

Contempt of Court as a Means of Addressing Noncompliance with the Enforcement of Court Decisions in Civil Cases

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Abstract: Non-compliance with final and binding court decisions in civil cases remains a major issue that undermines legal certainty and judicial authority in Indonesia. The absence of strict legal mechanisms against parties who intentionally disregard court rulings has contributed to ineffective enforcement practices. In this context, contempt of court may function as a legal instrument to compel compliance through the imposition of sanctions on disobedient parties. This study aims to analyze the implementation of contempt of court in Singapore regarding compliance with the enforcement of civil court decisions and to examine the urgency of regulating contempt of court within the Indonesian legal system as an effort to address non-compliance with court decisions. This research employs a normative legal research method using statutory, conceptual, and comparative approaches. The study is based on legislation, legal doctrines, judicial practices, and relevant scholarly literature concerning contempt of court. The findings show that the strict application of contempt of court in Singapore has been effective in strengthening compliance with court decisions and maintaining judicial authority. Therefore, regulating and implementing contempt of court in Indonesia is necessary to improve the effectiveness of civil judgment enforcement, uphold legal certainty, and protect the dignity and authority of the judiciary.

Keywords: *contempt of court, non-compliance, civil court*

Introduction

The enforcement of substantive law constitutes an inseparable unity with the enforcement of procedural law, as both operate concurrently within a legal system designed to realize justice for society without exception. Substantive law and procedural law complement one another in ensuring that the legal system functions effectively and that the rights and obligations recognized by law are properly protected and enforced. Similarly, the enforcement of civil law cannot be separated from civil procedural law, considering that the ultimate objective of the civil dispute resolution process is not merely the issuance of a court judgment that has obtained permanent

legal force, but also the proper implementation and execution of such judgment by the disputing parties, particularly through voluntary compliance.¹

However, numerous problems continue to arise in relation to parties who have been declared liable and ordered by the court to comply with final and binding judgments in civil cases yet fail or refuse to implement the contents of such judgments voluntarily or even through compulsory enforcement measures. Consequently, judicial institutions in Indonesia continue to face substantial challenges, particularly about non-compliance with the execution of final and binding civil court judgments. These challenges must be addressed to ensure that parties who lose civil disputes are legally obligated to comply with and implement the contents of court judgments that have obtained permanent legal force.²

This situation undoubtedly undermines the authority and dignity of the judiciary, especially in relation to the execution of civil judgments.³ Public perception toward judicial institutions in Indonesia has gradually become increasingly concerning, as courts are no longer consistently perceived by society as institutions capable of delivering justice and enforcing the law effectively.⁴ One of the factors contributing to this condition is the absence of specific and stringent regulations imposing sanctions upon parties who intentionally disregard or ignore the contents of court judgments.⁵ Therefore, issues relating to non-compliance with the execution of civil judgments continue to occur, thereby weakening judicial authority and diminishing legal certainty. Furthermore, the rights of parties who have prevailed in civil disputes are frequently neglected because the losing parties fail to implement final and binding court judgments, resulting in the legal efforts pursued by successful litigants becoming ineffective and meaningless in practice.

To overcome these problems, it is necessary to implement strict legal regulations through the application of contempt of court provisions.⁶ Contempt of court refers to conduct that may be regarded as insulting, undermining, or disobeying the authority of the court.⁷ Within the context of civil law, contempt of court is commonly referred to as civil contempt, which is used to describe acts of disobedience toward orders or judgments issued by civil courts. A person who has a legal obligation to implement the contents of a final and binding court judgment but intentionally fails to do so either voluntarily or after compulsory enforcement measures have been undertaken, may therefore be categorized as committing contempt of court. Such conduct may include acts of disobedience or disrespect toward court orders and judicial decisions that potentially obstruct the judicial process and hinder the realization of justice. Accordingly, parties who are considered to have committed contempt of court may be subjected to strict legal sanctions. These sanctions are

¹ Geofanny M.C. Runtu, Deasy Soekromo, Victor D. D. Kasenda, "Procedures for the Enforcement of Court Judgments in Civil Cases," *Journal of the UNSRAT Faculty of Law*

² M. Yahya Harahap, *The Scope of Problems in Civil Execution* (Jakarta: Sinar Grafika, 2007), p. 21.

