

**OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN DALAM
KERANGKA ACCESS TO JUSTICE: STUDI KOMPARATIF
PROGRESIVITAS HUKUM INDONESIA DAN THAILAND**

JURNAL

*Ditulis untuk memenuhi syarat
mendapatkan gelar Sarjana Hukum*

Oleh:

GEMA AKBAR TARIGAN
NPM: 2206200367



UMSU

Unggul | Cerdas | Terpercaya

**FAKULTAS HUKUM
UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA**

MEDAN

2026



UMSU
Unggul | Cerdas | Terpercaya

MAJELIS PENDIDIKAN TINGGI PENELITIAN & PENGEMBANGAN PIMPINAN PUSAT MUHAMMADIYAH
UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA

FAKULTAS HUKUM

Akreditasi Unggul Berdasarkan Keputusan Badan Akreditasi Nasional Perguruan Tinggi No. 174/SK/BAN-PT/Ak.Ppj/PT/III/2024

Pusat Administrasi: Jalan Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6622400- 66224567



<http://hukum.umsu.ac.id>



fahum@umsu.ac.id



[umsu.medan](https://www.facebook.com/umsu.medan)



[umsu.medan](https://www.instagram.com/umsu.medan)



[umsu.medan](https://twitter.com/umsu.medan)



[umsu.medan](https://www.youtube.com/umsu.medan)

Ela menjawab surat ini agar disebutkan
Nomor dan tanggalnya

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

PENGESAHAN JURNAL

JUDUL : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN DALAM
KERANGKA ACCESS TO JUSTICE:STUDI KOMPARATIF
PROGRESIVITAS HUKUM INDONESIA DAN THAILAND

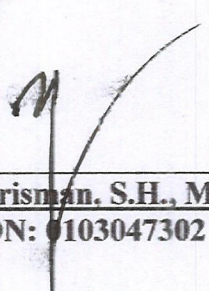

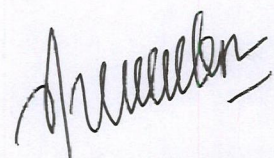
NAMA : GEMA AKBAR TARIGAN

NPM : 2206200367


PRODI/BAGIAN : HUKUM / HUKUM ACARA

Jurnal tersebut di atas telah diujikan oleh Dosen Penguji Fakultas Hukum Universitas Muhammadiyah Sumatera Utara pada hari Kamis, tanggal 09 April 2026.

Dosen Penguji

		
<u>Dr. Harisman, S.H., M.H</u> NIDN: 0103047302	<u>Ibrahim Nainggolan, S.H., M.H</u> NIDN: 0101017406	<u>Assoc. Prof. Dr. Atikah Rahmi, S.H., M.H</u> NIDN: 0129057701

Disahkan oleh:
Dekan Fakultas Hukum UMSU



Assoc. Prof. Dr. Faisal, S.H., M.Hum.
NIDN: 0122087502



FAKULTAS HUKUM

Akreditasi Unggul Berdasarkan Keputusan Badan Akreditasi Nasional Perguruan Tinggi No. 174/SK/BAN-PT/Ak.Ppj/PT/III/2024
Pusat Administrasi: Jalan Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6622400- 66224567

<http://hukum.umsu.ac.id> fahum@umsu.ac.id [umsumedan](https://www.facebook.com/umsumedan) [umsumedan](https://www.instagram.com/umsumedan) [umsumedan](https://www.youtube.com/umsumedan)

Bila menjawab surat ini agar disebutkan
Nomor dan tanggalnya

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

PENETAPAN HASIL UJIAN JURNAL MAHASISWA FAKULTAS HUKUM UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA

Panitia Ujian Sarjana Strata-I Fakultas Hukum Universitas Muhammadiyah Sumatera Utara, dalam sidangnya yang diselenggarakan pada hari Kamis, tanggal 09 April 2026, Jam 08.30 WIB sampai dengan selesai, setelah mendengar, melihat, memperhatikan, menimbang:

NAMA : GEMA AKBAR TARIGAN
NPM : 2206200367
PRODI/BAGIAN : HUKUM / HUKUM ACARA
JUDUL JURNAL : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN
DALAM KERANGKA ACCESS TO JUSTICE:STUDI
KOMPARATIF PROGRESIVITAS HUKUM INDONESIA DAN
THAILAND

PENGUJI : 1. Dr. Harisman, S.H., M.H./ NIDN: 0103047302
: 2. Ibrahim Nainggolan, S.H., M.H./ NIDN: 0101017406
: 3. Assoc. Prof. Dr. Atikah Rahmi, S.H., M.H./NIDN: 0129057701

Lulus, dengan nilai A, predikat Istimewa

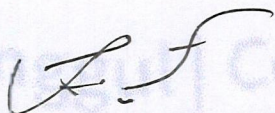
Oleh karenanya dinyatakan berhak menggunakan gelar Sarjana Hukum (S.H.)

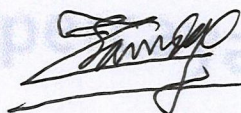
Ditetapkan di Medan
Tanggal, 09 April 2026

PANITIA UJIAN

Ketua

Sekretaris


Assoc. Prof. Dr. FAISAL, S.H., M.Hum.
NIDN: 0122087502


Assoc. Prof. Dr. ZAINUDDIN, S.H., M.H.
NIDN: 0118047901



UMSU
Unggul | Cerdas | Terpercaya

MAJELIS PENDIDIKAN TINGGI PENELITIAN & PENGEMBANGAN PIMPINAN PUSAT MUHAMMADIYAH

UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA

FAKULTAS HUKUM

Akreditasi Unggul Berdasarkan Keputusan Badan Akreditasi Nasional Perguruan Tinggi No. 174/SK/BAN-PT/Ak.Ppj/PT/III/2024

Pusat Administrasi: Jalan Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6622400- 66224567



<http://hukum.umsu.ac.id>



fahum@umsu.ac.id



[umsumedan](#)



[umsumedan](#)



[umsumedan](#)



[umsumedan](#)

Bila menjawab surat ini agar disebutkan Nomor dan tanggalnya

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

BERITA ACARA

UJIAN MEMPERTAHANKAN JURNAL SARJANA BAGI MAHASISWA PROGRAM STRATA 1

Panitia Ujian Sarjana Strata-I Fakultas Hukum Universitas Muhammadiyah Sumatera Utara, dalam sidangnya yang diselenggarakan pada hari Kamis, tanggal 09 April 2026, Jam 08.30 WIB sampai dengan selesai, setelah mendengar, melihat, memperhatikan, menimbang:

MENETAPKAN

NAMA : GEMA AKBAR TARIGAN
NPM : 2206200367
PRODI/BAGIAN : HUKUM / HUKUM ACARA
JUDUL JURNAL : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN
DALAM KERANGKA ACCESS TO JUSTICE:STUDI
KOMPARATIF PROGRESIVITAS HUKUM INDONESIA DAN
THAILAND

Dinyatakan:

- (A) Lulus Yudisium dengan Predikat Istimewa
- () Lulus Bersyarat, memperbaiki/Ujian Ulang
- () Tidak Lulus

Setelah lulus, dinyatakan berhak dan berwenang mendapatkan gelar Sarjana Hukum (SH) dalam Bagian Hukum ACARA.

