

CRIMINAL LAW ANALYSIS OF HEALTH SERVICE PRACTICES CARRIED OUT BY NON-HEALTH CARE PERSONNEL

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Abstract

Practice service health carried out by individuals without permit and not Health Workers still often occurs in society. Practice the cause risk for safety patients and violate provision law . Research This aim For analyze law criminal to practice service health services carried out by non- health workers. The methods used is study law normative with approach regulatory and conceptual . Research results show that actions the including action criminal Because done without legitimate authority . In drop criminal , the judge considers element error , consequence for the victims, as well as attitude defendant during trial . Enforcement law This expected can cause effect deterrent , protect society , and realize certainty law in the field service health .

Keywords: *Criminal Law , Health Services , Non- Health Workers, Practice Permit .*

BACKGROUND

Health is right basic fundamental human being and become one of the indicator main welfare society . In realize guarantee said , the state regulates organization effort health through system service standardized and professional health , which only can carried out by personnel who have qualifications and competencies in the field health . However thus , in in practice phenomenon practice health carried out by individuals without qualifications and authority legitimate health Still rampant happened in Indonesia. Various case practice health illegal has cause loss Serious for public . In Article 1 paragraph (7) of the Law Number 17 of 2023 concerning Health states that Health Workers are everyone who devotes self in health sector and own attitude professionalism , knowledge , and skills through education height for type certain need authority For carry out Health Efforts. According to Article 11 paragraph (2) of the Law Number 36 of 2014 concerning Health Workers is grouped to in eight categories , namely :

1. Health workers society that includes epidemiologist health , energy promotion health and science behavior mentor health work , energy administration and policy health and energy biostatistics and population
2. Sanitation workers environment that includes power sanitation environmental and entomological health ;
3. Nutrition staff consisting of from nutritionists and dietitians ;
4. Therapeutic power physical which includes physiotherapist , occupational therapist , therapist speech , acupuncture , and others ;
5. Technical staff health which includes radiographer , radiotherapist , technician teeth , beautician anesthesia therapist dental and oral , audiologist , refractionist optician , orthotic prosthetists and technicians transfusion blood ;
6. Engineering personnel biomedical sciences which includes recorder health and information health , engineering electrohealth , expert technology ;
7. Pharmaceutical personnel consisting of from pharmacists and staff technical pharmacy ;
8. Nursing staff which includes nurses and midwives .

In Article 1 paragraph (3) of the Law Number 17 of 2023 provides understanding related service health is all form activities and/ or a series activity services provided in a way direct to individual or Society for maintain and improve degree of public health in form promotive , preventive , curative , rehabilitative , and/ or palliative . In operate practice service health in a way valid and fulfilling criteria Constitution Number 17 of 2023 concerning Health, Manpower health must have two documents officially recorded in Article 1 paragraph (28) and paragraph (29) , namely :

1. The next Registration Certificate abbreviated as STR is proof written given to registered medical personnel and health workers .
2. License Next practice abbreviated as SIP is proof written given to Medical Personnel and Health Workers as giving authority For operate practice .

Based on criteria the can known that For can operate practice service health in a way legally , a health worker is obliged to fulfil condition administrative in the form of (STR) and (SIP) as proof legality and competence professionalism . However , in in practice Still found violations in the field , namely individuals who are not health workers carry out service health without own authority and experience in the field health . One of the for example can seen in Decision North Jakarta District Court Number 1096/ Pid.Sus /2020/PN Jkt.Utr ., which handed down decision to somebody with the initials BIM, a perpetrator beauty salon business in North Jakarta, which is not own background behind education health . In case said , the perpetrator proven do service health in the form of embroidery eyebrows , embroidery lips and embroidery folds eye (eyelid) with method inject anesthesia and suturing petals eye patient . Even though perpetrator in a way real No power health that has STR and SIP which should be become condition must for every individual if want to do practice service health . Consequences his actions , one of patient experience swelling and pain in the eyes . The panel of judges then state defendant guilty violates Article 86 paragraph (1) jo. Article 46 paragraph (1) of the Law Number 36 of 2014 concerning Health Workers, and imposing criminal fine Rp. 30,000,000.00, subsidiary to 4 months imprisonment prison .

