

The Position of Women in the *Mānawa Dharmaśāstra* and its Implementation in Denpasar City (Character Education Perspective)

Ketut Budiawan¹, I Putu Gelgel² dan I Putu Sastra Wibawa³

Program Studi Pendidikan Agama Hindu Sekolah Tinggi Agama Hindu Dharma Nusantara Jakarta, Jakarta Timur, DKI Jakarta 10430, Indonesia¹

Program Studi Doktor (S3) Ilmu Agama dan Kebudayaan, Universitas Hindu Indonesia Denpasar, Denpasar Timur, Bali 80238, Indonesia²³

budiaawanketut77@gmail.com¹, putu_gelgel@yahoo.co.id², sastra@unhi.ac.id³

ABSTRACT

Character education is a long-term investment to build a Hindu character that is of *Śuddha* (holiness), *Sādhu* (wise), *Siddhi* (intelligent), and *Siddha* (successful and perfect). This is based on the principle of mutual support and complementarity between *purusa* and *pradana*, as explained in *Mānawa Dharmaśāstra* I. 32. However, in reality, the hope to have a harmonious family faces various challenges. For example, in Denpasar City, 201 divorce cases were recorded among the Hindu community during a period of 2 months and 27 days, from August 15 to November 11, 2019.

The focus of discussion in this study is to analyse the reasons for and forms of differences in the position of women in the *Mānawa Dharmaśāstra* and the lives of Hindu women in Denpasar City, and the implications of the different positions of women in the *Mānawa Dharmaśāstra* and the lives of Hindu women on religious, social, cultural, and economic life in Denpasar City. The theories used are Derrida's deconstruction, legal system, and power relations. This research uses qualitative method, constructivism paradigm, case study approach through field observation, and in-depth interviews.

The results show that (1) the factors that cause differences in the position of Hindu women are the patrilineal family system, differences in the treatment of women in the family, customary law, and society; (2) The form of differences in the position of women is very significant compared to men; and (3) Implications in religious life due to the interpretation of texts about women, social life roles dominated by men, culture places men as rulers, women are subordinated, in the economic field economic inequality arises which affects women's participation, income, and limited economic opportunities.

The role of *Śuddha*, *Sādhu*, *Siddhi*, and *Siddha* characters in developing an independent, confident and empowered attitude for women. *Sādhu* characters are not only for women but also for men.

Keywords: *Position of Hindu Women, Mānawa Dharmaśāstra, Hindu Character Education.*

I. INTRODUCTION

Character education is a crucial long-term investment for the future of the family, community and nation. Introducing and teaching good values from an early age can build a quality generation, create social harmony, and strengthen the family system. The family environment, both positive and negative, provides valuable life experiences for children. As stated by Patching (2007: 30), Life's experiences, and the lessons we

learn from then, often reinforce our tendencies to believe in what we believe.

Character education, particularly in the Hindu context, can be connected to the concepts of *purusa* and *pradana*, which symbolize consciousness/soul and matter/creative principle respectively, with *purusa* as the spiritual principle and *pradana* as the material principle. This understanding can help in building a balanced and positive character. Based on this interest, Hindu society continues to explore the meaning of

purusa and *pradana*, which is connected to the process of origin of the creation of the universe and its contents. This is a source of harmony between creation and human life and all its creations. The goal is for each generation to develop the Hindu character of *Suddha* (clean, holy, pure) as a manifestation of emotional intelligence, *Sādhu* (kind and wise) as a manifestation of intellectual intelligence, and *Siddhi* (intelligent, perfection, extraordinary ability) as spiritual intelligence. Thus, individuals are expected to become successful and accomplished people with *Siddha* character (work ethic: success, accomplished, usually achieved through hard work and achievement). This is all done in the context of strengthening and complementing each other as *purusa* and *pradana*, in accordance with the teachings in the *Mānawa Dharmaśāstra*, especially those outlined in *Mānawa Dharmaśāstra* I. 32.'

*Dvidhā kṛtvātmano deham
ardhena puruṣo 'bhavat,
ardhena nāri tasyām sa
virājama srjat prabhuḥ*

Meaning:

Dividing himself into part male and part female (*ardha nari*), he created viraja from the female part. *Mānawa Dharmaśāstra* I. 32. (Pudja, G and Rai Sudharta, 2010: 9)

Balinese Hindus who adhere to the patrilineal family system often face challenges in achieving the hope of having a prosperous and happy family. In the short period between August 15, 2019 and November 11, 2019, Denpasar City recorded a high number of divorces, with 201 cases registered at the local District Court. This figure reflects the complexity of the problems faced by the society. Research shows that there is still a lack of positive understanding about women.

In Hindu law, *Tritiyō Dhyāyah* (Third Book) discusses marriage in the context of *Yajña*, specifically *Pañca Yajña Śraddhā*, which explains the obligations of a Grihastha. On the other hand, the *Atha Navamo Dhyāyah* (Ninth Book) book XI.96 explains the obligations of husband and wife

(Pudja, G and Rai Sudharta, 2010) and it can be understood that the purpose of marriage is not only to enjoy sexual life, but rather to achieve a nobler goal, namely the implementation of *dharma* or *dharmasapati*, and to produce offspring to continue the generation or *praja*. In other words, the purpose of marriage according to Hindu law, in addition to creating a happy and prosperous family both physically and mentally, also includes obtaining offspring as a successor to the generation (*pretisentana*).

Anshary notes six basic principles about marriage that are important to understand. First, the main purpose of marriage is to build a happy and lasting family. Second, a marriage is only considered valid if it is carried out in accordance with the laws of each religion and belief, and is registered as an administrative act. Third, marriage is governed by the principle of monogamy. Fourth, the prospective bride and groom must have reached the age of marriage, which is 19 years for men and 16 years for women. Fifth, divorce is to be made difficult, and if it occurs, there must be clear reasons and be carried out before the court. Sixth, the rights and position of the wife must be equal to the rights and position of the husband, both in the household and in society (Anshary, M, H, 2015: 76).

However, there are complex challenges in determining what constitutes Hindu law and how to distinguish it from customary law. To date, there is no codified Hindu law that applies to all Hindus in Indonesia. In addition, the existence of *Sila* and *Acara* or *Sadacara*, which are commonly interpreted as similar to customary law as sources of law, is also an issue that requires in-depth research and study to find a solution (Surpha, 2005: 58).