PANITIA UJIAN

Ketua

Sekretaris

Assoc. Prof. Dr. FAISAL, S.H., M.Hum.

NIDN: 0122087502

Assoc. Prof. Dr. ZAINUDDIN, S.H., M.H.

NIDN: 0118047901

ANGGOTA PENGUJI:

1. Dr. Harisman, S.H., M.H.
2. Ibrahim Nainggolan, S.H., M.H.
3. Assoc. Prof. Dr. Atikah Rahmi, S.H., M.H.

1.

2.

3.



UMSU
Unggul | Cerdas | Terpercaya

MAJELIS PENDIDIKAN TINGGI PENELITIAN & PENGEMBANGAN PIMPINAN PUSAT MUHAMMADIYAH
UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA

FAKULTAS HUKUM

Akreditasi Unggul Berdasarkan Keputusan Badan Akreditasi Nasional Perguruan Tinggi No. 174/SK/BAN-PT/Ak.Ppj/PT/III/2024

Pusat Administrasi: Jalan Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6622400- 66224567



<http://hukum.umsu.ac.id>



fahum@umsu.ac.id



[umsuMEDAN](https://www.facebook.com/umsuMEDAN)



[umsuMEDAN](https://www.instagram.com/umsuMEDAN)



[umsuMEDAN](https://twitter.com/umsuMEDAN)



[umsuMEDAN](https://www.youtube.com/umsuMEDAN)

Bila menjawab surat ini agar disebutkan
Nomor dan tanggalnya

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

PENDAFTARAN UJIAN JURNAL

Pendaftaran Jurnal Sarjana Strata I Fakultas Hukum Universitas Muhammadiyah Sumatera Utara, bagi:

NAMA : GEMA AKBAR TARIGAN
NPM : 2206200367
PRODI/BAGIAN : HUKUM / HUKUM ACARA
JUDUL JURNAL : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN
DALAM KERANGKA ACCESS TO JUSTICE:STUDI
KOMPARATIF PROGRESIVITAS HUKUM INDONESIA DAN
THAILAND

Pendaftaran : Tanggal 07 April 2026

Dengan diterimanya Jurnal ini, sesudah lulus dari Ujian Jurnal penulis berhak memakai gelar:

SARJANA HUKUM (S.H)

Diketahui
Dekan Fakultas Hukum

Assoc. Prof. Dr. FAISAL, S.H., M.Hum.
NIDN: 0122087502

Pembimbing

Assoc. Prof. Dr. Atikah Rahmi, S.H., M.H.
NIDN: 0129057701

Unggul | Cerdas | Terpercaya



UMSU
Unggul | Cerdas | Terpercaya

Bila menjawab surat ini agar disebutkan
Nomor dan tanggalnya

MAJELIS PENDIDIKAN TINGGI PENELITIAN & PENGEMBANGAN PIMPINAN PUSAT MUHAMMADIYAH

UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA

FAKULTAS HUKUM

Akreditasi Unggul Berdasarkan Keputusan Badan Akreditasi Nasional Perguruan Tinggi No. 174/SK/BAN-PT/Ak.Ppj/PT/III/2024

Pusat Administrasi: Jalan Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6622400- 66224567



<http://hukum.umsu.ac.id>



fahum@umsu.ac.id



[umsumedan](#)



[umsumedan](#)



[umsumedan](#)



[umsumedan](#)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

PERNYATAAN KEASLIAN PENELITIAN

Saya saya bertanda tangan di bawah ini:

NAMA : GEMA AKBAR TARIGAN

NPM : 2206200367

PRODI/BAGIAN : HUKUM/ HUKUM ACARA

**JUDUL SKRIPSI : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN
DALAM KERANGKA ACCES TO JUSTICE: STUDI
KOMPARATIF PROGRESIVITAS HUKUM INDONESIA
DAN THAILAND**

Dengan ini menyatakan dengan sesungguhnya bahwa skripsi yang saya tulis, secara keseluruhan adalah hasil penelitian/karya saya sendiri, kecuali pada bagian-bagian yang dirujuk sumbernya.

Dan apabila ternyata dikemudian hari data-data dari skripsi ini merupakan hasil Plagiat atau merupakan hasil karya orang lain, maka dengan ini saya menyatakan bersedia menerima sanksi akademik dari Fakultas Hukum Universitas Muhammadiyah Sumatera Utara.

Medan, April 2026

Saya yang menyatakan



GEMA AKBAR TARIGAN



UMSU
Unggul | Cerdas | Terpercaya

Bila menjawab surat ini agar disebutkan
Nomor dan tanggalnya

MAJELIS PENDIDIKAN TINGGI PENELITIAN & PENGEMBANGAN PIMPINAN PUSAT MUHAMMADIYAH
UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA
FAKULTAS HUKUM

Akreditasi Unggul Berdasarkan Keputusan Badan Akreditasi Nasional Perguruan Tinggi No. 174/SK/BAN-PT/Ak.Ppj/PT/III/2024

Pusat Administrasi: Jalan Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6622400- 66224567

<http://hukum.umsu.ac.id> fahum@umsu.ac.id [umsumedan](https://www.facebook.com/umsumedan) [umsumedan](https://www.instagram.com/umsumedan) [umsumedan](https://twitter.com/umsumedan) [umsumedan](https://www.youtube.com/umsumedan)

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

LEMBAR PERSETUJUAN PEMBIMBING

NAMA : GEMA AKBAR TARIGAN
NPM : 2206200367
PRODI/BAGIAN : HUKUM/ HUKUM ACARA
**JUDUL SKRIPSI : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN
DALAM KERANGKA ACCES TO JUSTICE: STUDI
KOMPARATIF PROGRESIVITAS HUKUM INDONESIA DAN
THAILAND**

Disetujui Untuk Disampaikan Kepada
Panitia Ujian Skripsi

Medan, April 2026

Pembimbing

(Assoc. Prof. Dr. Atikah Rahmi, S.H., M.H.)