With thus , the act practice service health services carried out by non- health workers refer to every related actions with effort health . Health efforts covers service health as one of the its elements , its implementation need source Power health .¹ Practice service health services carried out by non- health workers are form violation to system law health national , because all over effort health must carried out by manpower professionals who have permission official . This is cause question important about arrangement law criminal to practice service health without STR and SIP if carried out by non- health workers. Legal issues This need reviewed Because there is shifting norms between Health Workforce Law 2023 with The 2014 Health Workforce Law , in particular about provision criminal and subject laws that can subject to sanctions . This study is also important For evaluate to what extent the arrangement law criminal has give certainty law for community and protection to abuse practice service health .

In a way academic , urgency study This lies in the need confirm base normative enforcement law in the field health . Permatasari , et al ., emphasized that understanding to articles criminal in The 2023 Health Law is needed so that individuals who are not Health Workers who carry out service health without permission can ensnared in a way right .²In addition , research Previously by Yeni Triana, et al , showed that practice without STR and SIP by potential health workers cause consequence law , however Not yet discuss aspect perpetrator not a health worker or implementation The latest Health Law .³ From the background behind the Researchers interested For analyze How law criminal to practice service health services carried out by non- health workers. Therefore that , it is hoped can give analysis law comprehensive normative about regulation and implementation of criminal norms in Health Law on practice service health without permission by non- health workers, in order to strengthen certainty law and protection public in the field health .

METHOD

Study This is study law normative with approach legislation invitations , conceptual , and cases . Primary legal materials consist of on Constitution Number 17 of 2023 concerning Health, Law Number 36 of 2014 concerning Health Workers, and the Criminal Code (KUHP). Legal materials secondary obtained from literature scientific , journals , and results study previous . Collection material law done through studies literature , whereas analysis done in a way descriptive analytical with interpreting legal norms criminal law that regulates practice service health without permission by non- health workers.

¹Gunawan Widjaja, " Health Services for Patients According to Law No. 17 of 2023 concerning Health," INNOVATIVE: Journal of Social Science Research Vol. 3, No. 5 (2023): 3-4, <https://j-innovative.org/index.php/Innovative>

²Syarifah Prita Yulianti Permatasari, Bambang Fitrianto, and Yasmirah M. Saragih , "Criminal Liability of People Claiming to Be Health Workers Reviewed by Law No. 17 of 2023 Concerning Health," Asian Journal of Multidisciplinary Research and Analysis, 2025.

³Yeni Triana, Muhammad Agung Swasono, Ari Wirasto, Andhi Syamsul, & Afriadi Hamid, " Legal Considerations Regarding Practice Without STR in Perspective Health Law ," Journal of Education and Counseling , Vol. 5 No. 1, 2023. <https://journal.universitaspahlawan.ac.id/index.php/jpdk/article/view/11037>

RESULTS & DISCUSSION**Foundation Jurisprudence of Criminal Acts in Health Services**

Construction juridical action criminal Health services by non- health workers can understood through framework law positive that regulates about authority , responsibility answers and prohibitions in organization practice health . Framework law the aim For ensure that every action service health carried out by the party who has competencies and standards adequate professional . In context Indonesian law , practice service health only can done by manpower health that has qualification professional as well as has have STR and SIP as proof legality his competence .⁴ The absence of STR and SIP is telling No existence base valid law , so that practice service health services carried out by non- health workers can qualified as actions oppose law .⁵

In a way conceptual , authority in practice service health is form attribution laws given by the state to power health through mechanism licensing . Authority the No only functioning as legitimacy administrative , but also as instrument control For ensure safety patients and quality service health . According to doctrine law criminal , every actions carried out outside the authority granted Constitution can qualified as actions oppose law . Therefore that , action service health care carried out by individuals who are not health workers and are not have STR and SIP or not only violate provision administrative , but also potentially cause accountability criminal if fulfil elements action prescribed criminal penalties Constitution .⁶

Criminal law functioning as instrument protection interest law society (rechtsbescherming), in particular to safety patient . According to Moeljatno , law criminal No only aim punish perpetrators , but also protect public from dangerous acts interest general .⁷ Therefore that , criminalization to practice service health by unauthorized parties own competence and permits official is policy law rational and proportional punishment . In a way normative , provisions criminal to practice service health without permission arranged in Constitution Article 439 of Law Number 17 of 2023 concerning Health states " Any person who is not a medical worker or health worker carries out practice as Medical Personnel or Health Personnel who have having a SIP is punishable by law with criminal maximum imprisonment of 5 (five) years or criminal a maximum fine of Rp. 500,000,000.00 (five hundred million rupiah) The article confirm that every person who is not a health worker is not may do service categorized health as practice health or service health , including activity aesthetics invasive involving use tool or material health . Provisions This is a *lex specialis* from the Criminal Code (KUHP) , because in a way special arrange an act that only may done by manpower health licensed .

