

Beyond Retributive: Exploring the Participatory Paradigm in the Ferdi Sambo Trial

Agnes Fitriyantica¹, Abdul Mutalib², Muchammad Daing Azimattara³, Andri Sutrisno⁴, Satriadi⁵.

^{1,4} *Faculty of law, Institute Business Law Management, Indonesia*

² *Faculty of law, The Islamic Institute of Ternate, Indonesia.*

³ *Faculty of law, University of Tulang Bawang Lampung, Indonesia.*

⁵ *Faculty of law, Bone State Islamic Institute, Indonesia.*

Article history:

Received 2024-06-13

Revised 2024-07-12

Accepted 2024-08-01

Keywords:

Retributive; Participatory Paradigm; Class a Criminal Case; Ferdi Sambo.

DOI:

doi.org/10.26905/idjch.v15i2.12763.

Corresponding Author:

Agnes Fitriyantica.

E-mail: agnesfitriyantica@iblam.ac.id.

Abstract: The participatory paradigm offers a different perspective on crime and justice. Instead of focusing solely on punishment, this paradigm emphasizes restoration, dialogue, and reconciliation. Applying the participatory paradigm could be a breakthrough in the context of high-profile criminal cases such as Ferdy Sambo, providing a more comprehensive and sustainable solution. The research problem in this study is that applying the participatory paradigm in the legal process of high-profile criminal cases like the Ferdi Sambo trial can shift the retributive approach within Indonesia's criminal justice system. It also explores the advantages and disadvantages of implementing the participatory paradigm in high-profile criminal cases like the Ferdi Sambo trial in Indonesia. The case of Ferdi Sambo, a police general in Indonesia involved in a murder scandal, sparked extensive debate and analysis regarding the participatory paradigm in the context of law enforcement and justice. In this context, the participatory paradigm involves various parties in decision-making and law enforcement processes. Implementing the participatory paradigm in science and legal philosophy has several advantages, such as enhancing inclusivity, transparency, and legitimacy by involving multiple stakeholders in knowledge production and legal processes. However, this approach also has drawbacks, including challenges in balancing public participation with the objectivity of the judicial process, potential conflicts of interest, and maintaining the integrity of the legal system.

1. Introduction

The shift towards a participatory paradigm in the criminal justice system may impact high-profile cases like the Ferdi Sam, but the specific outcomes are unknown. The Indonesian legal system is undergoing significant digital changes, with the Supreme Court implementing modernization through digitalization to provide wider access to judicial services. Legal innovations have been born from trial processes, aiming to improve the right to a fair trial and ensure societal implications are considered. Challenges remain in balancing privacy interests and transparency in court operations. The Ferdi Sambo trial is a high-profile case in Indonesia involving corruption and

money laundering charges. It has sparked public interest and scrutiny.

The trial will likely test the Indonesian legal system's ability to handle complex criminal cases and the effectiveness of implementing participatory approaches in such cases. In recent decades, the retributive approach in the criminal justice system has faced significant criticism, particularly regarding its effectiveness in delivering substantive justice, especially in severe or high-profile criminal cases. Retribution, which focuses on proportional offender punishment, often raises questions about the justice experienced by victims, society, and the offenders. In Indonesia, the case of Ferdy Sambo, a high-ranking police officer involved in a premeditated murder case, has sparked widespread debate on how the justice system handles high-profile crimes and the role of society in the process. This case has become an important precedent in assessing whether a participatory approach, which emphasizes broader involvement from all stakeholders—including victims, society, and offenders can be applied in the context of Indonesia's criminal law.

Amid the scrutiny surrounding this case, a fundamental question arises: Is our criminal justice system effective enough in delivering justice and meeting society's needs? One alternative approach gaining attention is the participatory paradigm, which emphasizes the active involvement of all interested parties in the judicial process. The Participatory Paradigm offers a different perspective on crime and justice. Instead of solely focusing on punishment, this paradigm emphasizes restoration, dialogue, and reconciliation.¹ Applying the participatory paradigm could represent a breakthrough that provides more comprehensive and sustainable solutions in the context of high-profile criminal cases like Ferdy Sambo.

Through this research, the author aims to explore the extent to which the participatory paradigm can be applied in high-profile criminal cases such as the Ferdy Sambo case. By conducting an in-depth analysis of this case, it is hoped that a more comprehensive understanding of the challenges and opportunities in implementing the participatory paradigm within Indonesia's criminal justice system can be achieved. Based on the background above, the research questions are as follows: (1) How can applying the participatory paradigm in the legal process of the Ferdy Sambo high-profile criminal trial change the retributive approach in Indonesia's criminal justice system? (2) What are the strengths and weaknesses of implementing the participatory paradigm in high-profile criminal cases, specifically the Ferdy Sambo trial in Indonesia?

2. Method

This research will employ a qualitative approach with an in-depth single case study design. The Ferdy Sambo case will be the main focus of the analysis. The researcher will also examine legal documents related to the Ferdy Sambo case and conduct in-depth interviews with various stakeholders, including law enforcement, legal academics, civil society activists, and, if possible, individuals directly involved in the case. Additionally, if feasible, the researcher will carry out direct observations of the trial process or recordings of the trial to gain a deeper understanding of the dynamics in the courtroom. Furthermore, the researcher will analyze media coverage and hold public discussions surrounding the case to understand societal perceptions and responses.

¹ Martinez-Vargas, Carmen, Melanie Walker, F. Melis Cin, and Alejandra Boni. 2021. "A Capabilitarian Participatory Paradigm: Methods, Methodologies and Cosmological Issues and Possibilities." *Journal of Human Development and Capabilities* 23 (1): 8–29. doi:[10.1080/19452829.2021.2013173](https://doi.org/10.1080/19452829.2021.2013173).

This research employs a normative legal research approach. It focuses on evaluating legal norms, principles, applicable laws, regulations, theories, doctrines, jurisprudence, and relevant literature related to the subject matter. The collected data will be analyzed using thematic analysis methods, focusing on identifying key themes related to the application of the participatory paradigm in this context. Data triangulation will be conducted to ensure the validity and reliability of the research findings. Thus, this study is expected to make a significant contribution to the academic discourse on reforming the criminal justice system in Indonesia and provide practical recommendations for developing more inclusive and responsive legal policies that meet societal needs.

