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Analysis of Legal Capacity in Marriage Dispensation Applications Filed by Bridegroom Candidate

Rasikh Adila [®], Aprina Chintya [®]

¹Universitas Islam Negeri Maulana Malik Ibrahim, Indonesia

²Universitas Islam Negeri Mahmud Yunus Batusangkar, Indonesia

ABSTRACT

Background. The filing of a case with the court must be done by a person who is legally competent and has legal standing for the case being filed. This legal capacity is related to the age of majority or maturity, as regulated in Article 330 BW.

Purpose. This study aims to analyze the legal competence in an application for dispensation of marriage submitted by the bride-to-be herself as the applicant. This research uses a qualitative method with a descriptive analysis approach.

Method. The type of research used is empirical normative legal research (applied legal research). This research uses secondary data with documentation data collection techniques. The document used in this research is the Decision of the Purwodadi Religious Court Number 198/Pdt.P/2018/PA.Pwd. The data analysis technique in this research is content analysis technique.

Results. From this study, it was found that although in decision number 198/Pdt.P/2018/PA.Pwd the child can act as an applicant in a marriage dispensation case, Article 6 of Perma Number 5 of 2019 concerning Guidelines for Adjudicating Marriage Dispensation Applications has closed this opportunity so that when a child who is getting married is not old enough and does not have a parent or guardian, he cannot apply for marriage dispensation to the court.

Conclusion. Based on the results of the above research, it can be concluded that civil legal capacity means a person's ability to perform legal acts and therefore be accountable for the legal consequences. **KEYWORDS:**

Children, Legal Competencem, Marriage Dispensation

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Correspondence:

Rasikh Adila, rasikhadila@gmail.com

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INTRODUCTION

Indonesian law has regulated marriage in Law Number 1 Year 1974 concerning Marriage. This includes the age limit at which marriage is permitted (Di Vaio dkk., 2020). Article 7 paragraph (1) of Law Number 1 of 1974 concerning Marriage stipulates that marriage is only permitted if the man reaches the age of 19 (nineteen) years and the woman has reached the age of 16 (sixteen) years. Article 7 paragraph (2) of Law Number 1 of 1974 concerning marriage stipulates that in the event of a deviation from paragraph (1) of this article (Y. Yang dkk., 2019), dispensation may be requested from the Court or other officials requested by both parents of the male party or female party.

However, after the birth of Law Number 16 of 2019, the age limit for marriage for men and women is the same 19 years (Coppola dkk., 2019). This change in the age of marriage for men and women certainly brings significant changes to the filing of cases in religious courts.

Based on data compiled from the Data Bank of the Directorate General of Religious Courts (2022), there were 63,226 marriage dispensation cases filed in January-August 2020 throughout Indonesia (Paul dkk., 2021). As many as 33,692 cases were filed because the prospective bridegroom was not old enough and 29,534 cases were filed because the prospective bride was not old enough.

Judiasih, et al (2020) stated that in other countries the provisions regarding the minimum age of marriage are not the same, because each country's policy and government system is different. For example, countries with a Muslim-majority government system set a much lower age limit for marriage compared to western countries (Morel dkk., 2020). The following is a comparative table on the minimum age of marriage and exceptions to the minimum age for marriage in several countries, especially in Asia.

Basically, religion (Islamic law) does not concretely regulate child marriage and the minimum age for marriage (Chandrasekar dkk., 2020). The absence of religious provisions regarding the minimum and maximum age limits for marriage is assumed to provide leeway for humans to be able to regulate it (Candra, 2021: 10).

Although prospective brides who have not reached the age of 19 and still want to get married can apply for marriage dispensation, this application must be made by their parents or guardians to the court in accordance with the provisions of Article 6 of Perma Number 5 of 2019 concerning Guidelines for Adjudicating Marriage Dispensation Applications (W.-Y. Yang dkk., 2019). However, this article certainly cannot provide a legal umbrella for prospective brides who live alone, do not have parents, guardians or relatives (Karimi-Maleh dkk., 2022). This happened in a marriage dispensation case submitted to the Purwodadi Religious Court which was submitted by the prospective groom himself, one of which was case number 198/Pdt.P/2018/PA.Pwd, where at that time the prospective groom was 18 years and 1 month old.

Although Law Number 16 of 2019 and Perma Number 5 of 2019 are very clear in regulating the age limit of marriage, in fact the use of numbers as a measure of the maximum limit of a person categorised as a minor varies from one regulation to another (Luque dkk., 2019). This age standard is also what determines whether or not a person is capable before the law.