More continued , Article 441 of the Law Number 17 of 2023 concerning Health also contains provision criminal for individuals who with on purpose use identity or the way that gives rise to impression as if own authority as a Health Worker. Regulation This strengthen principle caution in service health at a time protect public from practice dangerous by unauthorized parties own competence health . Arrangement the expanding previous norms listed in Constitution Number 36 of 2014 concerning Health Workers, specifically Articles 84 to with Article 90, which only ensnare violations committed by health workers that exceed authority or permission in practice . Law Number 17 of 2023 concerning Health now confirm that subject law criminal No only health workers, but also everyone individuals who are not health workers who on purpose do practice service health .

In study by Erika Handayani, et al ., practice service health without STR and SIP stated as violation law administration that can implications criminal , because permission practice is form protection law for patient to possibility malpractice and abuse authority⁸ With thus , permission practice No only nature administrative , but also has function juridical as condition legitimacy practice service health . In addition to the provisions special said , practice service health by non- health workers can also ensnared with Article 378 of the Criminal Code concerning Fraud , if in his actions there is elements deception trick or series lies that move others to deliver something object or give agreement on action certain . Use chapter Fraud This relevant especially in cases in the form of perpetrator confess as power health licensed whereas No own qualification The same once , or use title and identity false For reassure the victim.

⁴Mega Orceka Depera , Yeni Triana & Bahrin Azmi, " Obligation to Obtain a Permit Practice for Doctors in Health Services based on Constitution Number 17 of 2023," *Tambusai Health Journal* , Vol. 5 No. 1 (March 2024), pp . 798–805.

⁵ Soerjono Soekanto, *Introduction to Health Law*, Jakarta: Rajawali Pers, 2019, pp . 52–55.

⁶PAF Lamintang , *Fundamentals of Indonesian Criminal Law* , Bandung: Citra Aditya Bakti, 2018, pp . 162–165.

⁷ Moeljatno , *Principles of Criminal Law* , Jakarta: Rineka Cipta, 2015, pp . 18–20.

⁸Erika Y. Handayani , Chika Shamer & Yeni Triana, " Doctors' Legal Responsibilities Regarding Medical Permits " Practice in Hospitals," *Innovative: Journal of Social Science Research*, Vol. 4 No. 6 (2024), pp . 3148–3155. <https://j-innovative.org/index.php/Innovative/article/download/16822/11269/28799>

Elements Action Criminal Non - Healthcare Services

For can accountable somebody in a way criminal on actions practice , need proven fulfillment elements action criminal good in nature objective and subjective . Based on construction juridical from various existing provisions , elements action criminal practice health illegal can identified as following :

1. Element Objective

First , the element " everyone " which refers to the subject the law that does good deeds individual or legal entities , which in context This is individuals who do not own qualification as power health licensed .

Second , the element " with " intentionally " which shows that actions done with awareness full and desired by the perpetrator , no Because negligence or ignorance . Element intentional This is form the most serious mistake (schuld). in law criminal and requires that perpetrator want actions and their consequences .⁹

Third , the element of " doing " practice medicine / health " which includes a series practice service health such as diagnosis, determination method treatment , administration drugs , and/ or service health others who need competence special in the field medical practice service health This must differentiated from practice treatment protected traditional Constitution or practice service health general that is not need permission special .