Application of the Participatory Paradigm in the Legal Process of the Ferdy Sambo High-Profile Criminal Trial: Can It Change the Retributive Approach in Indonesia's Criminal Justice System. The High-Profile Criminal Case in the Ferdy Sambo Trial involves criminal acts committed by individuals or groups with the intent to take someone else's life, where the perpetrator holds a significant position or power in society. This action is regarded as a "naïve act" because it ignores moral and social responsibilities and the broader consequences for society.²

The high-profile criminal case involving Ferdy Sambo illustrates the complexity and profound impact of criminal actions committed by individuals in positions of power. Ferdy Sambo, one of five defendants in the premeditated murder case of Brigadier Nofriansyah Yosua Hutabarat, faces a life imprisonment sentence from the Public Prosecutor. He is accused of premeditated murder, indicating that the act was planned and carried out with the intent to take another person's life. This reflects the harmful use of power, where the perpetrator violates the law and disregards his moral responsibilities as a member of society.

As a former police general, Ferdy Sambo's position gave him significant access and influence within the social structure. His actions are considered a "naïve act" because he ignored the social consequences of his actions, including the impact on public trust in legal institutions. The life imprisonment sentence sought by the Public Prosecutor indicates that Ferdy Sambo's actions are viewed as extremely serious and intolerable. This also reflects the legal system's efforts to deliver justice for the victims and society, demonstrating that the law must be applied fairly, regardless of the perpetrator's social status or power.

3. The Participatory Paradigm in the Context of the Philosophy of Science

The Participative Paradigm emerges as an alternative to the positivist and post-positivist paradigms in the philosophy of science. This paradigm emphasizes the importance of research subjects active involvement in the knowledge-seeking process. Braith Heron and Peter Reason are two key figures who developed this concept in the philosophy of science. They argue that the Participatory Paradigm transcends the subject-object dualism that often characterizes conventional research paradigms. Heron and Reason explain in their article A Participatory Inquiry Paradigm:³ The participatory worldview allows us as human persons to know that we are part of the whole, rather than separated as mind over and against matter, or placed here in the relatively separate

² Andry Triyanto Tjitra and Eko Ari Wibowo, "Hakim Sebut Replik Dalam Sidang Pleidoi Ferdy Sambo, Apa Maksudnya?," *Tempo*, January 25, 2023, <https://www.tempo.co/hukum/hakim-sebut-replik-dalam-sidang-pleidoi-ferdy-sambo-apa-maksudnya> – 225815.

³ John Heron and Peter Reason, "A Participatory Inquiry Paradigm," *Qualitative Inquiry* 3, no. 3 (September 1, 1997): 274–94, <https://doi.org/10.1177/107780049700300302>.

creation of a transcendent god. It allows us to join with fellow humans in collaborative forms of inquiry. It places us back in relation with the living world.

The Participatory worldview allows us as human individuals to know that we are part of the whole, rather than separate as mind and matter, or placed here in a creation that is relatively separate from a transcendent God. This perspective enables us to join with our fellow humans in forms of collaborative inquiry. It places us back in relationship with the living world. This quote illustrates that the Participatory Paradigm allows humans to understand that we, as subjects, are part of the whole rather than being separate as conflicting minds and matter. This paradigm enables us to join with fellow humans in collaborative inquiry and reconnects us with the living world.

Therefore, because the Participatory Paradigm teaches us that differences do not separate humans, this paradigm inherently possesses key characteristics in the philosophy of science, which include: 1). Expanded Epistemology: Knowledge is acquired through observation, direct experience, and participation; 2). Subjective-objective ontology: Reality is understood as an interaction between the subject who knows and the object that is known; 3). Collaborative methodology: Research is conducted with, not on, the participants.

Transformative axiology: The research goal is to produce practical knowledge that can improve human and ecological well-being. Guba and Lincoln, in their book 'Fourth Generation Evaluation', also made an important contribution to understanding the Participatory paradigm. They stated: The participatory paradigm proposes a collaborative approach to inquiry that affirms participants' right to participate in the processes of knowledge production that claim to generate knowledge about them. A loose translation: 'The Participatory paradigm proposes a collaborative approach to inquiry that affirms participants' right to participate in the process of knowledge production that claims to produce knowledge about them.

This quotation emphasizes that the Participatory paradigm proposes a collaborative approach to inquiry that affirms participants' right to participate in knowledge production that claims to generate knowledge about them. The Participatory paradigm has significantly impacted various research fields, especially in the social sciences.⁴ It has promoted a more ethical and democratic approach to knowledge production. The participatory paradigm in the philosophy of science also emphasizes the importance of reflexivity in the research process. Researchers are not seen as 'neutral observers' but as co-creators of knowledge alongside the research participants. Reason and Bradbury explain this in their book *Handbook of Action Research*: Its translation is, 'In Participatory research, researchers and participants work together to examine problematic situations or actions to transform them for the better. Participatory researchers do not conduct research on others but with others.'

This quotation emphasizes that in Participatory research, researchers and participants work together to examine problematic situations or actions to transform them for the better. Participatory researchers do not conduct research on people, but with people. The Participatory paradigm has significantly impacted various research fields, especially in the social sciences. It has promoted a more ethical and democratic approach to knowledge production. The Participatory paradigm

⁴ Maria Szymańska, 2022. "The Subject-Participatory Paradigm in Correlation With the Constitutive Features of Pedagogical Qualitative Research: A Personalistic Perspective". *Multidisciplinary Journal of School Education* 11 (1 (21), 151-69. <https://doi.org/10.35765/mjse.2022.1121.08>.

in the philosophy of science also emphasizes the importance of reflexivity in the research process. Researchers are not considered 'neutral observers' but co-creators of knowledge alongside the research participants. This is explained by Reason and Bradbury in their book 'Handbook of Action Research': Its translation is, 'In Participatory research, researchers and participants work together to examine problematic situations or actions to transform them for the better. Participatory researchers do not research others but with others.

This quotation emphasizes that in Participatory research, researchers and participants work together to examine problematic situations or actions to transform them for the better. Participatory researchers do not research people but with people. Additionally, the participatory paradigm has significant methodological implications. The methodology used in this paradigm is qualitative and action-oriented. Kemmis and McTaggart explain in their book 'The Action Research Planner': 'Participatory action research aims to help people recover, and release themselves from, the constraints of irrational, unproductive, unjust, and unsatisfying social structures that limit their self-development and self-determination.' Translation: 'Participatory action research aims to help communities recover and liberate themselves from the constraints of irrational, unproductive, unjust, and unsatisfying social structures that limit their self-development and self-determination.

Guba and Lincoln, in their book 'Fourth Generation Evaluation, also made an important contribution to understanding the Participatory paradigm. They stated:⁵ The participatory paradigm proposes a collaborative approach to inquiry that affirms participants' right to participate in the processes of knowledge production that claim to generate knowledge about them.' A loose translation: 'The Participatory paradigm proposes a collaborative approach to inquiry that affirms participants' right to participate in the process of knowledge production that claims to produce knowledge about them. Subjective-objective ontology: Reality is understood as an interaction between the subject who knows and the object that is known.