NIDN: 0129057701

Unggul | Cerdas | Terpercaya



UMSU

Unggul | Cerdas | Terpercaya

**MAJELIS PENDIDIKAN TINGGI MUHAMMADIYAH
UNIVERSITAS MUHAMMADIYAH SUMATERA UTARA**

FAKULTAS HUKUM

Jalan Kapten Mukhtar Basri No. 3 Medan 20238 Telp. (061) 6624567 Fax. (061) 6625474

Website : <http://www.umsu.ac.id> <http://www.fahum.umsu.ac.id> E-mail : rektor@umsu.ac.id fahum@umsu.ac.id

Bila menjawab surat ini, agar disebutkan
Nomor dan tanggalnya

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

KARTU BIMBINGAN JURNAL

NAMA : GEMA AKBAR TARIGAN
NPM : 2206200367
PRODI/BAGIAN : ILMU HUKUM/ HUKUM ACARA
JUDUL JURNAL : OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN
DALAM KERANGKA ACCESS TO JUSTICE:STUDI
KOMPARATIF PROGRESIVITAS HUKUM INDONESIA
DAN THAILAND
Pembimbing : Assoc. Prof. Dr. ATIKAH RAHMI, S.H., M.H.

TANGGAL	MATERI BIMBINGAN	TANDA TANGAN
4/Agustus 2015	Disrasi judul	
25/September 2015	Bimbingan Proposal	
29/September 2015	Revisi Proposal	
30/September 2015	Acc Proposal 1	
23/Desember 2015	Schinar Proposal	
20/Januari 2016	Bimbingan Artukasi Jurnal	
22/Januari 2016	Revisi Artukasi Jurnal	
25/Januari 2016	Disrasi Revisi Artukasi Jurnal	
27/Januari 2016	Penyusunan bukti los dan review	
2/April 2016	Acc Submit untuk didaftarkan	

Mahasiswa dengan data dan judul tersebut di atas, telah melalui proses pembimbingan dan telah dilakukan pemeriksaan terhadap daftar Pustaka, oleh karena Jurnal tersebut disetujui untuk diujikan.

Diketahui

DEKAN FAKULTAS HUKUM

DOSEN PEMBIMBING

(Dr. FAISAL, S.H., M.Hum.)
NIDN : 0122087502

(Assoc. Prof. Dr. ATIKAH RAHMI, S.H., M.H)
NIDN : 0129057701

Number : 1319/PCI/IJCSS/02/2026

Regarding: Letter of Acceptance of Journal Publication Manuscript

The Editor-in-Chief of IJCSS Journal Pena Cendekia Insani explained that:

Authors : **Gema Akbar Tarigan¹, Atikah Rahmi²**
Institution : **^{1,2}Fakultas Hukum, Universitas Muhammadiyah Sumatera Utara, Indonesia**
Article Title : **OPTIMIZATION OF WITNESS AND VICTIM PROTECTION WITHIN THE
FRAMEWORK OF ACCESS TO JUSTICE: A COMPARATIVE STUDY
OF THE PROGRESSIVENESS OF INDONESIAN AND THAI LAW**

Has written an article in the IJCSS journal: International Journal of Cultural and Social Science. After going through the review process, the article was declared accepted and will be published in IJCSS: International Journal of Cultural and Social Science in Vol. 7 Number 1 of 2026.

Thus this statement letter is issued to be used as needed, for your attention and good cooperation we thank you.

Medan, February 19, 2026

Editor,



Faisal Muhammad

Indexed :





OPTIMALISASI PERLINDUNGAN SAKSI DAN KORBAN DALAM KERANGKA ACCESS TO JUSTICE: STUDI KOMPARATIF PROGRESIVITAS HUKUM INDONESIA DAN THAILAND

Gema Akbar Tarigan¹, Atikah Rahmi²

^{1,2}Fakultas Hukum, Universitas Muhammadiyah Sumatera Utara, Indonesia

Article Info

Keywords:

Criminal Law,
LPSK,
Private Prosecution,
Victim Protection,
Witness Protection

ABSTRACT

This study aims to analyze and compare the witness and victim protection systems in the criminal procedural law of Indonesia and Thailand. The main focus of this research is to understand how both countries regulate the protection of witnesses and victims and identify significant differences in their legal frameworks and implementation practices. In Indonesia, witness and victim protection is regulated by Law No. 13 of 2006, later amended by Law No. 31 of 2014, which provides rights to physical and psychological protection, legal assistance, and restitution. Despite having a clear legal framework, the implementation of protection in Indonesia faces significant challenges, such as limited resources for the Witness and Victim Protection Agency (LPSK), insufficient coordination among law enforcement agencies, and low public awareness of the rights of witnesses and victims. In contrast, Thailand, through the Witness Protection Act B.E. 2546, offers more participatory rights to victims by allowing them to engage in private prosecution, enabling victims to play an active role in the prosecution process. However, Thailand also faces similar challenges related to inter-agency coordination and resource limitations. This study concludes that although both countries have strong legal frameworks, witness and victim protection on the ground remains limited by practical and institutional factors. Recommendations for both countries include enhancing institutional capacity, improving inter-agency coordination, and expanding victim participation in the legal process to improve the effectiveness of witness and victim protection.

This is an open access article under the [CC BY-SA](https://creativecommons.org/licenses/by-sa/4.0/) license.



Corresponding Author:

Gema Akbar Tarigan
Fakultas Hukum, Universitas Muhammadiyah
Sumatera Utara
gematarigam@gmail.com

1. INTRODUCTION

Protection of witnesses and victims is a fundamental principle in the enforcement of criminal law that prioritizes justice and human rights. Witnesses play an important role in helping to prove a criminal case, while victims, as parties directly affected by the crime, are entitled to protection and restitution. (Hardijanto, 2012). In the criminal justice system, the protection of witnesses and victims becomes a crucial element to ensure that the judicial process can proceed fairly and transparently without threats or intimidation against the parties involved. (Sugiarto, 2024). The access to justice framework emphasizes that rights must be accessible and effectively utilized thru institutions and procedures that enable citizens to receive protection and recovery. (Cappelletti & Garth,

1978). Therefore, the protection of witnesses and victims should not be understood merely as an administrative norm, but as a prerequisite for ensuring that access to justice is genuinely realized in practice.

