



Legal Analysis of the Protection of the Rights of Suspects and Defendants from a Human Rights Perspective (Study of Constitutional Court Decision Number 61/PUU-XX/2022)

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Article	Abstract
Keywords: Constitutional Court; criminal procedure; due process of law; human rights; suspects and defendants; Article History Received: Feb 25, 2025; Reviewed: Apr 25, 2025; Accepted: May 25, 2025; Published: June 25, 2025;	<i>This study examines the legal protection of the rights of suspects and defendants in the Indonesian criminal justice system from a human rights perspective, with a particular focus on Constitutional Court Decision Number 61/PUU-XX/2022. The research adopts a normative juridical method by analyzing constitutional provisions, statutory regulations, international human rights instruments, and judicial precedents. The findings demonstrate that the Constitution and the Criminal Procedure Code (KUHAP) guarantee fundamental rights such as the presumption of innocence, the right to legal counsel, and freedom from arbitrary arrest and detention. However, in practice, these guarantees are often undermined by law enforcement authorities, leading to violations of due process of law. The Constitutional Court decision provides a progressive interpretation by affirming that restrictions on individual rights must be based on law, proportionate, and aimed at protecting broader public interests. It also emphasizes the non-derogable nature of certain rights, particularly access to legal assistance and protection against arbitrary detention. This ruling is significant not only for strengthening the protection of suspects and defendants but also for shaping ongoing reforms of the Criminal Procedure Code in alignment with international human rights standards. The study contributes to academic discourse on criminal justice reform and offers practical implications for legislators, law enforcement officials, and policymakers in ensuring a more just and democratic legal system.</i>



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INTRODUCTION

The development of the criminal justice system in Indonesia cannot be separated from the dynamics of human rights protection, which constantly demands a balance between the interests of the state in enforcing the law and the interests of individuals in obtaining protection of their basic rights. One of the fundamental aspects of the criminal justice system is the guarantee of protection of the rights of suspects and defendants. This guarantee is not merely a normative instrument enshrined in law, but a manifestation of the principle of the rule of law as affirmed in Article 1 paragraph (3) of the 1945 Constitution of the Republic of Indonesia (Nurwati & Husna, 2025). The Constitution affirms that Indonesia is a country based on the rule of law, which means that every law enforcement process must adhere to the principles of legal certainty, justice, and protection of citizens' rights, including those who are facing criminal proceedings.

The rights of suspects and defendants are regulated in various legal instruments, both national and international. At the national level, Law No. 8 of 1981 on the Criminal Procedure Code (KUHAP) provides a basic framework for the protection of these rights through provisions on the right to legal assistance, the right not to be tortured, the right to a fair trial, and the right to be presumed innocent until proven guilty by a court of law (the presumption of innocence principle) (Prasetyo & Herawati, 2022). Meanwhile, at the international level, Indonesia has ratified the International Covenant on Civil and Political Rights (ICCPR) through Law No. 12 of 2005, which stipulates the state's obligation to guarantee individual rights in criminal justice proceedings universally. The convergence between the Criminal Procedure Code and international human rights instruments emphasizes the importance of harmony between criminal law enforcement and the protection of human rights (Noor et al., 2025).

The protection of the rights of suspects and defendants in Indonesia still faces serious challenges. A number of cases have revealed abuses of authority by law enforcement officials, ranging from arbitrary arrests and detentions to restrictions on access to legal assistance (Afandi & Bedner, 2022). This raises critical questions about the effectiveness of the normative provisions in the Criminal Procedure Code (KUHAP) and the extent to which the state is fulfilling its obligation to protect the human rights of everyone involved in the criminal justice process (Sukiyawati et al., 2023). The situation is further complicated by the ongoing deliberation of revisions to the Criminal Procedure Code through the Draft Criminal Procedure Code Bill (RUU KUHAP), one of the focuses of which is to strengthen the protection of the rights of suspects and defendants in line with developments in international human rights principles.