Fourth , the element " without " own letter sign registration (STR) and letter permission practice (SIP)" which is condition legality for everyone who practices in the field health . Fifth , the element of " using identity , title , or other forms that cause impression as if is power health licensed " which indicates existence abuse identity or deception towards society.¹⁰

2. Element Subjective

From the side subjective , action criminal practice service health not Health Workers require existence element intention (opzet /dolus) of perpetrator . Intentional This can in the form of intentional as intention (opzet als oogmerk), intentional with awareness certainty (opzet seed zekerheidsbewustzijn), or intentional with awareness possibility (opzet seed mogelijkhedenbewustzijn).¹¹ In doctrine law criminal , elements error (schuld) is condition absolute For can he asked for it accountability criminal to perpetrator . Mistake the related with ability responsible answer as well as existence connection inner between the perpetrator and his actions .¹² In practice service health without permission , error perpetrator generally shaped intentional , because perpetrator realize that himself No have STR and SIP, but still do actions that are medical .

In doctrine law criminal , elements error (schuld) is condition absolute For can he asked for it accountability criminal to perpetrator . Mistake the related with ability responsible answer as well as existence connection inner between the perpetrator and his actions .¹³ In practice service health without permission , error perpetrator generally shaped intentional , because perpetrator realize that himself No have STR and SIP, but still do actions that are medical In law criminal , intentional understood as form error that indicates existence will and consciousness perpetrator in do something acts prohibited by law . Adami Chazawi explains that intentional can proven through knowledge perpetrator about prohibition law as well as attitude inner permanent perpetrator want occurrence actions the .¹⁴ If actors who are not health workers aware open practice service health , receiving patients , and perform actions that are medical without legitimate authority , then element intentional has fulfilled . The condition This strengthen base accountability criminal to perpetrator practice service health illegal Because actions done with consciousness and will itself. Implementation of Criminal Law to Perpetrator Not a Health Worker

⁹Topo Santoso, Principles of Criminal Law , (Jakarta: Rajagrafindo Persada , 2023), pp . 89-92

¹⁰ Hasnul Fauzi and Iyah Faniyah, " Investigation Violation Practice Without Permission by Health Professionals in Beauty Health Actions , " Jurnal Sakato Ekasakti Law Review, Vol. 4 No. 1 (2025), pp . 34-36, accessed from <https://journal.unespadang.ac.id/JSELR/article/view/381>

¹¹Topo Santoso, Op.Cit ., pp . 89-92

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¹³ Sudarto , Criminal Law I, Semarang: Sudarto Foundation , Faculty of Law, Diponegoro University , 2013, pp . 72-74.

¹⁴Adami Chazawi, Criminal Law Studies, Jakarta: RajaGrafindo Persada , 2019, pp . 108-110.

In system Indonesian law, judges have role important in uphold justice, including in case related crimes with practice service health without permission. The judge did not only inspect fact laws and tools evidence, but also assess whether actions defendant has fulfil elements action regulated criminal law in Constitution. In the case practice service health by non-health workers, basic the law used beginning at first use Constitution Number 36 of 2014 concerning Health Workers he did renewal from Health Workers Law Health Law Number 17 of 2023 was implemented For unite regulations health become One comprehensive unity, replacing Lots Constitution previously considered overlapping overlapping and not sync.¹⁵ In drop decision, the judge considered a number of thing. First, is it defendant Correct do service health without permission (such as give injection, do service aesthetics, or treatment certain). Second, whether defendant own permission legitimate practices (STR and SIP). If not, then actions the can assessed as action criminal. Third, the judge also looks at intention or intentional perpetrator. If the perpetrator know that himself No own permission, but still do practice service health, then element fault (mens rea) is fulfilled.

For example seen in Decision North Jakarta District Court Number 1096/ Pid.Sus /2020/PN Jkt.Utr., namely defendant proven do practice service health whereas He No power health and not own permission practice. As a result, the victim experienced swelling and sores around eyes. The panel of judges assessed that actions defendant has fulfil element in Article 86 paragraph (1) jo. Article 46 paragraph (1) of the Law Number 36 of 2014 concerning Health Workers, and imposing criminal fine Rp. 30,000,000.00 subsidiary for 4 months confinement. From the judge's consideration in decision said, can seen that the judge focuses on two things important, namely the status of the perpetrator (not power health) and not existence permission practice. The judge also assessed consequence from actions that causes loss for patients, even though No cause death. Considerations This show that law criminal functioning For give protection for society so as not to become a victim of the practice health illegal.