Based on the background of the problems described, related to the legal system and its application for Hindu women, Hindu character education has a very important role in shaping individuals. The individual is not only expected to be

intellectually intelligent, but also have high moral and spiritual integrity. This aims to achieve spiritual (happiness) and physical (well-being) awareness for society, especially in the context of the position of women. The focus in this research is on the Hindu character, with a sub-classification on the position of women based on the legal values contained in the *Mānawa Dharmaśāstra*. This research will also examine the relationship between these values and the lives of Hindu women in Denpasar City.

II. RESEARCH METHOD

This research uses a qualitative method, constructivism paradigm, case study approach conducted through field observations and in-depth interviews. The informants involved in this research include Hindu women, Hindu religious bureaucrats, the Chairperson of the Denpasar City Customary Village Council, and the Head of the Customary Law Promotion Division of the Bali Province Indigenous Peoples Promotion Office. The choice of location in Denpasar City was based on two reasons: first, there is a high divorce rate that has been identified through the author's research in 2019; second, there is a gap in women's understanding of religious teachings vis-à-vis the patrilineal family system related to the position of women. Research data collection began in May 2023 and is planned for presentation in March 2025.

In this research, there are three theories used to analyse various aspects related to the differences in the position of women in the *Mānawa Dharmaśāstra*. First, the theory of deconstruction proposed by Derrida is used to unravel and analyse the factors that cause these differences. Second, the theory of the legal system serves to examine the form of differences in the position of women in the *Mānawa Dharmaśāstra* and its relationship to the lives of Hindu women. Finally, power relations theory is used to examine the implications of this difference in position on

the religious, social, cultural, and economic lives of Hindu women.

III. RESULT AND DISCUSSION

Factors Causing Differences in the Position of Women in the *Mānawa Dharmaśāstra* and the Life of Hindu Women in Denpasar City

The Balinese Family System is Patrilineal

The patrilineal family system still has a significant influence on women's lives, both in rural and urban areas. The dominance of men in various aspects of society - such as economics, politics, religion and culture - results in women often being marginalized. Existing gender inequality often leads to discrimination and injustice, with women being the most victimized group. To address this issue of gender injustice, efforts are made through women's empowerment programs. . To overcome the problem of gender injustice, efforts are made through women's empowerment programs. This problem is particularly evident in the marital phase, in relation to joint property and inheritance issues. According to the Vedas (Hindu religious scriptures) and Hindu literature, the meaning of marriage is to create happiness both outwardly and inwardly, including in the context of obtaining good offspring as a successor to the family (Agung, Istri, Agung, 2016: 3).

Marriage in Balinese society is known to consist of two forms, namely ordinary marriage and *nyentana* or *nyeburin* marriage. Based on the explanation of P. Windia (2006: 85), these two forms of marriage have different characteristics. First, the ordinary marriage, which is often referred to as *nganten biasa*. In this type of marriage, the woman leaves her family and joins her husband's family. All aspects related to the implementation of the marriage are the responsibility of the man's family. Second, the *nyentana* or *nyeburin* marriage. Unlike ordinary marriage, in a *nyeburin* marriage, the male party becomes

meawak luh, which means he has the status of a woman or *predana*. He will leave his family and become a member of his wife's *meawak muani* family, which has the status of a man or *purusa*. The interesting thing about this marriage is that the married couple will remain in the wife's family circle during the marriage. Women who marry through the *nyeburin* method have the status of *sentana rajeg*, which continues the family lineage.

In patrilineal family systems, justice for women often feels unfair. The good name and standing of a family can be lost forever just because one of their daughters loses her virginity prematurely, even if she is actually a victim of rape. This is why many cases of rape remain hidden and rarely come to light, allowing perpetrators to often escape the law (Saadawi, 2001: 35-36).

The term patriarchy literally means power held by men or "patriarchy". Originally, patriarchy was used to describe a type of family ruled by men, i.e. a large household consisting of women, young men, children, slaves, and servants, all under the control of a single male ruler. Today, the term has evolved and is used more broadly to refer to male dominance, power relationships in which men dominate women, as well as to describe systems that place women in a position of oppression through various means (Bhasin, 1996: 1).

The meaning of the *Mānawa Dharmaśāstra* articles IX. 9, IX. 10, and IX. 11 are closely related to roles and responsibilities in housework. Based on the results of a study involving 22 informants, it was found that 50% of respondents were of the opinion that the responsibility lies with the wife, while 13.6% stated that the responsibility lies with the husband. Another 36.4% believed that housework should be done jointly by husband and wife. From this data, there is a clear difference in roles and responsibilities between women as wives and men as husbands, where the responsibility is more dominantly held by the wife.

The difference of women's position in the *Mānawa Dharmaśāstra* as a legal value and the life of Hindu women in Denpasar City is influenced by several factors. One of them is the patrilineal family system of Balinese society, which results in gender inequality and injustice. In fact, in the teachings of the *Mānawa Dharmaśāstra*, especially in articles I. 32, IX. 9, IX. 10, and IX. 11, it is explained that men and women are created equal by *Hyang Widhi Wasa*/God Almighty, each holding complementary roles in life.

However, the patrilineal family system clearly stipulates that (1) children follow the father's lineage, where only sons are considered as successors to the family lineage, and (2) inheritance rights are prioritized for sons. Thus, men play a dominant role in implementing *Swadharma* and *Swadikara* in the Balinese family context. The role of character education in this kinship system is not only for women, but also for men. The character of *Sādhu*, which reflects kindness and wisdom, encourages men to be active in creating equality between men and women with mutual respect and complementarity. In addition, the *Siddhi* character, which reflects intelligence, provides an important role in developing women's potential. Meanwhile, the *Siddha* work ethic focuses on building independent, confident and empowered female characters in this patrilineal family system.

The Different Treatment of Women in the Family

The emergence of the term character education in the current context, as expressed by Arliman S. (2021: 182), is an interesting phenomenon to be studied and analysed. This can be seen from various perspectives, both political and bureaucratic, as well as from an academic perspective related to the position of women. One of the character education strategies is through the Multiple Intelligence or Multiple Talent approach. This strategy aims to develop students' full potential, which in turn will

build a self-concept that supports their mental health (Agustinus Hermino, 2013 in Arliman S, 2021: 183). Individual character development should also include special attention to women.