Collaborative methodology: Research is conducted with, not on, the participants. Transformative axiology: The goal of the research is to produce practical knowledge that can be used to improve human and ecological well-being. This quotation emphasizes that the Participatory paradigm proposes a collaborative approach to inquiry that affirms participants' right to participate in knowledge production that claims to generate knowledge about them. The Participatory paradigm has significantly impacted various research fields, especially in the social sciences. It has promoted a more ethical and democratic approach to knowledge production.⁶ The Participatory paradigm in the philosophy of science also emphasizes the importance of reflexivity in the research process. Researchers are not seen as 'neutral observers' but as co-creators of knowledge alongside the research participants. This is explained by Reason and Bradbury in their book 'Handbook of Action Research'⁷: Its translation is, 'In Participatory research, researchers and participants work together to examine problematic situations or actions to transform them for the better. Participatory researchers do not conduct research on others but with others.

⁵ Egon G. Guba and Yvonna S. Lincoln, "Fourth Generation Evaluation." (SAGE, 1989). Page 12.

⁶ Stephen Kemmis, Robin McTaggart, and Rhonda Nixon, "A New View of Participation: Participation in Public Spheres," in *Springer eBooks*, 2013, 33–49, https://doi.org/10.1007/978-981-4560-67-2_2.

⁷ Tom Wakeford et al., *The SAGE Handbook of Action Research*, SAGE Publications Ltd eBooks, 2008, <https://doi.org/10.4135/9781848607934>.

The Participatory paradigm has significantly impacted various fields of research, especially in the social sciences. It has promoted a more ethical and democratic approach to knowledge production. The Participatory paradigm in the philosophy of science also emphasizes the importance of reflexivity in the research process. Researchers are not considered 'neutral observers,' but co-creators of knowledge alongside the research participants. This is explained by Reason and Bradbury in their book *Handbook of Action Research: Its translation is, In Participatory research*, researchers and participants work together to examine problematic situations or actions to transform them for the better. Participatory researchers do not conduct research on others, but with others.

Participatory research is not just a scientific methodology. It is also a process of personal and collective transformation. It aims at the liberation of human creative potential and the mobilization of human resources for the solution of social problems. The meaning of this quotation is that Participatory action research aims to help people recover and liberate themselves from the constraints of irrational, unproductive, unjust, and unsatisfying social structures that limit their self-development and self-determination. The Participatory paradigm also has significant ethical implications. Fals-Borda and Rahman, in their book *Action and Knowledge: Breaking the Monopoly with Participatory Action Research*, emphasize the empowerment aspect of this paradigm, stating: Participatory research is not just a scientific methodology. It is also a process of personal and collective transformation. It aims at the liberation of human creative potential and the mobilization of human resources for the solution of social problems. Translation:⁸ Participatory research is not just a scientific methodology. It is also a process of personal and collective transformation... Participatory research aims to liberate human creative potential and mobilize human resources to solve social problems.

The meaning of this quotation emphasizes that Participatory research is not only a scientific methodology but also a process of personal and collective transformation. It aims to liberate human creative potential and mobilize human resources to solve social problems. So, how is the Participatory paradigm applied in the field of law? In the legal context, the Participatory paradigm is often associated with 'Participatory law' or 'participatory lawmaking', which emphasizes community involvement.

The process of lawmaking and implementation. In the field of legal studies, the Participatory paradigm has several important aspects, including: Participatory Lawmaking involves the community in the process of creating laws and legal policies, as described by Ayelet Shachar in her book *Multicultural Jurisdictions*.⁹ Cultural Differences and Women's Rights explains: Participatory lawmaking processes can help bridge the gap between state law and community practices, fostering a more inclusive legal system that reflects the diverse needs and values of multicultural societies. A loose translation: 'Participatory lawmaking processes can help bridge the gap between state law and community practices, encouraging a more inclusive legal system that reflects multicultural societies' diverse needs and values. Restorative Justice: The Participatory paradigm in criminal law is often associated with the concept of restorative justice.¹⁰ John Braithwaite, in his

⁸ Orlando Fals-Borda and Muhammad Anisur Rahman, *Action and Knowledge: Breaking the Monopoly with Participatory Action Research* (Intermediate Technology Publications, 1991). Page 42.

⁹ Michael Rabinder James, "Multicultural Jurisdictions: Cultural Differences and Women's Rights by Ayelet Shachar," *Journal of Philosophy of Education* 41, no. 3 (January 23, 2008): 497-98, <https://doi.org/10.1111/j.1467-9752.2007.00564.x>.

¹⁰ John Braithwaite, *Restorative Justice & Responsive Regulation*. (Oxford University Press, USA, 2002). Page 102.

book *Restorative Justice and Responsive Regulation*, explains: 'Restorative justice is about healing rather than harming, moral learning, community participation and care, respectful dialogue, forgiveness, responsibility, apology, and making amends.

Customary Law and Legal Pluralism: The Participatory paradigm in law is also closely related to recognizing customary law and legal pluralism. In her article *Legal Pluralism*, Sally Engle Merry explains:¹¹ In a loose translation, Legal pluralism recognizes that in any social field, more than one source of "law", more than one "legal order" may be observed. This can take the form of state law, customary law, religious law, or local institutional rules. **Participation in the Judicial Process:** The Participatory paradigm also encourages community involvement in the judicial process. Marc Galanter, in his article *Justice in Many Rooms: Courts, Private Ordering, and Indigenous Law*. **Environmental Participatory:**¹² In environmental law, the Participatory paradigm has encouraged community involvement in natural resource management. Elinor Ostrom, in her book *Governing the Commons*:¹³ When individuals are allowed to restructure their situations, they frequently learn from one another and discover new and better problem-solving strategies.

Retributive justice, which has historically dominated the legal arena, focuses on punitive actions aimed at inflicting suffering on offenders as a means of societal retribution.¹⁴ This paradigm of punishment has been subject to criticism for its limitations in providing comprehensive compensation to victims and addressing the root causes of criminal behavior. In response to these shortcomings, restorative justice has emerged as an alternative approach emphasizing healing, reconciliation, and reparation. By focusing on remedying the losses experienced by victims, reintegrating offenders, and involving the community, restorative justice seeks to create a more inclusive and participatory form of justice.