Constitutional Court Decision Number 61/PUU-XX/2022 is an important milestone in reviewing the effectiveness of protecting the rights of suspects and defendants in the criminal justice system. In this case, the petitioner filed a judicial review of provisions in the Criminal Procedure Code (KUHAP) that were considered to limit a person's constitutional rights in criminal proceedings. Through this ruling,

the Constitutional Court provided a constitutional interpretation of norms that have the potential to violate human rights, particularly those related to the right to legal assistance, the right to freedom from torture, and the right not to be treated arbitrarily by law enforcement officials (Mandjo & Sarson, 2021). Thus, this ruling has a significant impact not only on law enforcement practices, but also on the formulation of policies for the reform of criminal procedure law in Indonesia.

The protection of the rights of suspects and defendants is not only a manifestation of the principle of procedural justice, but also an integral aspect of a democratic rule of law. The theory of the rule of law emphasizes that every policy and action of the state must be limited by law to prevent abuse of power (Leben, 2019). In criminal justice studies, law enforcement should not sacrifice individual rights solely for the sake of legal certainty or effective law enforcement. In other words, substantive justice cannot be achieved without ensuring that legal proceedings are conducted in accordance with the principle of due process of law. In this regard, the protection of the rights of suspects and defendants is one of the main indicators for assessing the quality of law enforcement and democracy in Indonesia.

Constitutional Court Decision Number 61/PUU-XX/2022 is also relevant to analyze from a human rights perspective because it provides a paradigm shift regarding the limits of law enforcement authority. Through its *ratio decidendi*, the Constitutional Court emphasizes that any restriction on individual rights must be based on law, be proportional, and aim to protect greater interests (Kripsiaji & Minarno, 2022). This is in line with the principles of human rights as stipulated in Article 28J of the 1945 Constitution of the Republic of Indonesia, which emphasizes that restrictions on rights can only be imposed when necessary to guarantee the recognition and respect for the rights and freedoms of others and to fulfill the demands of justice in accordance with the values of morality, security, and public order. Thus, this decision has strategic value in rebalancing the authority of the state and the protection of citizens' rights in criminal proceedings.

Analysis of this Constitutional Court decision is also important given the dynamics of criminal procedure reform in Indonesia. The government and the House of Representatives (DPR) are currently discussing the Criminal Procedure Code Bill as part of the national legal reform agenda (Pangaribuan, 2025). One crucial aspect of the bill is the effort to strengthen the protection of the rights of suspects and defendants in line with developments in the principles of due process of law and international human rights standards (Suastuti et al., 2024). By using Constitutional Court Decision Number 61/PUU-XX/2022 as a case study, this paper is expected to contribute academically to the discourse on criminal procedure law reform, particularly in ensuring that the reforms undertaken truly reflect the principles of a democratic and just state based on the rule of law.

The above description shows that the discussion on the protection of the rights of suspects and defendants from a human rights perspective through the study of Constitutional Court Decision Number 61/PUU-XX/2022 is relevant and urgent. This study is expected to answer a number of important questions, such as the extent

to which the current criminal procedural law norms are able to guarantee the protection of a person's basic rights in criminal proceedings, the role of the Constitutional Court in correcting norms that have the potential to violate human rights, and the implications of this decision for law enforcement practices and the agenda for reforming the Criminal Procedure Code in the future. Thus, the results of this research not only contribute academically but also provide material for consideration by policymakers, law enforcement officials, and the wider community in realizing a criminal justice system that is more just, transparent, and respectful of human dignity.

METHOD

This study uses a normative legal research method based on literature review to examine the legal norms and principles governing the protection of the rights of suspects and defendants. The approaches used include a legislative approach by examining the 1945 Constitution, the Criminal Procedure Code, Law No. 39 of 1999 on Human Rights, and the Constitutional Court Law; a conceptual approach through analysis of the concepts of due process of law and fair trial; and a case approach by examining Constitutional Court Decision Number 61/PUU-XX/2022. Constitutional Court Decision Number 61/PUU-XX/2022 was used as the main object of study to assess the extent to which the protection of the rights of suspects and defendants is accommodated in criminal court practice in Indonesia. The legal materials consist of primary materials in the form of legislation and Constitutional Court decisions, secondary materials in the form of books, journals, and scientific articles, as well as tertiary materials such as dictionaries and legal encyclopedias. The analysis of legal materials is carried out qualitatively by interpreting legal norms and examining their conformity with human rights principles.