Character development originating from the family environment is explained by Samrin (2016: 120) who emphasizes that forming the next generation of the nation that has good character is a shared responsibility of all parties. This should be understood as part of a positive living culture. The prevailing culture in Indonesian society, as expressed by H. A. R. Tilar (1999) in (Samrin, 2016: 129), shows that the essence of Indonesian cultural values has been validated through Pancasila. The character that is built based on the values of Pancasila is very important; among others, tough, competitive, noble, moral, tolerant, cooperative, patriotic, dynamic, and cultured. Cultural values based on Pancasila are in line with the legal values of *Mānawa Dharmaśāstra* III. 56, III. 57, and IX. 96, which have awareness and meaning in daily life. In this context, women have an honorable and sacred position. This view is also explained by Setyawati (2017: 619), who points out that in the Vedas, women are highly respected even though the law is constantly changing, this is also stated by Martha (2018: 10). Where women are honored, the gods are pleased, whereas where women are not honored, there will not be any sacred ceremony that brings merit, as stated in *Mānawa Dharmaśāstra* III. 56.

*Yatra nāryāstu pūjante
ramante tatra devatāḥ,
yatra itāstu na pūjyante
sarvās tatrāphalaḥ kriyāḥ*

Meaning:

Where Women are honored, there the gods are pleased, but where they are not honored, no holy ceremony whatsoever will be merited *Mānawa Dharmaśāstra* III.56 (Pudja, G and Rai Sudharta, 2010: 105).

Reality shows that women's existence is often undervalued, as expressed by AA. This is in accordance with KA's

opinion, which states that women as wives should focus more on serving in-laws and husbands, as well as taking care of household chores, without looking for work outside. The reality faced by Balinese Hindu women shows that they face various challenges, especially when entering the adult phase and having to determine a life partner in the *Grhasta* space. As explained by Ida Ayu Sadnyini in her interview, being a woman is not an easy thing. They must face various obstacles in their life journey.

The position of women in the *Mānawa Dharmaśāstra* shows significant differences compared to the family life of Hindu women in Denpasar City. One of the main factors influencing this difference is the diverse treatment of women. There is a gap in the understanding of the meaning of women as described in the *Mānawa Dharmaśāstra*. Although the book affirms that women have an honorable, sacred, and noble position in the family, as described in articles III. 56, III. 57, and IX. 96, the reality is that there are still actions that ignore human and existential values in the interpretation of women. In many aspects of life, boys are often given greater priority. This is where the role of *Sādhu* character education-which emphasizes kindness and wisdom-is crucial. This education has the potential to change perceptions and strengthen the values of gender equality and girls' rights in the family. In addition, a *Siddhi* approach to education can help children develop a critical awareness of gender roles and the importance of character in everyday life.

The components and location of the Bali Customary Law findings show that the island of Bali is hailed as the last cluster of the archipelago, a place where people still faithfully worship the Gods in the Hindu tradition. In Chinese news, it is revealed that Bali is indeed mentioned, on the one hand considered possible by Chrome, while by Superhem it is declared "far from certain". This indicates that between 450 and 505 AD, Bali already had a Hindu king (Korn, 2017: 3-4).

The patrilineal family system adopted by the Balinese-Hindu community, known as *kapurusa*, means that only descendants with *kapurusa* status are allowed to manage and continue the *swadharma*, or family responsibilities. These responsibilities include relationships with *parahyangan* (Hindu religious beliefs), *pawongan* (Hindu community), and *palemahan* (preservation of nature according to Hindu teachings). As a result, only descendants with *kapurusa* status have *swadikara*, or rights, to inheritance. Meanwhile, descendants who are *pradana* (female) cannot continue the *swadharma*, so they are considered like people who leave family responsibilities (*ninggal kadaton*), and are therefore considered not entitled to inheritance in the family.

The patrilineal family system adopted by Balinese-Hindu society, known as *kapurusa*, means that only descendants of *kapurusa* status are considered capable of managing and continuing *swadharma*, i.e. family responsibilities. These responsibilities include relationships with *parahyangan* (Hindu religious beliefs), *pawongan* (Hindu community), and *palemahan* (preservation of nature according to Hindu teachings). As a result, only descendants of *kapurusa* status have *swadikara*, or rights, to inheritance. On the other hand, *pradana* (female) descendants cannot continue the *swadharma* and are considered the same as people who leave family responsibilities, or *ninggal kadaton*. Therefore, they are also considered to have no rights to inheritance in the family (Sumerta, I Ketut. , Windia, Wayan P. , Sena, 2018: 38).

Based on the facts, Pasamuhan Agung III of the Bali Pakraman Village Council has made a decision regarding the position of husband and wife and children regarding inheritance. However, there are still many obstacles faced, so the decision has not been fully implemented.

The different positions of women in the *Mānawa Dharmaśāstra* and Balinese Customary Law reflect different views on

the role and status of women in society. In the *Mānawa Dharmaśāstra*, especially in article III. 56, it is explained that women have a very sacred and noble meaning. In addition, article IX. 133 affirms that adopted daughters will have equal status with sons in terms of paternal descent.

On the other hand, in Balinese customary law, only offspring with *kapurusa* (male) status are considered capable of taking care of and continuing the family *swadharma*. This includes relationships with *parahyangan* (Hindu religious beliefs), *pawongan* (Hindu community), and *palemahan* (preservation of nature according to Hindu teachings). Nonetheless, accumulative Hindu character values, such as *Śuddha* (clean, holy, pure), *Sādhu* (kind and wise), *Siddhi* (intelligent, extraordinary ability), and *Siddha* (work ethic, achievement through hard work), can serve as important elements that strengthen women's position in customary law. As such, these differences demonstrate the complexity and dynamics of understanding women's roles in both contexts.

The Different Treatment of Women in Society

Knowledge that is instilled in an effort to develop human intellectual intelligence begins with ethical education that comes from the family environment, especially from parents (father and mother) and other family members. All of this is based on love in forming harmonious relationships through the values of behavior, speech, and example. In the process of children's self-development, this is very important so that they are able to interact with society and have good manners. Thus, they are expected to become a generation with the character of *Siddhi* (intelligent), *Siddha* (has a work ethic), *Śuddha* (clean, holy, pure), and *Sādhu* (kind and wise).

It is important to realize that the family as the first social institution and the center of strengthening the character of Hindu generations is often tainted by the irresponsible behavior of individuals in the

family. This can even lead to divorce, where women are often victimized, both in the context of their husband's family and when returning to their family of origin, known as *Mulih Daha*. I Nyoman Budiana explained that when women do *Mulih Daha*, this can lead to various views in society. Often, women are considered to have failed in raising a family, when in reality this may not always be the case.