If case similar happen after its validity Health Law 2023, then the judge will using Article 439 and Article 441 as base law. The contents from Article 439 of the 2023 Health Law, namely "Any person who is not a medical worker or Health Workers do practice as Medical Personnel or Health Workers who have having a SIP is punishable by law with criminal maximum imprisonment of 5 (five) years or criminal a maximum fine of Rp. 500,000,000.00 (five hundred million rupiah)". Whereas for Article 441 paragraph (1) contains about "Every person who uses identity in the form of title or other forms that cause impression bagr the community concerned is a Medical Personnel or Health Workers who have have STR and/ or SIP as intended in Article 1 312 letter a is punished with criminal maximum imprisonment of 5 (five) years or criminal a maximum fine of IDR 500,000,000.00 (five hundred million rupiah)." The difference is, in New law, sanctions the crime more weight and space scope the perpetrator more wide, because covers anyone who with on purpose copy or confess as power health.¹⁶ With Thus, the judge has base more laws firm in take action perpetrator practice service health without permits issued by non-health workers.

Considerations and the Purpose of Sentencing

In case criminal, the judge does not only see aspect formal law, but also pay attention to the sense of justice and benefit social. Roeslan Saleh emphasized that criminalization must directed For maintain authority law as well as define the limits of acceptable behavior accepted in life socialize.¹⁷ In case practice service health without permission, dropping criminal become means For confirm that service health No just activity economy, but rather areas concerned safety and fundamental rights of the Community.

In addition, the judge's considerations do not can released from the role of the judge as implementer power mandatory justice dig mark living justice in society. Sudikno Mertokusumo state that the judge did not only apply law in a way mechanical, but also must be evaluate context social and consequences real from the verdict that was handed down.¹⁸ Therefore that, the decision to perpetrator not expected Health Workers No only fulfil aspect certainty law, but also reflects a sense of justice and utility for public wide. Deep case practice service health without permission, the judge usually consider the consequences for victims, attitude defendant during trial, and purpose

¹⁵Adi Broto Hazelli Elfrida, "Revolution in the Health Room: Expecting Balance Between Innovation and Legal Certainty", LK2 FHUI, accessed on October 16, 2025, <https://lk2fhui.law.ui.ac.id/portfolio/revolusi-dalam-ruang-kesehatan-mengharapkan-keseimbangan-antara-inovasi-dan-kepastian-hukum/>

¹⁶Erika Y. Handayani, Chika Shamer & Yeni Triana, *Op.Cit.*, pp. 11269–11272

¹⁷Roeslan Saleh, *Deeds Crime and Criminal Responsibility*, Jakarta: Aksara Baru, 2016, pp. 37–40.

¹⁸Sudikno Mertokusumo, *The Discovery of Law*, Yogyakarta: Cahaya Atma Pustaka, 2019, pp. 64–67.

criminalization . According to Topo Santoso, the judge must uphold law at a time realize justice substantive , so that decision No only punish , but also give benefit for public .¹⁹ In context service health without permission , the judge issued criminal law so that society aware that every service health own risk law and health If done without permission official . The judge can choose criminal fine than criminal prison Because consider that defendant behave cooperative regretful his actions , and not yet Once punished previously . Behavior polite defendant in Trial as Judge's Consideration " , attitude defendant in trial like polite and cooperative can become consideration relieve .²⁰ However the judge remained evaluate actions defendant dangerous for safety patients , so that still worthy sentenced criminal

As explained by Mega Orceka Depera , et al . , giving permission practice is part from effort law For ensure only power professionals who may do service health , because concerning safety public wide .²¹ The judge's considerations in drop criminal No let go from theory objective criminalization that emphasizes function protection community , prevention crime , and development The perpetrators . Muladi and Barda Nawawi Arief explained that criminalization No only oriented towards revenge , but also directed For prevent recurrence action criminal as well as guard order social .²² In case practice service health without permission , purpose prevention become very dominant Because actions the potential cause impact Serious to safety patients and trust public to system service health . In addition , judges are also required For balance certainty law , sense of justice , and utility social . Wirjono Prodjodikoro confirm that the judge did not may only fixated on sound Constitution in a way textual , but also must be consider consequence social from the verdict handed down .²³ Drop criminal by the judge also has function preventive , namely prevent the practice illegal No happen again , and repressive , namely give sanctions to the perpetrator who violates law . Therefore that , the judge did not just punish , but also execute function education law for society . With Thus , the judge's consideration in drop decision to perpetrator not a Health Worker shows that law criminal functioning For guard order , protect right public on service safe health , as well as confirm that practice health without permission is actions oppose law .

