

LEGAL PROTECTION FOR HISTORIC SCHOOL BUILDINGS IN CULTURAL HERITAGE DESTRUCTION DISPUTES

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Abstract

Cultural heritage is a national heritage that must be protected and preserved sustainably, including historic school buildings that have a dual function as objects of preservation and character education. This study aims to analyze the legal protection for historic school buildings according to the Indonesian legal system and the forms of civil liability in disputes over the destruction of cultural heritage, using the case of SMAN 17 Yogyakarta as a case study. The method used is normative legal research with a statutory approach and a case approach. The results show that UUCB Number 11 of 2010 has provided a protection framework based on three pillars: protection, development, and utilization, but its effectiveness is still hampered by weak supervision and regulatory disharmony with the Job Creation Law. In addition, the case of the destruction of SMAN 17 Yogyakarta fulfills all elements of an unlawful act based on Article 1365 of the Civil Code with multiple responsibilities, but the absence of a civil lawsuit reveals a normative vacuum in the UUCB that needs to be addressed immediately through comprehensive implementing regulations.

Keywords: *Cultural Heritage, Historic School Buildings, Legal Protection, Unlawful Acts, Civil Liability.*

INTRODUCTION

Cultural heritage is a national heritage with significant value in the aspects of history, science, education, and culture that must be protected and preserved sustainably. In the Indonesian legal system, the protection of cultural heritage is regulated by Law Number 11 of 2010 concerning Cultural Heritage, which emphasizes the importance of protection, development, and utilization as a whole in cultural preservation (Nurjaya, 2021). However, in practice, cultural heritage management in Indonesia still faces various challenges, particularly related to weak coordination between institutions and suboptimal law enforcement against violations that cause physical damage to cultural heritage (Santosa, ED, & Wijayanto, A., 2020). In addition, increased development activities following the enactment of Law Number 6 of 2023 concerning Job Creation also pose new challenges, particularly through the risk-based licensing system (OSS-RBA) which has the potential to ignore the historical value of an area if it is not integrated with cultural heritage preservation policies (Ramadhan, MF, 2022).

The normative conflict between the Cultural Heritage Law and the Job Creation Law indicates regulatory disharmony, leading to legal uncertainty. This is reinforced by research indicating that overlapping laws and regulations in Indonesia often lead to conflicts of authority and weak legal implementation in the field (Paongan, RT, et al., 2025). From a civil law perspective, the destruction of cultural heritage can be classified as an unlawful act as stipulated in Article 1365 of the Civil Code, which requires an unlawful act, fault, loss, and a causal relationship. However, the Cultural Heritage Law does not yet regulate the detailed mechanism for civil compensation, creating a normative vacuum in dispute resolution (Nurjaya, 2021).

One concrete example is the case of the destruction of a building at Yogyakarta State Senior High School 17, which has been designated a cultural heritage site based on the Decree of the Governor of the Special Region of Yogyakarta Number 210/Kep/2010. This case reflects a conflict between the interests of developing educational facilities and the obligation to preserve cultural heritage. Construction activities that do not adhere to preservation principles have the potential to result in physical damage and the loss of the building's historical value (Yusdiana, Y., Rahmani, A., & Setiawati, E., 2024).

Previous research has generally focused on the criminal or macro-policy aspects of cultural heritage protection, leaving a gap in civil liability in cases of cultural heritage destruction, particularly in historic school buildings. Therefore, this study offers novelty by examining the legal protection of cultural heritage through a normative approach combined with a concrete case study .

METHOD

This study uses a normative legal research type with a descriptive-qualitative approach that aims to analyze the legal protection of historic school buildings in disputes over the destruction of cultural heritage. The subject of the study is the legal relationship between the government, managers, and other parties involved in the management of cultural heritage, while the object of the study focuses on legal regulations and forms of civil liability in the destruction of cultural heritage (Soekanto, S., & Mamudji, S., 2019).

Data were collected through a literature review using primary legal materials in the form of the 1945 Constitution of the Republic of Indonesia, Law Number 11 of 2010 concerning Cultural Heritage, the Civil Code, Law Number 6 of 2023 concerning Job Creation, and Government Regulation Number 5 of 2021 concerning Risk-Based Licensing. Secondary legal materials were obtained from scientific journals, books, and previous research results relevant to cultural heritage protection (Ramadhan, MF, 2022).