The treatment of women in society shows significant differences, especially when compared to the understanding of the position of women in the *Mānawa Dharmaśāstra* and the lives of Hindu women in Denpasar City. *Mānawa Dharmaśāstra* IX. 34 clearly states that the role of men as seed (father) and the role of women as *garbha* (mother) are two equal aspects of the family, aiming to create a noble and happy family as the first social foundation in society. However, the reality is different; under the patrilineal family system, women are often treated in a different way, where men are considered superior. The concept of *purusa-pradana* in Hinduism also influences the way society views the position of women. In this context, character education has a very important role in instilling values of equality, respect for human rights, and rejecting all forms of discrimination. Through the example of *Sādhu* (good and wise) character in various circles of society, positive changes are expected to occur.

The Differences between the Position of Women in the *Mānawa Dharmaśāstra* and the Life of Hindu Women in Denpasar City

The Different Position of Hindu Women in the Patrilineal Family System of Balinese Society

The patrilineal family system generally places men in a more dominant position than women, especially in terms of political leadership, economy, and property ownership. In the context of the family, the so-called “father” as a male figure still holds

authority over women, children, and family assets. The various *Mānawa Dharmaśāstra* scriptures remind us of the roles that both men and women should play in life, in order to realize mutual happiness as mothers and fathers, and contribute to the well-being of the family as a whole.

Women need protection, especially in the context of cultural society. This is due to the existence of a social structure that places women below men, as well as cultural influences that often bring values and patterns of behavior that do not support the process of change in society (Azis, 2007: 65) in (Zuhri, Saifuddin Zuhri, Amalia, 2022: 21).

In the *Mānawa Dharmaśāstra* IX. 96, it is explained that the purpose of creation by *Hyang Widhi Wasa* or God Almighty for men and women is as follows:

1. God created women to be mothers.
2. Men were created to be a father.
3. The purpose of creating a married couple is to form a family that performs religious ceremonies as prescribed in the Vedas.

The harmonious form in the life process explains that men and women have the same important roles and functions as between the seed and the land explained in the *Mānawa Dharmaśāstra* IX. 33:

क्षेत्रभूता स्मृता नारी बीजभूतः स्मृतः
पुमान् ।

क्षेत्रबीज समायोगात्सम्भवः सर्व देहिनाम्
॥३३॥

*kṣetrabhūtā smṛtā nāri bijabhūtaḥ
smṛtaḥ pumān, kṣetrabija
samāyogāt sambhavaḥ sarva
dehinām*

According to *Semrti*, woman is declared to be the soil, man is declared to be the seed, the result of the occurrence of a living corporeal body is due to the relationship between the soil and the seed. *Mānawa Dharmaśāstra* IX. 33 (Pudja, G and Rai Sudharta, 2010:446)

The data found shows that there is still negative treatment of women in the

family, especially by their husbands, as experienced by a woman with the initials AA. She shared her experience, “All the housework has to be done by women. Maybe because I come from a different caste, I feel obliged to serve people at home, such as my in-laws and in-laws-all from waking up to night. All this I do as a wife, while my husband doesn't care about me or the housework. “ In this context, men are often the ones who have the main power and function as the center of control in this type of society (Apriliandra and Krisnani, 2021: 3). This situation is also seen in patrilineal lineages, where the rights of the firstborn, personal sovereignty in social relations, and participation in public spheres such as politics, religion, and employment are largely determined by gender (Apriliandra and Krisnani, 2021: 3).

Parental attention to daughters is also often different in terms of material gifts, especially during marriage, between girls and boys. This finding is reinforced by the results of a questionnaire survey of 22 Hindu women in Denpasar City conducted randomly regarding material provisions (*stridhana*) given by parents, such as money, land certificates, houses, or other assets. As a result, 63.6% of respondents answered that they did not receive material provisions, while the other 36.4% acknowledged that they were given, confirming a clear difference in treatment.

The problem with the patrilineal family system, as practiced by the Balinese-Hindu community, lies in the fact that only descendants with *kapurusa* status, who are usually male, are considered capable of taking care of and continuing the *swadharma* or family responsibilities.

The different position of women in the patrilineal family system of Balinese society is clearly visible. In *Mānawa Dharmaśāstra* IX. 96, there is a legal value that states that women and men have an equally important role in building a happy and prosperous family. The ideal family is expected to give birth to generations in accordance with the full character of

Hinduism, namely generations that are *Śuddha* (clean, holy, pure), *Sādhu* (kind and wise), *Siddhi* (intelligent), and *Siddha* (have a successful work ethic, usually the result of hard work and achievement). However, in reality, the difference in women's position within this patrilineal family system is quite striking. The male lineage means that men are often seen as more important than women, especially in terms of inheritance and family responsibilities.

The Different Position of Hindu Women in Family Treatment

Giving birth to offspring is a very important aspect in the purpose of marriage, because children are the hope of every family. The presence of children as successors and part of the family can bring happiness to all family members. In Hinduism, this is considered one of the goals of life in the *Grihasthasrama* (household) stage. The intimacy of the relationship between family members - mother, father, and children (both brothers and sisters) - greatly affects the harmony and warmth of family life (Dagun, 1990: 19). While words can inspire, it is role models and real-life examples that are more capable of touching the heart (Koesoema, 2007: 214).

The presence of a child in Hinduism provides an opportunity for the ancestor to reincarnate into the world, make karma, and release the parents from suffering. In addition, the presence of a child also allows them to reunite with God. Therefore, the child born is often nicknamed “putra”, which is derived from the words “put” meaning hell and “ra” meaning to save. Thus, *putra* can be interpreted as a child who saves his parents from hell (Ida Ayu Tary Puspa, 2018) in (Rusli, 2021: 80). One important aspect of the relationship between parents and children that contributes to children's moral development is the quality of the relationship, parental discipline, proactive strategies, and constructive dialog (Santrock, 2007: 133). In addition, Balinese customary law experts also elaborate on descent and the nature of inheritance, where

the word “inheritance” is related to the term “warih” which means 'urine'. In the context of inheritance, this “urine” can be interpreted as “descent” (Windia, 2021: 622).

In families with a patrilineal family system, the phrase “lucky to have a son” is often heard. “ This statement clearly reflects the different views of boys and girls. The motivation and attention given to boys and girls also tend to be different. The different position of women in the family among Hindu women in Denpasar City can be seen in the context of the *Mānawa Dharmaśāstra*. In articles III. 57 and III. 58, it is stated that women have a very sacred and noble position. In addition, *Mānawa Dharmaśāstra* IX. 133 explains that there is no difference between the son of a man and the son of a woman who is elevated in status, both in worldly aspects and in sacred obligations. However, the reality on the ground suggests a difference in treatment where sons often have a more dominant role in terms of continuing the lineage, inheriting family property, and making decisions within the family. Women are often excluded from this decision-making.