CONCLUSION

From the results study can concluded that practice service health care carried out by individuals who are not health workers without permission is form violation laws that can categorized as action criminal act the No only violate provision administrative in organization service health , but also threatens safety and rights patient For get safe and professional service . In juridical , practice service health care carried out by non- health workers fulfil element actions oppose law Because done without legitimate authority as well as cause detrimental consequences society . Judges in cut off case kind of This consider a number of aspect important , namely element mistake , intention the perpetrator , the consequences , and attitude defendant during trial . The judge also has authority For drop criminal fine if found extenuating circumstances , such as attitude cooperative and regretful defendant . Implementation law criminal to perpetrator not a Health Worker reflects function law as instrument protection society and enforcement certainty law in the field health . Therefore that , strengthening system law in supervision , enforcement and criminalization to practice service health illegal become part important in realizing a sense of justice as well as protection right basic public For get service decent and safe health .

From the results study can concluded that practice service health care carried out by individuals who are not health workers without permission is form violation laws that can categorized as action criminal act the No only violate provision administrative in organization service health , but also threatens safety and rights patient For get safe and professional service . In juridical , practice service health care carried out by non- health workers fulfil element actions oppose law Because done without legitimate authority as well as cause detrimental consequences society . Judges in cut off case kind of This consider a number of aspect important , namely element mistake , intention the perpetrator , the consequences , and attitude defendant during trial . The judge also has authority For drop

¹⁹Topo Santoso, Op.Cit ., pp . 142–143

²⁰Andi Wijaya, “ The Defendant's Polite Behavior in Trial As a Mitigating Factor Verdict Criminal Based on Law no. 48 of 2009 Concerning Judicial Power ”, Journal Criminal Law and Judges (JIHHP), Vol. 5 No. 5 (2025), p . 4700, <https://dinastirev.org/JIHHP/article/download/5222/2918/24342>

²¹Mega Orceka Depera , Yeni Triana & Bahrin Azmi, “ Obligation to Obtain a Permit Practice for Doctors in Health Services Based on Constitution Number 17 of 2023,” Tambusai Health Journal , Vol. 5 No. 1 (2024), p . 801, <https://journal.universitaspahlawan.ac.id/index.php/jkt/article/download/25365/18544>

²²Muladi and Barda Nawawi Arief, Theories and Policies Criminal Law , Bandung: Alumni, 2010, pp . 16–19.

²³Wirjono Prodjodikoro , Principles of Criminal Law in Indonesia, Bandung: Refika Aditama , 2014, pp . 23–25.

Criminal fine if found extenuating circumstances, such as attitude cooperative and regretful defendant. Implementation law criminal to perpetrator not Health Workers reflect function law as instrument protection society and enforcement certainty law in the field of health. Therefore that, strengthening system law in supervision, enforcement and criminalization to practice service health illegal become part important in realizing a sense of justice as well as protection right basic public. For get service decent and safe health. It should be government need strengthen system supervision and enforcement law to practice service health care carried out by non- medical personnel with involving service health, apparatus enforcer law and organization profession. Supervision the must accompanied by strict sanctions to create effect deterrent for perpetrators. In addition, it is necessary done socialization law to public. For increase awareness to only choose service health that has permission official. Regulation derivatives are also necessary be clarified so that the boundaries between activity service health and not health. No cause multi-interpretable. With existence effective supervision, enforcement consistent laws, as well as participation society, it is hoped practice service health in Indonesia can walk in accordance law and guarantee protection to safety public.