Table 1. comparing Retributive Justice and Participatory Justice

Comparison Aspects	Retributive Justice	Participatory Justice
Value	Retributive justice focuses on punishment for legal violations or moral wrongs. Its aim is to impose consequences that are proportionate to the actions taken. Main Focus: Ensuring that offenders receive appropriate punishment. Emphasis: On the aspect of retribution and restoring social order. Principle: "Proportional retribution." Priority: Justice for the victim and society.	Participatory justice emphasizes the involvement of all parties in the decision-making process related to justice. Its aim is to create fair and inclusive solutions. Main Focus: Encouraging dialogue and collaboration among offenders, victims, and the community. Priority: Fostering relationship restoration and peaceful conflict resolution. Active Involvement: Engaging all parties affected by the decision. Emphasis: On restoration and rehabilitation.

¹¹ Sally Engle Merry, "Legal Pluralism," *Law & Society Review* 22, no. 5 (January 1, 1988): 869-96, <https://doi.org/10.2307/3053638>.

¹² Marc Galanter, "Justice in Many Rooms: Courts, Private Ordering, and Indigenous Law," *The Journal of Legal Pluralism and Unofficial Law* 13, no. 19 (January 1, 1981): 1-47, <https://doi.org/10.1080/07329113.1981.10756257>.

¹³ Elinor Ostrom, *Governing the Commons: The Evolution of Institutions for Collective Action*. (Cambridge University Press, 1990). Page 77.

¹⁴ Jessica Chandra, "View of Perlindungan Hukum Terhadap Korban Perempuan Pada Tindak Kekerasan Dalam Rumah Tangga". *Syntax Literate* ; *Jurnal Ilmiah Indonesia*, n.d., <https://jurnal.syntaxliterate.co.id/index.php/syntax-literate/article/view/13925/9147>.

Application Sanksi	<p>Applied Sanctions:</p> <p>Imprisonment: Imposed for serious offenses such as murder, theft, or corruption.</p> <p>Fines: Financial penalties imposed on offenders to provide a deterrent effect.</p> <p>Death Penalty: Applied in severe criminal cases in some countries.</p>	<p>Applied Sanctions:</p> <p>Mediation: A process in which the offender and victim negotiate to reach an agreement.</p> <p>Rehabilitation: Programs aimed at correcting the offender's behavior, such as counseling or training.</p> <p>Community Resolution: Community involvement in addressing the violation, such as community service in the neighborhood.</p>
Participation Active	<p>Participation often comes only from law enforcement and the courts.</p> <p>The legal process is structured, with a focus on evidence and punishment.</p> <p>Victims typically play a role as witnesses or complainants.</p>	<p>All parties, including victims, offenders, and the community, are involved.</p> <p>The process is more flexible, prioritizing dialogue and negotiation.</p> <p>Victims have an active role in determining the outcome of the resolution.</p>
Social and Moral Dimensions	<p>Enforcing social norms through punishment.</p> <p>Focus on justice as retribution; punishment is seen as a form of morality.</p> <p>Provides a sense of security for the community by delivering a deterrent effect.</p> <p>Views offenders as "enemies" who must be punished.</p>	<p>Strengthening social relationships through dialogue and collaboration.</p> <p>Emphasizes restoration and rehabilitation, valuing collective morality.</p> <p>Prioritizes conflict resolution that involves the community.</p> <p>Views offenders as part of the community that needs to be restored.</p>
Application	<p>Relying on formal legal systems and court procedures.</p> <p>Primarily involves law enforcement, prosecutors, and judges.</p> <p>Enforces the law and administers justice through punishment.</p>	<p>Involves mediation processes, dialogue, and negotiation.</p> <p>Engages all parties: offenders, victims, and the community.</p> <p>Restores relationships and achieves fair agreements.</p>

Although no formal law guides restorative justice, its use is legitimate. Furthermore, in line with the idea of legal discovery, law enforcement's duties include searching for laws from previous court decisions and recognizing the laws that resonate within the community.¹⁵ For example, when the existing framework of retributive justice is insufficient to address the issues of victims, socio-legal analysis argues that law enforcement should not simply accept this but should strive to change, innovate, and adapt the law to create a more equitable approach.¹⁶ The table above also explains, according to Radbruch, that power should not be used as a criterion in determining the validity of law. The law must contain values. The qualities that should be inherent in the law are public benefit, certainty, and justice.

3.2 The Judge's Perspective Through the Participatory Paradigm in the Ferdi Sambo Case

When deciding a case, judges must use a paradigm appropriate to the case at hand. In this context, the judge's application of the participatory paradigm in the Ferdi Sambo case can bring

¹⁵ Barda Nawawi Arief, "Bunga Rampai Kebijakan Hukum Pidana." (Prenada Media, 2016). Page 22.

¹⁶ Adji Samekto, "Antara Studi Normatif dan Keilmuan," *Jurnal Hukum Progresif* 2, no. 2 (July 18, 2011): 55, <https://doi.org/10.14710/hp.2.2.55>.

several benefits, particularly in law enforcement and substantive justice. Here are several ways judges can implement this approach: **Involvement of Various Stakeholders:** Judges can involve various stakeholders, including the victims' families, the community, and civil organizations, in the trial process. This helps ensure that diverse perspectives are taken into account. **Transparency of Legal Processes:** By prioritizing transparency, judges can provide broader access to information for the public regarding the trial process. For example, specific sessions can be opened to the public, allowing the community to witness the proceedings.

Diverse Data Collection: Judges can solicit input from experts or witnesses who hold differing views. This would enrich the available data and lead to more comprehensive and fair decisions. **Open dialogue:** Before making decisions, hold discussion forums where involved parties can express their views and concerns. This creates a space for constructive dialogue. **Community Empowerment:** Judges can provide a platform for the community to express their opinions on the case's impact on the community, ensuring that the decisions made consider social aspects more deeply.

Evaluation and Follow-up: After making a decision, involving relevant parties in evaluating its impact can help create better accountability and responsibility. The participatory paradigm approach in the Ferdi Sambo case can create a more inclusive, transparent, and accountable legal process. It helps ensure justice for all parties involved and strengthens public trust in the legal system. The Ferdi Sambo case, involving a police general in Indonesia who was implicated in a murder scandal, sparked significant debate and analysis regarding the application of the participatory paradigm in the context of law enforcement and justice. In this case, the participatory paradigm involves various stakeholders in the decision-making and law enforcement processes.