The Different Position of Hindu Women in Customary Law

Functionally, customs created in a system of society have the aim of creating order. According to Comte and Spencer, society is seen as a system consisting of parts that depend on each other (Poloma, 1987: 25 in Budiana, 2018: 89). Therefore, customary institutions as one of the structures in society are expected to provide a sense of security and comfort, thus creating a harmonious life based on character values. Thus, there is an interrelated relationship between society, values and character education (Suyanta, 2013: 9-10). This research found differences related to the division of inheritance.

The division of inheritance stipulated in the *Mānawa Dharmaśāstra* IX. 118 states that sisters will receive a share of the inheritance, which is one-fourth of the share received by brothers. Those who refuse to give this share will be considered

estranged. Further explanation shows that women get a share of the inheritance in the ratio of one to three between brothers and sisters. This means that a brother will receive three times what a sister receives, rather than everyone giving one-quarter of their share. In a situation where there are several brothers and only one sister, it is likely that the girl will receive more than one brother, which is contrary to legal principles that favor male descendants (Pudja, G and Rai Sudharta, 2010: 467). In addition, according to Ida Ayu Sadnyini, in the patrilineal family system, women are often neglected in the distribution of materials related to inheritance.

The position of women in Balinese customary law, especially regarding inheritance, has a deep meaning. According to Windia (2021: 622), inheritance includes all *swadharma* (responsibilities) that must be carried out both towards the family and the community (*Desa Adat*), as well as *swadikara* (rights) and *arta berana* (wealth) left by the heir to be managed and passed on to his descendants. The three aspects can be sequenced as follows: (1) *Swadharma* (responsibility); (2) *Swadikara* (rights); (3) *Arta berana* (wealth).

In this context, the position of women in Balinese customary law is very important, especially when they play a role in carrying out the *swadharma* and *swadikara*. This role is an integral part of women's lives in Bali. An interview with I Nyoman Budiana also shows that women operate in a positive space, where their involvement in adat can be tailored to their abilities and professions. In reality, women are able to fill existing roles well within the Balinese traditional society.

In the context of the patrilineal family system that dominates Balinese customs, women are often neglected, especially during marriage. During this time, there is usually a gift or *Stridhana* given by the girl's parents, in contrast to boys who are entirely the responsibility of their parents. Often, it is considered normal for women to escape the attention of their parents, while

boys receive greater attention. Regarding the issue of women returning to their original homes after divorce, they should be accepted back as part of the family. In this case, there is undivided property, which is 1/3 of the joint property that can be enjoyed jointly. Therefore, Balinese custom has actually provided a solution for this. However, in practice, women are often still neglected due to different perceptions of understanding within the family. In an interview conducted on May 26, 2023 with the Chairman of the Denpasar City Customary Village Council, A. A. Ketut Sudiana, it was revealed that there are two factors that influence the low attention of *adat* to women. First, external factors caused by the patrilineal family system itself. Second, internal factors, where women often see themselves as weak and feel it is unethical to fight for their rights.

The discussion on Legal Structure, Legal Substance, and Legal Culture shows that these three components influence and determine each other. In the context of customary law, the existence of Hindu women in Bali shows a striking difference, especially in terms of inheritance rights. In general, women do not have rights as heirs in Balinese customary inheritance law, except in certain situations, such as *nyeburin* marriage, where women take over the role of men in the family. Under these conditions, women can inherit property if their marital status changes to *purusa* after performing a *nyeburin* marriage.

Inheritance rules in Bali tend to follow the male lineage, where women are not allowed to bring *Stridhana* provisions from their parents when starting a family, while boys are fully dependent on their parents. Therefore, *Sādhu* character education, which emphasizes kindness and wisdom, can encourage a more equitable understanding and interpretation of Balinese customary law that is in line with the principles of gender equality. This is particularly important, given that some provisions of customary law are still considered discriminatory against women,

especially in relation to inheritance and property rights.

The Different Treatment of Hindu Women in Society.

In the sociocultural context, Customary Inheritance Law is a legal system that has distinctive and unique characteristics, reflecting the traditional way of thinking and spirit of the Indonesian people. This law is rooted in collective and communal values, where the principles of togetherness, family interests, mutual cooperation, deliberation, and consensus become the foundation in the distribution of inheritance. These cultural values serve as codes that give color to Customary Inheritance Law (Zamzami, 2013: 53).

Indonesia's traditional way of thinking and spirit has shifted in the sociocultural context, especially in the patrilineal family system. This can be seen in Hindu women in Denpasar City, whose social behavior is not in line with the principles stated in the *Mānawa Dharmaśāstra* IX. 33. The book emphasizes the importance of mutual respect and complementarity between men and women as social beings. Both have equally important roles and positions, like seeds that need land to grow.

The reality shows that the role boundaries between husbands and wives are very different. In an interview with KA (initials), she revealed that as a wife, her role in social life is very limited. Meanwhile, her husband has the freedom to socialize, often even engaging in negative activities such as getting drunk. This creates a significant gap between women's freedom and men's freedom in society (interviewed, May 11, 2023).

The position of women is often placed second, behind men, and sometimes demeaned due to the influence of the patrilineal family system. In society, there are still misconceptions regarding the role of women in this context, such as: (1) the notion that a wife should be completely subservient to her husband, (2) the common

belief that the birth of a male child is considered good luck, (3) the existence of stricter social boundaries for women compared to men, and (4) a misunderstanding of the roles of men and women, resulting in a distorted interpretation of the legal values in *Mānawa Dharmaśāstra* IX. 33, which emphasizes the importance of mutual respect between men and women (seed and land), and *Mānawa Dharmaśāstra* IX. 133, which states that the position of men and women are equal.

The role of *Śuddha* (clean, holy, pure) and *Sādhu* (kind and wise) character education is very important in changing society's paradigm regarding the role of women. With this increased awareness, society will increasingly value women's contributions in various fields. Generally, Balinese Hindu women have demonstrated Siddha character, which reflects a high work ethic: successful, skillful, and usually achieved through hard work. This makes women more confident and able to overcome the various challenges they face. In addition, character education also contributes significantly to reducing levels of violence and discrimination against women. By instilling values such as empathy, tolerance and respect, we can create a safer and more supportive environment for women.