In Indonesia, the protection of witnesses and victims is regulated by Law Number 13 of 2006 on the Protection of Witnesses and Victims, which was later amended by Law Number 31 of 2014. (Azzahra, 2025). The regulation includes physical and psychological protection, as well as protection of the procedural rights of witnesses and victims in the legal process. (Azzahra, 2025). Protection also includes legal assistance, protection from threats, and mental recovery for victims who have experienced trauma due to criminal acts. (Hardijanto, 2012). The institutional role in the implementation of this mandate is carried out by the Witness and Victim Protection Agency (LPSK) as an independent agency that provides protection to witnesses and victims facing risks during the judicial process. (Julianto, 2020). LPSK also plays a role in coordinating protection efforts with related agencies and facilitating the legal assistance needed by witnesses and victims. (Rosadi et al., 2024).

Although a regulatory framework is available, the implementation of protection in Indonesia still faces challenges that affect the quality of access to justice for witnesses and victims. The limited resources of LPSK, weak coordination among law enforcement agencies, and low public awareness regarding the rights of witnesses and victims make protection not always optimal. (Julianto, 2020). Misunderstanding of rights and protection mechanisms widens the gap between norms and implementation, so witnesses and victims may not receive protection when it is most needed. (Julianto, 2020). This obstacle is also exacerbated by the social stigma against crime victims, which discourages them from reporting or providing testimony due to fear of threats or retaliation. (Sugiarto, 2024). The situation indicates that strengthening protection is not just a legal-formal issue, but an issue of access to justice that requires a more responsive and accessible protection design.

The Thai legal system has similar principles in providing protection to witnesses and victims, but it shows a different approach in the aspects of victim participation and the design of protection mechanisms. Thailand regulates witness and victim protection in The Criminal Procedure Code as well as special laws such as the Witness Protection Act B.E. 2546, which emphasizes physical and psychological protection for witnesses whose safety is threatened. (Anisya, 2021). One important feature is the private prosecution mechanism, which allows victims to participate in the prosecution process, including when the prosecution does not continue the case. (Anisya, 2021). With this regulation, victims have the potential to take a more active role in the judicial process, so the path to justice does not entirely depend on the state's decision. (Anisya, 2021).

In Thailand, the Witness Protection Act B.E. 2546 provides forms of protection such as relocation to safe places, provision of new identities, and security support from authorities for witnesses facing serious threats. (Witness Protection Act B.E. 2546). However, the implementation of witness protection in Thailand also faces issues that can reduce the effectiveness of the protection, particularly related to the ambiguity of execution procedures and limited resources. (HumanRightsAsia, 2005). These obstacles become even more crucial in high-risk cases, such as organized crime or cases involving multiple witnesses, because inconsistent protection can reduce witness courage and weaken the evidentiary process. (HumanRightsAsia, 2005).

Based on the above dynamics, this research becomes important because it compares two systems that both have a basis for protection but differ in the design of mechanisms and the level of victim participation. This comparative study is placed within the framework of access to justice so that the protection of witnesses and victims is assessed based on the extent to which it truly provides effective access to justice, rather than merely the existence of rules. (Cappelletti & Garth, 1978). Furthermore, "legal progressiveness" is used as a lens to assess whether the regulations and protection practices are moving toward substantive justice for individuals, especially for vulnerable parties under the pressure of the criminal justice system. (Rahardjo, 2011). Thus, this research is directed at identifying the strengths and weaknesses in witness and victim protection in Indonesia and Thailand, while also formulating relevant optimization efforts to strengthen the fulfillment of access to justice.

This research focuses on three main problem formulations that are addressed thru comparative analysis. First, how is the protection of witnesses and victims regulated in the Indonesian criminal procedural law system within the framework of access to justice? Second, how is the protection of witnesses and victims regulated in the Thai legal system within the framework of access to justice? Third, how the differences in the design and orientation of protection in Indonesia and Thailand reflect legal progressiveness and affect the fulfillment of access to justice for witnesses and victims.

2. RESEARCH METHODS

This research uses a normative juridical method or normative legal approach that focuses on the study of written legal norms in legislation and relevant legal documents without involving the collection of primary data from respondents or the public. Normative research relies on the study of positive law by examining regulations and the substance of legal norms directly related to the issue being researched (Hukumonline 2023). Research data is obtained from primary, secondary, and tertiary legal materials that are analyzed to build legal arguments regarding the protection of witnesses and victims in Indonesia and Thailand (Markuat 2022).

The analysis focuses on the design of protection regulations, institutional mechanisms, and their normative consequences on the fulfillment of the rights of witnesses and victims in the criminal justice process (Hukumonline 2023). The access to justice framework is used as an evaluative lens to assess the extent to which regulations and protection mechanisms enable witnesses and victims to access protection, participate safely in legal processes, and obtain relevant restitution (Cappelletti & Garth 1978). The concept of legal progressiveness is used to read the orientation of witness and victim protection, specifically whether the law is moving toward substantive justice that favors humans and vulnerable parties within the criminal justice system (Rahardjo 2011). The approaches used include the statute approach to examine relevant legislation as the basis for analyzing protection norms, the conceptual approach to study the concepts, principles, and legal foundations underlying the formation of witness and victim protection norms, and the comparative approach to compare the design of witness and victim protection systems in Indonesia and Thailand to identify similarities, differences, and normative implications (Zweigert & Kötz 1998).

The sources of research data consist of primary legal materials in the form of legislation and official legal documents, secondary legal materials in the form of books, scientific journals, and academic articles, as well as tertiary legal materials in the form of general references such as legal dictionaries and encyclopedias (Solanki 2023). Data collection techniques were carried out thru library research with the tracing and critical examination of written legal materials from physical and digital sources (Deepublish 2024). The data analysis technique is doctrinal and analytical thru the inventory of norms, systematization, interpretation, and conclusion drawing using access to justice indicators as the basis for assessing the quality of protection and recovery access, as well as the lens of legal progressiveness to formulate recommendations for optimizing witness and victim protection (Cappelletti & Garth 1978).