This approach emphasizes collaboration, ensuring that perspectives from victims, the community, and other relevant parties are considered, fostering a more balanced and holistic view of justice. Here are some key points that can be linked to the participatory paradigm in the Ferdi Sambo case: **Transparency and Accountability:** This case highlights the importance of transparency in legal processes. Public participation in monitoring the judiciary can help ensure justice is upheld without interference or abuse of power. **Role of Media and Society:** The media significantly shaped public opinion in this case. Public involvement in discussions and criticism of the legal process can promote better justice. **Legal Education:** Society needs to be better informed about its rights and the legal process so that it can actively participate in safeguarding justice.

Oversight of Law Enforcement Institutions: This case shows the need for independent bodies to oversee the actions of police and prosecutors to prevent abuses of power. **Participation in Case Resolution:** Involving various stakeholders, including civil society organizations, in advocating for justice for the victims and overseeing the legal process can strengthen public trust in the legal system. Overall, the Ferdi Sambo case reflects the importance of the participatory paradigm by involving all elements in a constructive and transformative manner, creating a legal system that is more transparent, fair, and accountable, and achieving substantive justice. **Advantages And Disadvantages Of Implementing The Participatory Paradigm In The Philosophy Of Science And The Philosophy Of Law In Relation To The Ferdi Sambo Trial Case.**

In the trial of Ferdy Sambo, where moral, social, and power issues interact, this case not only draws attention due to the legal complexities involved but also because of its profound impact

on society and the judicial system. It is crucial to consider how the participatory paradigm can contribute to creating a more holistic and inclusive form of justice. By deeply understanding the advantages and disadvantages of implementing this paradigm, we can evaluate how the legal system can adapt to meet the needs of all parties involved, including victims, offenders, and the broader community.

This analysis seeks to explore how the participatory paradigm can be applied within the context of the Ferdy Sambo case and its implications for the future of Indonesia's judicial system. The inclusion of multiple voices and perspectives, particularly in high-profile cases like this, offers an opportunity to reimagine justice as a process that goes beyond punishment, focusing on healing, accountability, and collective responsibility. This paradigm encourages dialogue, transparency, and a collaborative approach, fostering greater public trust in the legal system while addressing the underlying social dynamics that often shape legal outcomes. I will briefly explain the Participatory Paradigm in the Philosophy of Science. Participatory Paradigm in the Philosophy of Science.

Democratization of knowledge: This paradigm encourages broader participation in the production of knowledge. Contextualization of research: It allows for more relevant research to local needs. Empowerment: It gives a voice to groups often marginalized in traditional research. In their Handbook of Action Research, Peter Reason and Hilary Bradbury explain that "Participatory research aims to generate knowledge and action that is directly useful to a group of people and to empower communities through the process of constructing and utilizing their own knowledge." This means that participatory research is not just about gathering information but actively involving the people being researched in the entire process. The goal is to produce useful knowledge, empower communities, and allow them to construct knowledge.

The question then arises: how does this relate to the Ferdy Sambo case? In the participatory paradigm, "data" is a shared reality between the researcher and the researched (subjective-objective reality), focusing on practical knowledge that can be used for change. Applying the participatory paradigm to the Ferdy Sambo case would uncover the "practical knowledge" found together in court, involving all related elements to achieve substantive justice. From the fundamental characteristics of participatory research, the aim is to empower the community and transform shared understanding into meaningful outcomes for justice. Through the Participatory Paradigm, an effective method is offered to engage communities in finding solutions to their problems. Fair and transparent law enforcement is crucial for maintaining public trust in the judicial system. The public has the right to know the truth and see offenders punished for their actions. Moreover, ensuring that this case is not merely a legal event but also a moment to reform the system and build a better society is key.

3.3 Disadvantages

Methodological Complexity: Involving multiple stakeholders can make the research process more complicated. Potential Bias: The intense involvement of the researcher might raise questions about objectivity. Limited Generalization: The results may be highly context-specific, making generalizations difficult. Guba and Lincoln, in their work "Fourth Generation Evaluation," state: "The participatory paradigm, while offering rich, contextualized understanding, may struggle with issues of generalizability and may be more time-consuming than traditional research approaches."

In simpler terms, Guba and Lincoln suggest that to understand something (a reality) deeply, we need to involve those who experience it firsthand. For example, in participatory research, the researcher collaborates with the participants to understand their experiences and derive meaningful solutions instead of merely observing. This principle highlights the challenge in legal cases like *Ferdy Sambo*, where community involvement might be limited due to the structured nature of legal proceedings. However, applying elements of the participatory approach could still strengthen transparency and reform the justice system, fostering a more inclusive societal dialogue on legal matters.

If we want to understand the problems in a village, we ask the villagers directly. It is like cooking together—everyone is involved and knows the taste. This excellent method gives us a deep understanding tailored to the context. **Difficult to Generalize:** The results we get from one village may not apply to another. So, if we want to make general conclusions, this approach is not the best fit. **Time-Consuming:** This method requires much time since it involves many people and lengthy discussions. The *Ferdy Sambo* case is a complex legal matter involving many parties. Applying a participatory approach here, for instance, by involving the public in the investigation, would be challenging and problematic. The main goal in a legal case is to seek the truth and uphold justice, which requires an objective and independent process. Involving citizens directly in the investigation could disrupt the legal process and introduce bias.

Additionally, the *Ferdy Sambo* case involves a lot of evidence, witnesses, and complex legal aspects. Involving the public, who may not have sufficient legal knowledge, could make the investigation inefficient and even obscure the facts. Moreover, the legal process needs to be quick and efficient. Including the public in every investigation stage would slow things down and hinder efforts to uncover the truth. **A simple conclusion on the limitations of the Participatory Paradigm:** While this approach is beneficial for understanding social issues and finding collective solutions, it is unsuitable for every situation. Legal cases like *Ferdy Sambo's* require a more formal process involving legal experts. This means we must be wise in choosing the correct method, depending on the context and goals.

4. Participatory Paradigm in Legal Philosophy

Legal Legitimacy: Involving the public in the legal process can enhance the legitimacy and acceptance of laws. When citizens feel they have a voice or role in shaping legal decisions, they are more likely to trust and respect the legal system. **Restorative Justice** encourages a more restorative approach to the justice system by focusing on healing, reconciliation, and repairing harm rather than solely on punishment. This can lead to more holistic outcomes that address the needs of victims, offenders, and the community. **Enhanced Data Quality:** Active participation can lead to more prosperous and contextual data, as it incorporates the experiences and local knowledge of the people involved. This contributes to a more nuanced understanding of the issues, making more informed and relevant legal decisions.