Implications of the Different Positions of Women in *Manawa Dharmaśāstra* with the Lives of Hindu Women on Religious, Social, Cultural, and Economic Life in Denpasar City

Implication in Religious Life

Women are a power that is deliberately 'hidden' by God and only appears when love in life and life begins to fade. God chose women as His 'extension' to carry out the main function, namely reproduction, which ensures the continuation of regeneration from generation to generation (Wita, Afri; Palupi, Aisyah Endah; Mulyani, Ai; Pandanwangi, Ariesa; Nalan, Athur S. , 2019: ix).

Therefore, it is only to women that God created the womb, a flexible cavity in which the process of human creation takes place, which we know as the uterus. Furthermore, I Nyoman Budiana in his interview explained that the real life of Hindu women in Bali, in the midst of a patrilineal family system, has a strategic meaning in religious life, especially in the implementation of religious rituals and in maintaining local wisdom (interviewed, May 8, 2023).

In the *Mānawa Dharmaśāstra*, women are not mere shadows of men, but are equal, powerful, and decisive parts in the formation of a complete life. The term "Ardhanareswari" in the book reflects this, where "Ardha" means half or equal half, "Nara" refers to men, and "Iswari" describes women (*Mānawa Dharmaśāstra* I. 32, Pudja and Rai Sudharta, 2010:9). Without the presence of the female element, a reality will not be fully realized. In the *Mānawa Dharmaśāstra*, this element has an equally important portion, similar to the right and left hemispheres in the human body. Both complement each other and function harmoniously. In fact, women are honored and venerated as a source of well-being and happiness, which will have a positive impact if appreciated, but conversely, if they feel sad and suffer, it can be the root of many problems. The challenges faced by women as mothers were explained by Ida Ayu Sadnyini through an interview, where she conveyed that a mother must be responsible for her husband, educate children, and also engage in activities in public and private spaces (interviewed, May 8, 2023).

Based on power relations, knowledge has the ability to organize not only oneself, but also others, related to the different positions of women stated in the *Mānawa Dharmaśāstra* and the lives of Hindu women in Denpasar city. Religious life in Denpasar displays complex dynamics for women, especially in the context of Balinese Hinduism. Traditionally, Balinese women are often associated with domestic roles and religious rituals.

However, along with the times, their roles have undergone a significant transformation. In various religious ceremonies, Balinese women play a very important role in preserving Hindu religious traditions and practices. They act as inheritors of this knowledge and practice to the younger generation. In the spiritual realm, women have a strategic position-though often overlooked by patriarchal societies-which can be summarized in two main points: (1) women are considered as figures who bring purity and glory, becoming a source of prosperity if treated well, or conversely, a source of destruction if not; and (2) the etymological meaning of women being able to give birth to men and women as a manifestation of love, through which God's omnipotence flows to them.

In order for the role of women in religious life to have a positive impact, there should be power intervention carried out, both through the office and custom, to realize the position of Hindu women based on Hindu character. This is expected to be implemented based on the principles of *Swadharma* and *Swadikara*, so that the position of Hindu women can be confirmed and strengthened.

Implications in Social Life

The position and role of women in the life of society and the state have been clearly recognized, namely as members of society and citizens who have certain rights and obligations. There is no difference between men and women in this regard. However, in the context of patriarchy that still exists in society, there is one thing that is rarely thought about, namely the importance of integrating women's perspectives in various life responsibilities, so that they can have an equal role.

Gender justice is a process that is fair to all, both women and men. For this process to be truly equitable, it is necessary to actively stop all forms of historical and social barriers that have prevented women and men from contributing to and enjoying

the fruits of their roles (Diska Widayani, Ni Made, Hartati, 2014: 149).

In the *Mānawa Dharmaśāstra* IX. 32 and IX. 33, it is explained that the roles of women and men are complementary, likened to “seed and soil”, which are prerequisites for growth in society. The status and role of women in the social context can be reflected in their involvement in various aspects of life, including in the household, development, as well as in the context of the extended family and the family in general (nuclear family) (Lestari, 2011: 58).

I Nyoman Budiana strongly emphasized the positive role of women in community life, especially in the context of *krama adat*. The various roles played by women in their respective professions are highly anticipated by the community, especially in the educational space tailored to the profession (interviewed, May 8, 2023). The implications of women's different positions in society and the challenges they face show that women's roles are very positive for social life. First, women perform various roles in their professions. In the duality perspective, women and men have their respective functions, likened to “seed and soil”. Both contribute to creating a harmonious life in society. Second, women have a dominant role in religious ceremonies, especially in the preparation of ceremonial facilities. This role reflects the importance of women's contribution, even though it is often considered an underappreciated nature.

The intervention of power, both in the family, official, and customary domains, plays an important role in improving the position of Hindu women in society. Therefore, the utilization of power relations must be implemented with Hindu character principles such as *Śuddha* (clean, holy, pure), *Sādhu* (kind and wise), *Siddha* (work ethic that produces success through hard work), and *Siddhi* (perfection and extraordinary abilities). This is important in the context of strengthening the position of Hindu women, especially in Denpasar City.

The patrilineal family system still has a big impact on people's lives today, both in rural and urban areas. In various aspects of life, such as economics, politics, religion and culture, men still dominate. The current gender inequality reflects the view in society that boys and girls have different values (Mannan, Abd., Farida, Siti Nur., 2021: 7). In the midst of this reality, there are still women who face suffering, but still show resilience. One example is the experience of AA (initials) who said: “. . . although the burden of life that I face feels heavy, I can still smile. Actually, I cry inside, but I try to show the community as if there is no problem” (interviewed, May 9, 2023). Thus, even though their life journey is filled with challenges, they still try to appear strong in front of the public.

The strength of the patrilineal family system had a significant effect on the Hindu way of life, without realizing the important lessons of their teachings on the meaning of women and men in life. There is a strong message in the *Mānawa Dharmaśāstra* IX. 34, which invites us to build a character of mutual respect and strengthen the *relationship* between women and men. It states that in some matters, the seed (man) is more prominent, while in others, the *garbha* (woman) is more important. However, when both are in the same position, their offspring will be greatly honored.

The complexity of women's roles shows that they are not just a complement or companion to men. On the contrary, women are vital to society and culture.

The different position of women in the *Mānawa Dharmaśāstra* has significant implications in a culture that adheres to a patrilineal family system. First, it places men as the rulers, while women are considered secondary or subordinate. Secondly, although the patrilineal family system has the potential to create relationships of mutual respect and complementarity, this is often overlooked. If good attitudes and behaviors are implemented in the family and society in accordance with the teachings of

Mānawa Dharmaśāstra IX. 34, the position of women will be greatly honored. Third, a society that follows a patrilineal family system should establish balanced power relations through family, service, and custom to strengthen the position of Hindu women. This should be based on the Hindu character with guidelines on *Swadharma* and self-determination of Hindu women, as well as applying wisdom values to strengthen the position of women in a patriarchal culture.