REFERENCES

- Aurellia, Chyntia, dan Ade Adhari. "Praktik Kecantikan Tanpa Izin Sebagai Tindak Pidana: Upaya Hukum dalam Pemulihan Kerugian Korban." *Legal Standing: Jurnal Ilmu Hukum*, Vol. 9 No. 3, 2023. <https://journal.umpo.ac.id/index.php/LS/article/view/11893>
- Chazawi, Adami. *Pelajaran Hukum Pidana*. Jakarta: Raja Grafindo Persada, 2019. Lamintang, P.A.F. *Dasar-Dasar Hukum Pidana Indonesia*. Bandung: Citra Aditya Bakti, 2018.
- Depera, Mega Orceka, Yeni Triana, dan Bahrin Azmi. "Kewajiban Surat Izin Praktik bagi Dokter dalam Pelayanan Kesehatan Berdasarkan Undang-Undang Nomor 17 Tahun 2023." *Jurnal Kesehatan Tambusai*, Vol. 5 No. 1, 2024. <https://journal.universitaspahlawan.ac.id/index.php/jkt/article/download/25365/18> 544
- Elfrida, Adi Broto Hazelli. "Revolusi dalam Ruang Kesehatan: Mengharapkan Keseimbangan Antara Inovasi dan Kepastian Hukum." *Lembaga Kajian dan Konsultasi Fakultas Hukum Universitas Indonesia (LK2 FHUI)*, 2024. <https://lk2fhui.law.ui.ac.id/portfolio/revolusi-dalam-ruang-kesehatan-mengharapkan-keseimbangan-antara-inovasi-dan-kepastian-hukum/>
- Fauzi, Hasnul, dan Iyah Faniyah. "Penyidikan Pelanggaran Praktik Tanpa Izin oleh Tenaga Non Medis dalam Tindakan Medis Kecantikan." *Jurnal Sakato Ekasakti Law Review*, Vol. 4 No. 1, 2025. <https://journal.unespadang.ac.id/JSELR/article/view/381>
- Fauziah, Yessy Andriani, Husin Alhadad, dan Dany Agis Susanti. "Malpraktik Kedokteran Gigi dan Pertanggungjawaban Hukum dalam Perspektif Undang-Undang Nomor 17 Tahun 2023 tentang Kesehatan." *Jurnal Hukum dan Etika Kesehatan*, Vol. 5 No. 1, 2024.
- Hananta, Dwi. "Pertimbangan Keadaan-keadaan Meringankan dan Memberatkan dalam Penjatuhan Pidana." *Jurnal Hukum dan Peradilan*, Vol. 7 No. 1, 2018. <https://www.jurnalhukumanperadilan.org/jurnalhukumanperadilan/article/download/185/165/361>
- Handayani, Erika Y., Chika Shamer, dan Yeni Triana. "Tanggung Jawab Hukum Dokter terhadap Surat Izin Praktik pada Rumah Sakit." *Innovative: Journal of Social Science Research*, Vol. 4 No. 6, 2024. <https://j-innovative.org/index.php/Innovative/article/download/16822/11269/28799> *Jurnal Hukum Pidana dan Kesehatan Masyarakat*, Vol. 3 No. 2, 2024.
- Moeljatno. *Asas-Asas Hukum Pidana*. Jakarta: Rineka Cipta, 2015.
- Muladi, dan Barda Nawawi Arief. *Teori-Teori dan Kebijakan Pidana*. Bandung: Alumni, 2010.
- Prodjodikoro, Wirjono. *Asas-Asas Hukum Pidana di Indonesia*. Bandung: Refika Aditama, 2014.
- Pujiyono, Hanafi. "Aspek Pidana dalam Praktik Estetika oleh Non Tenaga Kesehatan"
- Saleh, Roeslan. *Perbuatan Pidana dan Pertanggungjawaban Pidana*. Jakarta: Aksara Baru, 2016.
- Santoso, Topo. *Asas-Asas Hukum Pidana*. Jakarta: Rajagrafindo Persada, 2023.
- Saragih, Yasmirah Mandasari. *Pengantar Hukum Pidana Indonesia*. Medan: Yayasan Panca Budi, 2023.
- Soekanto, Soerjono. *Pengantar Hukum Kesehatan*. Jakarta: Rajawali Pers, 2019. Sudarto. *Hukum Pidana I*. Semarang: Yayasan Sudarto FH Undip, 2013.
- Wijaya, Andi. "Perilaku Sopan Terdakwa dalam Persidangan sebagai Faktor yang Meringankan Vonis Pidana Berdasarkan Undang-Undang Nomor 48 Tahun 2009 tentang Kekuasaan Kehakiman." *Jurnal Ilmu Hukum dan Hakim Pidana (JIHHP)*, Vol. 5 No. 5, 2025. <https://dinastirev.org/JIHHP/article/download/5222/2918/2434> 2