3. RESULT AND ANALYSIS

Results

Protection of Witnesses and Victims in the Indonesian Legal System

The protection of witnesses and victims in the Indonesian legal system is explicitly formulated thru Law Number 13 of 2006 on the Protection of Witnesses and Victims, which has been updated by Law Number 31 of 2014 (Law No. 13/2006 jo. Law No. 31/2014). This framework demonstrates a broad normative dimension of protection as it encompasses both physical-operational protection and procedural rights, including legal assistance, restitution, and rehabilitation (Law No. 13/2006 jo. Law No. 31/2014).

In the perspective of access to justice, international standards emphasize that victims have the right to access justice mechanisms and receive prompt redress, including the right to be informed, treated with respect, and protected from intimidation or retaliation (United Nations General Assembly, 1985). Therefore, the implementation of witness and victim protection can be understood as the state's responsibility in ensuring the fulfillment of human rights within the modern criminal justice system (Djogo, 2025).

The principles of protection are also stated clearly, including respect for human dignity, safety, justice, non-discrimination, and legal certainty (Article 3 of Law No. 31/2014). These principles emphasize that the legal process must not disregard the basic rights of witnesses and victims when providing testimony or facing judicial stages (Hardijanto, 2012). In the framework of access to justice, these principles and guaranties mean that witnesses/victims must be able to participate safely and receive relevant support so that access to justice does not stop at the text of the rules (Rosadi et al., 2024).

Institutionally, the Witness and Victim Protection Agency (LPSK) is the main instrument for carrying out the protection mandate as regulated by law (Law No. 13/2006 jo. Law No. 31/2014). Several studies assess that the existence of the Witness and Victim Protection Agency (LPSK) contributes to reducing the resistance of witnesses/victims to testify, thereby increasing the chances of achieving substantive justice thru safer participation (Sugiarto, 2024).

However, the effectiveness of protection still faces operational constraints such as limited human resources, budget, and coordination obstacles with law enforcement agencies in the regions (Julianto, 2020). These coordination obstacles impact the consistency of protection in the field, especially in areas with limited access to protection facilities and an unsolid inter-agency work pattern (Rosadi et al., 2024). In addition to institutional constraints, social barriers such as stigma against victims in certain types of cases can also pressure victims not to report or refuse to participate in legal processes (Julianto, 2020). This condition results in the low courage of witnesses/victims to provide testimony due to fear of threats or retaliation, which ultimately weakens the proof and recovery (Sugiarto, 2024).

From a paradigmatic perspective, victimological analysis shows that victim protection in Indonesia is still heavily influenced by a retributive approach, which risks sidelining the aspect of victim recovery in the focus on proof and punishment. Another normative obstacle is the limited access of witnesses and victims to understand their rights, so the available protection mechanisms are not utilized optimally (Julianto, 2020).

At the procedural level, the application for protection is regulated by LPSK Regulation Number 2 of 2020, which establishes the procedures and requirements for protection applications (Witness and Victim Protection Agency, 2020). The procedure is a crucial point because it determines whether access to protection is "easily accessible" or becomes an administrative obstacle. Several studies assess that the protection application procedures tend to be complicated and face challenges in socialization and procedural understanding at the local level (Julianto, 2020). The emerging legal criticism states that protection tends to be reactive because it waits for applications, thus a more proactive model is needed with early detection of threat risks from the initial stages of investigation (Adhytia, 2024).

In the context of serious/organized crime, international standards mandate that states take appropriate steps to provide effective protection for witnesses from retaliation or intimidation, including the possibility of relocation and identity protection, thereby emphasizing the importance of proactive and risk assessment-based protection design (United Nations, 2000). Good witness protection practices also emphasize that protective measures can range from simple escorting to relocation with a new identity when the threat from criminal groups is strong; therefore, an effective protection system requires adaptive programs, not a "one size fits all" approach (UNODC, 2008).

In certain cases, such as sexual violence, findings indicate that normative protection has not always been inclusive to ensure psychological recovery and social reintegration. Rahmi emphasizes that sexual violence has long-term impacts (trauma, shame, fear) making victims vulnerable to social and institutional revictimization if protection is limited to safety during testimony (Rahmi, 2018). Therefore, the need for protection in sexual violence cases demands a systemic approach across subsystems of the judiciary, in line with the concept of a gender-just Integrated Criminal Justice System to ensure that victims receive support, recovery, and processes that are sensitive to their experiences (Rahmi, 2018). In principle, the existence of protection mechanisms thru LPSK is still understood as a form of human rights fulfillment because it provides a sense of security so that witnesses/victims can participate in legal processes without fear of retaliation (Rohman, 2025).

Witness and Victim Protection in the Thai Legal System

The witness and victim protection system in Thailand is regulated thru several legal instruments that provide a normative basis for guaranteeing the rights of witnesses and victims in the criminal process. One of the legal bases is the Witness Protection Act, B.E. 2546 (2003), which specifically introduces protection mechanisms for witnesses facing threats or risks when involved in legal proceedings. This law not only provides physical protection to witnesses but also the right to compensation and restitution as part of the restoration of rights when witnesses suffer losses (Witness Protection Act, B.E. 2546). Sections 15 and 17 of this law explain the witness's right to compensation if their rights to life, body, health, freedom, honor, or property are threatened due to their involvement in giving testimony; for example, witnesses are entitled to compensation according to regulations set by the Minister of Justice and approved by the Minister of Finance (Witness Protection Act, B.E. 2546).

The provision of compensation shows that Thai law has recognized the economic aspect of the losses suffered by witnesses and victims, so the protection is not only preventive but also restorative. This is important normatively because it reflects the state's recognition of the non-physical impact experienced by witnesses due to their involvement in the criminal process.

Furthermore, under the Thai criminal justice system, there are regulations in the Criminal Procedure Code that grant victims the right to participate in the criminal process thru private prosecution. With private prosecution, victims can bring a criminal case to court even if the public prosecutor decides not to pursue the case. This approach differs from many other legal systems, including Indonesia, which do not grant the same rights to victims to become prosecutors in criminal cases (Anisya, 2021). The private prosecution approach is a form of legal recognition of the victim's right to actively access justice in the criminal process. From a normative perspective, this shows that the Thai legal system recognizes that victims are not just objects in the legal process, but can also be subjects who help determine the fate of criminal cases based on their rights.