RESULTS AND DISCUSSION

Legal Basis for the Protection of the Rights of Suspects and Defendants

The constitutional guarantees enshrined in the 1945 Constitution affirm that the rights of every individual facing legal proceedings must be respected. Article 28D paragraph (1) affirms the right to recognition, protection, and certainty of fair law, while Article 28G paragraph (1) regulates the right of every person to protection of themselves, their honor, and their personal dignity (Ni Komang Sutrisni et al., 2024). These two constitutional provisions form the fundamental basis that suspects and defendants are still considered legal subjects who must be treated fairly, regardless of the alleged criminal acts.

The Criminal Procedure Code, as an instrument of criminal procedure law, implements the principle of the rule of law by regulating procedures that are in line with the concepts of due process of law and the principle of fair trial (Indra Ariska, 2019). This mechanism affirms that everyone accused of a criminal offense has the right to be presumed innocent, the right to legal assistance from the initial stages of investigation, and the right to be tried by a court free from interference. This provision shows that the Criminal Procedure Code not only regulates the procedures for law

enforcement, but also serves as a protective barrier so that suspects and defendants are not treated arbitrarily by the authorities.

Indonesia's commitment to international standards is also evident in its ratification of the International Covenant on Civil and Political Rights (ICCPR) through Law No. 12 of 2005 (Muhtar et al., 2024). The instrument regulates guarantees of freedom from arbitrary detention, the right to an independent judiciary, the right to defense, and the right to a trial within a reasonable time. The existence of the ICCPR is a political and legal commitment that the national judicial system is in line with universal human rights principles.

The protection of suspects' rights still faces a number of weaknesses. The Criminal Procedure Code, which was enacted in 1981, does not regulate in detail the mechanism for judicial oversight of the legality of detention, leaving open the possibility of abuse of authority. Access to legal counsel is also often hampered at the investigation stage, leaving suspects in a weak position when facing the authorities. In addition, existing regulations do not fully accommodate the protection of vulnerable groups or victims of serious violations. This situation shows that existing regulations need to be updated to be in line with the principles of a modern constitutional state. Criminal procedure reform is urgently needed so that the protection of individual rights can be implemented consistently and effectively.

The Position of Human Rights in the Criminal Justice Process

The enactment of Law No. 39 of 1999 on Human Rights reinforced the position of human rights in the Indonesian legal system. The regulation states that everyone has the right to recognition, protection, and fair legal treatment (Utami et al., 2023). This provision emphasizes that suspects and defendants do not lose their status as subjects of law, so criminal proceedings must be conducted with respect for human dignity. This principle is based on the principle of equality before the law, which places everyone on an equal footing before the judicial system.

The theory of balance that has developed in criminal law emphasizes that the judiciary must accommodate three main interests, namely the state's interest in enforcing the law, the community's interest in public order, and the rights of individuals undergoing criminal proceedings (Sahran Hadziq & Gatot Sugiharto, 2024). This balance is necessary so that law enforcement does not result in repressive state actions that sacrifice individual rights, while still maintaining the public interest in justice. From a theoretical point of view, criminal law enforcement based on human rights requires substantive justice that harmonizes these three aspects.

The Criminal Procedure Code provides a number of provisions that demonstrate a close relationship with human rights principles. Article 50 guarantees the right of a defendant to be immediately examined by investigators and brought before a court (Sahran Hadziq & Gatot Sugiharto, 2024). Article 51 grants the right to obtain clear information regarding the charges against him. Article 56 guarantees the right to legal counsel, especially for defendants who do not have the financial means. These provisions demonstrate the commitment of the regulations to protecting the rights of individuals facing legal proceedings. The main problem lies in implementation, as enforcement in the field is still hampered by limited resources, bureaucratic red tape, and a lack of awareness among officials of the principles of fair trial.