³ Rozikin, O. (2019). "Contempt of Court in Indonesian Law." *JCIC: Journal of the CIC Institute for Social Research and Consultation*, 1(1)

⁴ Luhut M.P. Pangaribuan. "Lawyers and Contempt of Court: A Case Before the Professional Ethics Council." Jakarta: Djambatan Publishers. 2020. p. 32.

⁵ Anita Afriana, "Contempt of Court: Law Enforcement and Regulatory Models in Indonesia," *Journal of Law and Justice*, vol. 7, no. 3, 2018

⁶ Wahyu Wagiman. "Contempt of Court in the Draft Criminal Code," *Elsam Press: Jakarta*. 2005. p. 32.

⁷ Deni Niswansyah, "Contempt of Court in the Judicial System in Indonesia," thesis, Airlangga University. 2014

expected to function as coercive legal instruments to compel individuals to comply with and implement court judgments. Through the existence of strict sanctions, it is hoped that no parties will continue to disregard final and binding civil court judgments.

A comparative examination of the legal system in Singapore demonstrates that the implementation of contempt of court provisions has been relatively effective in ensuring compliance with civil court judgments. Singapore applies contempt of court regulations against parties who fail to comply with court judgments voluntarily or who obstruct the enforcement process, thereby strengthening judicial authority and improving the effectiveness of judgment execution. Reflecting upon the legal framework adopted in Singapore, the implementation of contempt of court regulations within the Indonesian legal system may constitute an important legal breakthrough capable of addressing the persistent problem of non-compliance with the execution of final and binding civil judgments.

This research is conducted with the objective of analyzing the implications of the application of contempt of court in relation to compliance with the enforcement of civil court judgments in Singapore and examining the urgency of regulating contempt of court within the Indonesian legal system as an effort to address non-compliance with the enforcement of civil judgments. The author expects that this research will contribute both theoretically and practically by providing a deeper understanding regarding the importance of contempt of court regulations as a mechanism for overcoming non-compliance with the execution of final and binding civil court judgments, while also offering practical guidance for future legislative and regulatory development in Indonesia.

Research Method

This study employed a normative juridical research method, which focuses on the examination of prevailing legal norms and relevant legal doctrines. The approaches applied in this research included the statutory approach and the historical approach. The statutory approach was conducted through an analysis of various legal provisions governing contempt of court in the enforcement of civil judgments, including Law Number 48 of 2009 concerning Judicial Power, Law Number 14 of 1985 concerning the Supreme Court along with its amendments, as well as other related regulations.

The study utilized secondary legal materials consisting of primary legal materials, such as legislation, official legal documents, and court decisions; secondary legal materials in the form of books, scholarly journals, and legal scholars' opinions; and tertiary legal materials, including legal dictionaries and encyclopedias. The collected data were analyzed qualitatively through interpretation and systematic legal analysis based on the research problems formulated in this study. All data obtained were organized and examined systematically to provide a comprehensive understanding of the application of the concept of contempt of court as an effort to address non-compliance in the enforcement of court judgments in civil cases.

Analysis of the Implications of the Application of Contempt of Court in Relation to Compliance with the Enforcement of Civil Court Judgments in Singapore

According to the 5th edition of Black's Law Dictionary, published by West Publishing Co. in 1979, contempt of court is defined as any act intended to disrupt, obstruct, or interfere with the court in the administration of justice, or any conduct aimed at undermining the authority and dignity of the court. Furthermore, contempt of court is classified into two categories:

1. Direct Contempts / Criminal Contempts

Direct contempt refers to acts committed directly in the presence of the court, such as insulting remarks or violent conduct, or acts occurring sufficiently close to the courtroom that they obstruct or disrupt the orderly administration of judicial proceedings. Such conduct may be punished summarily without extensive procedural requirements. Although also referred to as "criminal contempts," this category is more appropriately distinguished from "civil contempts."

2. Indirect Contempts / Civil Contempts

Constructive or indirect contempt refers to acts committed outside or away from the presence of the court, yet which have the effect of obstructing or impairing the administration of justice. This term is primarily used to describe the failure or refusal of a party to comply with lawful court orders, injunctions, or judgments requiring that party either to perform or to refrain from performing a particular act.

Based on the two points above, it can be concluded that civil contempt refers to conduct committed by a party against whom a mandate, order, or obligation has been imposed by the court.⁸

In Singapore, the concept of contempt of court is not regulated under a single specific statutory provision but is instead derived from both the common law tradition inherited from English law and various provisions contained in national legislation. Singapore continues to uphold the principles of the common law of contempt adopted from the English legal system. Consequently, the regulation of contempt of court is established not only through statutory law but also through judicial precedents and case law.