In the Compilation of Islamic Law (KHI) Article 98 paragraph (1) states that "The age limit of a child who is able to stand alone is 21 years as long as the child is not physically or mentally disabled or has never entered into marriage" (Riess dkk., 2019). Meanwhile, civil actions based on Article 1330 of the Civil Code cannot be carried out by people considered incapable of acting, one of which is an immature child (Reichstein dkk., 2019). Based on Article 330 of the Civil Code, a person who is not yet 21 years old and has not previously married is considered a minor (Stuart dkk., 2019). Based on this provision, the prospective bride who filed a marriage dispensation case in the aquo case is still considered legally incapable of acting.

There are several studies that are closely related to this research. Among them is a study written by Ba'its (2022) entitled Escalation of Marriage Dispensation Submissions in Gaji Village, Kerek District, Tuban Regency (Nosyk dkk., 2021). This research looks at the factors behind the increase in marriage dispensation applications in Gaji Village, Kerek District, Tuban Regency (Callhoff dkk., 2020). This research is certainly very different from the research that the researchers conducted both in terms of the problems and methods used.

In addition, there is also research conducted by Nurkholis (2017) entitled Determination of the Age of Legal Capable Adults Based on Law and Islamic Law. This research compares the determination of the age of legal capacity according to the laws of the Republic of Indonesia and according to Islam (Makdessi dkk., 2019). Although both examine the issue of legal capacity, the research conducted by Nurkholis focuses on determining the age of legal capacity in law and Islamic law (Pretorius dkk., 2021). Meanwhile, the research that this researcher conducted focused on the issue of applying for marriage dispensation who did not have parents or guardians.

Furthermore, there is an article written by Hambali & Khairi, n.d. entitled Dispensation of Marriage According to Perma No. 5 of 2019 in Religious Courts (Maṣlahah Mursalah Analysis of Judges' Considerations in Determining Marriage Dispensation Applications) (Elvén dkk., 2022). This study discusses the age standard of a person declared underage to be granted marriage dispensation and its relation to Perma No. 5 of 2019 as well as a review of the mursalah problem of the judge's consideration in determining the application for marriage dispensation. Although they both discuss marriage dispensation cases submitted to religious courts, the research conducted by H. Hambali and Nil Khairi discusses the judge's consideration in determining the marriage dispensation application. Meanwhile, the researcher will see how the legal considerations of the marriage dispensation application submitted by the underage bride and groom themselves.

METHODS

This research uses a qualitative method with a descriptive analysis approach. This research uses secondary data with documentation data collection techniques (Mao dkk., 2019). The document used in this research is the Decision of the Purwodadi Religious Court Number 198/Pdt.P/2018/PA.Pwd (Scarabottolo dkk., 2022). The data analysis technique in this research is content analysis technique so as to obtain conclusions about legal capacity in the application for dispensation of marriage submitted by the bridegroom candidate.

RESULTS AND DISCUSSION

Overview of Legal Capacity and Marriage Dispensation Legal Capability

Civil legal capacity means a person's ability to perform legal acts and therefore be accountable for their legal consequences (Bojanic & Warnick, 2020). All people are capable of acting, so they can perform legal acts, including making or signing an agreement, except those who are regulated by law. Those who are excluded are called people who are not capable (not authorised) to perform a legal action, namely the following parties:

- 1. Children who are not yet adults
- 2. Persons under guardianship

Women who have been married in matters determined by law and in general all persons who are prohibited by law from making certain agreements. However, based on SEMA No. 3/1963 in conjunction with Article 31 of Law No. 1/1974, women who are still bound in marriage are capable of performing their own legal acts.

People who are prohibited by law to perform certain acts

The legal capacity in question is that if a person performs a legal act, then he can be subject to certain legal actions against him. There are differences of view when the conditions for a person to be said to be legally capable, one of which is that he is an adult. The adult here to be seen is whether there is an age limit provision or not, and if so, what age limit is determined by each legal discipline (Ruzaipah et al., 2021: 2).

In other words, legal capacity, namely in principle, can perform legal actions legally with perfect legal consequences for those who are mature, can control what they do and are able to take responsibility for their actions (Himawan, 2019: 32).

Article 1329 BW says that in principle everyone is capable of making agreements, unless the law determines otherwise. Because making agreements is the most common action taken by members of society, it can be interpreted from this provision that all people are basically capable of acting, unless the law determines otherwise. However, there are exceptions to the principle of capacity to act. Those who are capable of acting are sometimes declared by law to be ineligible to perform certain legal acts. This can be seen in Article 1467; Article 1468; Article 1469; Article 1470; Article 1678; Article 1601 i BW. Thus, certain persons who are generally capable of acting are sometimes declared by law to be incapable of performing certain legal acts. However, they are still people who are capable of acting (Perdata Tuada, 2011: 3).

Marriage Dispensation

Subekti & Tjitrosudibio (1996) define dispensation as a deviation or exception from a regulation. Dispensation of marriage as referred to in Law Number 16 of 2019 concerning Amendments to Law Number 1 of 1974 concerning Marriage in conjunction with Article 1 Point 5 of Perma Number 5 of 2019 concerning Guidelines for Adjudicating Marriage Dispensation Applications is the granting of permission to marry by the court to a prospective husband/wife who is not yet 19 years old to enter into marriage.