The position of human rights is increasingly crucial when linked to contemporary issues, such as prison overcrowding, torture during interrogations, and discrimination against certain groups in society. The protection of human rights in criminal justice is not only measured by written norms, but also by the existence of effective oversight mechanisms, the independence of judicial institutions, and the consistency of officials in implementing the principle of justice. The understanding that respect for human rights is not an obstacle to law enforcement, but rather a fundamental requirement for achieving justice, is the foundation for a democratic and humane criminal justice system.

Analysis of Constitutional Court Decision Number 61/PUU-XX/2022

Constitutional Court Decision Number 61/PUU-XX/2022 is an important milestone in the development of Indonesian criminal procedure law because it provides a new constitutional interpretation regarding the protection of the rights of suspects and defendants. This analysis will comprehensively outline the background of the case, the subject matter of the petition, the legal considerations, and its normative implications for the criminal justice system, particularly in relation to the enforcement of human rights principles.

Case No. 61/PUU-XX/2022 was filed with the Constitutional Court by a number of petitioners who considered that certain provisions in the Criminal Procedure Code (KUHAP) violated the constitutional rights of suspects and defendants. The petitioners consist of individuals and organizations concerned with the protection of human rights in criminal proceedings. The subject of the petition is a judicial review of several articles in the Criminal Procedure Code relating to arrest, detention, and access to legal aid, in which the petitioners argue that these norms are not in line with the guarantee of human rights protection as guaranteed by Article 28D paragraph (1) and Article 28G paragraph (1) of the 1945 Constitution. The petitioners argued that the provisions being challenged gave law enforcement officials too much leeway to detain individuals without adequate procedural safeguards, thereby potentially violating the presumption of innocence and the right to personal liberty. In their view, the existing regulations did not sufficiently guarantee the protection of the rights of suspects and defendants, particularly during the investigation and prosecution phases.

The petitioners based their petition on two main arguments. First, they considered that the provisions in the Criminal Procedure Code that were being challenged were not in line with the principle of due process of law, namely fair, transparent, and accountable criminal court proceedings. In this case, the Criminal Procedure Code is considered to give excessive discretion to investigators and public prosecutors to detain a person without adequate judicial oversight, which could potentially violate a person's right to liberty arbitrarily. Second, the petitioners asserted that the norms being challenged also conflict with the principle of fair trial as stipulated in the International Covenant on Civil and Political Rights (ICCPR), which was ratified through Law No. 12 of 2005. They highlighted the provisions governing the right to legal counsel from the early stages of investigation, which they claimed were often ignored. According to the petitioners, the weak regulation of legal assistance from the outset makes suspects vulnerable to rights violations, including intimidation, psychological pressure, and even torture.

In its deliberations, the Constitutional Court provided an in-depth analysis of the relationship between individual rights and the state's authority to enforce criminal law. The Court emphasized that a democratic state based on the rule of law requires that all actions taken by law enforcement officials be subject to the principle of protecting human rights. The Court cited Articles 28D and 28G of the 1945 Constitution as the constitutional basis guaranteeing every person's right to legal certainty, protection, and fair treatment before the law.

The Court highlighted the fact that law enforcement practices have often resulted in violations of the basic rights of suspects and defendants. Detentions have been excessive, access to legal assistance has been restricted, and examination procedures have often ignored the principle of presumption of innocence. The Court found that the provisions of the Criminal Procedure Code that were being tested did not fully reflect the principle of due process of law, even though this principle is fundamental in guaranteeing substantive justice. The Court also linked its considerations to applicable international standards, particularly the ICCPR. This instrument stipulates that every individual accused of a criminal offense has the right to know the charges against them, to obtain adequate legal assistance, and to be tried fairly by an independent and impartial court. The Court emphasized that Indonesia's commitment to protecting human rights requires the adaptation of criminal procedure practices to international standards.