Within Singapore's civil law system, the relevant concept is referred to as *civil contempt of court*. Civil contempt of court arises when an individual violates or fails to comply with a lawful court order, particularly in civil proceedings. Its primary purpose is not merely punitive, but coercive in nature, namely, to compel compliance with court orders to preserve the authority and dignity of the judiciary and to ensure the effective enforcement of legal decisions. Conduct that may constitute civil contempt of court includes failure to comply with court orders or injunctions, non-fulfillment of orders relating to payment or the submission of documents, and disregard of undertakings given before the court.

⁸ Otto Hasibuan, "Contempt of Court in Indonesia: Is It Necessary?", *Journal of Law and Justice*, Volume 4, Issue 2, July 2015: 267–274

The legal basis governing contempt of court in Singapore is regulated under several legal instruments, including the following:

1. The *Administration of Justice (Protection) Act 2016* (AJPA), particularly Section 15 concerning *Disobedience to Court Order*, which stipulates that non-compliance with a court order constitutes civil contempt.⁹
2. The *Rules of Court 2021*, Order 52, which regulates the procedures for applications and enforcement measures relating to contempt proceedings.¹⁰
3. The *Supreme Court of Judicature Act* (Cap. 322), Section 7(1), which grants the courts the authority to punish acts of contempt.¹¹
4. Common law cases, such as *Pertamina Energy Trading Ltd v Karaba Bodas Co LLC* [2007] 2 SLR(R) 518, which provide jurisprudential guidance regarding the application of contempt of court principles.

Based on judicial decisions and the interpretation of Section 15 of the AJPA, several elements must be satisfied for conduct to constitute civil contempt, namely:

1. The existence of a valid court order;
2. Knowledge of the order by the relevant party;
3. Wilful or intentional failure to comply with the order; and
4. The absence of a reasonable excuse for such non-compliance.

Where these four elements are fulfilled, the court may declare an individual guilty of civil contempt.

The procedural framework governing civil contempt is further regulated under the *Rules of Court 2021*, Order 52. Generally, the procedure begins with an application for leave submitted to the General Division of the High Court to initiate contempt proceedings. Subsequently, an official notice of motion must be served upon the party alleged to have committed contempt. Thereafter, during the hearing process, the court examines and evaluates the evidence of the alleged violation. Where the allegation is proven, the court may impose coercive sanctions or criminal penalties.

Section 12 of the *Administration of Justice (Protection) Act 2016* (AJPA) regulates the penalties for acts constituting civil contempt of court, providing that:

“A person guilty of contempt of court is liable to a fine not exceeding \$100,000 or to imprisonment for a term not exceeding 3 years or both.”

This provision means that any person found guilty of contempt of court may be subjected to a fine not exceeding SGD 100,000, imprisonment for a term not exceeding three years, or both penalties simultaneously.

An example of non-compliance in Singapore can be observed in the case of *Mok Kah Hong v. Zheng Zhuan Yao* [2017] SGCA 3. In this case, the defendant failed to comply with a court judgment relating to the repayment of funds and was consequently found guilty of civil contempt due to non-compliance with the payment order. The court imposed a sentence of eight months' imprisonment; however, the sentence was suspended to provide the defendant with an

⁹ *Administration of Justice (Protection) Act 2016* (AJPA) di Section 15 – *Disobedience to court order*

¹⁰ *Rules of Court 2021*, Order 52

¹¹ *Supreme Court of Judicature Act* (Cap. 322), s.7(1)

opportunity to comply with the judgment. In this regard, the court adopted a coercive approach, utilizing the threat of punishment as a mechanism to encourage compliance with judicial orders.¹²

Another example can be seen in the case of OCM Opportunities Fund II v. Burhan Uray [2016] SGCA 8. The case concerned a violation of a *Mareva injunction*, namely an asset-freezing order intended to prevent the transfer or dissipation of assets by the defendant prior to the resolution of the dispute. However, the defendant failed to comply with the order and continued to transfer funds despite having received the freezing injunction. Consequently, the court held that the defendant had lawfully committed civil contempt due to the deliberate disregard of a court order. The defendant was threatened with imprisonment as a sanction. In this case, the punishment imposed constituted a form of *coercive punishment*, aimed at compelling compliance and preserving the authority and dignity of the court.¹³

The cases discussed above demonstrate that the sanctions imposed by Singapore in cases of civil contempt are coercive in nature. This means that the punishment is intended not merely to penalize the offender, but also to compel compliance with court orders and encourage the fulfillment of obligations that have been deliberately disregarded. Such coercive measures may include detention until compliance is achieved as well as monetary penalties imposed for each day of delay.