Implications for Economic Life

The implications of women's different positions in *Manawa Dharmaśāstra* for economic life in the real world show that women's empowerment has a noble goal, which is to increase added value for all family members and individuals. However, constraints often arise due to limited resources, caused by the lack of education and information received by them. The discussion on the condition and position of women in Indonesia, especially in Denpasar City, shows the difference in the position of women in the *Mānawa Dharmaśāstra* and the patrilineal family system. As discussed in sub-chapter 5. 1, it is clear that women are still far behind men in various aspects of life. Men dominate the social system in various sectors of life.

Mānawa Dharmaśāstra III. 55. , III. 56. , III. 57, and III. 58 clearly reveal that women are sacred and noble, a source of prosperity and happiness for those who respect, appreciate, and provide good treatment. However, in reality, the data obtained by the researcher shows a condition that is very contrary to the message conveyed in the teachings of the *Mānawa Dharmaśāstra*.

The different position of women in the *Mānawa Dharmaśāstra* compared to the lives of Hindu women today has significant economic implications. First, it creates various inequalities that impact economic participation, income and opportunities. Women often have more limited access to quality education and training, which in turn

limits their skills and employment opportunities. Secondly, women often face a double burden of unpaid domestic and childcare responsibilities in addition to their paid work. This unpaid work is often unrecognized and undervalued, even though it has significant economic value. Thirdly, spiritually, women can be a source of well-being if treated well, but can also be a source of suffering if treated poorly.

The legal values contained in the *Mānawa Dharmaśāstra* IX. 55, IX. 56, IX. 57, and IX. 58 explain that *Sādhu*, meaning kind and wise, attitude and behavior towards women can attract positive energy that will bring well-being and happiness to the individual and his family. Conversely, if one treats women with disrespect, causing them to feel sad and suffer, this can eliminate the source of energy that brings well-being and happiness. Therefore, to realize a Hindu society that adheres to the patrilineal family system that is spiritually and physically prosperous, and achieves happiness in life, good power relations are needed through the family, customary services, government, and various other parties. They must educate the community through policies that encourage *Sādhu* ('kind and wise') attitudes towards women in the context of economic life.

IV. CONCLUSION

Based on the discussion above, it can be concluded as follows

(1) Factors that cause differences in the position of Hindu women in Denpasar City are the result of complex interactions of the family system, namely the patrilineal system in society, different treatment of girls in the family, the position of women in Balinese customary law, and the treatment of women in society. These four factors cause men to have a dominant role and hold authority compared to women. The role of *Sādhu* (kind and wise) character education is not only for women, but also for men so that men play an active role in realizing the nature between men and women is actually the same, equally respectful and

complementary, *Siddhi* (intelligent) character has a role in developing women's potential, and *Siddha* (work ethic) character in the formation of independent, confident and empowered women;

(2) The difference between the position of women in the *Mānawa Dharmaśāstra* and the lives of Hindu women in Denpasar City - There are significant differences between women and men in the legal system. Substantially, the *Mānawa Dharmaśāstra* serves as the basic value of the law, while the customary service serves as the legal structure. The views and practices of families and communities towards women reflect a legal culture characterized by clear differences (a) In the patrilineal Balinese family system, the lineage is passed down through the father. When women marry, they will follow their husband's lineage, and children will continue their father's lineage. Moreover, in terms of inheritance, sons are generally prioritized, while inheritance rights for women tend to be more limited, depending on their marital status; (b) Regarding the position of Hindu women in the context of the family, their role is often more focused on domestic affairs. Women are usually expected to take care of the household and, if married, the children. On the other hand, men have a more dominant role in public affairs and decision-making processes, and women are rarely involved in these. Access to education is also limited; men usually get greater opportunities to pursue education as they are considered the successors and responsible for the family, while women are expected to follow their husbands; (c) Position of Hindu Women in Customary Law: (1) Inheritance Rights: In customary law, women are often positioned behind men in the context of inheritance. Typically, women only receive gifts of jewellery or certain possessions, such as *stridhana*, and in some cases, nothing. (2) Decision Making: In many indigenous communities, women have a limited role in public decision-making. Male dominance in customary forums and important decisions is very evident; (d) Treatment of Hindu

Women in Society: (1) Gaps in Interpretation: Gaps in society's understanding of women often result in unfair treatment. For example, there is an assumption that women should be subservient to their husbands, women's grief is often trivialized, and society generally considers the birth of a male child as good luck. (2) Public Participation: Women's participation in public activities is still much more limited than that of men. (3) Role in Rituals: Although women have important roles in religious rituals, such as preparing ceremonies, men's roles are often considered more important. The role of character education based on the principles of *Śuddha* (holy and pure) and *Sādhu* (kind and wise) is crucial in changing society's paradigm regarding the role of women. With increased awareness, society will increasingly appreciate women's contributions in various fields. In general, Balinese Hindu women have demonstrated *Siddha* (work ethic) character that makes them more confident and able to face various obstacles. In addition, character education also contributes significantly to reducing the level of violence and discrimination against women;

(3) The implications of the differences in the position of women in the *Mānawa Dharmaśāstra* and the lives of Hindu women on religious, social, cultural, and economic life in Denpasar City. (a) Implications for Religious Life: (1) The different interpretations of the texts in the *Mānawa Dharmaśāstra*, which are often influenced by the patrilineal kinship system, can result in diverse views on the role and rights of women in religious practice. Ironically, there are also some who do not understand that the texts depict women as having purity and nobility, and as a source of prosperity in life; (2) In terms of etymological meaning, women have an important role because of their ability to give birth to both men and women. This becomes an expression of love and shows that to women, God's omnipotence flows; (b) Implications in Social Life: (1) Role in the

Family: Differences in position in society often affect the division of roles within the family. Women are generally expected to take primary responsibility for childcare and household chores, while men are often considered the primary breadwinners. As a result, men as children tend to have better access to education and resources than women. This creates a double burden for women and limits their opportunities to engage in other areas. (2) Public Participation: Women often face various barriers that prevent them from participating in public life, in contrast to men. Inequalities in access to education and resources also contribute to these restrictions; (c) Implications in Cultural Life: The patrilineal family system has several significant impacts. Firstly, it places men as the rulers, while women are often seen as secondary, causing their position to become subordinate. Secondly, the strength of the patrilineal family system often results in behaviors and attitudes that should be respectful and complementary, becoming neglected; (d) Implications for Economic Life: First, emerging inequalities can affect women's participation in the economy, their earnings and available opportunities. This is because women often have more limited access to quality education and training, which in turn limits their skills and employment opportunities. Secondly, women often face a double burden, with the responsibility of carrying out unpaid household chores in addition to their paid work duties. Third, in terms of spirituality and values, women can be a source of prosperity if treated well, but can also be a source of suffering if treated improperly.