The approaches used include the legislative approach and the case approach, especially in the event of the destruction of cultural heritage buildings at SMA Negeri 17 Yogyakarta which has been determined through the Decree of the Governor of DIY Number 210/Kep/2010. The analysis was carried out qualitatively to assess the suitability between legal provisions and practices in the field and to determine the form of civil liability for damage to cultural heritage (Santosa, ED, & Wijayanto, A., 2020).

RESULTS AND DISCUSSION

How is the protection of cultural heritage in the form of historic school buildings according to the Indonesian legal system?

Legal protection of cultural heritage in Indonesia is based on the constitutional mandate of Article 32 paragraph (1) of the 1945 Constitution, which requires the state to advance national culture while guaranteeing the community in maintaining its cultural values (1945 Constitution of the Republic of Indonesia). This mandate is operationalized through Law Number 11 of 2010 concerning Cultural Heritage (UUCB), which replaces Law Number 5 of 1992 which is considered no longer responsive to the need to protect the nation's cultural heritage (Nurjaya, 2021). UUCB defines cultural heritage in Article 1 number 1 as material cultural heritage including objects, buildings, structures, sites, and areas that must be preserved because they have important value for history, science, education, religion, and/or culture (Law Number 11 of 2010 concerning Cultural Heritage) . This definition firmly places historic school buildings as objects that are within the scope of state legal protection.

(UUCB) builds a protection system based on three inseparable pillars: protection, development, and utilization. Protection as referred to in Article 53 of the UUCB includes rescue, security, zoning, maintenance, and restoration, all of which are directed at preventing physical damage or loss of the historical value of a building (Law Number 11 of 2010 concerning Cultural Heritage). This three-pillar construction is a legal political instrument that strategically integrates cultural heritage preservation into the national development agenda, while ensuring that protection is not only defensive but also adaptive to utilization needs (Arifin, HP, 2018).

The development pillar provides space for increasing the value of cultural heritage through research, revitalization, and functional adaptation that does not sacrifice the historical integrity of the building (Article 80 of the UUCB). The concept of adaptive reuse , which is now mainstream in international preservation practices, has actually been accommodated within the UUCB framework, although its implementation in Indonesia is still far from optimal (Jokilehto, J., 2018). Rahardjo's (2021) research on the revitalization of cultural heritage buildings in Jakarta's Old Town shows that adaptive reuse , carried out by maintaining historic facades and structural elements, not only successfully preserves historical value but also increases the property's economic value by up to 2.3 times, a relevant finding for convincing cultural heritage owners of the economic benefits of preservation.

A building can be designated as a cultural heritage if it meets the criteria of Article 5 of the UUCB: at least 50 years old, representing a certain style period, and having special meaning for the history and culture of the nation (Law Number 11 of 2010 concerning Cultural Heritage). The designation is carried out in stages by the Regent/Mayor, Governor, or Minister according to their level of importance, and without this official designation, a building does not receive full protection even though it is factually of high historical value (Herawati, R., 2016). Kurniawan (2022) cautioned that utilization for modern educational purposes, which involves adding technological infrastructure, expanding classrooms, and installing supporting facilities, has the potential to conflict with the

obligation to maintain the physical authenticity of the building. Therefore, more operational technical guidelines are needed regarding the limits of permitted changes. Thus, the three-pillar system of the UUCB, while normatively comprehensive, still requires more detailed implementing regulations to address the real-world needs of historic school building managers (Santosa, ED, & Wijayanto, A., 2020).

What needs to be underlined from the normative aspect of the UUCB is that protection is not merely a prohibition on damage, but rather an active obligation imposed on the state, owners, and society simultaneously. Article 95 paragraph (1) of the UUCB emphasizes the obligation of the central and regional governments to implement preservation, including developing protection policies, conducting supervision, and allocating budgets. This means that the state cannot hide behind the excuse of limited capacity if damage occurs that could have been prevented through adequate supervision (Law Number 11 of 2010 concerning Cultural Heritage). In the context of historic school buildings, the urgency of this protection is doubled because the building also functions as a medium for character education and the transmission of historical values to future generations (Yusdiana, Y., Rahmani, A., & Setiawati, E., 2024).

