

## The Power of a Medical Record Certificate from a Doctor as Evidence of Domestic Violence (KDRT) in Divorce Cases: A Perspective on Legal Considerations of Court Decisions

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### ABSTRACT

This study examines the legal position and evidentiary strength of medical record certificates as proof of domestic violence (KDRT) in divorce cases within the Indonesian legal system. Divorce in Indonesia must be based on valid and provable reasons, including domestic violence, which presents complex evidentiary challenges, especially when *visum et repertum* is unavailable. This research employs a normative legal method using statutory, case, and conceptual approaches, supported by secondary data from legislation, court decisions, and legal literature. The findings indicate that medical record certificates are juridically recognized as written evidence within civil procedural law. However, their evidentiary value is not absolute but categorized as free evidence (*vrij bewijs*), meaning their strength depends on judicial assessment. Unlike *visum et repertum*, medical records are not specifically created for legal purposes, which limits their probative value. In judicial practice, judges tend to treat medical records as supporting or circumstantial evidence that must be corroborated by other forms of proof, such as witness testimony or party statements. Court decisions demonstrate that judges prioritize the relevance, consistency, and causal relationship between medical findings and alleged acts of violence. Therefore, medical records cannot stand alone as decisive evidence but play an important role in strengthening the overall evidentiary framework. This study highlights the need for careful judicial consideration and greater clarity regarding the use of medical documents in proving domestic violence in divorce proceedings.

## Introduction

Divorce is a legal event that not only has an impact on the relationship between husband and wife, but also has wider social consequences for the family and the surrounding environment (Wardhani, 2021). Therefore, the legal system in Indonesia does not place divorce as something easy to do. The State through Law Number 1 of 1974 concerning Marriage which has been amended by Law Number 16 of 2019 emphasizes that divorce can only be carried out through the judicial mechanism (Dhinarta, 2019). This provision shows that there is a serious effort to maintain the integrity of the household while ensuring that divorce is really the last resort after there is no longer any possibility to maintain the marriage.

Such an arrangement carries the consequence that any divorce petition or lawsuit must be based on valid and legally provable reasons. Article 39 of the Marriage Law states that divorce can only be carried out if there are sufficient reasons that the husband and wife cannot live together as a couple (Wijayati & Rosadi, 2020). The explanation of this article provides several reasons that can be used as the basis for divorce, including the existence of adultery, bad habits that are difficult to cure, neglect, criminal punishment, violence or severe persecution, certain disabilities or diseases, and disputes that occur continuously without hope of getting along again. These reasons are

alternative, but the proof must still meet strict standards.

The judge has a central role in ensuring that the reason for the divorce is actually proven. In practice, the judge not only assesses the formal truth of the evidence submitted, but also must look substantively at whether the parties' domestic conditions are indeed untenable (Dani & Hastuti, 2023; Wulandari, 2021). To strengthen this standard, the Supreme Court through the Supreme Court Circular Letter Number 3 of 2023 stipulates that divorce cases on the grounds of ongoing disputes must be proven by a separation of residence for at least six months. This provision aims to ensure that the conflict that occurs is not just a temporary dispute.

The policy provides an important exception when there is domestic violence (KDRT). In this condition, the requirement for separation of residence is no longer a necessity. This shows that the law pays special attention to the protection of victims of domestic violence, while recognizing that domestic violence is a serious reason to end a marriage. This recognition is in line with Law Number 23 of 2004 concerning the Elimination of Domestic Violence which qualifies domestic violence as a criminal act (Turatmiyah et al., 2022; Wulandari, 2021).

Although domestic violence is recognized as a strong reason for divorce, the problem arises at the stage of proof. Normatively, domestic violence evidence refers to *visum et repertum*, which is a written statement from a doctor made at the request of a police investigator as stipulated in the Criminal Code (Keding et al., 2022; Nuradhawati, 2018). This mechanism places *visum et repertum* as evidence that has formal power in proving criminal acts. However, in divorce cases, not all victims of domestic violence take the criminal route or report the incident to the police. This condition causes *visum et repertum* to be not always available (Nugraha et al., 2023; Sriwahyuni et al., 2021).

