



Prophetic Pulpit or Hate Speech: The Limits of Criminalising Christian Preaching under Articles 300–301 of the Indonesian Criminal Code

^{1st} Daniel Parhorasan Tambunan*, ^{2nd} Darwance

¹Universitas Terbuka, Indonesia

²Universitas Bangka Belitung, Indonesia

*email: 048823722@ecampus.ut.ac.id

Keywords:

freedom of religion; freedom of expression; National Criminal Code; prophetic theology; hate speech

ABSTRACT

The Indonesian National Criminal Code, which came into effect on 2 January 2026, establishes a more explicit connection between religious preaching and the criminal restrictions on religion-related hate speech. The problem intensified following the amendment of Article 300 by Law No. 1 of 2026, which focused legal safeguards on individuals or groups discriminated against due to their religion or belief, and transformed the exclusion in paragraph (2) into a clear legal standard. This research investigates the legal demarcation between safeguarded Christian prophetic preaching and punishable speech as delineated in Articles 300–301 of the Criminal Code. It utilizes normative-interdisciplinary legal research via statutory, conceptual, case law, human rights, and prophetic-theological methodologies. Legal documents are analyzed via grammatical, systematic, constitutional, and prescriptive interpretations. The research concludes that doctrinal critique, theological exclusivity, severe homiletic rhetoric, or simple offense do not suffice to impose criminal responsibility. The proposed interpretation examines the statutory conduct and intent alongside the target, context, reach, and realistic risk of harm. Constitutional Court reasoning on the Electronic Information and Transactions Law is used as a limited interpretive reference rather than a ruling on Article 300. The research introduces a Prophetic-Proportionality Test as an interpretative framework for Articles 300–301, maintaining strong prophetic critique while rejecting protection for pulpits that dehumanize or incite animosity toward religious groups.

1. INTRODUCTION

The religious pulpit is a communicative space that may derive moral weight from religious office, sacred texts, and communal trust. Wessels (2022, pp. 1–3) shows how prophetic preaching is bound up with identity and power, so that the speaker's authority must be matched by accountability. Searle (2020, pp. 102–103) explains the function of Christian witness as protest against injustice. Together, the two studies help explain why preaching can serve as social correction and why its influence must be scrutinised when other groups become targets of hostility. The legal problem lies not in the harshness of language as such, but in whether the elements of an offence are

satisfied by communication that makes religious identity the basis of an attack on human beings.

This debate entered a new phase when the National Criminal Code (Kitab Undang-Undang Hukum Pidana, KUHP) came into force on 2 January 2026. Article 300 regulates hostile acts, statements of hatred or hostility, and incitement to violence or discrimination against other persons, groups, or collectivities on the basis of religion or belief. Article 301 then covers the broadcasting, performance, display, playing of recordings, and dissemination through information technology of content that constitutes an offence under Article 300, with the aim of making it more widely known to the public (Republik Indonesia, 2023, Arts. 300–301). This legal structure means that preaching no longer confronts only the norm of freedom of religion; it now also interacts with the criminal law governing public communication.

The amendment introduced by Law No. 1 of 2026 both clarifies and complicates the situation. The new wording of Article 300(1) no longer treats religion as the direct object of attack; instead, it addresses individuals, groups, or collectivities who are targeted because of their religion or belief. Paragraph (2) provides that statements about religion or belief that are objective, confined to one's own circle, or scholarly in nature, and made with an effort to avoid language that expresses hostility, hatred, violence, or discrimination, do not constitute a criminal offence (Republik Indonesia, 2026, Art. 300(1)–(2)). This shift in the object of protection is highly significant, because it determines whether the criminal law serves to protect individuals from identity-based harm or, conversely, to protect doctrine from criticism.

The problem is further complicated by the fact that Christian preaching is not neutral communication. A sermon is confessional and persuasive. In a sermon, a form of conduct may be judged sinful, a structure unjust, a doctrine mistaken, or a religious practice contrary to the faith of the church. Such expression may cause discomfort and even strong rejection, yet being offended cannot be the sole measure for punishment. Studies of judicial decisions on religion-based hate speech show that Indonesian courts may still shift from questions of intent and target towards the commotion, protest, or offence experienced by a community, so that the boundary between an attack on individuals and criticism of a religion is not always clear (Susanti et al., 2026, pp. 323–325, 343).

Constitutional Court Decision No. 105/PUU-XXII/2024 limited the meaning of the hate-incitement norm in the Electronic Information and Transactions Law (UU ITE) to the deliberate, public dissemination of identity-based hatred that creates a real risk of discrimination, hostility, or violence (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 455–460). The operative ruling binds the UU ITE provision under review, not Article 300 of the Criminal Code. Its relevance to this article is interpretive: both norms restrict identity-based expression and must be read consistently with legal certainty, freedom of expression, and protection from discrimination under the 1945 Constitution. The Court's reasoning is therefore used to restrain overbroad interpretation, not to

transplant the elements of the UU ITE offence, to enlarge the prohibited conduct, or to suggest that the Court has reviewed Article 300.

The question of freedom to preach cannot be reduced to a simple conflict between the right to religion and the prohibition of hatred. Studies of oppositional religious speech show that such speech can be both a manifestation of belief and a form of communication capable of influencing other groups. Quoting sacred texts confers no legal immunity, but disagreement with the beliefs or conduct of others does not automatically make a sermon hate speech (Edge, 2018, pp. 278–280). The legal threshold should be set by the function of the speech, its target, intent, context, and the harm it causes, not merely by the impression that a sermon sounds polite or offensive.

Prophetic theology deepens the problem through its orientation towards criticism of injustice and accountability for the use of power. Searle (2020, pp. 102–105) situates prophetic protest within a Christian witness that sides with those who suffer. Wessels (2022, pp. 1–3) complements this with a critique of identity formation and the exercise of power in preaching. This framework allows the article to assess prophetic claims through the purpose and target of the criticism, without treating rhetorical intensity as the sole measure and without substituting theological judgement for criminal proof.

Previous research has opened several important avenues but has not resolved the problem after the 2026 legal amendment. A normative study of Articles 300–305 highlighted the need to balance the protection of religious life with freedom of expression, but it still rested on the original wording of Law No. 1 of 2023 (Syamsudin & Fernando, 2025, pp. 19–34). A decade-long study of court decisions revealed problems of intent and target in religious hate speech cases, but it focused on judicial practice in 2016–2025 and did not treat Christian prophetic preaching as the principal test case for Article 300 after the 2026 amendment (Susanti et al., 2026, pp. 325–326, 333–343). The public theology literature likewise affirms the critical function of prophetic preaching while warning of the risks of *ressentiment*, the simplification of enemies, and the neglect of responsibility when prophetism loses its ethical discipline (Wessels, 2022, pp. 1–22).