The intervention of power from family, official, and customary sources has an important role in improving the position of Hindu women. This has a positive impact in religious, social, cultural, and economic aspects. Therefore, the utilization of power relations should be implemented based on Hindu character values, namely *Śuddha* (clean, holy, pure), *Sādhu* (kind and wise), *Siddhi* (intelligent), and *Siddha* (perfect

success). In this context, the effort aims to strengthen the role of Hindu women in Denpasar City.

References

- Agung, Istri, Agung, A. (2016). *Makna purusa dan pradana dalam putusan hakim mengenai sengketa waris adat Bali*. 2016. Denpasar. Udayana Universitas Press.
- Anshary, M, H. (2015). *Hukum Perkawinan di Indonesia*. Yogyakarta. Pustaka Pelajar.
- Apriliandra, S., & ., Krisnani, H. (2021). Perilaku Diskriminatif Pada Perempuan Akibat Kuatnya Budaya Patriarki Di Indonesia Ditinjau Dari Perspektif Konflik. *Kolaborasi Resolusi Konflik Universitas Padjajaran Volume 3 Nomor 1*, 3, 13.
- Arliman S, L. (2021). Pendidikan Karakter Dalam Tinjauan Psikologi. *Lembaga Penelitian Dan Penerbitan Hasil Penelitian Ensiklopedia*, Vol. 3 No. 3 h. 181-186
- Bhasin, K. (1996). *Menggugat Patriarki* (1st ed.). Yogyakarta. Yayasan Bentang Budaya.
- Budiana, N. (2018). *Perkawinan Beda Wangsa dalam Masyarakat Bali*. (2nd ed.). Yogyakarta, Graha Ilmu.
- Dagun, S. M. (1990). *Psikologi Keluarga*. Jakarta, Rineka Cipta.
- Diska Widayani, Ni Made ., Hartati, S. (2014). Kesetaraan dan Keadilan Gender dalam Pandangan Perempuan Bali: Studi Fenomenologis Terhadap Penulis Perempuan Bali. *Psikologi Undip*, Vol.13 h. 149-162.
- Kartika, N. G. A. (2021). Fungsi dan Peranan Perempuan Hindu dalam Pelaksanaan Yadnya di Bali. *Pangkaja*, . 24 NO. 2.h. 194-202
- Koesoema, D. (2007). *Pendidikan Karakter*. Jakarta. Grasindo.
- Korn, D. V. . (2017). *Hukum Adat Bali (Het Adatrecht Van Bali)* (Joeber; Mean.; Merta; I Nengah. (ed.); 1st ed.). Denpasar. Udayana Universty Press.
- Lestari, P. (2011). Peranan Dan Status Perempuan Dalam Sistem Sosial. *Dimensia*, 5, No. 1 h. 45-60
- Mannan, Abd., Farida, Siti Nur., F. (2021). *Penguatan Pendidikan Perempuan (Peran Perempuan dalam Agama, Keluarga, dan Kehidupan Sosial di Masa Modern)*. 5, No. 1, 1–35.
- Martha, W. (2018). Posisi Wanita Pada Hukum Hindu dalam Sistem Vivaha Samskara. *Jurnal Universitas Hindu Indonesia*, 1, 2018.
- P. Windia, W. (2006). *Pengantar Hukum Adat Bali* (pertama). Lembaga Dokumentasi dan Publikasi Fakultas Hukum Universitas Udayana.
- Patching, K. (2007). *Leadership, Character and Strategy*. New York. Palgrave.
- Pudja, G dan Rai Sudharta, T. (2010). *Manawa Dharmasastra*. Surabaya. Paramita.
- Rusli, A. R. (2021). Fungsi Anak dalam Yadnya Sebagai Basis Pembentukan Karakter. *Al-Adyan: Journal of Religious Studies*, Volume 2,.
- Saadewi, N. El. (2001). *Perempuan dalam Budaya Patriarki (The Hidden Face Of Eve)* (Zulhilmiasri (ed.); Cetakan 1). Pustaka Pelajar.
- Samrin. (2016). Pendidikan Karakter (Sebuah Pendekatan Nilai). *Al -Ta'dib*, Vol. 9 No.
- Santrock, J. W. (2007). *Perkembangan Anak*. (Terjemahan Mila Rachmawati & Anna Kuswanti). Erlangga. (Buku asli diterbitkan tahun 2007).
- Setyawati, N. K. (2017). *Kedudukan Perempuan Hindu Menurut Hukum Waris Adat Bali dalam Perspektif Kesetaraan Gender*. 1.
- Sumerta, I Ketut., Windia, Wayan P., Sena, I. G. A. (2018). *Kompilasi Hasil-Hasil Pesamuhan Agung MDP Bali* (Cekakan ke). Majelis Utama Desa Pakraman (MUDP) Provinsi Bali.
- Surpha, I. W. (2005). *Pengantar Hukum Hindu*. Paramita.
- Suyanta, S. (2013). Membangun Pendidikan Karakter dalam Masyarakat. *Islam Futura*, 13. No. 1,.

- Windia, W. P. (2021). *Hukum Adat dan desa adat di Bali* (W. P. Windia (ed.); I). Denpasar. Udayana University Press.
- Wita, Afri., Palupi, Aisyah Endah., Mulyani, Ai., Pandanwangi, Ariesa., Nalan, Athur S., D. dkk. (2019). *Perempuan Indonesia Dulu dan Kini Membangun Kecerdasan Bangsa di Bumi Nusantara* (E. Caturwati (ed.); p. 489). Bandung. Unpad Press.
- Zamzami, D. H. M. (2013). *Perempuan & Keadilan dalam Hukum Kewarisan Indonesia* (1st ed.). Jakarta. Kencana Prenada Media Group.
- Zuhri, Saifuddin Zuhri., Amalia, D. (2022). Ketidakadilan Gender dan Budaya Patriarki Di Kehidupan Masyarakat Indonesia. *Murabbi : Jurnal Ilmiah Dalam Bidang Pendidikan STIT Al-Hikmah Tebing Tinggi*, 05 No. 01. h. 17-41