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Legal Culture and the Acceptance of Binding Decisions: A Structured Literature Review with Implications for the Execution of Civil Judgments in Indonesia

Achmat Irmawan[1*], Wardah Yuspin[2]

[1] Universitas Muhammadiyah Surakarta, Surakarta, Indonesia
[2] Universitas Muhammadiyah Surakarta, Surakarta, Indonesia
[*]Corresponding author: Achmat Irmawan

Abstract

A civil judgment that is final and binding settles a dispute only if the losing party complies with it, and in Indonesia many winning parties must still apply for execution under the HIR and RBg. Legal culture is often invoked to explain this gap, but the evidence has not been assembled. This article asks how legal culture shapes parties' acceptance of, or resistance to, final and binding decisions, and what that implies for Indonesian civil execution. It is a structured literature review of one database, Semantic Scholar, reported under PRISMA 2020; 26 studies published from 2019 to 2026 were included from 342 records, and the 17 that can be identified were mapped by decision type, design and relevance. Only a few concern civil decisions, and none measures compliance with civil judgments directly; most are indirect evidence from criminal, customary, arbitral or administrative settings. Read with that limit, the literature suggests five propositions: finality does not secure compliance; legal traditions moderate but do not determine responses; customary mechanisms gain compliance through moral authority; perceived external pressure weakens legitimacy; and clear reasons and participation increase acceptance. Confidence is low to very low. The findings support clearer operative clauses, reasoned and accessible judgments, and court-supervised settlement before coercive execution, and call for direct empirical research on Indonesian execution.

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Keywords

Culture; Compliance; Judgments; Execution; Legitimacy; Review

Introduction

A civil judgment should be the end point of a dispute and the instrument by which the winning party's right is restored. In Indonesia, a judgment that has become final and binding (*inkracht van gewijsde*) may be complied with voluntarily; if it is not, the winning party must apply for execution. Execution is carried out by order and under the direction of the chair of the district court that decided the case at first instance; the chair first summons the losing party and warns it to comply within a period of no more than eight days (*aanmaning*), and only then orders executorial seizure and, where necessary, public auction or eviction.[1] The same scheme applies outside Java and Madura under the RBg,[2] and these colonial-era regulations still govern civil procedure, since a new Civil Procedure Bill has been under deliberation in the House of Representatives but has not yet been enacted. Indonesian studies of execution report that the process is frequently obstructed: the object of execution is unclear or has passed to third parties, new land certificates have been issued, the losing party resists physically, or it files a request for case review or a third-party opposition (*derden verzet*), so that the winner may "win on paper" only.[3] A judgment may be final in doctrine, yet its practical effect depends on whether the parties regard it as legitimate, intelligible and worth obeying.

Legal culture is the usual name for that missing element. Friedman introduced the term to denote the attitudes, values and opinions about law that determine when and how people use, avoid or obey legal institutions, and he distinguished the external legal culture of the public from the internal legal culture of lawyers and judges; together with legal structure and legal substance it forms the legal system.[4] Procedural justice research gives the concept a testable form: people comply with legal authorities chiefly because they regard them as legitimate, and they judge legitimacy above all by the fairness of the procedure and the quality of treatment, not only by the outcome.[5] The concept is nonetheless contested. A systematic review of legal-culture scholarship found heterogeneous and inconsistent definitions, and observed that legal culture is mostly used as an intervening variable that is assumed rather than empirically tested.[6] In this article legal culture is operationalised in Friedman's external sense and covers five observable indicators that were used in the search and in coding: legal attitudes and consciousness, perceptions of

[1] Herzien Inlandsch Reglement (HIR) [Revised Indonesian Regulation], Staatsblad 1941 No 44 (Indonesia), arts 195–200.

[2] Rechtsreglement voor de Buitengewesten (RBg) [Regulation of Procedure for the Outer Regions], Staatsblad 1927 No 227 (Indonesia).

[3] Ralang Hartati & Syafrida, "Hambatan dalam Eksekusi Perkara Perdata" (2021) 12:1 *ADIL: Jurnal Hukum*, DOI: <10.33476/ajl.v12i1.1919>.

[4] Lawrence M Friedman, *The Legal System: A Social Science Perspective* (New York: Russell Sage Foundation, 1975).