The gap in the literature lies in the need to construct parameters that can distinguish three often-conflated domains: protected doctrinal criticism; speech that may be ethically objectionable but does not warrant criminal punishment; and speech that has crossed the criminal threshold because it makes religious identity the basis for mobilising harm. This study seeks to answer two questions. First, how should Articles 300–301 be interpreted after the 2026 amendment so that they do not function as instruments for protecting doctrine from criticism? Second, how can prophetic theology be used to test claims of being “prophetic” without turning them into an automatic justification? The ultimate aim is to develop a Prophetic-Proportionality Test as an interpretive framework that ties the freedom of the pulpit to the structure of the offence, intent, real risk, and human dignity.

2. RESEARCH METHOD

This study employs a normative-interdisciplinary legal method. The normative method was chosen because the principal objects of study are criminal norms, constitutional principles, court decisions, and human rights instruments. The interdisciplinary dimension is necessary because the term “prophetic” cannot be understood through the categories of criminal law alone. Theology is not used as a source that determines whether an offence has been committed. It is used as a conceptual framework for assessing whether a preacher’s claim that an utterance is prophetic has a moral orientation consistent with the prophetic tradition, or instead serves as a cover for degrading the identity of another group. Prophetic theology was selected because the object of study is the prophetic claim in Christian preaching. Searle (2020) was chosen to read public witness as a response to injustice, while Wessels (2022) is used to test the risks of power and enemy-formation in preaching. Both are treated as complementary theological perspectives, not as representative of all denominations or as a measure of faith that courts must apply.

The primary legal materials comprise the 1945 Constitution; Law No. 12 of 2005 on the Ratification of the International Covenant on Civil and Political Rights (ICCPR); Law No. 1 of 2023 on the Criminal Code; Law No. 1 of 2024 on the second amendment to the UU ITE; and Law No. 1 of 2026 on Criminal Penalty Adjustment. The decisions examined include Constitutional Court Decisions No. 76/PUU-XV/2017 and No. 105/PUU-XXII/2024. Secondary literature is limited to publications from 2016–2026, in line with a ten-year review window. This age limit is not applied to constitutional texts, statutes, and human rights instruments that remain relevant as legal materials, including *General Comment No. 34* and the *Rabat Plan of Action*.

The search was conducted through official legislation portals and the national legal documentation network (JDIH), the Constitutional Court’s decision repository, and the websites of journals and institutional repositories. Keywords included “Article 300”, “Article 301”, “Criminal Penalty Adjustment”, “hate speech”, “real risk”, “religion-based hate speech”, and “prophetic preaching”, accompanied by statute numbers, decision numbers, or DOIs for verification. Statutes were selected for their relevance to the elements of the offence and to constitutional rights; decisions were selected for their reasoning on target groups, intent, and the limits of criminalising expression. Literature was included where it directly addressed these issues or the responsibility of preaching, and where the identity of the author and publication could be verified. Sources that merely repeated others without an argumentative contribution were excluded. The search was purposive and designed for normative analysis; it is neither a systematic review nor an inventory of all Indonesian decisions.

A statutory approach is used to read the relationship among Article 300, Article 301, and Article 36 of the Criminal Code. Article 300 is not analysed in isolation, because criminal responsibility depends on the general rules on intent, while Article 301 depends on the existence of content that first satisfies Article 300. A case-law approach compares the reasoning on group protection in Constitutional Court Decision No.

76/PUU-XV/2017 with the limits on criminalising expression in Decision No. 105/PUU-XXII/2024. Both are examined as sources of constitutional reasoning, not as decisions applying Article 300 after the 2026 amendment. A conceptual approach employs the distinctions between offence and harm, legality, proportionality, *mens rea*, criticism of ideas, and attacks on persons as rights-holders.

A human rights approach draws on Articles 19 and 20(2) of the ICCPR, *General Comment No. 34*, and the *Rabat Plan of Action*. The *Rabat Plan* is not treated as a source that displaces national law, but as an interpretive aid for the incitement threshold, which covers context, the speaker's position, intent, content and form, extent, and the likelihood of harm (OHCHR, 2013, para. 29). This framework is relevant because Indonesia has ratified the ICCPR and the Constitutional Court itself used the logic of real risk to limit the hate speech norm in the UU ITE (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 455–457).

The analysis proceeds in four stages. First, the wording of Article 300 before and after the 2026 amendment is compared grammatically and systematically to identify the change in the object of protection and the function of paragraph (2). Second, the structure of the offence is examined together with Articles 36 and 301 in order to separate prohibited content, intent, and dissemination. Third, the resulting interpretation is tested against the constitutional guarantees of freedom of religion and expression and the real-risk standard. Fourth, a synthesis of law and prophetic theology is used to formulate the Prophetic-Proportionality Test. The analysis is prescriptive because the study does not stop at describing norms but offers a model of application that avoids two errors at once: criminalising legitimate criticism and allowing dangerous incitement to shelter behind religious language.

The limits of the evidence must be made explicit. The findings of Susanti et al. (2026) on decisions from 2016–2025 and of Putri (2023) on 27 decisions are used as secondary research results; this article does not claim to have re-examined the underlying case files. Direct reading of decisions is confined to the two Constitutional Court decisions mentioned above. No corpus of post-2026 criminal decisions on Christian preaching has been analysed in this study. The Prophetic-Proportionality Test is therefore an interpretive proposal that requires further testing against cases, not a description of decision patterns under Article 300 that has been empirically established.

3. RESULTS AND DISCUSSION

3.1. Article 300 after 2026 and the Protection of Persons

The amendment of Article 300 by Law No. 1 of 2026 should be read as a correction of the orientation of the object of protection. The original wording of Law No. 1 of 2023 placed “religion” together with belief, groups, or collectivities as the target of hostility. The new wording directs the prohibition at acts against “other persons, groups, or collectivities” on the basis of religion or belief (Republik Indonesia, 2026, Art. 300(1)). This change in wording shifts the centre of the norm from the

sanctity of ideas to the safety, equality, and dignity of legal subjects. A doctrine has no body that can be discriminated against or attacked; human beings do.