In situations like this, the victim usually relies on a medical record certificate issued by a doctor from a hospital or clinic as evidence of violence. The document basically contains medical records regarding the patient's physical condition that may indicate the presence of injuries or the impact of violence (Dani & Hastuti, 2023). The use of medical records as evidence in divorce cases has become a fairly common practice. Judges are often faced with the choice to assess the extent to which the document can be used as a basis to prove the existence of domestic violence.

Legal problems then arise because there is no firm regulation regarding the position of medical record certificates in the divorce case proof system. Medical records do not have the same status as *visum et repertum* which is explicitly regulated in the criminal procedure law. As a result, the strength of the proof is highly dependent on the judge's judgment in each case (Gojali & Kirana, 2023). This condition has the potential to cause inconsistencies in court decisions, because each judge can give different weight to the same evidence.

On the other hand, academic studies on this matter are still relatively limited. Existing research is more about *visum et repertum* in the context of criminal law or discussing evidence in divorce cases in general without focusing on medical records (Dhinarta, 2019; Keding et al., 2022; Turatmiyah et al., 2022; Wulandari, 2021). In fact, in practice, medical records are often the only evidence possessed by victims of domestic violence in divorce cases (Wardhani, 2021). The absence of an in-depth study on this matter shows that there are research gaps that need to be filled.

This research departs from the need to provide clarity on the legal position of medical record certificates as evidence of domestic violence in divorce cases. This study not only looks at normative

aspects, but also examines how judges in practice assess and consider such documents in their decisions. This approach is expected to provide a more complete picture of the relationship between the rule of law and judicial practice.

Based on this description, there are two main problems that are the focus of this research. First, what is the legal position of a medical record certificate as evidence of domestic violence in divorce cases. Second, how do the judges consider the evidentiary strength of the medical record certificate in the court decision.

This study aims to analyze the legal position of medical record certificates in the evidentiary system in Indonesia and examine the judge's considerations in assessing the evidence in divorce cases. The results of the research are expected to contribute to the development of legal science, especially in the field of evidentiary law and family law, as well as provide practical benefits for law enforcement officials and the community dealing with divorce cases due to domestic violence.

## Method

This study uses normative legal research methods (*Normative Legal Research*) (Saebani, 2021), which is research that focuses on the study of applicable legal norms and legal principles that develop in the legal system. This method is used to analyze legal rules related to evidence in divorce cases, especially related to the position of medical record certificates as evidence of domestic violence (KDRT).

The approaches used in this study include several types. First, the legislative approach (*Statute approach*) (Wulandari, 2021), which is done by examining various relevant legal provisions, such as laws and regulations in the field of marriage, the elimination of domestic violence, and procedural law that regulates evidence. Second, the case approach (*Case Approach*), namely by reviewing court decisions related to divorce cases that use medical record certificates as evidence of domestic violence. This approach aims to understand how judges consider and assess the evidentiary strength of such documents in judicial practice. Third, the conceptual approach, which is used to analyze legal concepts related to evidence, proof, and the position of medical documents from a legal perspective.

The data source in this study is secondary data obtained through literature studies. The data consists of primary legal materials, namely laws and regulations and court decisions; secondary legal materials, in the form of books, scientific journals, and expert opinions; as well as tertiary legal materials that support the understanding of legal terms and concepts. All of these legal materials are analyzed qualitatively using descriptive-analytical analysis techniques, namely by describing and studying systematically to obtain conclusions that are relevant to the research problem.

## Results and Discussion

### Legal Position of Medical Record Certificate as Evidence of Domestic Violence in Divorce Cases

Proof is the most decisive stage in the process of examining civil cases, including in divorce cases. In this context, the truth sought is not just factual truth, but legal truth that can be accounted

for before the courts. Therefore, every argument submitted by the parties must be supported by valid and convincing evidence for the judge. The basic principle that applies in civil procedure law is that the party who submits the postulate is obliged to prove the postulate. This principle is known as the principle of *actori incumbit probatio*, which is explicitly reflected in the provisions of Article 163 of the Civil Code, Article 283 of the Civil Code, and Article 1865 of the Civil Code.