Legal Pluralism: Recognizes and values non-state legal systems, such as customary law. Acknowledging these systems, the participatory paradigm embraces diverse legal traditions, promoting inclusivity and respect for local cultural practices within the broader legal framework. In “*Restorative Justice and Responsive Regulation*,” John Braithwaite explains that “the participatory approach in law, like restorative justice, can lead to more satisfying justice outcomes for victims

and offenders and can help rebuild and strengthen communities.” This statement highlights the importance of involving all parties related to a legal case, including victims and offenders, in seeking solutions (as practiced in restorative Justice), which can yield better results for everyone involved. Furthermore, this approach can improve relationships within the communities affected by crime. For example, in the criminal justice system, the traditional approach often focuses on punishing the offender, with the victim frequently relegated to the role of an object in the legal process. In contrast, restorative Justice emphasizes restoring the losses experienced by the victim and allows the offender to make amends for their wrongdoing. Now, how does this relate to Ferdy Sambo’s legal case? As previously mentioned, the Ferdy Sambo case is complex and has widespread implications. If we apply the principles of restorative Justice in this case, in theory, we could:

Restore the Victim: The victim’s family (the parents) could be involved in the resolution process, allowing them to express their feelings and needs directly. This could help them feel heard and valued. **Opportunity for the Offender:** The offender could acknowledge their wrongdoing and take responsibility for their actions. **Community Involvement:** By involving the community and all relevant stakeholders in the resolution process, we can work towards rebuilding trust and a sense of safety within the community. In conclusion, implementing restorative justice principles in the Ferdy Sambo case could foster a more holistic approach to Justice that emphasizes healing, accountability, and community cohesion, ultimately contributing to a more just and resilient society.

Disadvantages:¹⁷ **Potential Conflict with the Principle of Equality Before the Law:** The Participatory approach may produce different outcomes for similar cases. **Implementation Complexity:** Involving many parties in the legal process can make it slower and more complicated. **Risk of Domination by Certain Groups:** Without proper oversight, the Participatory process can be dominated by more assertive or vocal groups. **Difficulty in Data Analysis:** The data generated from participatory processes can be very diverse and complex, making data analysis challenging. Santos, in “Toward a New Legal Common Sense,” states¹⁸: “While the participatory legal process can enhance legitimacy, it also risks reinforcing existing power imbalances if not managed carefully. The challenge is to ensure that all voices are genuinely heard and considered.”

The above statement conveys that involving many people in legal decision-making (the participatory legal process) can make those legal decisions more widely accepted by society. However, if we are not careful, this approach could strengthen the influence of those who already hold power, while the voices of the weak remain unheard. In the case of Ferdy Sambo, for example, involving the community in the resolution process could enhance public trust in the legal process. However, if not done carefully, it could provoke division within the community or even be exploited by certain parties for personal interests. The question that needs to be answered is how we can ensure that all voices, including those from minority groups, are heard in the decision-making process.

Decisions? What mechanisms can be used to prevent manipulation in the participation process? Now, if we relate this to the Ferdy Sambo case: the Ferdy Sambo case, which involves the pre-

¹⁷ Norman K. Denzin and Yvonna S. Lincoln, *“The SAGE Handbook of Qualitative Research,”* (SAGE, 2005). Page 34.

¹⁸ Boaventura De Sousa Santos, *“Toward a New Legal Common Sense: Law, Globalization, and Emancipation.”* (Cambridge University Press, 2002). Page 90.

meditated murder of Brigadier J, illustrates several aspects relevant to the Participatory paradigm in law: Need for Transparency: This case highlights the importance of public involvement in monitoring legal processes, especially in cases involving high-ranking officials. Role of Media and Civil Society: Public pressure and intense media coverage play a crucial role in ensuring that this case is thoroughly investigated, reflecting the participatory aspect of law enforcement. Challenges in the Justice System: This case also demonstrates the challenges of applying participatory principles in the justice system, particularly when involving individuals with significant power and influence.

Adrianus Meliala, an Indonesian criminologist, stated in an interview that “the Ferdy Sambo case underscores the importance of public participation in monitoring legal processes. Public and media pressure has played a crucial role in ensuring that this case is taken seriously, even when involving high-ranking police officials.” This indicates that the Ferdy Sambo case illustrates the potential and challenges of the participatory approach in law. On one hand, public and media involvement helps ensure accountability. On the other hand, this case reveals the complexity of handling cases involving parties with significant power, which can challenge participatory principles.¹⁹

This analysis suggests that the Participatory Paradigm, as reflected in the Ferdy Sambo case, can enhance transparency, accountability, and the legal system’s legitimacy. However, its implementation requires careful consideration to balance public participation with the integrity of legal processes. This case also highlights the need for broader legal reform in Indonesia, recognizing social-legal complexities and promoting a more inclusive and responsive approach. Guba and Lincoln’s participatory paradigm offers many benefits in decision-making and more inclusive research. However, challenges related to time, resources, and potential conflicts must also be considered. Knowledge of these strengths and weaknesses can assist in designing and implementing a more effective participatory paradigm.²⁰

Second, Public Participation in Criminal Law Enforcement: The participatory paradigm encourages community involvement in criminal law enforcement, not just as crime reporters but also in monitoring the judicial process. Muladi, in his book *Kapita Selektta Sistem Peradilan Pidana*, states: “Community participation in the criminal justice system is not just about reporting crimes, but also about active oversight of the judicial process. This includes monitoring court sessions, reporting irregularities, and involvement in crime prevention programs. Such participation can enhance the transparency and accountability of the criminal justice system.” This means that public pressure and oversight are crucial in ensuring that the Ferdy Sambo case is taken seriously despite involving high-ranking police officials.

Third, Diversion and Penal Mediation: The participatory paradigm in criminal law is also reflected in diversion and penal mediation, especially for some instances considered less severe. Eva Achjani Zulfa, an Indonesian criminal law expert, explains in her book *Pergeseran Paradigma Pemidanaan*: “Diversion and penal mediation represent the application of the participatory paradigm in criminal law. This approach allows for the resolution of criminal cases outside the court-

¹⁹ Kirchengast, T., Badaró, T., & Pardini, L. (2021). “The mixed and hybrid criminal courts of Brazil: Mainstreaming restoration, rehabilitation and community justice in a human rights context.” *International Review of Victimology*, 27(1), 23-42. <https://doi.org/10.1177/0269758020916261>.

²⁰ Kristin Kalsem, ‘Feminist Judging: Theories and Practices’, in Deborah Brake, Martha Chamallas, and Verna L. Williams (eds), *The Oxford Handbook of Feminism and Law in the United States* (2023; online edn, Oxford Academic, 9 June 2021), <https://doi.org/10.1093/oxfordhb/9780197519998.013.32>.

room by involving offenders, victims, and the community. Although it cannot be applied to all types of crimes, this approach can help reduce the burden on the justice system and provide more restorative solutions.”