This distinction determines the space for theological freedom. A church may state that a particular doctrine is incompatible with its understanding of God, Christ, salvation, or humanity. A preacher may describe certain conduct as sinful and remain within the sphere of freedom of religion, provided that the judgement does not turn into a call to diminish a person's rights because of his or her identity. Criticism of a religion as a system of ideas differs from making adherents the target of hostility. Recent literature on religion-based hate speech likewise emphasises that the concrete victims are human beings attacked because of their religion or religious views, not religion as an abstract entity (Susanti et al., 2026, pp. 325–326).

Consequently, the sentence “we reject the teaching of X” cannot be equated with “those who adhere to X are unfit to live in our neighbourhood”. The first operates in the domain of exchange and conflict of ideas. The second converts doctrinal disagreement into social consequences for human beings. The difference is not a matter of politeness but of a change in the object and in the rights affected. Article 300 acquires strong relevance only when religious identity becomes the reason for justifying hostility, discrimination, or violence.

Article 300(1) must also not be treated as a single vague category called “hate speech”. The provision contains three forms: acts of a hostile nature, statements of hatred or hostility, and incitement to violence or discrimination. Incitement has the clearest communicative structure because it is directed at influencing the audience's conduct. Statements of hatred or hostility have a broader scope but cannot be reduced to the expression of ordinary antipathy. Criminal sanctions require a sufficiently serious degree of culpability so that the principle of legality and legal certainty do not collapse into the subjective judgement of officials.

The need for restrictive interpretation becomes all the more pressing because studies of decisions show that courts have linked speech deemed insulting to religion with protests and demonstrations by followers. Such a pattern easily shifts the centre of analysis from the perpetrator's elements to the reaction of the crowd (Susanti et al., 2026, p. 343). The number of angry parties proves the existence of controversy, but not that the speaker deliberately produced hatred or incited the audience to discriminate against a particular group. The criminal law cannot leave the boundaries of freedom to whichever group is most effective at organising anger.

Article 36 of the Criminal Code provides an important safeguard against such expansion. A criminal offence in principle requires intent unless the statute expressly provides for negligence (Republik Indonesia, 2023, Art. 36). Article 300 does not create a negligence offence. A preacher therefore cannot be punished merely because he or she should have foreseen that someone would take offence. The prosecution must prove intent relevant to the prohibited act. Where the charged form is incitement, the

relationship among speaker, audience, target, and the conduct encouraged becomes central to the proof, not an accessory.

Separating intent from social consequences improves the way controversial sermons are read. A sermon may be deliberately confrontational in order to challenge corruption, exploitation, or hypocrisy. Intentionally choosing harsh language is not the same as intending to cause discrimination. Conversely, speech may be delivered in calm language yet systematically direct a congregation to reject the rights of a particular religious group. The temperature of the rhetoric is not an adequate measure. The structure of purpose and communicative function matter more.

The 2026 amendment also means that interpretation based on the title of Chapter VII must be limited. That chapter indeed continues to deal with offences against religion, belief, and religious life. The chapter title must not be used to revive religion as a direct object when the wording of Article 300 has been changed. Reading the norm as though it had not changed would hollow out the intent of the new legislation. The law must begin with the elements of the provision in force and then interpret them systematically in light of constitutional guarantees, not the other way round.

This change in orientation is consistent with the tendency in human rights law to reject the use of criminal law solely to protect religion from disrespect. *General Comment No. 34* affirms that prohibitions on displays of lack of respect for a religion may be justified only within very strict limits and must not be used to prevent criticism of religious leaders or doctrine (United Nations Human Rights Committee, 2011, paras. 48–50). This direction does not abolish the protection of religious communities. Rather, protection is transferred to the bearers of rights: human beings who may become targets of discrimination and violence.

Article 300 after 2026 should therefore be read as an offence protecting persons from identity-based harm, not as an offence guaranteeing that religion is not debated. This reading allows churches to maintain their doctrinal claims while limiting the transformation of those claims into the diminution of the civil dignity of others. The dividing line does not lie in whether a theology is right or wrong in the eyes of the state. It lies in the shift from evaluating ideas to treating human beings differently on the basis of identity.

Separating doctrine, symbols, institutions, and persons also prevents a silent expansion of the object of Article 300. Religious symbols may carry great significance for a community, but verbal attacks on a symbol are not always identical to attacks on adherents. Research on religious speech cases shows that an unclear target may lead courts to construct symbol and group as a single unit without testing who was actually attacked (Susanti et al., 2026, pp. 335–339). After the 2026 amendment, such an interpretive step must be tightened. Courts need to show how criticism of a symbol or institution turns into hostility towards persons, groups, or collectivities on the basis of religion. Without that argumentative bridge, protection of persons may slide back into protection of objects, ideas, or institutions from criticism.

Indrayanti and Saraswati (2022) propose shifting the orientation of blasphemy law towards protecting people from intolerance, discrimination, and violence on religious grounds. The contribution of that study lies in clarifying the purpose of protection; it does not demonstrate the success of the wording of Article 300 after the 2026 amendment. Butt (2023) discusses the reform of the Criminal Code in relation to democratisation and the risk of restricting freedom of expression. Its relevance is the need to assess the content of the new norm, rather than assuming that codification reform in itself guarantees the protection of rights.

A direct reading of Constitutional Court Decision No. 76/PUU-XV/2017 provides a point of comparison. In considerations [3.12]–[3.14], the Court explained the need to protect diversity and retained the scope of “inter-group” in the UU ITE norm at that time. In consideration [3.16], the Court distinguished the context of disseminating electronic information from statements made in public under the former Criminal Code (Mahkamah Konstitusi Republik Indonesia, 2018). In other words, similarity of terms does not justify equating the entire structure of the offences. For Article 300, the lesson is limited to the protection of groups and caution in reading the context of the norm; the decision provides no basis for extending the targets of Article 300 beyond religion or belief.

The principle of *lex certa* demands a further consequence. The terms “hostility” and “hatred” carry an emotional content that is easily broadened, so judges must tie them to verifiable indicators. A statement must not be judged on the choice of a single word detached from the whole argument. Patterns of generalisation, targeting, calls to action, and intended social consequences are more relevant than the impression that a preacher’s language is improper. The need for a measurable threshold also appears in the normative study of Articles 300–305, which warns of the need to balance the protection of religious life with freedom of expression (Syamsudin & Fernando, 2025, pp. 19–34). A criminal law that does not provide predictability may produce a chilling effect on legitimate religious discussion.