The Cultural Heritage Law (UUCB) regulates the balance between the rights and obligations of owners and managers of cultural heritage within a binding framework. In terms of rights, Article 72 guarantees owners compensation for restrictions or takeovers of rights made for preservation purposes, while Article 73 provides incentives in the form of tax breaks for those who actively participate in preservation activities (Law Number 11 of 2010 concerning Cultural Heritage). This compensation and incentive mechanism is the state's recognition that the burden of preservation should not be borne entirely by the owner, so the state needs to be present as a partner in preserving the nation's cultural heritage (Surbakti, K., 2017).

In terms of obligations, Article 75 paragraph (1) of the Cultural Heritage Law is imperative: everyone is obliged to maintain the cultural heritage they own or control. This obligation is not subject to economic considerations or commercial interests, but rather is a legal responsibility inherent from the time a building is designated as a cultural heritage (Law Number 11 of 2010 concerning Cultural Heritage). Furthermore, Article 75 paragraphs (2) and (3) regulate the obligation to report damage within 30 days, with the consequence of the takeover of management by the state if this obligation is ignored (Law Number 11 of 2010 concerning Cultural Heritage). In the context of a foundation that manages a historic school, this means that the foundation's organs of patrons, administrators, and supervisors jointly bear legal obligations for the physical condition of the cultural heritage building under their management (Santosa, ED, & Wijayanto, A., 2020). Ownership of cultural heritage is thus not an absolute right, but rather a right that is limited by social functions and preservation responsibilities.

The system of prohibitions and sanctions in the Cultural Heritage Law is designed to provide a deterrent effect and emphasize the state's commitment to protecting cultural heritage. Article 66 of the Cultural Heritage Law absolutely prohibits any act of damaging, stealing, moving, or transferring ownership of cultural heritage without proper authorization, and this prohibition applies even to the building's legal owner (Law No. 11 of 2010 concerning Cultural Heritage). This means that ownership status does not provide the authority to carry out actions that threaten the preservation of cultural heritage (Arifin, HP, 2018).

For these violations, Article 66 paragraph (1) of the Cultural Heritage Law stipulates a minimum prison sentence of 1 year and a maximum of 15 years, and/or a fine of IDR 500 million to IDR 5 billion (Law Number 11 of 2010 concerning Cultural Heritage) . If the destruction is carried out on someone's orders, Article 113 paragraph (3) of the Cultural Heritage Law adds 1/3 of the principal penalty for the person giving the order, a provision that is particularly relevant in cases where the destruction involves a command hierarchy (Law Number 11 of 2010 concerning Cultural Heritage). Outside of criminal channels, administrative sanctions in the form of cessation of activities and revocation of permits serve as preventive protection instruments before the damage becomes irreversible. However, the implementation of these two instruments in the field still faces significant challenges, especially due to the weak supervisory capacity of local governments and suboptimal coordination between institutions (Santosa, ED, & Wijayanto, A., 2020).

What is the form of civil liability in the dispute over the destruction of the cultural heritage of the historic school building at SMAN 17 Yogyakarta?

The case of the destruction of the SMA "17" 1 Yogyakarta building became the first legal precedent in Indonesia in terms of the enforcement of cultural heritage law that was successfully processed to a final and binding court decision. The building, located on Jalan Tentara Pelajar, Jetis District, Yogyakarta City, has been officially designated as a Cultural Heritage Building through the Decree of the Governor of the Special Region of Yogyakarta Number 210/Kep/2010. On May 11, 2013, around 30 workers carried out the physical demolition of the building on the orders of Mochamad Zakaria who claimed ownership based on the Purwokerto District Court decision after

purchasing it from the heirs with R. Yoga Trihandoko as the field coordinator. The demolition took place in front of teachers and students who were carrying out teaching and learning activities, and was later assessed by the panel of judges as an act that was "done intentionally, even planned" (Tribunnews, 2015, February 4). The root of the problem is an ownership dispute between the heirs and the Development Foundation as the school manager. The heirs who no longer recognize the attachment to the building's cultural heritage status sold the property to Mochamad Zakaria without first obtaining permission from the authorized agency. After an investigation process by the Yogyakarta PPNS-BPCB in coordination with the DIY Regional Police PPNS Supervisory Corps, including the examination of 12 witnesses and 3 expert witnesses, the case was transferred to the Yogyakarta District Attorney's Office. On February 3, 2015, the Yogyakarta District Court sentenced each party to a fine of IDR 500,000,000.00 or a subsidiary of 12 months imprisonment based on Article 105 in conjunction with (Keling, G., 2019). Article 113 paragraph (3) of the UUCB, and the decision has now become final (Yogyakarta Cultural Heritage Conservation Center (BPCB), 2014).