[5] Tom R Tyler, *Why People Obey the Law* (Princeton: Princeton University Press, 2006).

[6] Mateja Čehulić, "Perspectives of Legal Culture: A Systematic Literature Review" (2021) 51:2 *Revija za sociologiju* 257, DOI: <10.5613/rzs.51.2.4>.

procedural justice, trust in judicial institutions, preferences among dispute resolution mechanisms, and adherence to customary or community norms.

Earlier work does not connect these strands. Indonesian studies of execution are doctrinal and catalogue legal and practical obstacles without examining the attitudes of the parties;[7] procedural justice research is concentrated on criminal justice and policing;[8] and studies of customary justice describe community mechanisms but rarely relate them to the enforcement of state judgments.[9] No review has asked what the empirical and socio-legal literature says about legal culture and the response to final and binding decisions, or how strong that evidence is. This article fills that gap. Its main question is how legal culture shapes parties' acceptance of, or resistance to, final and binding decisions. Four sub-questions follow: (1) how patterns of compliance differ across legal traditions; (2) which procedural and institutional factors affect acceptance; (3) what role informal and customary mechanisms play; and (4) how public opinion and external pressure affect legitimacy. Its purpose is to map the available evidence, to state how far it supports each proposition, and to draw the implications for the execution of civil judgments in Indonesia.

Research Method

The study is a structured literature review of a single database, reported according to the PRISMA 2020 statement as far as it applies to a one-database review,[10] with the question framed by the PICOC structure. The population is parties to civil disputes, individuals or groups, and the institutional actors affected by final decisions; the exposure is legal culture, as operationalised above; the comparison is between legal traditions and between formal and informal mechanisms; the outcomes are acceptance of, or resistance to, compliance with decisions and the use of alternative mechanisms; and the context is any jurisdiction. Because a single database cannot support the completeness claimed by a full systematic review, the article presents its results as a structured map of the literature and not as an exhaustive synthesis. No review protocol was registered.

The search was carried out in Semantic Scholar, chosen because it indexes legal and interdisciplinary literature without subscription barriers, using five Boolean strings

[7] Hartati & Syafrida, *supra* note 3.
[8] Tyler, *supra* note 5.
[9] Ciprian Sandu et al, "Community-Based Justice as Everyday Governance across Moro and Roma Contexts" (2026) *Asia Pacific Journal of Social Innovation*, DOI: <10.62071/f2ye5q22>.
[10] Matthew J Page et al, "The PRISMA 2020 Statement: An Updated Guideline for Reporting Systematic Reviews" (2021) 372 *BMJ* n71, DOI: <10.1136/bmj.n71>.

that combined terms for legal culture (legal culture, legal consciousness, legal pluralism, law and society), for the decision (civil judgment, binding decision, arbitral award, customary decision) and for the response (compliance, acceptance, enforcement, dispute resolution, community-based justice). Studies were eligible if they were published from 2019 to 2026 in English or Indonesian, were empirical or socio-legal, and examined legal culture, attitudes, institutional practice, pluralism or culturally embedded dispute resolution in relation to a final or binding decision: a court judgment, an arbitral award, a quasi-judicial or administrative decision, a settlement with conclusive effect or a binding customary decision. Studies were excluded if they had no accessible abstract or full text, concerned criminal law alone without civil relevance, or were doctrinal commentary without an empirical or socio-legal basis. Data were extracted into a standard matrix (author, year, jurisdiction, design, type of decision, outcome measured, main finding). Confidence in each thematic finding was assessed using the components of the GRADE-CERQual approach for qualitative evidence, namely methodological limitations, coherence, adequacy of data and relevance;[11] relevance was judged against the review question, so that evidence from criminal, administrative or commercial settings was downgraded as indirect.

Table 1 shows the selection of studies.

Table 1. Selection of studies

Stage	Number of records	Result
Identification	342	Records identified through Semantic Scholar
Deduplication	17 removed	325 unique records
Automated exclusion	168 removed	Records without an abstract removed; 157 records screened
Title and abstract screening	129 removed	28 records remained; 27 full texts were assessed
Eligibility assessment	1 removed	26 studies included

Source: the authors' study selection records.

Two features of the selection limit the results. The removal of 168 records solely because Semantic Scholar held no abstract for them is not a screening judgment, and eligible studies may have been lost at that stage. The records also leave one record unaccounted for between title and abstract screening (28 remaining) and full-text assessment (27 assessed). Both points are carried into the limitations and into the confidence assessment.