3.2. Offence and the Threshold of Real Risk

Article 300(2) is the part most vulnerable to abuse if its logic is inverted. The provision states that statements about religion or belief that are objective, confined to one’s own circle, or scholarly in nature, and accompanied by an effort to avoid language of hostility, hatred, violence, or discrimination, are not criminal offences (Republik Indonesia, 2026, Art. 300(2)). The word “or” indicates alternative categories, not cumulative conditions. The greatest problem arises if officials conclude that a sermon that is not objective, not confined, and not scholarly automatically falls within paragraph (1). Such an inference is invalid.

Paragraph (2) is an exception clause, not a reverse formula for proving the offence. Failing to fall within the safe harbour does not prove the *actus reus* and *mens rea*. The prosecution must still return to paragraph (1) and prove the form of hostility, hatred, or incitement directed at a person or group on the basis of religion. This

principle matters because a sermon is by nature not a neutral academic text. It contains commitments of faith, moral evaluation, and persuasive force. Making academic “objectivity” a legal prerequisite for preaching would shrink freedom of religion into freedom of speech only to the extent that religion ceases to be religion.

The phrase “confined to one’s own circle” likewise cannot be read with an image of the place of worship from the last century. Physical services are often livestreamed, sermon archives are stored on YouTube, and video clips are circulated by congregants or third parties. The boundary between internal and external has become porous. The fact that content eventually circulates widely does not necessarily show that the speaker intended it to spread from the outset. Conversely, a church that consciously broadcasts sermons through public channels can hardly claim that all of its communication is purely internal. The assessment must follow the facts of distribution and intent, not the label of the place of worship.

The clause on efforts to avoid hostile language must also not be translated into a duty to use sterile vocabulary. Prophetic language often employs harsh metaphor, irony, and moral condemnation. Sharpness of style does not prove hatred. The more relevant measures are the function of the sentence and its social target. The judgement that “corruption is a betrayal of God” can be very harsh without attacking any religious group. The statement that “adherents of religion X are inherently unclean and should be kept from public employment” uses identity as the ground for reducing human status.

Constitutional Court Decision No. 105/PUU-XXII/2024 sets a threshold for the UU ITE provision under review. The Court warned that an unrestricted hatred norm may ensnare criticism, satire, neutral expression, and even those who merely repost content without malicious intent. Within the scope of the norm reviewed, punishment is limited to the deliberate public dissemination of identity-based hatred that creates a real risk of discrimination, hostility, or violence (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 455–458). This formulation moves the focus from “who is offended?” to “what harm has been deliberately and genuinely created?”.

Using that threshold to read Article 300 requires two limits. First, the distinction among the three forms of conduct in paragraph (1) must be maintained; a statement of hatred must not be wholly equated with incitement. Second, real risk is used as a test of necessity and proportionality for criminal interpretation, especially where the words “hatred” or “hostility” are liable to be broadened. This article proposes such a restrictive constitutional reading; it does not claim that the Court’s operative ruling automatically adds a real-risk element to every form of Article 300. Interpretation must still start from the wording of the provision and the prohibition on analogy in defining criminal offences.

The real-risk standard does not mean that the state must wait until violence actually occurs. Risk is a preventive category, but it must have a factual basis. The context of conflict, the speaker’s position, the readiness of the audience, patterns of mobilisation, temporal proximity, repetition of the message, and the nature of the

instruction can show whether speech has a realistic capacity to encourage discrimination or violence. The Court emphasised that consequences arising solely from third-party responses must not automatically be attributed to the speaker where the initial expression was not tendentious (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 456–457).

This principle is especially important in religious cases because an offended audience can become a heckler's veto. If the anger of a group that feels insulted were always sufficient to prove harm, the group with the greatest capacity for mobilisation would hold the practical power to decide which expression may survive. Freedom of religion would then be governed not by law but by the capacity to generate social pressure. The finding that some cases link speech to protests or demonstrations shows why public reaction must be treated as context, not as a substitute for the elements of the offence (Susanti et al., 2026, pp. 343–344).

The ICCPR reinforces this reading. Article 19 protects freedom of expression while permitting restrictions that are provided by law and necessary for a legitimate purpose. Article 20(2) requires the prohibition of advocacy of national, racial, or religious hatred that constitutes incitement to discrimination, hostility, or violence (Republik Indonesia, 2005, Annex to the ICCPR, Arts. 19–20). The *Rabat Plan* then sets out context, the speaker's position, intent, content and form, extent, and likelihood as threshold factors for distinguishing reprehensible expression from serious incitement (OHCHR, 2013, para. 29).

The Rabat threshold also helps correct the tendency to treat certain words as automatic proof. A single harsh word may take on different meanings depending on context. A call to “fight injustice” in a social-justice sermon is not equivalent to “fight religious group X and drive them out”. The assessment must move from the text to the relationship among speaker, audience, and target. The definition of hate speech itself is used in widely varying ways, so the criminal law needs a narrower threshold than everyday language so that legality does not turn into moral panic (Lepoutre et al., 2024, pp. 397–430).

Separating offence from harm has practical consequences. A sermon may be ethically poor, arrogant, insensitive, or theologically narrow, yet still fall short of the criminal threshold. Appropriate responses may include public criticism, rights of reply, interfaith dialogue, denominational discipline, or pastoral correction. The criminal law, as the most coercive instrument, gains legitimacy when speech moves into the domain of serious harm to human beings. Using imprisonment to resolve every instance of offence would expand criminalisation without strengthening harmony.

Article 300(2) should be read as an additional guarantee for certain contexts, not as a closed list of all legitimate religious expression. Public sermons that are not academic remain protected if the elements of paragraph (1) are not met. The opposite reading would have the state indirectly determine which styles of religious communication are permitted. A state governed by law does not need state-approved

sermons; it needs boundaries certain enough to prevent hatred without punishing differences of belief.

Tests of necessity and proportionality also prevent Article 300 from being used as an automatic response to every harmful expression. Criminal restrictions must pursue a legitimate aim, be necessary to protect others, and not exceed the degree of harm they seek to prevent. This position matters because there is a wide spectrum between speech that deserves criticism and speech that deserves imprisonment. Social criticism, counter-narratives, rights of reply, internal community moderation, education, or administrative mechanisms may be more appropriate when problematic speech has not reached the threshold of serious incitement. *General Comment No. 34* emphasises that restrictions on expression must satisfy necessity and proportionality and must not be applied excessively to silence differing views (United Nations Human Rights Committee, 2011, paras. 21–36).