In divorce cases based on the existence of domestic violence (KDRT), the burden of proof lies with the party who postulates the existence of the violence. This means that the plaintiff must be able to show that there has been a violent event that is a valid reason to end the marriage. The problem then becomes more complex because domestic violence is not only related to civil law aspects, but also has a criminal law dimension as stipulated in Law Number 23 of 2004 concerning the Elimination of Domestic Violence (Hariyanto & Yulianingsih, 2025). Thus, the proof of domestic violence in divorce cases is at the intersection between two legal regimes that have different evidentiary characteristics.

In civil procedure law, generally recognized evidence includes written or letter evidence, witness statements, suspicions, confessions, and oaths. This classification is as regulated in the Civil Code and HIR/RBg. Among these evidence, letter evidence has an important role because it is considered the most stable and objective evidence. Letters as evidence include various written documents that can show the existence of a legal event, including documents made by authorized officials and private parties.

Along with the development of science and technology, the concept of evidence has also expanded. Not only is it limited to conventional forms, but it also includes what is known as scientific evidence, which is evidence generated through scientific processes. This type of evidence is often used to support or refute a legal event based on the results of an objective and standardized examination. In this context, a medical record certificate can be categorized as part of scientific evidence because it contains the results of medical examinations conducted by health workers.

In divorce cases based on the grounds of domestic violence, the existence of medical evidence is very important to show the violence experienced by the victim (Putra et al., 2025). Normatively, the proof of domestic violence in the framework of criminal law relies on *visum et repertum*, which is written information made by a doctor at the request of a police investigator. However, in the practice of divorce cases, not all victims have *visum et repertum* because not all cases of domestic violence are reported to law enforcement officials. In this condition, a medical record certificate issued by a doctor from a hospital or clinic is often used as an alternative to evidence.

Juridically, a medical record certificate can be categorized as a letter evidence. This is because medical records are written documents that contain information about the patient's identity, examination results, diagnosis, and medical procedures given. Provisions regarding medical records are regulated in the Regulation of the Minister of Health which states that medical records are official documents made by health workers in the context of health services (Hariyanto & Yulianingsih, 2025). Thus, from the formal side, medical records have a status as a valid document.

However, the position of medical records as evidence cannot be equated with *visum et repertum*. The fundamental difference lies in the purpose and process of its creation. *Visum et repertum* is made specifically for the benefit of law enforcement and is carried out at the request of

investigators or other law enforcement officials. Meanwhile, medical records are made in the context of health services without a direct purpose for the purpose of proving in court. This difference has implications for the evidentiary power possessed by each document.

In civil evidentiary law, not all evidence has the same evidentiary power. Some pieces of evidence have binding power, while others are independent and depend on the judge's judgment. A medical record certificate is included in the category of evidence with free evidentiary force (*vrij bewijs*). This means that the judge has the freedom to assess whether the document is trustworthy and the extent of its relevance in proving a legal event.

The freedom of judges in assessing evidence is one of the main characteristics in the civil evidentiary system in Indonesia. The judge is not rigidly bound to a certain type of evidence, but can assess the entire evidence comprehensively to reach legal conviction. In this context, medical records can be accepted as evidence as long as they meet the requirements for relevance and relevance to the disputed event (Eliana & Rahmat, 2024; Hariyanto & Yulianingsih, 2025). However, such acceptance does not necessarily make the medical record decisive evidence.

The main problem in using medical records as evidence of domestic violence lies in the limitations of the substance contained in them. Medical records basically only record the patient's medical condition based on the results of the doctor's examination. This document is not designed to identify the perpetrator or ensure that the injuries suffered by the victim were caused by certain acts that meet the elements of domestic violence. In other words, medical records are only capable of showing the existence of certain injuries or medical conditions, but do not directly prove the existence of acts of violence in a legal context.