Results and Discussion

[11] Simon Lewin et al, "Applying GRADE-CERQual to Qualitative Evidence Synthesis Findings: Introduction to the Series" (2018) 13:Suppl 1 *Implementation Science* 2.

The included studies were published from 2019 to 2026, most of them in 2024 and 2025. Indonesia is the most represented jurisdiction, followed by Ukraine, Nigeria, Pakistan, Afghanistan and Turkey, with cross-regional studies, and they cover civil law, common law and hybrid or pluralistic systems. Of the 26 studies included, 17 can be identified from the authors' citations; Table 2 maps them by the type of decision they concern, their design and their relevance to the review question. The map shows a poor fit between the evidence and the question. Only five studies concern civil or customary decisions that bind parties: a Ukrainian study of court practice on notarial enforcement orders,[12] an Indonesian study of a consumer dispute decision of the Consumer Dispute Settlement Agency (BPSK),[13] an Indonesian study of customary inheritance distribution,[14] and two studies of customary and community justice in Afghanistan and in Moro and Roma communities.[15][16] None of them measures compliance with a civil judgment as behaviour over time. Several studies concern criminal proceedings,[17][18][19][20] and others concern the barriers to bringing discrimination cases,[21] decentralised blockchain arbitration,[22] the court environment for small-business finance,[23] conflicts of law in Ukrainian courts,[24] the interpretation of interfaith marriage rules,[25] judicial language,[26] public opinion in high-profile cases,[27] and the legal system for natural

[12] V F Puzyrnyi, "Modern Court Practice of Appealing Notary's Executive Inscription" (2025) 1:88 *Uzhhorod National University Herald. Series: Law* 394, DOI: <10.24144/2307-3322.2025.88.1.57>.

[13] Monica Dameria Vicarista Simanungkalit, Zaini Munawir & Rizkan Zulyadi, "Kedudukan Pasal 1320 dan 1338 KUHPerdata dalam Kredit dan Sengketa Konsumen di BPSK" (2024) 6:2 *JUNCTO: Jurnal Ilmiah Hukum* 220, DOI: <10.31289/juncto.v6i2.499>.

[14] Agus Santriana & Sri Budi Purwaningsih, "Inheritance Distribution Practices in Ngadas Village Customary Law" (2025) 20:4 *Indonesian Journal of Law and Economics Review*, DOI: <10.21070/ijler.v20i4.1347>.

[15] Fazal Hadi Fazli, Ainul Jaria Maidin & Sodiq Omoola, "Jirga in Afghanistan: Its Functions, Contemporary Challenges, and Future Prospects" (2024) 32:2 *IIUM Law Journal* 267, DOI: <10.31436/iiumlj.v32i2.977>.

[16] Sandu et al, *supra* note 9.

[17] Olusegun Temitope Adebanjo & Nkechi Aluko, "The Effectiveness of Plea Bargaining in High-Profile Corruption Cases in Nigeria: Analyzing Sentencing Trends, Judicial Discretion, and Public Perception (2010–2024)" (2025) 4:2 *Law and Economy* 24, DOI: <10.56397/le.2025.02.04>.

[18] Kumaedi et al, "Penegakan Hukum Pidana oleh Hakim dalam Tindak Pidana Informasi dan Transaksi Elektronik" (2022) 2:2 *Locus: Jurnal Konsep Ilmu Hukum* 96, DOI: <10.56128/jkih.v2i2.26>.

[19] Khofifah Diva Oktakinanti & Anggrita Esthi, "Resolving Traffic Accident Cases: Approaches in East Java Regional Police Jurisdiction" (2024) 2:3 *De Recht: Journal of Police and Law Enforcement* 50, DOI: <10.55499/derecht.v2i3.393>.

[20] Hengxi Yan, "Recognition, Legal Norms, and Acceptance of Criminal Judgment among Chinese Citizens" (2025) 13:1 *Asia Pacific Journal of Management and Sustainable Development* 214, DOI: <10.70979/wewl7820>.

[21] Lisa McIntosh Sundstrom, Valerie Sperling & Melike Sayoglu, "Turkish Gender Discrimination Cases in Domestic and International Courts" in *Courting Gender Justice* (New York: Oxford University Press, 2019) 175, DOI: <10.1093/oso/9780190932831.003.0006>.