For prospective husband and wife who have not reached the age of 19 years and wish to enter into marriage, the parents concerned must submit an application for dispensation to marry to the Religious Court or Sharia Court. In the event that the parents are divorced, the application for Dispensation to Marry is still submitted by both parents, or by one of the parents who has custody of the child based on a court decision.

Meanwhile, if one of the parents has passed away or their whereabouts are unknown, the application for Dispensation of Marriage shall be submitted by one of the parents. In the event that both parents are deceased or their powers are revoked or their whereabouts are unknown, the application for dispensation to marry is submitted by the child's guardian.

The judge will examine this marriage dispensation case by considering the best interests of the child, after previously hearing the testimony of the child for whom the marriage dispensation is sought, the prospective husband/wife and the parents/guardians of the prospective husband/wife. The applicant is obliged to present these parties. If the applicant is unable to present these parties on the third hearing day, the application for dispensation of marriage cannot be accepted.

An application for dispensation of marriage is voluntary, the product being a determination. If the applicant is not satisfied with the decision, then the applicant can file a cassation (Directorate General of Religious Courts, 2013: 150).

Legal Capacity of the Prospective Bride and Groom as an Applicant for Marriage Dispensation

An application for marriage dispensation based on article 6 of Supreme Court Regulation Number 5 of 2019 concerning Guidelines for Adjudicating Marriage Dispensation Applications must basically be submitted by both parents of the child for whom marriage dispensation is sought. This provision relates to parental authority in article 47 of Law of the Republic of Indonesia Number 1 Year 1974 on Marriage as follows:

A child who has not reached the age of 18 (eighteen) years or has not yet entered into marriage is under the authority of his or her parents as long as they are not deprived of their authority.

The parents shall represent the child in respect of all legal acts within and outside the Court.

The provisions regarding applications submitted by guardians or families who have a blood relationship in a straight line of descent upwards are related to the provisions of Article 50 paragraph (1) of Law of the Republic of Indonesia Number 1 of 1974 concerning Marriage that children who have not reached the age of 18 (eighteen) years or have never entered into marriage, who are not under the authority of parents, are under the authority of the guardian.

In the case filed at the Purwodadi Religious Court with number 198/Pdt.P/2018/PA.Pwd was filed by a child with the age of 18 years. If referring to several provisions of existing legislation, the age of 18 years can be categorised as no longer a child so that it can have its own legal capacity.

The provisions regarding maturity based on positive law in Indonesia have the following variations:

The age of majority in civil law is regulated in Article 330 of the Civil Code, namely:

Immature are those who have not reached the age of twenty-one (21) years, and have not previously been married. If the marriage is dissolved before they reach the age of twenty-one (21) years, then they do not return to the position of immature and are not under parental authority, are in guardianship on the basis and in the manner as regulated in the third, fourth, fifth, and sixth sections of this chapter.

Article 1912 of the Civil Code states that the age limit for a child to be considered competent as a witness is 15 (fifteen) years.

Article 47 of Law No. 1 of 1974 Concerning Marriage states in Article 47 paragraph (1), children referred to in the Marriage Law are those who have not reached the age of 18 years or have never entered into marriage are under the authority of their parents as long as they are not deprived of their authority.

Article 1 point (3) of Law Number 11 of 2012 concerning the Juvenile Criminal Justice system stipulates that a child in conflict with the law is a child who has reached the age of 12 (twelve) years, but not yet 18 (eighteen) years of age who is suspected of committing a criminal offence.

Circular Letter of the Minister of Agrarian Affairs and Spatial Planning Head of the National Land Agency number 4/SE/I/2015 on Land Age Limitation regulates that the age limit of adulthood is 18 years old or already married;

Article 1 point (1) of Law (UU) No. 23 of 2002 concerning Child Protection as amended by Law No. 35 of 2014 concerning Child Protection, in Article 1 point 1 provides a child age limit, namely a person who is not yet 18 (eighteen) years old. The content of the Article states; "a child is someone who is not yet 18 (eighteen) years old, including children who are still in the womb".

Article 1 paragraph (5) of Law of the Republic of Indonesia Number 39 Year 1999 on Human Rights, the definition of a child is: "A child is any human being under the age of 18 (eighteen) years and unmarried, including a child still in the womb if it is in his/her interest."

Law No. 1 Year 2000 on the Ratification of ILO Convention No. 182 Concerning the Prohibition and Immediate Action for Elimination of the Worst Forms of Child Labour and Presidential Decree No. 87 Year 2002 on the National Action Plan for the Elimination of Commercial Sexual Exploitation of Children stipulates that a child is any person under the age of 18 (eighteen) years.