Beyond the criminal realm, this incident has a civil law dimension that has not been fully explored in this case. Article 1365 of the Civil Code stipulates that any unlawful act that causes harm to another person requires the perpetrator to compensate for the loss (Civil Code (KUHPer). To apply this article, the doctrine requires the cumulative fulfillment of five elements: the act, the unlawful nature, fault, loss, and causal relationship (Sari, I., 2021). Analysis of the case facts shows that all five elements are fulfilled (Halipah, G., Purnama, DF, Pratama, BT, Suryadi, B., & Hidayat, F., 2023). The elements of the act and its unlawful nature are undisputed: the physical demolition of cultural heritage buildings is explicitly prohibited by Article 66 of the UUCB and contradicts the Decree of the Governor of the Special Region of Yogyakarta Number 210/Kep/2010. The perpetrator's knowledge of the building's cultural heritage status, as proven in the criminal trial, fulfills the element of deliberate wrongdoing. According to Article 1365 of the Civil Code, both deliberate and negligent actions have equal legal consequences, so in this case, civil liability stands firm (Sari, I., 2021). The losses incurred are dual in nature: material losses in the form of physical damage to the building, and immaterial losses in the form of permanent loss of historical value and authenticity of the building, a type of loss that has been recognized by Indonesian jurisprudence as a loss worthy of civil compensation (Suryoutomo, M., Mariyam, S., & Satria, AP, 2022). The causal relationship between the act of demolition and both types of losses is direct and uninterrupted, so the last element is also fulfilled.

This overall analysis demonstrates that the destruction of the cultural heritage building at SMAN 17 Yogyakarta is not only worthy of criminal prosecution but can and should also form the basis for a civil lawsuit filed by the PMH. The absence of a civil lawsuit in this case actually highlights one of the fundamental weaknesses of Indonesia's cultural heritage protection system, which has relied heavily on criminal instruments and neglected the potential of civil litigation as a more comprehensive redress mechanism (Nurjaya, IN, 2021). Determining the subject of civil liability in this case involves at least three layers. First, there is the direct liability of Mochamad Zakaria as the person giving the order and R. Yoga Trihandoko as the person executing the case. Both can be held jointly and severally liable under Article 1278 of the Civil Code, with the proportions differentiated according to their respective levels of involvement (Suryoutomo, M., Mariyam, S., & Satria, AP, 2022).

Second, indirect responsibility (vicarious liability) based on Article 1367 of the Civil Code, which allows the imposition of responsibility on employers for the actions of their employees in carrying out entrusted tasks (Civil Code (KUHPer). Third and this is the dimension that is least often noticed, there is the potential responsibility of the regional government as the supervisory authority for cultural heritage. If it can be proven that negligence in carrying out the supervisory function as required by Article 95 of the UUCB contributed to the destruction, then the construction of an unlawful act by the authorities (onrechtmatige overheidsdaad) can be applied (Law Number 11 of 2010 concerning Cultural Heritage). However, this mechanism faces its own normative complexities because the UUCB does not explicitly regulate the government's accountability in this context (Nurjaya, 2021).

A dimension of responsibility that is rarely discussed in Indonesian legal literature is the potential liability of the seller's heirs. Those who transfer rights to cultural heritage to third parties without obtaining permission from the authorized agency as required by the UUCB have committed a normative violation that can be constructed as part of a causal chain that leads to destruction. This unauthorized transfer of rights places the building in the ownership of a party that is later proven to have disregarded the cultural heritage status, so that a causal link between the violation of the sale and the ultimate destruction can be argued, albeit indirectly (Hoesin, UA, 2017).

