



The Position of Heirs Born to Parents of Different Religions According to Balinese Customary Law

I Komang Arya Kusumantara¹, Putu Ayu Sriasih Wesna², I Wayan Kartika Jaya Utama^{3*}

Magister Kenotariatan Fakultas Pascasarjana, Universitas Warmadewa

Corresponding Author: I Wayan Kartika Jaya Utama notariatqk@gmail.com

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ABSTRACT

This study analyzes the inheritance rights of children from interfaith marriages under Balinese customary law. It was found that children who followed the mother's religion only inherited from the mother's side, not from the father's side. This is supported by the decision of the Denpasar District Court Number 483/Pdt.G/2020/PN Dps, which states that non-Hindu children cannot inherit from their Hindu father's family. This study concludes that religious changes during marriage affect children's inheritance rights in Balinese customary law.

INTRODUCTION

Inheritance law is part of civil law as a whole and is the smallest part of family law (Nugroho, 2016). Inheritance law is very closely related to the scope of human life (Citrawan & Witasari, 2022), which can be related to the time when a human being has died, which from the death of the human being, there is a legal role that arises, one of which is the most related is the inheritance law, where the deceased has property, debts and receivables that belong to him while he is still alive, so that several questions will arise including the problem of management and continuation of rights and the obligations of a person who has died. The settlement of rights and obligations as a result of the death of a person, regulated by inheritance law, Indonesian inheritance law is very diverse, in the territory of the Unitary State of the Republic of Indonesia (NKRI) applies various inheritance law systems, namely customary, Islamic, and western inheritance law listed in *Burgerlijk Wetboek (BW)* (Sjarif & Elmiyah, 2006; Zakaria et al., 2024).

The diversity of inheritance laws in Indonesia applies according to the region and the family system of Indonesian society (Fauzi, 2016). Each group of the population follows its own law, this results in differences in the meaning and significance of inheritance law. However, when discussing inheritance law, it will consist of 3 (three) elements, namely the existence of inheritance, heirs and heirs (Komari, 2015).

The provisions of inheritance law cannot be separated from marriage law. At least two reasons can be stated, namely first, the determination of heirs starts from the marriage, and second, the determination of inheritance is based on the joint property obtained during the marriage (Dahwal, 2019). Based on Law Number 1 of 1974 concerning Marriage (hereinafter referred to as the Marriage Law) it is stated that a marriage is valid if it is carried out according to the law of each religion, its beliefs and each marriage must be recorded based on the applicable laws and regulations (Angela, 2024; Saji & Tedjosaputro, 2020).

Interfaith marriage will certainly have a legal impact, one of which is on the child who is born who will later become the heir in the family, that the legal child is regulated in Article 42 of the Marriage Law. From these provisions, it can be said that to determine whether a child is valid or not depends on the validity of a marriage or not (Armi et al., 2024). Therefore, according to the author's understanding, children from marriages of different religions are illegitimate children or children out of wedlock. Because the marriage of both parents is also invalid according to religious law or marriage law. So the result is that the child does not have a civil relationship with his father, the child only has a civil relationship with his mother and his mother's family. This is regulated in article 43 paragraph (1) of the Marriage Law (Pujiningsih, 2023).

Balinese customary law has views related to children born from interfaith marriages who are the heirs in which family (Desimaliati, 2022). In the event of a marriage between a couple of different religions, to determine inheritance, it can be considered whether or not the child born from the marital status of his parents is valid or not (Hudiata, 2021). The Civil Registration Population Office has the duty and authority to register marriages in accordance with the provisions of Article 2 of the Marriage Law.

Balinese customary law which is very strongly influenced by Hindu religious elements, determines that the so-called inheritance is in the form of rights and obligations (Srirahma & Nanang Meiske Kamba, 2022). The obligations of the heirs are to pay the debts of the heirs, carry out the ritual of burying the heirs as well as worship as their ancestors in the family hall, as well as maintain the refutation, merajan, and family temple. Balinese customary law determines how to draw family relations (descent) from the paternal (patrilineal) line. Therefore, in terms of inheritance, it is considered an heir also based on the descendant relationship of the paternal line, which in Bali is known as the relationship of the patriarch. Based on the above, if in a marriage a couple of different religions has offspring, it affects the rights in the field of inheritance. Therefore, the legal status of heirs born to parents who have different religions will be the main topic of discussion in this study.