Putri (2023) broadens the secondary empirical basis of this article through a study of 27 Indonesian decisions concerning Article 28(2) of the UU ITE. The study found inconsistency in the assessment of harm, which supports the need to distinguish the assessment of the content of speech from the relationship between speech and harm. Its findings are not treated as results of an analysis of Article 300 after 2026. Meanwhile, Dreißigacker et al. (2024) examine feelings of insecurity resulting from online hate speech victimisation. Their contribution is to show the relevance of victims' experience, without treating insecurity in itself as complete proof of the elements of an offence. Protecting freedom of expression must therefore be accompanied by an examination of specific harm.

The difference between offence and harm is the most concrete test of proportionality. Offence relates to feeling insulted, affronted, or disturbed, whereas harm touches more serious legal interests such as safety, equality, liberty, and protection from discrimination. A plural society cannot promise a condition free of offence, because religions inherently contain claims that may contradict one another. The state has a strong reason to use criminal law only when expression converts such denial into harm to others. The Court itself rejected constructions that would allow criticism, satire, or neutral expression to be ensnared merely because third-party responses generated hostility (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 456–457). This threshold means that democratic tolerance is not the same as a duty to like what others say.

3.3. Prophetic Theology in the Physical and Digital Pulpit

The term “prophetic” cannot be determined by volume or the severity of condemnation. In a constructive reading of Amos 5:21–24, Isaiah 1:10–17, and Micah 6:6–8, criticism of worship is tied to the demand for justice and a change of conduct. Searle (2020, pp. 102–105) helps situate that protest within Christian witness against injustice. This reading provides a moral orientation for the article, not a single interpretation of the whole Christian tradition.

Orientation towards justice must be accompanied by scrutiny of the speaker's power. Wessels (2022, pp. 1–3) identifies the risks of forming colonial identities, nurturing hatred, oversimplifying social problems, and weakening personal responsibility in prophetic preaching. Drawing on this critique, the article distinguishes condemnation of changeable conduct from labelling a religious group as lesser human beings. This distinction is the author's own synthesis for dialogue between law and theology, not an element of an offence formulated by Wessels.

Contemporary public theology also warns that prophetism can become corrupted from within. Prophetic preaching may produce new colonial identities, *ressentiment*, simplified accounts of the causes of social problems, or the displacement of personal responsibility when criticism works only through the formation of a collective enemy (Wessels, 2022, pp. 1–22). The history of prophetic public theology likewise shows the need for self-criticism so that prophetic language does not harden into a black-and-white dichotomy that obscures moral complexity (Laubscher, 2022, pp. 1–7). This warning is relevant to Article 300 because the internal claim “we are prophesying” does not suffice to prove that speech lies beyond the reach of the law.

The law need not become a judge of theology in order to draw on this distinction. Courts need not decide whether a sermon truly comes from the Holy Spirit or is faithful to a particular interpretation of Scripture. The law need only examine observable communicative patterns: whether the speech evaluates actions, policies, structures, or doctrines, or whether it turns a group's identity into a reason to lower its dignity and rights. Prophetic criticism is generally oriented towards moral correction. Hate speech works through the generalisation of identity and the normalisation of hostility.

The sharpest distinction can be framed as one between the moralisation of conduct and the degradation of identity. The sentence “corruption is sin, and officials who steal must repent and be prosecuted” makes a moral judgement of conduct. The sentence “adherents of religion X are fundamentally untrustworthy, so do not give them jobs” degrades identity. Both may use absolute language, but only the second ties civil status to religious membership. This distinction accords with the concept that hate speech positions its target as an unwanted presence and an object of hostility because of the characteristics of their identity (Lepoutre et al., 2024, pp. 397–430).

Theological exclusivity must also be separated from civic exclusivity. A church may state that salvation is only through Christ or that a particular teaching is mistaken according to the Bible. The state has no mandate to turn all religions into doctrinal pluralists. Freedom of religion would lose its meaning if believers could speak only so long as all truth claims were negated. The legal problem arises when a theological conclusion is translated into a social inference: because others do not hold my faith, they do not deserve the same employment, permits for worship, public services, or security.

Cases of oppositional religious speech show that religious expression does indeed have room to criticise the beliefs and conduct of others. Using sacred texts does not automatically free a speaker from the law, but courts must also give weight to the religious character and context of the manifestation when assessing the proportionality of restrictions (Edge, 2018, pp. 278–280, 287–289). This approach is relevant to Christian preaching in Indonesia. Scripture is not an absolute shield, but the controversial content of Scripture is also not automatic proof of hatred.

The digital pulpit transforms the whole configuration because a message originally spoken within a community can undergo context collapse. The audience of a sermon no longer consists of people who share the same history, vocabulary, or interpretive frame. An internal metaphor can be clipped, retitled, and circulated to a different public. This phenomenon does not free the speaker from responsibility, but it makes examination of context more important. A ten-second clip cannot always represent the intent of a full sermon, while a full recording must not serve as an alibi if there is in fact an explicit call to discrimination.

Article 301 must be read as a dissemination offence that depends on Article 300. The phrase concerning content “containing a criminal offence as referred to in Article 300” means that virality does not create a new crime from content that never satisfied the elements of Article 300 (Republik Indonesia, 2023, Art. 301). A million viewers do not convert doctrinal criticism into hatred. Reach is relevant only as a factor that magnifies the potential for harm once the substance, target, and intent have shown a prohibited character.

The element of intent that the content be known or more widely known to the public in Article 301 also requires a separation of roles. Preachers, channel administrators, video editors, and third-party users do not always share the same *mens rea*. A preacher who delivers internal material does not necessarily intend a particular clip to go viral. A church media administrator who deliberately uploads a provocative title may have a distinct distribution role. A third-party user who edits a clip and adds a narrative of hatred also creates a new context. Responsibility must follow each person’s acts and intent, not virality as a single fact.

Algorithms heighten this complexity. Emotional content can travel beyond its intended audience because of platform recommendation mechanisms. Algorithmic reach cannot be automatically converted into criminal intent. Evidence of intent must be sought in the way content is uploaded, calls to share, repetition of the message, audience targeting, titles, hashtags, follow-up comments, and actions taken after the risk became known. The extent factor in the *Rabat Plan* is useful precisely because it assesses reach together with other factors, not as a substitute for intent (OHCHR, 2013, paras. 29–30).