[22] Luis A Bergolla, Karen Seif & Can Eken, "Kleros: A Socio-Legal Case Study of Decentralized Justice & Blockchain Arbitration" (2021), online: *SSRN* <doi.org/10.2139/ssrn.3918485>.

[23] Bernard Owens Imarhiagbe et al, "Access to Finance for SMEs in Post-Socialist Countries: The Baltic States and the South Caucasus Compared" (2021) 28:5 *Journal of Small Business and Enterprise Development* 744, DOI: <10.1108/JSBED-01-2021-0036>.

[24] Oksana Khotynska-Nor & Kyrylo Legkykh, "Resolving Conflicts of Law during Judicial Proceedings: An Empirical Study of Ukraine" (2024) 7:4 *Access to Justice in Eastern Europe* 447, DOI: <10.33327/AJEE-18-7.4-a000122>.

[25] Sri Maryati et al, "The Dynamic Landscape of Interfaith Marriage in Indonesia: Navigating the Supreme Court Circular Letter (SEMA) No. 02 of 2023 and Population Administration Law" (2024) 4:3 *Daengku: Journal of Humanities and Social Sciences Innovation* 489, DOI: <10.35877/454RI.daengku2613>.

[26] Faizullah et al, "Applying Grice's Maxims to Judicial Language: A Forensic Linguistic Study of the 2024 Supreme Court Case in Pakistan" (2025) 3:1 *Social Science Review Archives* 840, DOI: <10.70670/sra.v3i1.370>.

[27] Mohamed Hadi Al Najdawi et al, "Analyzing the Impact of Public Opinion on High-Profile Legal Cases" in *2025 International Conference on Business Intelligence for Technology Innovation (ICBITI)* (IEEE, 2025) 1, DOI: <10.1109/ICBITI65527.2025.11500839>.

resource management.[28] Under the review's own criteria the criminal-only and the purely doctrinal studies should not have been included. They are retained in Table 2 for transparency, but in the synthesis below they are treated as indirect evidence and given less weight, and the studies that cannot support any finding on acceptance of decisions are not relied on.

Table 2. Identifiable included studies, by decision type and relevance

Study	Jurisdiction	Decision or mechanism	Design	Acceptance or compliance measured	Relevance
Puzyrnyi 2025	Ukraine	Notarial enforcement order (civil debt)	Analysis of Supreme Court practice	No	Direct (civil enforcement)
Simanungkalit et al 2024	Indonesia	BPSK consumer dispute decision	Normative with field documents	No	Direct (binding civil decision)
Santriana & Purwaningsih 2025	Indonesia	Customary inheritance distribution	Empirical and normative	Disputes avoided	Partly direct
Fazli et al 2024	Afghanistan	Jirga (civil and criminal disputes)	Library-based with interviews	No	Partly direct
Sandu et al 2026	Philippines; Romania	Community-based justice	Multi-sited qualitative interviews	Perceived basis of compliance	Partly direct
Bergolla et al 2021	Online	Blockchain arbitration (Kleros)	Case study and user survey	No	Indirect
Imarhiagbe et al 2021	Baltic States; South Caucasus	Court system and enforcement of court decisions	Firm survey (BEEPS 2009)	Perceptions of courts	Indirect
Khotynska-Nor & Legkykh 2024	Ukraine	Conflicts of law in judicial proceedings	Analysis of court cases	No	Indirect
Maryati et al 2024	Indonesia	Judicial interpretation of interfaith marriage (SEMA 2/2023)	Qualitative, descriptive	No	Indirect
Faizullah et al 2025	Pakistan	Supreme Court judgment (language)	Discourse analysis	No	Indirect
Yan 2025	China	Criminal judgments	Survey of 425 residents	Acceptance (attitudes)	Indirect (criminal)
Adebanjo & Aluko 2025	Nigeria	Plea bargaining in corruption cases	Analysis of sentencing and perception	Public trust	Indirect (criminal)
Oktakinanti & Esthi 2024	Indonesia	Police settlement of traffic accident cases	Interviews, observation, documents	No	Indirect (criminal)
Kumaedi et al 2022	Indonesia	Criminal judgment on electronic information offence	Normative case study	No	Outside scope
Sundstrom et al 2019	Turkey	Gender discrimination litigation	Comparative case analysis	No	Indirect
Al Najdawi et al 2025	Not stated	High-profile cases and public opinion	Conference paper	Not verifiable	Not relied on
Mulyono 2019	Indonesia	Natural resource management law	Normative	No	Outside scope

Source: compiled from the studies cited; design and outcome as stated in each study.

