly regulated in criminal law in Indonesia, it can be said that Indonesia does not provide opportunities for the practice of criminal acts *euthanasia*. Therefore, Regulations related to this action need to be discussed in health laws or in the Indonesian Criminal Code, so that this action does not experience a vacuum of norms, and there are specific and clear regulations regarding the action. *euthanasia* especially in Indonesia, so there is no abuse of this action because there are no clear and firm legal regulations regarding the action *euthanasia*.

3.2. *Euthanasia in Human Rights Perspective*

Human freedom to do something for themselves, a demand begins to emerge to acknowledge the action *euthanasia* parts of human rights, in this case euthanasia considered a right to die. The presence of this Act as the right to die is considered to be a logical consequence of the right to life. Because every person also has the right to choose the death that he considers pleasant. This happy death for himself who wants to take action *euthanasia*. In action terminology euthanasia known as the act of someone ending their own life because they lost the opportunity or hope of being cured. This is usually done by people with serious illnesses with very little life expectancy. The action itself takes the form of lethal injection to ward off prolonged suffering, in many cases the action euthanasia carried out at the request of someone who is dying. But there are also cases *euthanasia* which was carried out by a team of doctors, because the patient was no longer able to beg. If viewed from an ethical perspective, whether or not this action can be carried out is still a matter of debate among many people. In fact, not all countries allow this practice *euthanasia* because this action is a violation of a person's right to life.

Meanwhile, human rights are rights given by the Almighty God when humans are born so they are considered as human natural rights. Some human rights terms include: Human Rights, Natural Rights, Fundamental Rights, Civil Right, and others. Human rights were first documented in the Magna Cahrta in 1215. Human rights are a legal and normative concept which states that humans have rights inherent in themselves because they are human beings, human rights themselves include civil and political rights, such as the right to life, freedom of expression and also social, cultural and economic rights. Rights Humans are also protected by international and national laws and agreements.

In this case, humans have been given life by God so they have the right to defend their lives. So from the right to life arise other rights such as the right to receive equal treatment under the law, the right to freedom of movement and the right to independence.¹¹ The right to life is a right a quo the nature of the existence of this right is an absolute right or cannot be waived under any circumstances (non derogable rights) which is fundamental in the issue of action euthanasia, we can understand the concept of the right to life in terms of human rights, which juridically, human rights are basic human rights which are understood as Natural Rights which by nature must be protected, respected, maintained, and must not be ignored, reduced or taken away by anyone.

The theory regarding the right to life was put forward by Laica Marzuki who argued that "the right to life is a basic right inherent in every human being, a right that cannot be overridden either by law or by anyone else."¹² The right to life is first This means that if the right to life can be excluded then the existence of other rights is meaningless. Regarding human rights in Indonesia, we can see it in the 1945 Constitution of the Republic of Indonesia in CHAPTER XA which consists of 10 articles, especially in articles 28 A and 28 I paragraph (1). Apart from the 1945 Constitution, human rights are also regulated in article 1 of Law Number 39 of 1999 and in article 3 of the International Declaration (Universal Declaration of human rights). This right to life is also recognized by all religions and cultures in the world so that no one, intentionally or unintentionally, can take another person's life.¹³

¹¹ Nur Hayati, 2004, "Euthanasia from the perspective of human rights and its relationship to criminal law", Lex Jurnalica, Vol. 1, No. 2, p. 93.

¹² Constitutional Court Decision No. 2-33/PUU-V/2007, p. 443.

¹³ National Human Rights Commission, "General condition of human rights in Indonesia", Jakarta: National Human Rights Commission, p. 32.

Implementation of human rights must be based on principles agreed by the international community. This is to suppress violations of human rights, human rights principles in the international community, as follows:

1. The principle of equality, which states that all people are born free and have equality in human rights.:
2. The principle of discrimination is an important part, if everyone is equal then there should be no discriminatory treatment. Discrimination is a gap in treatment from behavior that should be the same or equal.
3. Positive obligations to protect certain rights.

The application of this principle is a violation of the government, intended to suppress discrimination, especially for small groups of society who receive little attention from the government in order to avoid violations of human rights. So when discussing the right to life (the international convention on civil and political rights) it is seen that the death penalty is an exception to the right to life. Article 6 allows the death penalty to be imposed on a perpetrator of a crime, although with certain restrictions. The restrictions in question are:

1. An establishment of the death penalty does not preclude a suspension or prevent the abolition of the death penalty by the state;
2. The death penalty can only be imposed for the most serious crimes;
3. The imposition of the death penalty must be in accordance with the law in force at the time the crime was committed;
4. The imposition of punishment must not conflict with other provisions of the covenant or convention regarding ethnic extermination/genocide;
5. Can only be implemented by a competent court;
6. Not prescribed for children under 18 or women who are pregnant;
7. Every person who has been sentenced to death has the right to obtain a pardon or a reduction of the sentence or can be given amnesty even without disability.