The application of civil contempt serves several important objectives, namely to uphold the authority and dignity of the judiciary, ensure the effective enforcement of civil judgments, protect the rights of successful litigants so that judicial decisions are not disregarded, and reinforce the principle of the rule of law, under which all parties are equally subject to the law.

It may therefore be concluded that Singapore treats non-compliance with court orders in civil cases as a form of civil contempt of court, regulated under Section 15 of the *Administration of Justice (Protection) Act 2016* and Order 52 of the *Rules of Court 2021*. The sanctions imposed may take the form of fines, imprisonment, or coercive orders requiring compliance with judicial decisions. Singapore regards the effective implementation of the law and court orders as a fundamental priority in maintaining public confidence in the judicial system.

Analysis of the Urgency of Regulating Contempt of Court in Indonesian Law to Address Non-Compliance with the Enforcement of Civil Judgments

The regulation governing the enforcement of court judgments in Indonesia has not yet formally adopted the concept of contempt of court against parties who fail to comply with judicial decisions. This is primarily because the concept of contempt of court in Indonesia has not been comprehensively regulated in the manner found in jurisdictions such as Singapore.¹⁴ In Indonesia, the term *contempt of court* was first formally introduced in 1985 through the enactment of Law Number 14 of 1985 concerning the Supreme Court.

In the General Elucidation, point 4, the law provides that:

¹² Civil Appeal No 177 of 2013 (Summons No 240 of 2015), Court of Appeal, Republik Singapura, 4 Februari 2016

¹³ Suit 50/2004, SIC 1150/2004, High Court, 6 Agustus 2004

¹⁴ Ida Keumala Jeumpa, "Contempt of Court: A Comparison of Various Legal Systems," *Kanun Journal of Legal Science*. Vol. 2, No. 62, Vol. XVI (April 2014)

“In order to better ensure the creation of the most conducive conditions for the administration of justice in upholding law and justice based on Pancasila, it is necessary to establish legislation regulating actions, behavior, attitudes, and/or statements that may degrade or undermine the authority, dignity, and honor of the judiciary, commonly referred to as Contempt of Court.”

This provision reflects the recognition of the importance of protecting the authority and dignity of judicial institutions within the Indonesian legal system.¹⁵

The concept of *contempt of court* may also be identified within the Indonesian Code of Criminal Procedure (*Kitab Undang-Undang Hukum Acara Pidana* – KUHAAP). Although KUHAAP does not specifically regulate contempt of court as an independent legal concept, it contains several provisions that may be interpreted as efforts to uphold the dignity and authority of the judiciary.¹⁶ Likewise, the Indonesian Criminal Code (*Kitab Undang-Undang Hukum Pidana* – KUHP) includes various provisions that may be applied against acts degrading the dignity of the court, including insults directed at public officials or institutions, attempts to improperly influence judges, disturbances during court proceedings, failure to fulfill obligations as a witness, and the destruction or damage of evidence.¹⁷

Nevertheless, it is argued that the regulation of contempt of court should not merely be limited to specific legislation but should also be incorporated into the Draft Civil Procedure Code in order to provide a more comprehensive legal framework for addressing non-compliance with court proceedings and judicial decisions in civil matters.

Based on the terminological guidance contained in the General Elucidation of the Supreme Court Law, Oemar Seno Adji classified acts constituting contempt of court into several categories, as follows:

1. **Misbehaving in Court**

Misbehaving in court refers to improper or inappropriate conduct during court proceedings that disrupts or obstructs the orderly administration of justice. Contempt of court arising from such misconduct serves two principal functions. First, it functions to address disturbances and restore order so that judicial proceedings may continue properly. Second, it serves a repressive function by imposing sanctions or punishment upon individuals who engage in improper conduct warranting judicial reprimand.

2. **Disobeying Court Orders**

Disobedience to court orders refers to the failure or refusal to comply with instructions issued by the court, which may ultimately undermine the authority, dignity, and principles of justice upheld by judicial institutions. This category generally encompasses actions by parties who fail to execute court orders or neglect obligations arising within ongoing legal proceedings. Under the Indonesian Criminal Code (KUHP), such conduct may constitute a criminal violation of judicial authority.