The Constitutional Court has provided a progressive interpretation of the rights of suspects and defendants in criminal proceedings. According to the Court, these rights cannot be curtailed on the grounds of law enforcement or national interests. The protection of these rights is non-derogable, meaning that they cannot be curtailed under any circumstances, except where strictly and proportionally limited by law. In this ruling, the Court affirmed several important principles, including the right of suspects to obtain legal assistance from the investigation stage is an integral part of the right to defense, the right to know the charges against them is an absolute requirement for a fair trial, and the right to personal freedom cannot be restricted without a clear legal basis and transparent procedures. The Court considers that the protection of these rights is a fundamental prerequisite for the realization of fair and humane criminal justice. This affirmation sends a strong signal for the improvement of regulations and law enforcement practices in the future.

Judgment and Its Impact

Through Decision Number 61/PUU-XX/2022, the Constitutional Court granted part of the petitioners' request and declared several provisions of the Criminal Procedure Code to be in conflict with the 1945 Constitution. This decision emphasizes the need to adjust criminal procedural law norms to be in line with human rights principles. The normative impact of this ruling can be categorized into two aspects: *first*, the Constitutional Court's ruling requires lawmakers to harmonize the norms in the Criminal Procedure Code so that they are in line with the constitutional guarantees of the rights of suspects and defendants. These adjustments include stricter regulations on the limits of detention, judicial oversight mechanisms, and access to legal counsel from the investigation stage onwards. *Second*, this ruling provides guidelines for law enforcement officials to be more cautious in exercising their authority. Investigators,

prosecutors, and judges are required to strictly comply with legal procedures to prevent violations of individual rights. The application of the principle of fair trial is now an operational standard that must be followed in all stages of the criminal process.

Constitutional Court Decision No. 61/PUU-XX/2022 sets an important precedent for the reform of criminal procedure law in Indonesia. The Court's progressive interpretation strengthens the protection of the rights of suspects and defendants while promoting the creation of a criminal justice system that is more accountable, transparent, and oriented towards respect for human dignity. This decision also serves as an important reference in the discussion of the Criminal Procedure Code Bill. The new regulation is expected to accommodate the principles affirmed by the Court, thereby creating a criminal procedure system that is in line with constitutional commitments and international human rights standards.

CONCLUSION

This study emphasizes that the protection of the rights of suspects and defendants is a fundamental pillar of the criminal justice system based on the principles of the rule of law and respect for human dignity. The provisions of the 1945 Constitution, the Criminal Procedure Code, and international human rights instruments such as the ICCPR place the right to legal assistance, the right to be presumed innocent until proven guilty by a final and binding court decision, and the right to a fair trial as fundamental elements that cannot be overlooked. An analysis of Constitutional Court Decision Number 61/PUU-XX/2022 shows that the Court provided a progressive interpretation of the protection of the rights of suspects and defendants, particularly in relation to access to legal assistance from the investigation stage, guarantees of freedom from arbitrary detention, and the right to know the charges against them. This decision not only corrects normative weaknesses in the Criminal Procedure Code, but also strengthens the position of human rights as the foundation for the administration of criminal justice. The significance of this decision lies in the strengthening of the principles of due process of law and fair trial, which are key indicators of the quality of democracy and the legal system in Indonesia.

The recommendations that can be given are as follows: *first*, adjustments to the content of the Draft Criminal Procedure Code (RUU KUHAP) are needed to bring it into line with the constitutional interpretation provided by the Constitutional Court. This harmonization includes more explicit provisions on the limits of detention authority, strict judicial oversight mechanisms, and the obligation to provide access to legal counsel from the outset of the investigation. This step is urgent to ensure that criminal procedure law is consistent with human rights principles. *Second*, the Constitutional Court's decision must be implemented consistently by the police, prosecutors, and the judiciary. The application of standards for the protection of the rights of suspects and defendants must be made into binding operational guidelines, so that law enforcement practices are no longer oriented solely towards institutional interests, but rather towards the fulfillment of the principle of justice. The compliance of officials with this ruling will determine the success of criminal procedure law reform at the practical level. *Third*, Further research on the protection of human rights in the criminal justice process needs to be developed, both through comparative analysis with other countries' legal systems and through critical studies of practices in the field.

Academic contributions play an important role in enriching scientific discourse and providing constructive input to policy makers and law enforcement officials, thereby creating a criminal justice system that is more fair, transparent, and oriented towards respect for human dignity.

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