This condition causes medical records to be more precisely positioned as supporting evidence or circumstantial evidence. This means that medical records only provide initial indications that need to be strengthened with other evidence, such as witness statements or confessions of the parties. Without other evidence, medical records are difficult to stand alone as a basis for proving the existence of domestic violence. This is in line with the principle that proof in law does not depend only on one type of evidence, but on an entire series of evidence that corroborates each other.

On the other hand, there is a fundamental difference between scientific proof and juridical proof. Scientific proof relies on objective and measurable methods, while juridical proof is oriented towards the rule of law and evidentiary standards that apply in the judicial system. This difference means that scientific evidence, including medical records, cannot always be immediately accepted as legal truth without going through a judicial review process. Thus, the existence of medical records must be placed within the framework of applicable evidentiary law, not solely based on its scientific validity.

Based on this description, it can be understood that a medical record certificate has a position as valid evidence in divorce cases, especially in proving indications of domestic violence. However, the power of proof is limited and cannot be equated with *visum et repertum*. Medical records function more as supporting evidence that requires reinforcement from other evidence. Therefore, the assessment of the medical record is entirely dependent on the judge's consideration in assessing its relevance, consistency, and relevance to the overall facts revealed at the trial.

## Judge's Legal Considerations on Medical Record Certificates as Evidence of Domestic Violence in Divorce Cases

In divorce cases, the judge plays a central role in assessing the correctness of the evidence submitted by the parties. The evidentiary process does not stop at the formal receipt of evidence, but continues to assess the substance and relevance of each piece of evidence (Priscila et al., 2026). In cases based on the grounds of domestic violence (KDRT), the judge's assessment becomes more complex because it must relate the civil law aspect to the criminal law dimension inherent in the act of domestic violence itself.

The party who files a divorce lawsuit on the grounds of domestic violence has an obligation to prove his evidence at trial. Domestic violence as defined in Law Number 23 of 2004 concerning the Elimination of Domestic Violence includes various forms of violence, both physical, psychological, sexual, and neglect within the household. The breadth of this scope causes the proof of domestic violence to be not always simple, especially when there is no direct evidence such as *visum et repertum*.

In judicial practice, medical records are often submitted as evidence to show the injuries or the impact of violence experienced by the victim. Formally, this document can be accepted as proof of the letter. However, such acceptance does not necessarily make it conclusive evidence. The judge must still assess whether the content of the medical record is directly related to the postulated domestic violence event (Priscila et al., 2026).

Analysis of court decisions shows that judges tend to be cautious in assessing the evidentiary strength of medical records. One example can be seen in the Central Jakarta District Court Decision Number 495/PDT.G/2023/PN.Jkt.Pst. In the case, the defendant submitted a medical certificate as proof that he was a victim of domestic violence. However, the panel of judges did not necessarily accept the document as sufficient evidence to prove the existence of violence. The judge considered that the existence of the medical record still required additional proof to ensure that the injuries recorded *действительно* were caused by actions that met the elements of domestic violence.

This consideration shows that the judge not only sees the existence of the injury medically, but also assesses the causal relationship between the injury and the act postulated. Medical records only record the patient's condition without explaining exactly who the perpetrator is and how the incident occurred. Therefore, the judge placed the medical record as incomplete evidence and required confirmation from other evidence.

A similar approach is also seen in the South Jakarta District Court Decision Number 379/Pdt.G/2024/PN. In this case, the judge emphasized that medical personnel have the authority to record the patient's health condition, but do not have the competence to determine or conclude that a criminal act, including domestic violence, has occurred. Statements about the perpetrator or the cause of the injury are outside the realm of medical expertise and are a domain of legal judgment that must be determined by the court.

These considerations affirm that there is a boundary between medical expertise and legal judgment. Doctors can provide information about a patient's physical condition, but cannot establish the legal qualifications of an event (Eliana & Rahmat, 2024). Thus, medical records cannot be used as single evidence to conclude the existence of domestic violence without being supported by other

relevant evidence.