¹⁵ Muhammad Fadli, “Contempt of Court in the Enforcement of Law in Indonesia,” *Journal of Legal Analysis*, Volume 3, Issue 1, April 2020

¹⁶ Dian Rositawati, *Protecting Freedom of Expression: An Analysis of Criminal Law and Human Rights in Indonesian Court Rulings*, E-book, Jakarta, November 2022

¹⁷ Siti Nurhaliza, “A Legal Analysis of Electronic Criminal Trials,” *Unimal Faculty of Law Student Journal*, Vol. 4, No. 1 (2021): January

3. Scandalizing the Court

Scandalizing the court refers to statements made outside judicial proceedings that potentially damage the reputation, integrity, or impartiality of the judiciary, commonly through publications containing negative opinions or criticism. Such conduct constitutes a form of contempt directed at the neutrality and integrity of judges during the adjudicative process. The regulation of this conduct aims to preserve the credibility, objectivity, and integrity of the judicial system while strengthening public confidence in judicial institutions.

4. Obstructing Justice

Obstructing justice refers to conduct intended to interfere with or disrupt the administration of justice and the proper functioning of legal proceedings. Such acts may diminish the fairness, effectiveness, or efficiency of judicial processes and are frequently manifested through direct actions that hinder the conduct of court proceedings.

5. Sub Judice Rule

The sub judice rule concerns contempt committed through publications or public communications relating to ongoing judicial proceedings. Contempt through media reporting or publication refers to statements, whether oral or written, that have the potential to improperly influence judicial decision-making. Such conduct may create legal complications and interfere with the administration of justice by shaping public opinion regarding matters currently under judicial examination.

When associated with the issues discussed in this study, the concept is highly relevant to situations involving non-compliance with the enforcement of civil court judgments. This theory provides an appropriate classificatory basis for determining whether certain conduct may be categorized as contempt of court. The principle of the rule of law emphasizes the importance of safeguarding justice by ensuring that the law, as the supreme norm, is consistently enforced, and that any act disregarding the implementation of civil court judgments must be held accountable in accordance with applicable legal provisions. The classification of acts constituting contempt of court is intended to establish clear and detailed standards that may serve as guidelines in the formulation of legislation concerning contempt of court. Legal certainty can only be achieved through explicit statutory regulations that are free from multiple interpretations.

Civil lawsuits generally arise from disputes or conflicts between parties concerning the protection or restoration of violated civil rights. In practice, claims may be submitted either in writing or orally to the chairperson of the district court as a means of seeking legal protection and certainty regarding the plaintiff's infringed rights. Nevertheless, litigation should not necessarily be regarded as the ultimate mechanism for dispute resolution, since judicial decisions inherently produce a *win-lose solution*, which often leaves one of the parties dissatisfied. Consequently, dissatisfaction with the judgment may lead to non-compliance by one of the parties with the contents of the court decision.

Every legal subject possesses rights that must not be violated. However, where such rights are infringed by another party, the injured legal subject is granted the opportunity to defend and reclaim those rights through the filing of a civil lawsuit before the court. The primary objective of such legal action is to ensure the fulfillment and protection of those rights. Yet, difficulties arise

when the efforts undertaken by the injured party ultimately fail to secure the realization of the rights that have been judicially recognized. In such circumstances, the struggle pursued through legal proceedings may appear futile. A person initiates legal proceedings before a civil court as an effort to defend violated rights. At the conclusion of the proceedings, the court may render a judgment in favor of the plaintiff, declaring in its ruling that the defendant is obligated to comply with the contents of the judgment.

The defendant is initially given the opportunity to comply voluntarily with the judgment. Where voluntary compliance is not forthcoming, the court may intervene through compulsory enforcement measures. However, in many cases, even coercive measures fail to compel the defendant to execute the judgment, often for various reasons advanced by the non-complying party. This situation inevitably raises concerns regarding the protection of the plaintiff's rights. The plaintiff's legal struggle becomes meaningless where the defendant persistently refuses to implement the court's ruling. In other words, the rights sought and recognized through judicial proceedings remain unfulfilled.