Although witness and victim protection has been normatively regulated, several academic studies highlight the limitations in the implementation of this protection in Thailand. For example, research on public administration in assisting crime victims shows that although there are legal protection rules, in practice, support and assistance for victims are often unevenly applied depending on the capacity of the public agencies involved. These limitations include aspects of resources, coordination among related agencies, and the lack of professional training for officers providing legal and psychological assistance to victims (Chokprajakchat, 2017).

The analysis emphasizes that legal norms written in laws or codes do not always guaranty effective implementation without strong institutional support. In the context of Thailand, although the norms in the Witness Protection Act and the Criminal Procedure Code substantively recognize the rights of witnesses and victims, implementation at the operational level often encounters challenges related to public policy coordination and resource allocation.

Moreover, another study shows that the challenges in implementing witness and victim protection in Thailand are also related to the gap between written norms and the legal culture that prevails at the practical level. This includes the limited understanding among the general public about the legal rights available to them as witnesses or victims, as well as the restricted access to clear information regarding the procedures for applying for protection through existing legal mechanisms. This phenomenon causes not all witnesses or victims to fully utilize their rights.

In a broader perspective, the protection of witnesses and victims in Thailand also receives support from discussions and international legal reforms that encourage ASEAN member countries to enhance cross-jurisdictional cooperation in witness protection, especially in cases of transnational crimes such as human trafficking or organized crime. The expansion of these norms not only addresses domestic regulations but also Thailand's involvement in relevant international legal frameworks for the protection of witnesses and victims.

The norm regulating the victim's right to conduct private prosecution also indicates a greater focus on the participatory rights of victims within the Thai criminal justice system. Such efforts strengthen the position of victims in the legal process so that they are not merely sources of evidence, but can also take legal initiatives to obtain justice. This approach is philosophically different from a more reactive legal system, where all criminal actions can only be pursued by the state through law enforcement agencies.

Normative analysis from various sources shows that in Indonesia, the LPSK institution, despite having a strong legal foundation, is often considered to stand somewhat apart from the main architecture of the criminal justice system in practice. This hinders the comprehensive integration of witness and victim protection in the national criminal justice process, necessitating more explicit legal reforms to make it an integral part of the justice system.

In another aspect that has not been explicitly regulated in Indonesian law but appears in international best practices is the mechanism for cross-jurisdiction witness protection, especially in cases of transnational crime. International discussions in the Southeast Asian region held by stakeholders highlight the importance of cross-border cooperation to address witness protection against cross-border threats and transnational crimes.

Overall, although witness and victim protection in Thailand has received recognition and fairly strong normative regulations through the Witness Protection Act and the Criminal Procedure Code, the implementation of these laws still faces practical and structural challenges. Not only is it about highly technical legal provisions, but also about how institutionalization and the socialization of rights can be ensured to operate in society so that these legal norms can be accessed and effectively utilized by witnesses and victims.

Discussion

The protection of witnesses and victims from the perspective of positive law is an important part of a fair criminal justice system. This protection is rooted in human rights principles, where the state is obligated to ensure the safety, dignity, and participation of witnesses and victims in the legal process to consistently achieve substantive truth (due process of law) (Hidayat, 2015).

In the Indonesian legal system, Law No. 13/2006 jo. Law No. 31/2014 provides substantive rights such as physical and psychological protection, legal assistance, restitution, and compensation for witnesses and victims who face threats due to their involvement in the criminal justice process (Arsawati, 2024). In the framework of access to justice, restitution and compensation must be understood as real recovery, because victims can bear physical, psychological, economic, and social impacts that cannot be resolved merely by a criminal verdict against the perpetrator (Rahmi, 2019). If the progressiveness of the law is measured by the system's ability to ensure effective victim recovery, then the fundamental issue is the recovery design that still easily "hangs" on the perpetrator's ability, whereas the victim should not fully depend on the perpetrator's willingness/ability; the state needs to take a more assertive role in ensuring compensation as its responsibility (Rahmi, 2019).

At the implementation level, the fulfillment of restitution/compensation rights is often not optimal due to the inconsistency of officials and the lack of information provided to victims/families regarding the recovery mechanisms. As a result, rights that are available normatively do not automatically become accessible rights. The normative implication is the need to clarify the calculation of losses, including immaterial losses, and to strengthen the role of the state in compensation payments without eliminating the perpetrator's responsibility (Rahmi, 2019).

Another issue in Indonesia is the protection model that tends to be reactive because it relies on applications to the LPSK, so threats that arise from the beginning of the investigation are not always addressed (Sulistiani et al., 2025). Although LPSK stands as an independent institution with a strong legal basis, in practice, it is often viewed as being "outside" the main criminal justice system architecture, so protection is not always effectively integrated into the investigation and prosecution processes. Obstacles such as limited resources, inter-agency coordination, and low public understanding of the law also weaken the effectiveness of protection (Rosadi et al., 2024).

From the perspective of the victim's position, the Indonesian legal system often still positions victims merely as witnesses without adequate active roles. Indonesian criminal procedural law has not clearly regulated victim participation to express opinions, objections, or recovery demands proactively outside the context of testimony, resulting in victims losing their vocal space and the criminal process being predominantly state-dominated (Wijayanto & Wulandar, 2024). In the context of sexual violence, Rahmi emphasizes the importance of a gender-just integrated justice system that places victims as subjects, provides psychosocial support, and prevents revictimization, so that victims can endure the legal process until completion (Rahmi, 2018). This strengthens the argument that access to justice does not stop at "the availability of regulations," but also at the functionality of an integrated service system that can be accessed by victims (Rahmi, 2018).

In Thailand, witness and victim protection has a clear normative basis thru the Witness Protection Act, B.E. 2546, including provisions for compensation/restitution as an explicit part of the protection (Witness Protection Act, B.E. 2546). Additionally, the space for victim participation is strengthened thru private prosecution in the Criminal Procedure Code, which allows victims to continue the case when the prosecution does not take further action (Anisya, 2021). Philosophically, this mechanism expands access to justice because victims gain a participatory channel to pursue their cases. This perspective aligns with the idea of strengthening victim agency, especially in cases that are prone to bias and stigma (Rahmi, 2018). However, research also shows that victim support in Thailand can be uneven due to differences in institutional capacity, limited resources, coordination, and the need to strengthen the competence of officers (Chokprajakchat, 2017). In other words, the strength of norms does not automatically translate into effective protection without strong institutional support.