LITERATURE REVIEW

Legal Certainty Theory

The doctrine of legal certainty constitutes a fundamental objective of law and can be asserted to be integral to the pursuit of justice. Legal certainty manifests in the tangible enforcement of law against actions, irrespective of the perpetrator's identity. Individuals might assess their experience through legal certainty when engaging in a particular legal activity. Without legal clarity, an individual lacks a normative basis to engage in a specific conduct. By this objective, Gustav Radbruch elucidated that legal certainty constitutes one of the aims of the law.

The law must be transparent and equitable. A definitive law serves as a standard for behavior, whereas fairness acts as a principle of conduct that must uphold order and is deemed rational. The law is executed solely via clarity and impartiality by its purpose. Alongside Gustav Radbruch, Jan M. Otto articulated his perspective on legal certainty (Firmansyah & Astuti, 2024), asserting that legal certainty entails the provision of clear, consistent, and accessible legal rules. He posited that state authority must promulgate legal regulations and possess three characteristics: clarity, consistency, and accessibility.

Furthermore, various adjudicative bodies or governmental entities should consistently enforce and adhere to the rule of law, with the majority of citizens in a nation endorsing the principles contained therein. Consequently, residents' conduct will adapt to the regulations established by the government. Judicial judges possess an independent nature, indicating that they do not regularly exhibit bias in applying the law when they can adjudicate, resulting in rulings from the judiciary that can be effectively enforced (Utama, 2018).

Legal Protection Theory

Legal protection refers to safeguarding individuals by legal instruments, encompassing both preventive and repressive measures, whether codified or uncodified. Legal protection includes the role of law, precisely the notion that law can ensure justice, order, certainty, utility, and tranquility. According to Satjito Rahardjo, legal protection constitutes an endeavor to safeguard an

individual's interests by conferring the authority of human rights to pursue those interests (Prabowo et al., 2023).

As cited by Satjipto Raharjo, Fitzgerald posits that the doctrine of legal protection originated from the philosophy of natural law or the natural law tradition (Simatupang, 2021). This institution was initiated by Plato, Aristotle (Plato's pupil), and Zeno (the originator of the Stoic school). The natural law school posits that law originates from God, who is universal and eternal, asserting that law and morality must remain interconnected. Proponents of this school perceive law and morality as internal and external reflections and regulations of human existence expressed through legal and moral frameworks. According to the doctrine of legal certainty posited by experts, the law must not possess contradictory attributes. If it is inconsistent, the law will engender uncertainty. Legal certainty serves as a legal instrument for a nation that possesses clarity and can ensure the rights and obligations of every citizen by the cultural norms of society.

Theory of Justice

Aristotle articulated his views on justice in his work named *Ethics of Nichomachea* (Silalahi et al., 2023). According to Aristotle, the virtue of adherence to the law (both codified and uncodified within the polis) constituted justice. In other terms, justice constitutes a universal virtue. Theo Huijbers elucidated Aristotle's conception of justice. Justice, distinct from generic virtue, is a specific moral quality about human interactions, particularly in establishing equitable relationships and reconciling opposing parties. This equilibrium measure is analogous in both numerical and proportional aspects. Aristotle comprehended justice as a concept of equality. In numerical equivalence, every individual is standardized to a singular unit. For instance, all individuals are equal under the law. Proportionality allocates rights to individuals based on their abilities and accomplishments (Rhiti, 2015).

Roscoe Pound perceives justice through the tangible outcomes it yields for society. The solutions achieved should fulfill human requirements to the greatest extent possible with minimal sacrifice (Ngara et al., 2024). Pound expressed his satisfaction with the broader acknowledgment and fulfillment of human needs, demands, or desires via social control, emphasizing the necessity for a more extensive and effective assurance of social interests, an initiative to eradicate persistent and increasingly efficient waste, and to prevent conflicts among individuals in resource enjoyment, ultimately advocating for progressively effective social engineering.

METHODOLOGY

In the preparation of this study, the author uses a normative legal research method (Dinata et al., 2023; Rinanti et al., 2024) with a case study focusing on Decision Number 483/Pdt.G/2020/PN Dps. This study adopts a statutory approach (Wesna & Andika Bagaskara, 2023), conceptual approach, and case approach to obtain a deeper understanding of the position of heirs born to parents with different religions according to Balinese customary law. This research is based on legal sources consisting of primary, secondary, and tertiary

legal materials, which provides a comprehensive foundation in analyzing existing problems. The technique of collecting legal materials used is a literature research technique (Muin & Arifin, 2024), by utilizing various relevant literature to support the analysis. In addition, the analysis is carried out by legal interpretation methods to explore the meaning and application of the law in the case studied. Conclusions from the analysis are drawn using deductive thinking, which starts from general principles and then applies to concrete cases in the verdict that is used as a case study.