The consequences for the church must also be distinguished from criminal consequences. A church may set communication standards higher than the criminal threshold. A sermon that is pastorally inappropriate can be corrected internally even if it does not satisfy Article 300. Media governance, pastoral training, guidelines for video

clips, and procedures for correcting context can reduce risk without making the criminal law an editor of sermons. The prophetic function is in fact more credible when moral courage does not depend on stereotypes and dehumanisation.

The authority of the pulpit magnifies responsibility because the preacher speaks from a position that can shape the moral judgement of the audience. However, the magnitude of authority must not be inverted into a presumption of guilt. Religious leaders retain the right to criticise the state, their own religious institutions, and even other religious traditions. Authority becomes an analytical aggravating factor only when combined with dehumanising content and the audience's capacity to act. Studies of hate preaching treat proportionality as a way of weighing the manifestation of religion against the interest in protecting target groups, not as a reason to eliminate either (Edge, 2018, pp. 287–289). The preacher's position is thus not an independent criminal element; it affects the assessment of the causal force of the speech.

Farrand (2023) shows that coded communication makes it harder to recognise messages that encourage radicalisation; its contribution is a reason to examine the function of speech beyond the meaning of isolated words. Ullmann and Tomalin (2020) discuss the technical and ethical problems of handling online hate speech, which helps distinguish platform moderation from criminal proof. In this article, both are used to support examination of context and of the full recording. Automated classification or platform policy is not used as a substitute for assessing intent and whether the elements of the provision are satisfied.

Prophetic theology also has internal corrective mechanisms relevant to prevention. Authentic prophetism does not stop at pointing out the faults of others but opens space for self-criticism of the church and the speaker. When a pulpit serves only to divide the world into a holy community and a homogeneous enemy, the prophetic structure begins to turn into identity politics. This risk has been discussed in contemporary homiletic reflection, which sees *ressentiment* and oversimplification as possible distortions of prophetic preaching (Wessels, 2022, pp. 1–22). For the law, such internal correction is not an element of the offence, but it helps explain why the label “prophetic” cannot simply be accepted as a defence.

3.4. The Prophetic-Proportionality Test in Enforcing Articles 300–301

The greatest problem in enforcing hate speech law is the temptation to look for a single indicator regarded as sufficient, such as a crude word, a police report, the number of viewers, protests, or the identity of the speaker. None of these indicators, however, can operate independently. This study proposes the Prophetic-Proportionality Test as a way to combine the structure of Articles 300–301, the principle of intent in Article 36, the orientation towards restricting expression in the Constitutional Court's reasoning, the Rabat threshold, and the ethical control of prophetic theology. The test is an interpretive matrix proposed by the author. It does not replace the elements of the offence, does not equate all forms of conduct in Article 300 with incitement, and does not transfer the operative ruling on the UU ITE to the Criminal Code.

The first layer is the target of the speech. The examination must begin with the question of what or whom is being attacked. Criticism of policies, doctrines, conduct, institutions, or power structures is not the same as an attack on individuals on the basis of religion. The target is key because Article 300 after 2026 places persons, groups, or collectivities as the object of protection. Findings from judicial practice show how easily the target becomes blurred when symbols, religion, and adherents are treated as a single object without adequate distinction (Susanti et al., 2026, pp. 333–337).

The second layer is intent. Article 36 requires intent, while the Constitutional Court emphasised the act of disseminating hatred deliberately in public (Republik Indonesia, 2023, Art. 36; Mahkamah Konstitusi Republik Indonesia, 2025, pp. 456–458). Intent need not be proven through confession; it may be inferred from the overall narrative, repetition, choice of target, calls to the audience, timing, symbols, and follow-up actions. The crucial distinction here is between intent to deliver criticism and intent to mobilise hostility.

The third layer is content and form. The analysis must look for collective stereotypes, dehumanisation, conspiratorial accusations, glorification of violence, depiction of a group as an existential threat, and calls to restrict rights. Theological language requires contextual reading. The metaphor of “spiritual warfare” does not automatically mean a call to attack human beings. Risk increases when the spiritual enemy is explicitly mapped onto a particular religious community accompanied by instructions for action against them.

The fourth layer is context and the speaker’s authority. The words of a religious leader with many followers amid local tension have a different mobilising force from a discussion in a closed classroom. The speaker’s position matters because audiences may interpret the words as a moral command. Context includes the history of conflict, the vulnerability of the target, the political situation, and earlier patterns of violence. The *Rabat Plan* treats context and the speaker’s position as initial factors, because the same sentence can carry different risks in different social situations (OHCHR, 2013, paras. 29–30).

The fifth layer is reach and the mechanism of distribution. The size of the audience, the frequency of repetition, the nature of the platform, the audience’s capacity to act, and the speaker’s control over dissemination must be examined. Article 301 operates principally in this domain, but reach only strengthens the analysis of content that is already problematic. Legitimate criticism does not become a criminal offence merely because it goes viral. Conversely, incitement directed at a small audience can still be regarded as serious if the audience is capable of immediately carrying out the action requested.

The sixth layer is real risk. Risk must be explained through a traceable relationship between the speech and discrimination, hostility, or violence. Indicators may include explicit calls to action, audience readiness, a history of mobilisation, temporal proximity, or foreseeable patterns of behaviour. Protests from groups that feel

attacked do not automatically prove a risk created by the speaker. The relevant harm is harm to the target because the audience was moved by the speech, not harm to the speaker because the target became angry. This principle prevents third-party responses from taking over the structure of the offence (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 456–457).

The “prophetic” dimension works as a substantive control on target and purpose, not as a separate justification. Speech comes closer to a prophetic character when the criticism is directed at injustice, abuse of power, and changeable conduct while keeping open a horizon of repentance and restoration. Speech moves further from prophetism when identity attached to a group is used as the reason to deny dignity, rights, or security. The law does not assess the piety of the speaker; it examines whether the prophetic claim is used to correct conduct or to legitimise harm to human beings.

The six dimensions must be read together without being turned into a score that automatically determines guilt. Target, intent, and the charged conduct are still examined according to the wording of the statute. Authority, reach, and the likelihood of harm help explain context and the proportionality of interpretation; none of the three can replace an element that has not been proven. An orientation of criticism towards doctrine or conduct is an important reason to protect expression, whereas calls to reduce the rights of a group on the basis of religion require closer scrutiny. A conviction still depends on proof of each element and individual responsibility.