Further normative analysis shows that the protection model in Indonesia tends to be rooted in a retributive paradigm, focusing on proving and punishing the perpetrator, while victim recovery is often less integrated. This approach differs from the principles of restorative justice, which emphasize victim involvement, social restoration, reintegration, and more humane recovery options (Wiguna & Sugama, 2025). Additionally, witness/victim protection is also relevant in the international context, especially in transnational crimes. Instruments such as UNTOC emphasize the importance of witness/victim protection as part of the efforts to combat transnational crime (United Nations, 2000).

The differences in the witness and victim protection systems between Indonesia and Thailand can be summarized thru the indicators of access to justice and legal progressiveness as follows.

Table 1. Differences in the witness and victim protection systems between Indonesia and Thailand

Key indicator	Indonesia	Thailand
Basis & model of protection	Law on Witness/Victim Protection; protection centralized at LPSK	Witness Protection Act + CPC; protection is regulated by a special mechanism
Access to protection	Tends to be reactive (often dependent on requests)	More open channels for normative protection, implementation depends on capacity.
Victim participation	Victims dominate as witnesses; active participation is limited	There is private prosecution → the victim's participation space is stronger
Recovery (restitution/compensation)	Normatively recognized, fulfillment practices are still inconsistent	Compensation/restitution is more explicit in protection instruments.
Coordination & capacity	Coordination between APH and LPSK often becomes an obstacle.	Equalizing institutional capacity and policy coordination are obstacles.
Social barriers	Stigma/fear reduces reporting & testimony	Barriers to understanding procedures and access to information
Direction of progressiveness	Special institutions exist, but they tend to be administratively responsive.	Participatory channels + more prominent recovery, implementation constraints

Based on the table, the most significant differences are in (i) initial access to protection (reactive vs. more open), (ii) the space for victim participation, and (iii) recovery design. From here, reform recommendations can be directed toward strengthening proactive access, operational recovery, and institutional coordination.

Overall, this discussion shows that the protection of witnesses and victims is not only a matter of positive law but also related to institutional structures, legal culture, and human rights principles. Normative and structural reforms are needed so that the criminal procedure law in Indonesia not only protects witnesses and victims symbolically but also provides substantive participatory space and recovery, as seen in more progressive practices in other jurisdictions.

4. CONCLUSION

This research shows that witness and victim protection in Indonesia has a clear legal basis and includes guaranties of physical and psychological protection, assistance, and the right to recovery. The protection is carried out thru LPSK as the institution mandated to provide protection and assistance to witnesses and victims in the criminal justice process. This regulatory framework outlines the state's responsibility to ensure that witnesses and victims can safely participate in legal proceedings as part of fulfilling access to justice. The analysis also shows that the effectiveness of protection in Indonesia is still influenced by a request-oriented protection design, limited resources, and inconsistent inter-agency coordination. Consequently, protection often reaches the early stages of case handling too late, while the need for protection can arise from the initial stages of the investigation. This situation widens the gap between strong protection norms and the actual utilization of protection by witnesses and victims. In the Thai system, witness and victim protection has a normative basis thru the Witness Protection Act and criminal procedural provisions that provide space for protection and recovery thru compensation and restitution schemes. Thailand also provides a private prosecution mechanism that offers a channel for victims to continue the case when the state prosecution is inactive. The design shows a more participatory protection pattern because victims gain a more active role in the criminal process, while also emphasizing the recovery dimension.

The comparison between Indonesia and Thailand shows differences in legal progressiveness within the framework of access to justice. Indonesia places more emphasis on protection thru special institutions, while Thailand strengthens the position of victims thru participation channels and emphasizes recovery as part of protection. These differences shape variations in access to justice: protection access in Indonesia relies on institutional pathways and application procedures, while access to justice in Thailand is expanded thru a more active role for victims and more explicit recognition of recovery. Based on these results, the optimization of protection in Indonesia is directed toward the integration of protection from the early stages of the criminal process, strengthening institutional coordination, simplifying procedures, and enhancing the socialization of rights and protection mechanisms so that witnesses and victims can access them more easily. Strengthening recovery also needs to be emphasized thru more operational restitution and compensation mechanisms, including certainty of procedures, information support, and facilitation of recovery rights fulfillment. For Thailand, strengthening is directed toward the standardization of victim protection and assistance procedures, the equitable distribution of the implementing agencies' capacities, and the enhancement of information access so that protection, recovery, and victim participation schemes can be effectively utilized. These improvements strengthen access to justice not only at the normative level but also at the level of the accessibility of protection and recovery that is genuinely felt by witnesses and victims.