RESEARCH RESULT AND DISCUSSION

Marriages that are carried out without equality in terms of embracing religion are very prone to cause very complicated problems both that will be faced by the married couple or a third party, for example, the nuclear family or the extended family of the married couple. The most complicated problem that will definitely be faced is the issue of inheritance rights for children born in marriages of different beliefs. The common property produced in a marriage actually depends on the existence or absence of a valid marriage as the legal basis. This causes a child born in an illegitimate marriage to only have a legal relationship with his mother as stipulated in article 43 paragraph (1) of the Marriage Law which regulates that a child born out of wedlock only has a civil relationship with his mother, his mother's family, then all rights of the child to his father will be lost and not recognized by law (Setiawan et al., 2023).

Regarding children's rights as stipulated in Law Number 23 of 2002 concerning Child Protection in conjunction with Law Number 35 of 2014 concerning Amendments to Law Number 23 of 2002 concerning Child Protection, it is determined that children have the right to worship in accordance with their religion. Children born to married couples of different religions, of course, will not be bifid, but the child may follow the religion of one of his parents or be able to choose his beliefs when he is an adult.

In the event of a marriage between a couple of different religions, to determine the inheritance is seen from the validity or not of the child born from the marital status of his parents. The Civil Registration Population Office has the duty and authority to register marriages in accordance with the provisions of Article 2 of the Marriage Law.

A marriage that is legalized by each religion is considered valid, while a marriage that is not legalized by each religion, then the marriage cannot be recorded. As for marriages of couples of different religions and marriage through court determination, the Civil Registration Office is tasked with recording in accordance with the provisions of the law. Marriage registration is as authentic evidence to obtain legal certainty that the marriage has occurred, then the child will become a legitimate child and according to civil law has the right as an heir.

The legal status of children from marriages of couples of different religions is a legitimate offspring, because the marriage has been recorded by the State in accordance with the law of each religion. Juridically, based on the law, children grow and develop from a legal marriage but of different religions, children can make legal choices for themselves related to the religion to be adhered to.

Balinese customary law which is very strongly influenced by Hindu religious elements (Sujana, 2023), determines that the so-called inheritance is in the form of rights and obligations. The obligations of the heirs are to pay the debts of the heirs, carry out the ritual of burying the heirs as well as worship as their ancestors in the family hall, as well as maintain the refutation, merajan, and family temple. Furthermore, according to the Balinese customary inheritance law, it also classifies those who are considered heirs, namely:

- 1) *prati sentana* (descendents);
- 2) *sentana rajeg* (female children granted special status);
- 3) *sentana paperasan* (foster child).

According to Balinese customary law, an heir may also lose his right to inherit if:

- 1) *alpaka guru* (Resisting/threatening their parents);
- 2) *sentana rajeg* (mating out);
- 3) Married *nyeburin* (The son who entered the wife's family);
- 4) *ninggal kedaton* (leaving home, changing religion).

Balinese customary law determines how to draw family relations (descent) from the paternal (patrilineal) line. Therefore, in the case of inheritance, it is considered an heir also based on the relationship of descendants from the paternal line, which in Bali is known as a relationship *kapurusa*.

Based on the above, if in a marriage a couple of different religions has offspring, it affects the rights in the field of inheritance. A person who is not the same religion as the heir of the paternal line (*kapurusa*) or converts from Hinduism to a non-Hindu religion is considered to have left home (*ninggal kedaton*). Because it is considered to be a *kedaton* abandonment, there are no inherent rights and obligations to the person concerned. So if a child is born from a marriage of different religions and follows the religion of his mother, he will not be considered as an heir of his father.

Based on Decision Number: 483/Pdt.G/2020/PN Dps. It can be concluded that all descendants of I Gusti Kompyang Widia do not have the right to inherit or enjoy the inheritance from their grandfather, it is because the father of the defendant (I Gusti Kompyang Widia) has abandoned his obligations and responsibilities as a community because he married a different Balinese Hindu religion and then chose to change religions. It should be explained that what is meant by the decision in this description is the decision of the court of first instance. If the problem is that the parents have changed religions even though they have first had a marriage of different religions and finally choose to change religion so that it can be valid in the country, then their non-Hindu children move to Hinduism and ask for rights in the form of inheritance to their grandfather's family who are Hindu on the grounds that they have also embraced Hinduism, it is definitely not possible because in the process of distributing the inheritance to the heirs who become the heirs are the parents (father/mother), because children only have the right to inherit rights from their parents. However, if there is a case of a person who is Hindu and married to a different religion and then changes to another religion and returns to Hinduism, in Balinese customary law leaving the religion or changing religion from Hinduism to another religion is

the same as leaving the responsibility (parahyangan, pawongan, and palemahan), which is related to the origin of one's birth/ancestors/heirs or place of birth.