In practice, such cases frequently occur in Indonesia, including situations where judgments possessing permanent legal force remain unenforced. This commonly occurs because the losing party refuses to comply voluntarily and, in some instances, even resists coercive enforcement measures imposed by the court.¹⁸ The author therefore presents several examples of cases illustrating non-compliance with the enforcement of civil court judgments in Indonesia.

Case	Year & Decision Number	Type of Judgment	Brief Chronology	Non-Complying Party
Supersemar Foundation Case	Supreme Court Decision No. 1406 K/Pdt/2006 (14 August 2008), reaffirmed by the Supreme Court in 2010	Civil case – compensation amounting to IDR 4.4 trillion payable to the State	The State prevailed in a lawsuit against the Supersemar Foundation, established by Soeharto. Although the judgment had obtained permanent legal force (<i>inkracht</i>), its execution was only partially implemented after many years.	Supersemar Foundation
Lapindo Mudflow Case	South Jakarta District Court Decision No. 384/Pdt.G/2006/PN.Jkt.Sel (2007)	Civil case – compensation for mudflow victims	Victims of the Lapindo mudflow filed a claim for compensation. The	PT Lapindo Brantas and the Government

¹⁸ Arsas Muslimah, Selamat Widodo, "The Urgency of Applying Contempt of Court Against Parties Who Obstruct Civil Enforcement," *Jurnal Karya Ilmiah Multidisiplin (JURKIM)*, Vol. 5, No. 2, May 2025, pp. 86–95

Case	Year & Decision Number	Type of Judgment	Brief Chronology	Non-Complying Party
			court held the company liable; however, the compensation payments were delayed and not fully implemented in accordance with the judgment.	
Customary Land Case in East Nusa Tenggara (2017)	Kupang District Court Decision No. 236/Pdt.G/2017/PN.Kpg	Land dispute	Indigenous communities succeeded in their claim concerning a land dispute against the regional government and private parties. Nevertheless, the judgment was not implemented on the grounds that the land was being used for investment purposes. As a result, the decision remained merely “on paper,” while the community continued to lose its land rights.	Regional Government and private parties
Inheritance Civil Case (Surabaya, 2014)	Surabaya District Court Decision No. 178/Pdt.G/2014/PN.Sby	Inheritance distribution dispute	The court ordered the distribution of inheritance among the lawful heirs. However, one of the losing parties resisted the execution by blocking access to the property and filing legal objections, causing the execution	Losing party

Case	Year & Decision Number	Type of Judgment	Brief Chronology	Non-Complying Party
			process to be delayed for years.	
Kedaton Golf Course Case, Lampung	Supreme Court of Indonesia Decision No. 360 K/Pdt/2011	Land dispute	A lawsuit was filed against a business entity seeking the return of land to the local community. However, the company continued to control the land and resisted execution of the judgment, resulting in the community losing its land rights despite prevailing in court.	Golf course business owner

The table above demonstrates that there remain numerous instances of non-compliance with the enforcement of court judgments that have obtained permanent legal force. This issue must therefore be addressed by Indonesia through the establishment of specific legal regulations functioning as a coercive mechanism to compel parties to fulfill their obligations in implementing judicial decisions.

The author argues that one possible solution for Indonesia is the formal adoption of contempt of court provisions. Based on an examination of the Singaporean legal system, the implementation of contempt of court has proven capable of addressing non-compliance in the enforcement of civil judgments. Singapore utilizes contempt of court as a coercive legal instrument against parties who fail to comply with civil court decisions. Where a defendant refuses to obey or implement the contents of a judgment, such conduct may be categorized as contempt of court. Singapore imposes coercive sanctions for contempt of court, meaning that the purpose of punishment is not merely punitive, but also aimed at compelling compliance with neglected legal obligations.

The author further argues that sanctions imposed upon individuals found guilty of contempt of court should not be limited solely to imprisonment, but may also include additional restrictions on individual freedoms, particularly concerning access to and enjoyment of public facilities. Several examples of such restrictions may include:

1. Restrictions on banking services, including the freezing of bank accounts or limitations on financial transactions;
2. Restrictions on access to public transportation services, such as the suspension or revocation of driving licenses;

3. Restrictions on telecommunication services, including the blocking of SIM card usage or mobile services in certain cases;
4. Suspension or revocation of business licenses and supporting commercial facilities, including access to government licensing services;
5. Restrictions on access to clean water and sanitation services in cases involving particular administrative violations;
6. Restrictions on access to subsidized healthcare services or government social welfare facilities for individuals violating administrative obligations;
7. Suspension of internet access or restrictions on the use of government digital platforms for individuals or entities failing to comply with public obligations, such as taxation; and
8. Suspension of certain educational services or rehabilitation facilities for prisoners who violate regulations during their correctional period.