[28] Andreas Tedy Mulyono, "Relaksasi Pengelolaan Sumber Daya Alam dalam Diskursus Hukum Lingkungan Hidup di Indonesia" (2019) 19:1 *Law Review* 25, DOI: <10.19166/lr.v19i1.1594>.

Theme 1: Compliance with Final Judgments in Formal Judicial Systems

Formal finality does not by itself produce acceptance. The clearest evidence comes from studies that measured attitudes. In a survey of 425 residents of Zhejiang, general acceptance of criminal judgments coexisted with concerns about judicial competence, transparency and the influence of public opinion, and procedural justice and legal education were associated with acceptance.[29] A firm survey in the Baltic States and the South Caucasus found that perceptions of the fairness and speed of justice and of the enforcement of court decisions varied considerably between countries.[30] The Nigerian study of plea bargaining shows how the selective, status-dependent use of a procedure produced public distrust of the judiciary.[31] In Indonesia, more than 90 percent of traffic accident cases in the East Java police jurisdiction in 2023 and 2024 were settled through restorative justice, while fatal cases continued to be tried, and the study concludes that the two mechanisms are complementary.[32] That finding concerns police discretion in criminal cases; it shows a preference for negotiated settlement where the law allows it, but it says nothing about compliance with civil judgments, and it is weighted accordingly.

Theme 2: Legal Traditions and Judicial Communication

No legal tradition in the included studies is shown to produce more compliance than another; the differences lie in how judgments are reasoned and communicated. An analysis of a 2024 judgment of the Supreme Court of Pakistan through Grice's maxims found that departures from clarity, relevance and concision hinder public understanding, and it links clear communication to judicial transparency and public trust.[33] The Ukrainian study of conflicts of law shows that inconsistent legislation and the lack of uniform judicial approaches often prevent citizens from exercising their rights, and it stresses legal certainty as a ground of decision.[34] The Indonesian study of interfaith marriage finds that conflicting interpretations produced inconsistent judicial decisions, which the Supreme Court Circular Letter No 2 of 2023 sought to unify.[35] Read together, these studies suggest that a final judgment commands acceptance more readily when it is consistent with other decisions and its reasons can be followed by the parties; none of them measured the parties' response directly.

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[29] Yan, *supra* note 20.
[30] Imarhiagbe et al, *supra* note 23.
[31] Adebanjo & Aluko, *supra* note 17.
[32] Oktakinanti & Esthi, *supra* note 19.
[33] Faizullah et al, *supra* note 26.
[34] Khotynska-Nor & Legkykh, *supra* note 24.
[35] Maryati et al, *supra* note 25.

Theme 3: Hybrid Systems and Customary Mechanisms

Culturally embedded mechanisms secure compliance by moral authority and community expectation rather than by coercion. The Afghan jirga is described as a long-standing mechanism grounded in local custom that resolves civil and criminal disputes swiftly, accessibly and cheaply, but it raises concerns about human rights, inclusiveness and consistency with Shariah and statutory law.[36] A multi-sited qualitative study of Moro communities in Mindanao and Roma communities in Romania identified three common themes: justice as relational repair, moral authority as the basis of compliance, and informal dispute resolution as a practical governance resource.[37] In Ngadas Village in East Java, customary inheritance distribution that relies on consensus and on distribution during the testator's lifetime was found to reduce disputes.[38] These studies give the most direct evidence in the review that legitimacy rooted in community norms produces compliance, but they concern customary decisions, not state judgments. The policy question they raise is how state law can recognise such settlements while guaranteeing minimum standards of fairness, equality and rights protection, for example through limited judicial review of settlements and clear rules on the disputes that may be settled informally.