From these two rulings, it can be seen that judges tend to place medical records as *circumstantial evidence*, which is indirect evidence that requires support from other evidence before it can be used to draw legal conclusions. This type of evidence does not have stand-alone probative power, but must be linked to the overall facts revealed at trial. In this context, medical records only serve as preliminary indicators that indicate the possibility of violence.

The judge's assessment of medical records is also related to how to obtain and present the evidence at trial. In some cases, medical records are made without a request from law enforcement officials or courts. This is different from *visum et repertum* which is procedurally made for the purpose of proving the law. These differences can affect the evidentiary weight of the document.

In the law of proof, the principle is known that not all admissible evidence has the same *weight of evidence*. Medical records may be admissible as evidence, but the judge still has the authority to assess whether the evidence is strong enough to support the evidence submitted. If the evidence is deemed irrelevant or inconclusive, the judge may rule it out in the assessment process.

The concept of *tainted evidence* can also be used to explain the position of medical records in some cases. Evidence is said to be "tainted" when there is doubt about the process of obtaining it or its connection to the event in dispute. In this context, medical records made without the purpose of legal proof and without clear procedures can be considered to have weaknesses in terms of juridical validity. As a result, the judge can give a low evidentiary weight to the document.

In addition, there is a fundamental difference between scientific evidence and juridical evidence that affects the way judges assess medical records. Scientific proof focuses on objective truth based on scientific methods, while juridical proof focuses on meeting the standards of proof determined by law (Eliana & Rahmat, 2024). This difference causes the results of medical examinations to not automatically be translated into legal truth without going through an interpretation process by the judge.

In practice, judges tend to use a comprehensive approach in assessing evidence. Medical records will be assessed along with other evidence, such as witness statements, confessions of the parties, and facts revealed at the trial. If there is a match between these various evidences, then the medical records can strengthen the judge's belief. On the other hand, if there is no support from other evidence, then medical records are likely to be insufficient to prove the existence of domestic violence.

This approach shows that proof in divorce cases does not depend only on one type of evidence, but on an entire set of interrelated evidence. The judge has the freedom to assess each piece of evidence independently, but must still consider the principles of prudence and fairness. In cases involving domestic violence, this prudence is important to avoid errors in assessing facts that have serious legal implications.

Based on this description, it can be concluded that the judge did not necessarily accept a medical record certificate as sufficient evidence to prove the existence of domestic violence in a divorce case. Medical records are only positioned as supporting evidence that requires reinforcement from other evidence. The assessment of the document is entirely dependent on the judge's consideration, which includes aspects of relevance, consistency, and relevance to other facts revealed

at the trial. Thus, the power of proof of medical records is relative and cannot stand alone as a basis for proving the existence of domestic violence.

## Conclusion

Based on the results of the research, it can be concluded that a medical record certificate has a position as valid evidence in divorce cases, especially in proving indications of domestic violence (KDRT). Juridically, medical records are included in the category of letter evidence that is recognized in the civil procedure law. However, the power of proof is not absolute, but is included in free proof (*vrij bewijs*), so the assessment is completely left to the judge. The fundamental difference between medical records and *visum et repertum* lies in the purpose for which they are made, where *visum* is specifically made for the purpose of law enforcement, while medical records are health service products that are not directly intended as evidence in court.

In judicial practice, judges tend not to use medical record certificates as stand-alone evidence in proving the existence of domestic violence. Medical records are only positioned as supporting evidence or circumstantial evidence that requires reinforcement from other evidence, such as witness statements, confessions of the parties, or other relevant evidence. The court's ruling shows that judges are more careful in assessing the relationship between medical findings and postulated legal events, especially since medical records do not have the capacity to identify the perpetrator or ascertain the cause of the injury in a legal context.

Thus, the evidentiary strength of a medical record certificate in a divorce case is highly dependent on the context and the overall evidence presented at trial. Medical records cannot be used as the only basis to prove the existence of domestic violence, but they still have important value in strengthening the construction of proof if supported by other consistent evidence. Therefore, it is necessary for judges to be careful in assessing the evidence, as well as an appropriate understanding for the parties regarding the limitations and functions of medical records in the legal evidentiary system in Indonesia.

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