The test produces a more honest spectrum than the dichotomy of “sermon” versus “hate speech”. A sermon that condemns ecclesiastical corruption, manipulation of offerings, sexual violence, or abuse of power lies close to the core of the prophetic function. An apologetic sermon that declares another doctrine mistaken also falls fundamentally within the space of theological freedom. Risk rises when doctrinal rejection is generalised into an innate trait of all adherents. Risk becomes very high when that generalisation is linked to calls to deny a particular group employment, permits for worship, education, political participation, or security.

Direct incitement is the easiest case. Calls to expel, attack, damage places of worship, or block the rights of a group because of its religion lie close to the centre of the prohibition in Article 300. The claim that a call derives from sacred texts does not change the legal character of the act. The law is not putting Scripture on trial; it assesses the conduct of a speaker who uses religious authority to mobilise discrimination or violence. By contrast, harsh scriptural quotation that does not function in this way must not be punished merely because it is controversial.

The difficult cases lie in ambiguous territory: satire, video clips, institutional criticism, or statements that audiences may read differently. Here investigators must obtain the full recording, the context before and after the sentence, distribution metadata, who uploaded it, whether it was edited, and how the speaker responded after learning of the consequences. Analysing fragments without the original source risks turning criminal proceedings into a viral contest. Research on decisions shows the

importance of clarity about the target if enforcement is not to drift towards overcriminalisation (Susanti et al., 2026, pp. 336–340).

Public prosecutors need to separate evidence of intent from evidence of public reaction. The number of reports, angry comments, or demonstrations may be relevant as context but does not prove *mens rea*. Stronger evidence may take the form of explicit instructions, earlier patterns of messages, repeated stereotypes, choice of targets, coordination, or calls to act. Judges must explain clearly why the speech reached the criminal threshold, rather than merely concluding that the public felt disturbed.

Constitutional Court Decision No. 105/PUU-XXII/2024 provides a constitutional basis for limiting the meaning of the hate-incitement norm in the UU ITE (Mahkamah Konstitusi Republik Indonesia, 2025, pp. 455–460). In this article, its reasoning serves as a reference for the proposed restrictive interpretation of Article 300, while preserving the differences in wording and context between the two provisions. Courts must explain why its constitutional principles are relevant in a concrete case; merely citing the Constitutional Court’s decision is not enough to treat every parameter of the UU ITE as an element of Article 300.

Reconstructing law enforcement requires changing the opening question. Officials should not begin by asking “which religion has been insulted?” but “who is the target, what act was intended, and what harm was deliberately created?”. This change of question shifts the focus from the honour of doctrine to the protection of persons. It also prevents religious experts from taking over the function of judges. Theologians may explain the meaning of internal terms, but the judgement that a particular teaching is heretical or offensive cannot be the sole evidence that the elements of an offence have been met.

Ultimately, the Prophetic-Proportionality Test avoids two symmetrical errors. A false positive occurs when legitimate criticism is punished because it is deemed harsh or offensive. A false negative occurs when dangerous incitement escapes merely because it is wrapped in verses, prophecy, or a prophetic claim. Good law must be able to reject both. The strength of Articles 300–301 lies not in an ability to create a public sphere free of theological conflict, but in an ability to keep conflicts of ideas from turning into a licence to demean, exclude, or injure human beings.

Table 1. The Prophetic-Proportionality Test for Articles 300–301 of the Criminal Code

Dimension	Key Question	Indicator of Criminal Risk
Target	Is the criticism directed at ideas or conduct, or at persons because of their religious identity?	Religious identity becomes the reason for demeaning dignity or rights.
Intent	Does the speaker intend to criticise, or to mobilise hostility or discrimination?	Calls to action, repetition, patterns of targeting, and follow-up actions indicate an intent to mobilise.
Content and form	Are there collective stereotypes, dehumanisation, threats, or legitimisation of violence?	The group is portrayed as a threat that deserves to be removed or attacked.
Context and authority	How influential is the speaker, and what is the social situation of the target?	High authority, active conflict, a vulnerable target, or a history of mobilisation.
Reach	How is the content disseminated, and who is the audience able to act?	Deliberate, repeated, wide, and targeted distribution to an audience that can be mobilised.
Real risk	Is there a realistic link to discrimination, hostility, or violence?	Concrete and explicable harm, not merely offence or protest.

Source: Compiled from Articles 300–301 of the Criminal Code, Constitutional Court Decision No. 105/PUU-XXII/2024, and the Rabat Plan of Action

The architecture of proof for Articles 300–301 needs to shift from reliance on screenshots to a contextual approach. The full recording, a complete transcript including the time and place of delivery, the composition of the audience, the pattern of messages before and after, and distribution metadata must be treated as a single ecosystem of evidence. Truncated digital evidence may remove negation, irony, or correction that could change the meaning of a sentence. At the same time, the argument that something was “taken out of context” must not be accepted without further examination, particularly where the full recording shows a consistent pattern of dehumanisation. Such an evidentiary framework better fits the demands of real risk, because judges assess the likelihood of harm from the facts of communication, not merely from the impression left by a single viral fragment.

Non-criminal responses remain relevant to problematic speech that does not yet satisfy the elements of an offence. De Silva and Simpson (2023) discuss the role of law as a response to demeaning speech, thereby widening attention from punishment to restoring the standing of those attacked. Garland et al. (2022) examine the dynamics of hate speech and online counter-speech; their study supports attention to communicative interaction, without guaranteeing the same effectiveness in every community. For churches, the normative implication is to provide clarification, rights of reply, pastoral correction, and media guidelines suited to the specific problem. Such measures do not preclude criminal proceedings where all the elements of an offence are proven.

The construction of the indictment must also preserve the relationship between Articles 300 and 301. Prosecutors need first to show why the content satisfies Article 300 before proving the act of dissemination and the intent that the content become more widely known. This order is important to prevent virality from being used as a substitute

element for hatred. It also separates the responsibility of the preacher from that of channel administrators and third parties. In a digital ecosystem, a single piece of content may involve several actors with different degrees of control and intent. Individual liability should follow roles that can be proven, not mere connection with the material in circulation.

4. CLOSING REMARKS

Articles 300–301 of the Criminal Code after the 2026 amendment need to be read by distinguishing criticism of ideas or conduct from attacks on human beings on the basis of religion or belief. Doctrinal criticism, exclusive theological claims, and harsh preaching language do not automatically satisfy the elements of an offence. The assessment must follow the charged form of conduct, intent, and the relationship of responsibility of each party; the exception in Article 300(2) cannot be inverted into a presumption of guilt.