Criminal Code Article 45 defines a child as a minor if he/she is not yet 16 (sixteen) years old. Therefore, if he/she is involved in a criminal case, the judge may order that the offender be returned to his/her parents; guardian or custodian without any punishment. Or order him to be handed over to the government without any punishment.

Based on some of these provisions, it can be seen that although marriage has its own age limit of 19 years, but in some other provisions, the age of 18 years is no longer included as a child. So that what is done by a person of that age, he should be considered capable of taking responsibility for the act, both criminally and civilly.

Meanwhile, in the case that occurred at the Purwodadi Religious Court with case number 198/Pdt.P/2018/PA.Pwd, it was submitted by a child who would request dispensation of marriage where the age of the child at the time of filing the case was 18 years and 1 month. Based on the posita in his petition, the Applicant explained that the Applicant was the second of three children and his parents had died. Then, after his parents died, the Applicant was cared for by the Applicant's mother's older sibling. However, when applying for this marriage dispensation case the Applicant's mother's older sibling had passed away. The Applicant's brother refused to arrange and marry the Applicant and his prospective wife on the grounds that the Applicant's brother was busy working so he did not have enough time to do so at the Purwodadi Religious Court. As a result, the Applicant himself was forced to apply for dispensation to marry after consulting with an officer of the Purwodadi Religious Court.

The prospective bride and groom themselves applied for dispensation of marriage due to several factors, including:

Both parents have passed away.

The family in the straight line of descent upwards has died first.

There has never been a guardianship determination over the prospective bride and groom.

The family of the prospective bride and groom agreed to the desire of the prospective bride and groom to marry but were reluctant to submit an application to the court because they were busy.

If you pay attention to the legal considerations in case number 198/Pdt.P/2018/PA.Pwd, the legal fact that the Applicant's parents have passed away and the Applicant's siblings are not willing to assist the Applicant to apply for marriage dispensation does not make the Applicant lose his legal standing in filing this case.

Thus the prospective bride and groom no longer have a representative who can convey their will to apply for marriage dispensation to the Court. In fact, the age of the prospective bride and groom has not yet separated from the age limit of immaturity as stipulated by Article 330 of the Civil Code, namely 21 years, which is one of the requirements for legal capacity.

However, maturity is not only obtained at a certain age limit, but can also be obtained by marriage. The construction of civil law in Indonesia requires that all people are capable of acting except those who are regulated by law. Therefore, a bride-to-be who submits her own marriage dispensation application can be positioned not only as an applicant for marriage dispensation, but also as a person who applies to have her inherent immaturity status lifted.

When referring to the provision of legal capacity to act in court, the age of 18 can stand alone as a party in court, both criminal and civil. Therefore, if the child is 18 years old, they can stand alone in other cases in court. However, the provisions in Perma No. 5/2019 on Guidelines for Adjudicating Marriage Dispensation Applications substantially prevent children who do not have parents or guardians from filing cases in court.

In Islamic law, the age limit of marriage is not mentioned in the Qur'an or the Prophet's Hadith, but there is a provision of baligh or the maturity factor of both parties who will enter into marriage. Mature age does not guarantee that it will produce a mature mindset/psychic. It could be that, even though the age is young, the mindset/psychic is mature.

From the description above, the Panel of Judges used the maslahah mursalah method in considering that the Applicant had legal standing in this application. Similarly, in granting the

applicant's request for permission for Dispensation of Marriage in order to marry his wife-to-be, because Islam does not provide a minimum age limit for marriage, Islam only provides provisions for baligh for someone who wants to enter into marriage.

Although the child who is more than 18 years old in this case can file their own case with the court, Article 6 of Supreme Court Regulation No. 5/2019 on Guidelines for Adjudicating Marriage Dispensation Applications has closed the possibility of filing their own case. As a result, if the child is without parents and guardians at that age, then he or she must wait until they are old enough to marry. If he or she insists on getting married, the marriage will not be recorded at the KUA, creating new problems in the community.

CONCLUSION

Based on the results of the above research, it can be concluded that civil legal capacity means a person's ability to perform legal acts and therefore be accountable for the legal consequences. All people are capable (authorised) to act except those who are regulated by law. Although in decision number 198/Pdt.P/2018/PA.Pwd the child can act as an applicant in a marriage dispensation case, Article 6 of Supreme Court Regulation Number 5 of 2019 concerning Guidelines for Adjudicating Marriage Dispensation Applications has closed this opportunity so that when a child who is getting married but is not old enough and does not have parents or guardians, they cannot submit a marriage dispensation case to the court.

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AUTHORS' CONTRIBUTION

Author 1: Conceptualization; Writing - original draft; Methodology;

Author 2: Conceptualization; Writing - review and editing; Resources;

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