In the joint and several liability structure, the plaintiff has full freedom to demand compensation from one or both defendants simultaneously. This strengthens the plaintiff's position in the recovery process and prevents the financially stronger defendant from exploiting the incompetence of the other (Suryoutomo, M., Mariyam, S., & Satria, AP, 2022).

Compensation under Indonesian civil law encompasses two dimensions that can be claimed simultaneously: material and immaterial. In the context of the destruction of cultural heritage, material losses include the costs of physical restoration and restoration of the building to return it to its original condition, the costs of research and documentation of the damage, and the economic losses suffered by school administrators due to the interruption of teaching and learning activities during the damage management process. All of these components have measurable economic value and can be submitted as concrete compensation claims in civil lawsuits (Mantili, R., 2019).

Intangible damages are much more difficult to quantify but are substantially more significant: the loss of a building's historical value and authenticity that cannot be fully restored, even through physical restoration. Indonesian jurisprudence has consistently recognized immaterial damages in PMH cases that affect the public interest, and in the context of cultural heritage, which is essentially the collective property of the nation, this basis should be even stronger (Suryoutomo, M., Mariyam, S., & Satria, AP, 2022). The fact that both defendants in the criminal trial promised to repair the buildings they had damaged is an implicit acknowledgment of this obligation to restore.

In comparative law, Italy has developed the concept of 'dano culturale' as a specific category of civil damages regulated in the Codice dei Beni Culturali e del Paesaggio, where the amount of compensation is calculated based on the cost of restoration plus the non-economic cultural value assessed by an independent expert commission (Frigo, M., 2004). Meanwhile, Indonesian courts tend to use the *ex aequo et bono* method in determining the amount of immaterial damages without a uniform methodological standard, so that the results of the verdict are often disproportionate to the actual amount of cultural damages that occurred (Mantili, 2019).

However, the absence of a civil lawsuit in the SMAN 17 Yogyakarta case confirms the finding that the UUCB contains a normative vacuum regarding the civil compensation mechanism: there are no provisions governing the method of assessing immaterial losses of cultural heritage, who has legal standing to sue, or the procedure for executing compensation decisions (Nurjaya, 2021). This vacuum needs to be addressed immediately through comprehensive implementing regulations, considering that the civil route has the potential to provide a more holistic remedy encompassing both physical recovery and collective compensation for cultural losses compared to criminal sanctions, which have so far been the sole mainstay of cultural heritage law enforcement in Indonesia (Paongan, RT, et al., 2025).

CONCLUSION

The Indonesian legal system has provided a fairly comprehensive protection framework for cultural heritage, including historic school buildings, through the constitutional mandate of Article 32 paragraph (1) of the 1945 Constitution which is operationalized in Law Number 11 of 2010 concerning Cultural Heritage (UUCB). Protection is built on three main pillars, namely protection, development, and utilization that are integrative. UUCB also emphasizes the active obligations of the state, owners, and the community in maintaining the sustainability of cultural heritage, supported by severe criminal sanctions in the form of imprisonment of 1–15 years and a fine of IDR 500 million to IDR 5 billion (Law Number 11 of 2010 concerning Cultural Heritage). However, the effectiveness of this protection is still hampered by weak regional government oversight, suboptimal coordination between institutions, and the potential for regulatory disharmony between the UUCB and the Job Creation Law, particularly in the risk-based licensing system, which has the potential to ignore the historical value of an area.

The case of the destruction of the cultural heritage building of SMAN 17 Yogyakarta which has been processed criminally until the final decision shows that the incident actually fulfills all the elements of an unlawful act (PMH) based on Article 1365 of the Civil Code, namely the existence of an act, unlawful nature, error, material and immaterial losses, and a direct causal relationship (Civil Code (KUHP)). Civil liability can be imposed in layers on the direct perpetrator jointly and severally, the employer through the vicarious liability mechanism, to the potential liability of the local government for negligence in its supervisory function. However, the absence of a civil lawsuit in this case reveals a fundamental weakness of the UUCB, namely the absence of norms regarding the civil compensation mechanism, the assessment of immaterial losses, the plaintiff's legal standing, and the procedures for executing the decision. Therefore, comprehensive implementing regulations are needed so that the civil route can function as a more holistic recovery instrument, not only relying on criminal sanctions alone.

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