Apart from explaining the concept of the right to life and the principles of implementing human rights, there is also an explanation of the right to die which has been used as a label to describe the current political debate regarding action. *Euthanasia*, for example “the right to die” can includes suicide, euthanasia passive (allowing someone to die due to refusal or withdrawal of medical intervention), assisted suicide (giving someone advice to commit suicide), and palliative care (providing comfort care that speeds up the dying process). and recently a new category has been proposed of physician-assisted suicide which appears to be a combination of assisted suicide or *euthanasia* actively performed by a licensed physician.¹⁴

Examining any of these rights to die has several different legal consequences: some currently have no legal consequences, some are common law violations, some are statutory violations, some may be contractual consequences, some may be protected by the United States constitution. and keep in mind that the legal and moral status of these rights can vary greatly depending on the medical status of the individual patient. Although it is seen that the “right to die” can be associated with terminal illness, the focus is on medical status which can involve high levels of pain, a futile prognosis, reduced quality of life, or even mental suffering.¹⁵ Talking about euthanasia certainly not separated from what is called

¹⁴ Jakarta Legislative, 2005, “The Right to Die: Constitutional and Legal Analysis”, Journal of Congressional Research Services, American Law Division, p. 3.

¹⁵ *Ibid*, p.4.

the right to self-determination (the right self of determination) on someone. This right is one of the main elements of Human Rights and that is why it is always interesting to discuss.¹⁶ With advances in society's way of thinking, new awareness has arisen regarding these rights, the right to self-determination in practice. *Euthanasia* becomes a focal point itself whether it violates human rights or not and in the sophisticated medical world, it turns out that it still requires ethical, moral, and legal requirements in its implementation which is closely related to the application of human rights (HAM) in the scope of medicine. It can also be seen to what extent the rights owned by the patient (and also the doctor) in relation to *euthanasia*.

Therefore, based on the explanation above, take action *euthanasia* against a person's right to life. Where this action has long been a topic of debate because the government should put in place the right regulations and clear procedures to carry out the action *euthanasia* in order not to reduce respect for the right to a person's life.

4. Conclusion

Based on the description above, it can be concluded that: first, regulations regarding actions euthanasia still experiencing a legal vacuum where the government should immediately make strict regulations with clear conditions and procedures for actions *euthanasia* so that there is no misuse of this action because there are no firm and clear legal regulations regarding the action *euthanasia* This. Second, Right of self-determination cannot be the basis for justification of action euthanasia , not a violation of human rights. In principle, a patient who is in a coma or critical condition is helpless, unable to defend his or her rights and applying for legal options with the patient's weak position is vulnerable to human rights violations. Therefore, clear qualifications must be made for taking action *euthanasia* . This is so as not to reduce a person's right to life.

Experiencing a legal vacuum where the government should immediately make strict regulations with clear conditions and procedures for actions *euthanasia* so that there is no misuse of this action because there are no firm and clear legal regulations regarding the action euthanasia This. Second, Right of self-determination cannot be a basis for justification of action *euthanasia* , not a violation of human rights. In principle, a patient who is in a coma or critical condition is helpless, unable to defend his or her rights and applying for legal options with the patient's weak position is vulnerable to human rights violations. Therefore, clear qualifications must be made for taking action *euthanasia* . This is so as not to reduce a person's right to life.

References

1. Alexandra Indrayanti, 2008, "Ethics and Health Law", Yogyakarta: Pustaka Book Publisher.
2. Djoko Prakoso and Djaman Andi Nirwanto, 1984, "Euthanasia Human Rights in Criminal Law", Jakarta: Ghalia Indonesia.
3. Dyah Novita, 2022, "Euthanasia and the Pros and Cons behind it", PT. Medika Komunika Teknologi, Jakarta, quoted in, <https://www.klikdokter.com/info-health/berita-kesehatan/pro-kontra- euthanasia> accessed on 27 May 2024, at 01:54 WITA
4. Haryadi, 2011, "The problem of euthanasia in relation to human rights", UNJA Journal, p. 23.
5. Jakarta Legislative, 2005, "The Right to Die: Constitutional and Legal Analysis",
6. Journal of the Congressional Research Service, American Law Division, p. 3.

¹⁶ Haryadi, 2011, "The problem of euthanasia in relation to human rights", UNJA Journal, p. 23.

7. Komnas HAM, "The general condition of human rights in Indonesia", Jakarta: Komnas HAM, p. 32. Muhammad Yasin and Aida Mardhatillah, 2019, "Euthanasia in Indonesia, Legal Issues from Recorded Stories", [https://www. Hukumonline.com/berita/a/euthanasia-di-indonesia--legal-problems-from-recorded-stories-lt5dd4f5e2ae4f7f/](https://www.Hukumonline.com/berita/a/euthanasia-di-indonesia--legal-problems-from-recorded-stories-lt5dd4f5e2ae4f7f/) accessed on 27 May 2024, at 00:33 WITA.
8. Nur Hayati, 2004, "Euthanasia in the Human Rights Perspective and its Relation to Criminal Law", *Lex Jurnalica*, Vol. 1, No. 2.
9. Rospita A Siregar, 2015, "euthanasia and human rights", *Law Journal*, Vol.1.
10. Rospita A Siregar, 2020, "Euthanasia Viewed from the Perspective of Human Rights and Article 344 of the Criminal Code in Indonesia", *Yure Humano Journal*, Vol. 4.
11. Siska Elvandari, 2015, "Medical Dispute Resolution Law", Yogyakarta: Thafa Media.
12. Takdir, 2018, "Introduction to Health Law", IAIN Palopo Campus, Print I.
13. Widyawati Boediningsih and Novi Prameswari Regina Dermawan, 2023, "The Development of Human Rights in Indonesia and Its Problems", *Journal of Social Humaria and Education*.