The Prophetic-Proportionality Test offers six dimensions of examination: target, intent, content and form, context and authority, reach, and real risk. Prophetic theology serves as an ethical critique of prophetic claims, while the Constitutional Court's reasoning on the UU ITE is used in a limited way to support an interpretation consistent with constitutional rights. This framework is a normative proposal that has not yet been tested against a corpus of decisions applying Article 300 after 2026.

Law enforcement officials and courts need to examine the full recording, the target, intent, and the role of distribution before concluding that an offence has been committed. Churches are advised to develop guidelines for public communication, legal literacy training, and correction procedures that preserve criticism of injustice without demeaning other religious groups.

Further research should test the Prophetic-Proportionality Test on decisions or cases applying Articles 300–301 after 2026, compare assessments across researchers, and examine whether its six dimensions help produce consistent legal reasoning. Cross-religious studies are also needed to assess the applicability of the framework beyond Christian preaching, taking into account differences in authority, interpretive traditions, and communication patterns in each community.

REFERENCES

- Butt, S. (2023). Indonesia's new Criminal Code: Indigenising and democratising Indonesian criminal law? *Griffith Law Review*, 32(2), 190–214. <https://doi.org/10.1080/10383441.2023.2243772>
- de Silva, A., & Simpson, R. M. (2023). Law as counterspeech. *Ethical Theory and Moral Practice*, 26, 493–510. <https://doi.org/10.1007/s10677-022-10335-3>
- Dreißgacker, A., Müller, P., Isenhardt, A., & Schemmel, J. (2024). Online hate speech victimization: Consequences for victims' feelings of insecurity. *Crime Science*, 13, 4. <https://doi.org/10.1186/s40163-024-00204-y>

- Edge, P. W. (2018). Oppositional religious speech: Understanding hate preaching. *Ecclesiastical Law Journal*, 20(3), 278–289. <https://doi.org/10.1017/S0956618X18000467>
- Farrand, B. (2023). “Is this a hate speech?” The difficulty in combating radicalisation in coded communications on social media platforms. *European Journal on Criminal Policy and Research*, 29, 477–493. <https://doi.org/10.1007/s10610-023-09543-z>
- Garland, J., Ghazi-Zahedi, K., Young, J.-G., Hébert-Dufresne, L., & Galesic, M. (2022). Impact and dynamics of hate and counter speech online. *EPJ Data Science*, 11, 3. <https://doi.org/10.1140/epjds/s13688-021-00314-6>
- Indrayanti, K. W., & Saraswati, A. A. A. N. (2022). Criminalizing and penalizing blasphemy: The need to adopt a human rights approach in the reform of Indonesia’s blasphemy law. *Cogent Social Sciences*, 8(1), 2104704. <https://doi.org/10.1080/23311886.2022.2104704>
- Laubscher, M. (2022). The (demanding) history of South African public theology as prophetic theology. *In die Skriflig/In Luce Verbi*, 56(1), 1–7. <https://doi.org/10.4102/ids.v56i1.2856>
- Lepoutre, M., Vilar-Lluch, S., Borg, E., & Hansen, N. (2024). What is hate speech? The case for a corpus approach. *Criminal Law and Philosophy*, 18(2), 397–430. <https://doi.org/10.1007/s11572-023-09675-7>
- Mahkamah Konstitusi Republik Indonesia. (2018). Decision No. 76/PUU-XV/2017, 28 March 2018, especially considerations 3.12–3.16. https://www.mkri.id/public/content/persidangan/putusan/76_PUU-XV_2017.pdf
- Mahkamah Konstitusi Republik Indonesia. (2025). Decision No. 105/PUU-XXII/2024, 29 April 2025, pp. 455–460. https://www.mkri.id/public/content/persidangan/putusan/putusan_mkri_12530_174_5894606.pdf
- Office of the United Nations High Commissioner for Human Rights. (2013). *Rabat Plan of Action on the prohibition of advocacy of national, racial or religious hatred that constitutes incitement to discrimination, hostility or violence* (A/HRC/22/17/Add.4, Appendix). United Nations.
- Putri, D. K. (2023). Hate speech and the harm in Indonesian judicial decisions. *Cogent Social Sciences*, 9(2), 2274430. <https://doi.org/10.1080/23311886.2023.2274430>
- Republik Indonesia. (1945). 1945 Constitution of the Republic of Indonesia.
- Republik Indonesia. (2005). Law No. 12 of 2005 on the Ratification of the International Covenant on Civil and Political Rights.
- Republik Indonesia. (2023). Law No. 1 of 2023 on the Criminal Code.
- Republik Indonesia. (2024). Law No. 1 of 2024 on the Second Amendment to Law No. 11 of 2008 on Electronic Information and Transactions.
- Republik Indonesia. (2026). Law No. 1 of 2026 on Criminal Penalty Adjustment.

- Searle, J. T. (2020). Prophecy, protest and public theology: The relevance of Dietrich Bonhoeffer's prophetic mandate in today's post-truth world. *Journal of European Baptist Studies*, 20(2), 102–112. <https://doi.org/10.25782/jebs.v20i2.318>
- Susanti, D. I., Saintio, F. A., & Wejak, J. (2026). Intention and target of religion-based hate speech in a decade of judicial decisions. *Jurnal Hukum dan Peradilan*, 15(2), 323–346. <https://doi.org/10.25216/jhp.15.2.2026.323-346>
- Syamsudin, S., & Fernando, Z. J. (2025). The protection of freedom of religion and belief under Indonesia's Criminal Code: A normative review of Articles 300–305 of Law No. 1 of 2023. *Negara Hukum: Membangun Hukum untuk Keadilan dan Kesejahteraan*, 16(1), 19–34. <https://doi.org/10.22212/jnh.v16i1.4618>
- Ullmann, S., & Tomalin, M. (2020). Quarantining online hate speech: Technical and ethical perspectives. *Ethics and Information Technology*, 22, 69–80. <https://doi.org/10.1007/s10676-019-09516-z>
- United Nations Human Rights Committee. (2011). *General Comment No. 34: Article 19: Freedoms of opinion and expression* (CCPR/C/GC/34). United Nations.
- Wessels, W. (2022). Identity, power, and responsibility: Reflections on prophetic preaching in South Africa. *Stellenbosch Theological Journal*, 8(2), 1–22. <https://doi.org/10.17570/stj.2022.v8n2.a6>



This work is licensed under a [Creative Commons Attribution 4.0 International License](https://creativecommons.org/licenses/by-nc/4.0/).