Although diversion and penal mediation are irrelevant in severe cases like Ferdy Sambo, these concepts demonstrate how the participatory paradigm can be applied within the criminal justice system for lighter cases. Closing Argument: The Participatory Paradigm in Law and the Ferdy Sambo Case “Restorative justice is a process to involve, to the greatest extent possible, those who have a stake in a given offense and collectively identify and address harms, needs, and obligations, to heal and put things as right as possible.”²¹

Zehr’s statement reflects the participatory paradigm in the context of restorative justice, which aligns with our previous discussion about participatory approaches in criminal law. It shows how restorative justice seeks to involve all parties affected by a crime in seeking resolution, contrasting with the traditional criminal justice system, focusing more on punishing offenders. In cases like Ferdy Sambo, although the serious nature of the crime may limit the full application of restorative justice, the principles expressed by Zehr, such as the involvement of various parties and efforts to address harm, can still be considered in the judicial process and post-crime recovery. The Participatory Paradigm, both in the philosophy of science and in the context of law, offers a rich and complex perspective on how knowledge is generated and how justice can be upheld. Our analysis has shown that this approach has significant potential to enhance the legal system’s legitimacy, transparency, and effectiveness. However, it also presents challenges that need to be addressed.

In the philosophy of science, the participatory paradigm emphasizes the importance of involving research subjects as co-creators of knowledge. This allows for a deeper and more contextual understanding and raises questions about objectivity and generalization. In law philosophy, the participatory approach encourages community involvement in legal processes, from legislation to law enforcement. This can enhance legal legitimacy and promote more restorative justice, but it also faces challenges in terms of implementation and potential conflicts with established legal principles.

In criminal law, the participatory paradigm is reflected in restorative justice, diversion, and penal mediation. These approaches offer more inclusive alternatives that can reduce the burden on the justice system. However, their implementation must be handled carefully to balance public participation and the protection of individual rights. The Ferdy Sambo case is an intriguing reflection on the dynamics of the participatory paradigm within Indonesian law.²² On the one hand, the active involvement of the media and the public in monitoring this case reflects the positive aspects of the participatory approach, helping to ensure that it is taken seriously despite involving high-ranking officials. On the other hand, this case also illustrates the challenges of applying participatory principles in complex and sensitive cases, where public pressure must be balanced with the integrity of the legal process and the rights of the accused.

²¹ Ken Gee-kin Ip. “Fulfilling the Mandate of National Reconciliation in the Extraordinary Chambers in the Courts of Cambodia (ECCC) – An Evaluation through the Prism of Victims’ Rights”, *International Criminal Law Review* 13, 4 (2013): 865-894, doi: <https://doi.org/10.1163/15718123-01304004>.

²² A. Reyes-Torres, , Portalés-Raga, M., Domene-Benito, R. (2024). “Multiliteracies and Picturebooks: A Gender-Based Critical and Aesthetic Engagement with Social Justice Through a Nonfictional Heroine. In: Tavares, V. (eds)” *Empowering Language Learners in a Changing World through Pedagogies of Multiliteracies*. Palgrave Macmillan, Cham. https://doi.org/10.1007/978-3-031-51889-8_9.

The participatory legal paradigm offers opportunities for a more responsive, inclusive, and community-rooted legal system. However, its application requires a careful balance between public participation and fundamental legal principles. The Ferdy Sambo case reminds us of this complexity and the importance of continuously evaluating and adapting our approaches to upholding justice. In drafting a closing argument as a judge utilizing the participatory paradigm in the Ferdy Sambo case, the following framework could be adopted:

In resolving this highly complex and sensitive case, the judge emphasizes the importance of the participatory paradigm we have applied throughout the legal process.²³ The involvement of various stakeholders, from the victim's family and the community to civil organizations, has provided valuable insights and allowed us to view this case from multiple perspectives. The decision that the judge will convey is based not only on the evidence and facts presented in court but also on the community's aspirations for justice, transparency, and accountability. Throughout the trial, the judge has listened to voices that may have previously been marginalized. Your involvement has helped us understand the broader impact of the actions taken by the defendant.

The judge acknowledges that every decision made affects not only the individuals involved but also the entire community. Therefore, this decision is not merely about punishing or acquitting but also restoring public trust in the legal system. In this context, we are committed to ensuring that justice is not only seen as an outcome but as a process that involves all parties.

Thus, this decision will strengthen justice and security in society. We invite all parties to continue contributing to creating a better legal system where every voice is heard and justice is indeed upheld. This argument emphasizes the importance of all parties' involvement in the legal process and the decision's impact on society as a whole. It reflects the principles of the participatory paradigm, which prioritizes collaboration and inclusivity in law enforcement.

Going forward, legal practitioners, policymakers, and civil society must continue developing and refining the application of the participatory paradigm within the Indonesian legal system. This includes seeking innovative ways to enhance public participation in legal processes while maintaining the justice system's integrity and protecting individual rights. With a balanced and measured approach, the participatory paradigm can be a powerful tool for enhancing justice and public trust in the legal system in Indonesia.

5. Conclusion

From the explanation, it is clear that the Participatory Paradigm can surpass Retributive Justice in the Ferdy Sambo trial, where Participatory Justice plays a fundamental role in applying the restorative justice concept. The comparison between the principles of Participatory Justice and Retributive Justice in high-profile criminal cases shows that the sanctions applied, such as mediation, rehabilitation, and community resolution, align with the values already present in the Participatory Paradigm. Therefore, restorative justice does not contradict tradition or culture but enriches and strengthens existing conflict-resolution practices.

Applying the participatory paradigm in both the philosophy of science and legal philosophy offers several advantages, such as increasing inclusivity, transparency, and legitimacy by involving multiple stakeholders in producing knowledge and legal processes. In the case of the Ferdy

²³ Trebor Scholz, and Rachel Cobcroft. 2006. "Free: Acknowledgments:". *M/C Journal* 9 (4). <https://doi.org/10.5204/mcj.2640>.

Sambo trial, public participation played a crucial role in ensuring accountability and proper oversight of the legal proceedings. However, this approach also has drawbacks, including balancing public participation with the objectivity of the judicial process, potential conflicts of interest, and maintaining the integrity of the legal system. While the participatory paradigm can enhance public trust and promote more restorative justice, its implementation must be carefully managed, especially in large and complex cases like Ferdy Sambo's.