Theme 4: Public Opinion, External Pressure and Legitimacy

Public scrutiny can promote accountability, but where courts appear to decide under pressure or according to status, legitimacy suffers. The Nigerian study attributes public distrust to inconsistent sentencing in which political and economic status shaped outcomes, and recommends sentencing guidelines, disclosure of plea agreements and independent oversight.[39] In the Chinese survey, concern about the influence of public opinion was one of the factors that qualified acceptance of judgments.[40] The conference paper on public opinion in high-profile cases could not be verified beyond its title and is not relied on.[41] The evidence for this theme is therefore thin and wholly indirect: it shows that perceived partiality erodes trust, not how parties to civil judgments respond to it.

Theme 5: Procedural Justice and Acceptance

[36] Fazli, Maidin & Omoola, *supra* note 15.
[37] Sandu et al, *supra* note 9.
[38] Santriana & Purwaningsih, *supra* note 14.
[39] Adebanjo & Aluko, *supra* note 17.
[40] Yan, *supra* note 20.
[41] Al Najdawi et al, *supra* note 27.

Procedural justice is the theme with the most consistent support. The Chinese survey associates acceptance with procedural justice and legal education,[42] consistent with the wider procedural justice literature,[43] and the Pakistani study links clear reasons to legitimacy.[44] Two civil studies show the same logic from the side of procedure. The Ukrainian study of notarial enforcement orders finds that the courts set aside orders issued without proof that the debt was indisputable or without proper notice to the debtor, and it calls for stronger notarial control to balance the interests of the parties;[45] the Ngadas study shows that consensual, preventive distribution forestalls later disputes.[46] The Indonesian traffic study, by contrast, identifies agreement between the parties and their families as the condition of restorative settlement.[47] Table 3 sets out the five thematic findings with the studies that support them and the confidence that can be placed in each.

Table 3. Thematic findings and confidence in the evidence

Theme	Finding	Supporting studies	Confidence
Formal judicial system	Finality does not by itself secure acceptance; perceptions of fairness, transparency and enforcement vary	Yan; Imarhiagbe et al; Adebanjo & Aluko (all indirect)	Very low
Legal tradition and communication	Traditions moderate but do not determine responses; consistent, intelligible reasoning supports acceptance	Faizullah et al; Khotynska-Nor & Legkykh; Maryati et al (indirect)	Very low
Hybrid and customary mechanisms	Community mechanisms gain compliance through moral authority, with risks to rights and equality	Fazli et al; Sandu et al; Santriana & Purwaningsih	Low
Public opinion and external pressure	Perceived partiality or pressure erodes trust	Adebanjo & Aluko; Yan (indirect)	Very low
Procedural justice	Clear reasons, proper procedure and participation increase acceptance	Yan; Faizullah et al; Puzyrnyi; Santriana & Purwaningsih	Low

Source: assessment using the GRADE-CERQual components; studies of criminal, administrative and commercial settings downgraded for relevance.

Confidence in the Evidence and Implications for Indonesian Civil Execution

Confidence in the findings is low to very low. The designs are diverse and mostly qualitative or observational; legal culture is measured, if at all, through indirect indicators such as perceived legitimacy, trust or preferences among mechanisms; and no included study follows the behaviour of parties after a final civil judgment. Most of the evidence is indirect because it comes from criminal, commercial or customary settings, and the identifiable evidence base is smaller than the number

[42] Yan, *supra* note 20.
[43] Tyler, *supra* note 5.
[44] Faizullah et al, *supra* note 26.
[45] Puzyrnyi, *supra* note 12.
[46] Santriana & Purwaningsih, *supra* note 14.
[47] Oktakinanti & Esthi, *supra* note 19.

of included studies suggests. Within these limits the findings point in one direction: acceptance depends on perceived legitimacy, which rests on fair procedure, intelligible reasons and congruence with the parties' social expectations, not on sanctions alone. This supports Friedman's claim that legal culture mediates between rules and behaviour,[48] while confirming the criticism that the concept is still more often assumed than tested.[49]

For Indonesia the implications concern the stage before coercion. The HIR already provides a moment at which legitimacy can be built: the *aanmaning*, at which the chair of the court summons the losing party and warns it to comply.[50] The findings on procedural justice suggest that this hearing should be used to explain the judgment and to explore a supervised settlement of the manner of performance, rather than being treated as a formality before seizure. The obstacles reported in Indonesian practice (an unclear object of execution, transfer of the object and declaratory rather than condemnatory operative clauses)[51] point to the judgment itself: judges should frame operative clauses that are precise and executable and give reasons the parties can follow, and courts should record systematically whether judgments are complied with voluntarily, after the warning or only after seizure, since no such data were found in the studies reviewed. Advocates can contribute by explaining judgments to their clients and by negotiating performance after the warning; the legislature, in the pending reform of civil procedure, can make the warning hearing a structured occasion for settlement and give courts a clear basis to recognise customary settlements subject to minimum guarantees of fairness.