According to the author, such sanctions would not merely punish offenders but would also function as effective mechanisms for encouraging compliance with neglected obligations. Once individual freedoms are restricted, the non-complying party may ultimately be compelled to execute the contents of the civil court judgment.

Indonesia has demonstrated an intention to regulate contempt of court through a specific and independent statute. This intention arises from the increasing number of actions by litigants and even law enforcement officials that undermine the dignity and authority of the judiciary, while no comprehensive legal framework currently exists to specifically address acts constituting contempt of court. Consequently, the problem of non-compliance with final and binding court judgments has become increasingly complex within Indonesia.

It may therefore be concluded that the effectiveness of a legal system in enforcing court judgments largely depends on how a state upholds the rule of law and respects judicial decisions. In Singapore, a firm approach toward contempt of court has proven comparatively more effective, whereas Indonesia continues to require significant improvements in law enforcement mechanisms to enhance compliance with judicial decisions.

Uncertainty in the enforcement of court judgments may diminish public confidence in the legal system, particularly where executions are delayed or ineffective. Although certain successful enforcement cases exist, many members of the public continue to perceive judicial processes and enforcement mechanisms as slow and insufficiently firm. Public trust in the Indonesian judiciary may therefore be strengthened through reforms aimed at improving the execution of judgments and imposing stricter enforcement measures against parties obstructing judicial implementation.

Such conduct not only harms parties who have lawfully prevailed through judicial proceedings but also undermines the broader principle of justice itself. Once execution is postponed, the successful party is generally limited to reapplying for enforcement, without any guarantee that subsequent execution efforts will be effectively implemented. Furthermore, the successful party lacks the legal authority to undertake additional coercive measures, such as invoking criminal sanctions or custodial penalties, in order to ensure compliance with the judgment.

In addition to strengthening legal certainty, the regulation of *contempt of court* in Indonesia would also contribute significantly to improving the effectiveness of judicial institutions and

reinforcing public confidence in the administration of justice. A judicial system cannot function properly if court decisions that have obtained permanent legal force are continuously ignored without meaningful legal consequences. The authority of the judiciary is not only determined by the ability of judges to render decisions, but also by the capacity of the state to ensure that such decisions are respected and effectively enforced by all parties involved. Therefore, the existence of clear and enforceable contempt of court provisions would serve as an important instrument in safeguarding the dignity, integrity, and credibility of the judiciary.

Furthermore, the implementation of contempt of court regulations may also create a deterrent effect for individuals or entities intending to obstruct or delay the enforcement of civil judgments. In many civil disputes, the successful party often experiences prolonged uncertainty due to the unwillingness of the losing party to voluntarily comply with the judgment. This situation not only causes material losses but may also create psychological burdens and diminish public trust in legal institutions. Consequently, the absence of effective enforcement mechanisms may encourage the perception that judicial decisions are merely symbolic and lack practical authority.

The comparative experience of Singapore demonstrates that a firm legal framework concerning contempt of court can function effectively as a coercive mechanism to compel obedience to judicial orders. Through the imposition of sanctions such as fines, imprisonment, or other coercive measures, the legal system is able to ensure that court judgments are not disregarded. Indonesia may therefore consider adopting a similar approach while still adapting it to the constitutional principles, legal culture, and social conditions of the Indonesian legal system. Such reform would not only strengthen the enforcement of civil judgments but also affirm the principle that all individuals are equal before the law and obligated to respect judicial authority.

Conclusion

1. Singapore has demonstrated a more effective legal system in ensuring the enforcement of court judgments through the application of *contempt of court*. The implementation of this mechanism provides the judiciary with stronger authority to prevent and address non-compliance with judicial decisions.
2. Indonesia, on the other hand, continues to face various challenges and obstacles in the enforcement of court judgments, as evidenced by the continuing occurrence of cases involving the disregard of final judicial decisions. One of the principals contributing factors is the absence of clear legal certainty regarding sanctions for non-compliance with court judgments. Therefore, drawing from the Singaporean legal system, the adoption of *contempt of court* regulations may serve as an appropriate model for Indonesia in addressing the problem of non-compliance with the enforcement of civil court judgments.

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