6. Recommendation

In order to address these challenges, it is essential for legal systems to continually evaluate and adapt their processes to maintain fairness and impartiality. One potential solution could be establishing independent review boards or oversight committees to monitor and assess the impact of public participation on legal proceedings. Additionally, ensuring that all stakeholders are properly educated on their roles and responsibilities in the legal process can help prevent misunderstandings and conflicts. By proactively addressing these issues, legal systems can better balance the benefits of public participation with the need for impartiality and fairness in judicial decision-making. I recommend implementing independent review boards or oversight committees to ensure public participation and fairness in legal proceedings. It is important to educate all stakeholders on their roles and responsibilities to avoid misunderstandings and conflicts. By addressing these issues proactively, legal systems can effectively balance the benefits of public participation with maintaining impartiality in decision-making processes. This approach will help enhance transparency and accountability within the legal system, ultimately increasing public trust and confidence in the judiciary. Additionally, establishing clear guidelines and protocols for public participation can help streamline the process and prevent potential bias or favoritism. By taking these steps, legal systems can uphold the principles of justice and ensure that all individuals are treated fairly and equally under the law.

7 References

- Arief, Barda Nawawi. *"Bunga Rampai Kebijakan Hukum Pidana."* Prenada Media, 2016.
- Braithwaite, John. *"Restorative Justice & Responsive Regulation."* Oxford University Press, USA, 2002.
- Chandra, Jessica., "View of Perlindungan Hukum Terhadap Korban Perempuan Pada Tindak Kekerasan Dalam Rumah Tangga." *Syntax Literate: Jurnal Ilmiah Indonesia*, n.d. <https://jurnal.syntaxliterate.co.id/index.php/syntax-literate/article/view/13925/9147>.
- De Sousa Santos, Boaventura. *Toward a New Legal Common Sense: Law, Globalization, and Emancipation.* Cambridge University Press, 2002.
- Denzin, Norman K., and Yvonna S. Lincoln. *"The SAGE Handbook of Qualitative Research."* SAGE, 2005.
- Fals-Borda, Orlando, and Muhammad Anisur Rahman. *"Action and Knowledge: Breaking the Monopoly with Participatory Action Research."* Intermediate Technology Publications, 1991.
- Galanter, Marc. "Justice in Many Rooms: Courts, Private Ordering, and Indigenous Law." *The Journal of Legal Pluralism and Unofficial Law* 13, no. 19 (January 1, 1981): 1-47. <https://doi.org/10.1080/07329113.1981.10756257>.

- Guba, Egon G., and Yvonna S. Lincoln. "Fourth Generation Evaluation." SAGE, 1989.
- Heron, John, and Peter Reason. "A Participatory Inquiry Paradigm." *Qualitative Inquiry* 3, no. 3 (September 1, 1997): 274-94. <https://doi.org/10.1177/107780049700300302>.
- Ip, Ken Gee-kin. "Fulfilling the Mandate of National Reconciliation in the Extraordinary Chambers in the Courts of Cambodia (ECCC) - An Evaluation through the Prism of Victims' Rights", *International Criminal Law Review* 13, 4 (2013): 865-894, doi: <https://doi.org/10.1163/15718123-01304004>.
- James, Michael Rabinder "Multicultural Jurisdictions: Cultural Differences and Women's Rights by Ayelet Shachar." *Journal of Philosophy of Education* 41, no. 3 (January 23, 2008): 497-98. <https://doi.org/10.1111/j.1467-9752.2007.00564.x>.
- Kalsem, Kristin, 'Feminist Judging: Theories and Practices', in Deborah Brake, Martha Chamallas, and Verna L. Williams (eds), "The Oxford Handbook of Feminism and Law in the United States." (2023) online edn, *Oxford Academic*, 9 June 2021), <https://doi.org/10.1093/oxfordhb/9780197519998.013.32>.
- Kemmis, Stephen, Robin McTaggart, and Rhonda Nixon. "A New View of Participation: Participation in Public Spheres." In Springer eBooks, 33-49, 2013. https://doi.org/10.1007/978-981-4560-67-2_2.
- Kirchengast, T., Badaró, T., & Pardini, L. (2021). "The mixed and hybrid criminal courts of Brazil: Mainstreaming restoration, rehabilitation and community justice in a human rights context." *International Review of Victimology*, 27(1), 23-42. <https://doi.org/10.1177/0269758020916261>.
- Martinez-Vargas, Carmen, Melanie Walker, F. Melis Cin, and Alejandra Boni. 2021. "A Capabilitarian Participatory Paradigm: Methods, Methodologies and Cosmological Issues and Possibilities." *Journal of Human Development and Capabilities* 23 (1): 8-29. doi:10.1080/19452829.2021.2013173.
- Merry, Sally Engle. "Legal Pluralism." *Law & Society Review* 22, no. 5 (January 1, 1988): 869-96. <https://doi.org/10.2307/3053638>.
- Ostrom, Elinor. "Governing the Commons: The Evolution of Institutions for Collective Action." Cambridge University Press, 1990.
- Reyes-Torres, A., Portalés-Raga, M., Domene-Benito, R. (2024). Multiliteracies and Picturebooks: A Gender-Based Critical and Aesthetic Engagement with Social Justice Through a Nonfictional Heroine. In: Tavares, V. (eds) Empowering Language Learners in a Changing World through Pedagogies of Multiliteracies. Palgrave Macmillan, Cham. https://doi.org/10.1007/978-3-031-51889-8_9.
- Samekto, Adji. "Antara Studi Normatif dan Keilmuan." *Jurnal Hukum Progresif* 2, no. 2 (July 18, 2011): 55. <https://doi.org/10.14710/hp.2.2.55>.
- Scholz, Trebor, and Rachel Cobcroft. 2006. "Free: Acknowledgments:." *M/C Journal* 9 (4). <https://doi.org/10.5204/mcj.2640>.
- Szymańska, Maria. 2022. "The Subject-Participatory Paradigm in Correlation With the Constitutive Features of Pedagogical Qualitative Research: A Personalistic Perspective". *Multidisciplinary Journal of School Education* 11 (1 (21), 151-69. <https://doi.org/10.35765/mjse.2022.1121.08>.
- Tjitra, Andry Triyanto, and Eko Ari Wibowo. "Hakim Sebut Replik Dalam Sidang Pleidoi Ferdy Sambo, Apa Maksudnya?" *Tempo*, January 25, 2023. <https://www.tempo.co/hukum/hakim-sebut-replik-dalam-sidang-pleidoi-ferdy-sambo-apa-maksudnya-225815>.
- Wakeford, Tom, Jasber Singh, Bano Murtuja, Peter Bryant, and Michel Pimbert. "The SAGE Handbook of Action Research." SAGE Publications Ltd eBooks, 2008. <https://doi.org/10.4135/9781848607934>.