5. REFERENCES

- [1] Adhytia, P. (2024). Perlindungan hukum saksi dan korban oleh Lembaga Perlindungan Saksi dan Korban (LPSK). [CEK ULANG: nama jurnal/penerbit, volume(issue), halaman, URL/DOI belum tersedia dari data yang kamu beri—ambil dari PDF/jurnal aslinya].
- [2] Anisya, A. F. (2021). Studi perbandingan penuntutan perkara pidana dalam perspektif hukum acara pidana Indonesia dan Thailand. *PAMPAS: Journal of Criminal*.
- [3] Arsawati, N. N. J., Putri, N. W. N. N., Wulandari, N. M. Y., Tajuddin, M. F., & Withmall, E. (2024). Comparative analysis of witness protection law in Indonesia, Malaysia, and Australia. *Journal of Indonesian Legal Studies*.
- [4] Azzahra, J. (2025). Mekanisme pelaksanaan restitusi terhadap korban dalam hukum pidana Indonesia dan Thailand. *LS: Law and Society Journal*.
- [5] Cappelletti, M., & Garth, B. (1978). Access to justice: The newest wave in the worldwide movement to make rights effective. *Buffalo Law Review*, 27(2), 181-292.
- [6] Chokprajakchat, S., Techagaisiyavanit, W., & Iyavarakul, T. (2017). Developing Thailand's comprehensive crime victim assistance model through a comparative perspective of the Swedish and Norwegian systems. *International Journal of Criminal Justice Sciences*, 12(2), 237-251. <https://doi.org/10.5281/zenodo.1034668>
- [7] Deepublish. (2024). Metode penelitian yuridis normatif di bidang hukum.
- [8] Djogo, A. T. L. (2025). Victimological analysis of Law No. 31 of 2014 concerning the protection of witnesses and victims. *Armada Journal*.
- [9] Hardijanto, H. P. (2013). Perlindungan hukum saksi dan korban dalam proses perkara pidana di pengadilan. *Wawasan Hukum*, 11(1), 95-108. <https://doi.org/10.33061/wh.v1i1.733>
- [10] Hidayat, T. (2017). Perlindungan saksi dan korban dalam hukum acara pidana Indonesia. *Jurnal Cakrawala Hukum*, 6(2), 256-265. <https://doi.org/10.26905/idjch.v6i2.691>
- [11] Hukumonline.com. (2015, March 5). Di Thailand, korban bisa gantikan jaksa menuntut di muka sidang. *Hukumonline.com*.
- [12] Hukumonline.com. (2023). Tiga jenis metodologi untuk penelitian skripsi jurusan hukum. *Hukumonline.com*.
- [13] Julianto, B. (2020). Perlindungan hukum terhadap saksi dan korban dalam sistem peradilan pidana di Indonesia. *Lex Renaissance*, 5(1), 20-31. <https://journal.uui.ac.id/Lex-Renaissance/article/view/16800>
- [14] Lembaga Perlindungan Saksi dan Korban. (2020). Peraturan Lembaga Perlindungan Saksi dan Korban Nomor 2 Tahun 2020 tentang permohonan perlindungan saksi dan/atau korban tindak pidana. *Berita Negara Republik Indonesia Tahun 2020 Nomor 606*.
- [15] Markuat, M. (2022). Dampak penetapan lockdown bagi sebuah negara dalam pemenuhan kebutuhan berdasarkan asas keadilan. *Jurnal Penelitian Hukum Indonesia*, 3(1), 80-97. <https://mappihui.org/wp-content/uploads/2022/05/Artikel-4.pdf>
- [16] Musyafa'ah, N. L. (2023). The role of the Witness and Victim Protection Agency (LPSK) in safeguarding individuals affected by sexual violence. *UINSA Repository*.
- [17] Rahardjo, S. (2011). Hukum progresif: Hukum yang membebaskan. *Jurnal Hukum Progresif*, 1(1), 1-24. <https://doi.org/10.14710/hp.1.1.1-24>
- [18] Rangkuty, P. R., Ritonga, S., Khoiri, M. A., Rahmadani, M. S., & Pane, P. N. S. (2025). Perlindungan hukum terhadap saksi dan korban dalam Undang-Undang LPSK. *Jurnal Ilmiah Penelitian Mahasiswa*, 4(1), 306-314. <https://doi.org/10.61722/jipm.v4i1.1886>
- [19] Rahmi, A. (2018). Urgensi perlindungan bagi korban kekerasan seksual dalam sistem peradilan pidana terpadu berkeadilan gender. *Mercatoria*, 11(1), 37-59.
- [20] Rahmi, A. (2019). Pemenuhan restitusi dan kompensasi sebagai bentuk perlindungan bagi korban kejahatan seksual dalam sistem hukum di Indonesia. *De Lega Lata: Jurnal Ilmu Hukum*, 4(2), 140-159. <https://doi.org/10.30596/dll.v4i2.3173>
- [21] Rohman, M. M., Mu'minin, N., Masuwd, M., & Elihami, E. (2024). Methodological reasoning finds law using normative studies (theory, approach and analysis of legal materials). *MAQASIDI: Jurnal Syariah dan Hukum*, 4(2), 204-221. <https://doi.org/10.47498/maqasidi.v4i2.3379>
- [22] Rohman, M. M. (2025). Victim protection and LPSK in Indonesia: Challenges and solutions. *JIPM*. [CEK ULANG: judul & metadata.
- [23] Rosadi, R., Shodiq, M., & Pringle, N. (2024). Role of witness and victim protection agencies for victims of sexual violence. *Journal Evidence of Law*, 3(3), 579-585. <https://doi.org/10.59066/jel.v3i3.952>
- [24] Satrio, N., & Faisal, M. (2021). Protection of witnesses and victims of certain cases based on equality before the law perspective. *Cepalo*, 5(1), 1-10. <https://doi.org/10.25041/cepalo.v5no1.2109>
- [25] Solanki, R. A. (2023). Sources of legal research: Primary, secondary and the role of AI. *Thomson Reuters Legal Blog*.

- [26] Sugiarto, A. (2024). Legal review of the role of witness and victim protection institutions under Indonesian law. *Fox Justu*, 14(2), 153–160. <https://ejournal.seaninstitute.or.id/index.php/Justu/article/view/4338>
- [27] Sulistiani, L., Fakhriah, E. L., Tajudin, I., & Tobing, C. (2025). Urgency of regulation of Witness and Victim Protection Agency (LPSK) in the upcoming KUHAP. *Jurnal IUS Kajian Hukum dan Keadilan*, 13(3), 520–544. <https://doi.org/10.29303/ius.v13i3.1835>
- [28] Thailand. (2003). Witness Protection Act, B.E. 2546 (2003). United Nations Office on Drugs and Crime (UNODC), SHERLOC Knowledge Management Portal. https://www.unodc.org/cld/uploads/res/document/tha/2003/witness_protection_act_b_e__2546_html/Thailand_Witness_Protection_Act_BE_2546_2003.pdf
- [29] United Nations. (2000). United Nations Convention against Transnational Organized Crime. United Nations.
- [30] United Nations General Assembly. (1985, November 29). Declaration of Basic Principles of Justice for Victims of Crime and Abuse of Power (Resolution 40/34). United Nations.
- [31] United Nations Office on Drugs and Crime. (2008). Good practices for the protection of witnesses in criminal proceedings involving organized crime. United Nations Office on Drugs and Crime.
- [32] United Nations Office on Drugs and Crime. (2014). Praktek terbaik perlindungan saksi dalam proses pidana yang melibatkan kejahatan terorganisir. United Nations Office on Drugs and Crime.
- [33] Waldi, D. D., & Efri, Y. (2025). Perlindungan hukum bagi saksi dan korban dalam persidangan pidana di Pengadilan Negeri. *Court Review: Jurnal Penelitian Hukum*.
- [34] Zweigert, K., & Kötz, H. (1998). *An introduction to comparative law* (3rd ed.; T. Weir, Trans.). Oxford University Press.