Marriages between couples with different religions can risk causing various legal problems, especially in terms of the inheritance rights of children born from the marriage. Referring to the theory of legal certainty, expressed by Gustav Radbruch, the applicable law must be ascertainable and enforced fairly regardless of the individual's background. In this context, the law governing marriage and inheritance should provide clear provisions so that each individual can predict the legal consequences of their actions. In line with this, laws regulating inheritance and marriage rights must be able to provide provisions that do not raise doubts about individual rights, including the inheritance rights of children born from interfaith marriages. If a marriage is considered valid according to state law, then the child born from the marriage should be recognized as a legitimate child and has the right to inherit.

The theory of legal protection, as explained by Satjipto Rahardjo, states that the law functions to protect individual interests, including children's inheritance rights in the context of interfaith marriages. Legal protection of children's rights is based on the Child Protection Law which guarantees the right of children to obtain protection and the opportunity to worship according to their religion. Therefore, even if a child is born into a marriage of different religions, his rights, including the right to worship and choose religion, must be protected by law. At the same time, state law and customary law must be harmonized, so that children's rights in the context of inheritance can be obtained in accordance with the principles of justice applied in society.

In line with the theory of justice put forward by Aristotle, justice in the context of inheritance law must reflect the principles of equality and proportionality. Children born from marriages of different religions and following the religion of one of their parents are entitled to certain rights, in accordance with the legal relationship with both parents. However, in Balinese customary law which is patrilineal, a child who follows his mother's religion may not be considered the rightful heir of his father, according to the principle of "leaving home" (leaving home) if he converts from Hinduism. The decision in the judicial decision as in Decision Number: 483/Pdt.G/2020/PN Dps shows that although children can choose a certain religion, inheritance rights in Balinese customary law are highly dependent on religious status and patrilineal relationships.

CONCLUSIONS AND RECOMMENDATIONS

The legal arrangement of inheritance rights against Balinese men who come from interfaith marriages and then change religion from Hinduism to another religion in Balinese customary law is called *inggal kedaton*, where inheritance in Balinese customary law is not only a right but also must carry out obligations, therefore in Balinese inheritance law obligations must take precedence before rights. So Hindus in Bali who convert cannot inherit. Inheritance for a man who has changed religions and returned to Hinduism, even though he has carried out a ceremonial procession to enter Hinduism in Bali, he cannot inherit but if he

wants to be given something in the form of a grant from the family, it is legal, but in this grant there is no coercion from anyone because the grant is voluntary.

ADVANCED RESEARCH

The issue of inheritance rights for Balinese men from interfaith marriages who convert from Hinduism to another religion raises significant legal and cultural questions within the framework of Balinese customary law. According to the principle of *inggal kedaton*, inheritance is closely tied not only to rights but also to customary obligations. Therefore, individuals who leave Hinduism are traditionally excluded from inheritance, even if they later return to the faith through religious ceremonies. In such cases, grants (*hibah*) may be given voluntarily by the family, but these are not considered inheritance rights and must be free from coercion.

Future research should explore the following areas:

- 1. Legal Certainty and Human Rights Perspective**
A deeper analysis is needed on how customary inheritance rules align or conflict with national laws on human rights, especially concerning freedom of religion and the right to equal treatment in family law.
- 2. Customary Law vs. National Law Harmonization**
Investigating the possibility of harmonizing Balinese customary inheritance law with Indonesian civil and religious legal frameworks to create more inclusive inheritance policies.
- 3. Sociocultural Impacts of Conversion on Family Relations**
Research into the social implications of religious conversion on familial roles and inheritance practices in Bali, particularly the psychological and social impact on converted individuals.
- 4. Role of Voluntary Grants in Customary Settlements**
Evaluating the legal status and societal acceptance of voluntary grants as a means of balancing tradition with evolving values around fairness and family obligations.

Such research will contribute to a better understanding of the dynamic relationship between religion, culture, and legal rights, while supporting the development of more equitable and context-sensitive legal solutions in multicultural societies like Indonesia.

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