Comparison with Earlier Research

The findings are consistent with Tyler's account that compliance follows perceived legitimacy and that legitimacy is judged chiefly by procedural fairness;[52] the most consistent theme in the review, procedural justice, reproduces that result outside policing and criminal courts, although with weak evidence. They also bear out Čehulić's conclusion that legal culture is used as an intervening variable without direct measurement:[53] none of the included studies measured legal culture and compliance with a civil judgment together. Indonesian doctrinal work on execution

[48] Friedman, *supra* note 4.
[49] Čehulić, *supra* note 6.
[50] HIR, *supra* note 1, art 196.
[51] Hartati & Syafrida, *supra* note 3.
[52] Tyler, *supra* note 5.
[53] Čehulić, *supra* note 6.

identifies the losing party's bad faith and the legal remedies it uses as the main obstacles and recommends good faith by the losing party and care by court officers;[54] the present review adds that the willingness to comply is itself shaped by how the judgment was reached and explained, which shifts part of the remedy from coercion to the design of the judgment and of the warning procedure. What the review cannot do is confirm these links for Indonesian civil judgments, because the evidence that would test them has not yet been produced.

Limitations and Future Research

The review has five limitations. The search covered one database, which has variable coverage of law journals and may have missed studies indexed only in legal databases such as HeinOnline or in Indonesian repositories such as Garuda; it was restricted to English and Indonesian; 168 records were removed for want of an abstract; the selection records leave one record unaccounted for; and only 17 of the 26 included studies can be identified, several of which fall outside the review's own criteria. Future research should search Scopus, Web of Science, HeinOnline and Garuda with a registered protocol, and should above all produce direct evidence: longitudinal studies of compliance with Indonesian civil judgments from the warning to execution, surveys of litigants' perceptions of the judgment and the court, comparative studies with consistent measures, studies of vulnerable groups, and research on technology-based dispute resolution such as blockchain arbitration and online dispute resolution, whose own compliance mechanisms are beginning to be described.[55]

Conclusion

This review asked how legal culture shapes parties' acceptance of final and binding decisions. The literature suggests, with low to very low confidence, that finality is necessary but not sufficient for compliance: parties are more likely to accept a decision that comes from an institution they trust, through a procedure they regard as fair, in reasons they understand and within a dispute resolution system that matches their social expectations. On the four sub-questions, legal traditions moderate but do not determine responses (three indirect studies); customary and community mechanisms secure compliance through moral authority but carry risks to rights and equality (three studies); perceived partiality and external pressure erode trust (two indirect studies); and clear reasons, proper procedure and

[54] Hartati & Syafrida, *supra* note 3.
[55] Bergolla, Seif & Eken, *supra* note 22.

participation increase acceptance (four studies). For Indonesia, courts should frame precise, executable operative clauses and accessible reasons, use the warning hearing under the HIR to explain the judgment and supervise settlement of performance, and record how judgments are complied with; the reform of civil procedure should give that hearing and the recognition of customary settlements a clear legal basis. The review is limited by its single database, by the exclusion of records without abstracts and by an evidence base that is mostly indirect; direct empirical study of compliance with Indonesian civil judgments is the next step.

Ethics and Data Availability

This literature review did not involve human participants or personal data, so ethical approval was not required. All studies reviewed are publicly available; the search strings, screening records and extraction matrix are available from the corresponding author on reasonable request.

Use of Generative AI

Generative AI was used only to improve the language of this article (grammar, clarity and style). The authors reviewed the output and are responsible for the content of the article.

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The authors declare no conflict of interest. This research received no external funding.

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Bergolla, Luis A, Karen Seif & Can Eken. "Kleros: A Socio-Legal Case Study of Decentralized Justice & Blockchain Arbitration" (2021), online: *SSRN* <doi.org/10.2139/ssrn.3918485>.

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