



## Mandatory Testament for heirs of different religions

Laurensia Sherlyn Tania Ika Prabowo<sup>1\*</sup>, Nyoman Arya Kusuma Wardana<sup>2\*</sup>, Dian Prastiyowati<sup>3</sup>, Amelya Rizky Indriarukmana<sup>4</sup>, Sofia Ramdhani Oliviantari<sup>5</sup>

<sup>1,2,3,4,5</sup> Master of Notary, Faculty of Law, Airlangga University, Surabaya, Indonesia

**Abstract:** A Testament as part of an inheritance is given to heirs or relatives who do not receive a share of the inheritance because they are prevented by religious rules. Problems arise because the Compilation of Islamic Law does not strictly regulate inheritance for heirs of different religions. Article 171 letter c of the Compilation of Islamic Law determines that the heir is someone who is Muslim. However, it does not regulate the amount and requirements for mandatory bequests for heirs of different religions. The problem studied in this research is how the mandatory Testaments of heirs of different religions are regulated according to Islamic law and is related to the basis for considering the judge's decision regarding the mandatory Testament of heirs of different religions. This research is Normative Law research using legal literature with a statutory regulation approach, case approach and conceptual approach. The result of this research is that the Compilation of Islamic Law does not regulate the size of the share and requirements for obligatory Testament for heirs of different religions, but only for heirs who do not get their rights because they are hindered by sharia, such as adopted children and adoptive parents. Judges have the authority to carry out *rechtsvinding* or *ijtihad* in resolving cases if a legal vacuum occurs. This is reflected in several Court decisions and Constitutional Court decisions which provide mandatory Testament for heirs of different religions based on considerations of humanity and justice.

**Keywords:** Inheritance, Wajibah Testament, Jurisprudence

### 1. Introduction

Following the principles of Pancasila, Indonesia is a multiethnic nation. Indonesia benefits from a diverse population in comparison to other nations because its citizens learn tolerance and unity via interacting with others of various races, ethnicities, languages, cultures, and faiths. Ethnic, racial, ethnic, linguistic, cultural, and religious variety are only a few forms of Indonesia's rich diversity (Muhtar, 2023). On the other hand, Islamic Law, Civil Law, and Customary Law all have a role in Indonesian law, particularly in matters of inheritance. One of Indonesia's many private positive laws governing interpersonal interactions is the Compilation of Islamic Law (KHI), which will be shortened to that. Some of the legal norms found in Islamic civil law include *Munakahat* (the law of marriage), which governs all aspects of marriage and the legal ramifications of divorce, and *Faraid* (the law of inheritance), which governs all matters pertaining to heirs, inheritance, inheritance, and the division of inheritance (Jarchosi, 2020). Indeed, the field of Inheritance Law is pluralistic.

Inheritance is a key component of Islamic law. Islamic Inheritance Law specifies in great detail how assets are to be divided, who is eligible to receive them, and what obstacles stand in the way of their receiving them. In Indonesia, Islam governs both the interaction between people and other humans (*Hablum Minannas*) and between creatures and their God Allah (*Hablum Minallah*). *Ahkam al-Muamalat* is the body of law that governs interactions between humans. It covers a wide range of topics, including Islamic criminal law, procedural law, personal and family law, and object law (*Ahkam al-Madaniyyat*). Object law governs transactions involving physical things, including purchasing, selling, renting, lending, borrowing, settling inheritance and waqf disputes, and wills and testaments (Dimiyati et al., 2023).

#### Correspondence:

Name Nyoman Arya Kusuma Wardanari  
Email nyoman.arya.kusuma-

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The two primary texts that make up Islamic law are the Qur'an and the Hadith. These holy texts govern every facet of human conduct. Islamic law has grown in significance in Muslims' eyes due to its comprehensive quality. For example, if the heirs, such as brothers or relatives, are not able to receive the inheritance, a will may be used to transfer the assets to the next generation. Another option is to simply pass up the assets to the legitimate heirs (Mubarak, 2020). There can be no division of an inheritance in the absence of a finalized will controlling its distribution; this is a common theme in the law of succession. It is customary to distribute an heir's inheritance once all of their debts or obligations have been settled.

Because death is a fact of life for every individual, and because every death has legal ramifications, such as the question of who gets to keep the deceased's possessions and what happens to their responsibilities after they pass away, the field of inheritance law is intrinsically linked to the duration of human life. Inheritance law governs the rights and responsibilities that follow a person's death (Poespasari, 2018).

The bequests made in a will, whether monetary or in the form of intangible benefits, are legally binding and effective upon the testator's death. The law of this will, according to Fuqaha, is sunnah (recommended) in normal conditions, and the words of Allah SWT must be the basis for carrying out its contents (Nuzha, 2017).

For those relatives or heirs who are unable to receive a portion of the deceased's estate because of a sharia impediment, a required will may be made. *Wajibah* wills are also not affected by or dependent on the desires of the dead when it comes to carrying them out. An act of *ikhtiyariah*, defined as an action done in accordance with one's own will regardless of other factors, is essentially what a required will is. A person's freedom is therefore fundamentally unaffected by the presence or absence of a will (Zakiul Fuady Muhammad Daud, 2022).

How a will is made is governed by Indonesia's Islamic legal system. The second paragraph of article 195 KHI stresses that, without unanimous agreement among the heirs, a will cannot be valid for more than one-third of the inherited assets (Nuzha, 2017). The above-mentioned hadith from the Prophet SAW supports this view; the prophet himself advised Sa'd that bequeathing only one-third of his wealth was a substantial sum. Thus, it is the most extreme case. It is believed that the heirs would suffer greatly if it exceeds one third. This is particularly true if the heir is immature or has not yet begun to work (Erniwati, 2018).

Along with wills, the notion of current Islamic law also includes the phrase "mandatory will," meaning that a will is required to be issued. In principle, a ruler or judge acting in their official capacity to compel or decide upon an obligatory will for a deceased person is known as a mandatory will. This kind of will is granted to certain individuals under specific conditions (Yefrizawati et al., 2022).

When it comes to heirs of various faiths, the KHI's regulation of *wajibah* wills is somewhat restricted. Only adopted children who do not receive a will can benefit from the *wajibah* will arrangement in the KHI, which allows them to receive up to 1/3 of their adoptive parents' inheritance. Similarly, adoptive parents who do not receive a will are given a *wajibah* will, which allows them to receive up to 1/3 of their adopted child's inheritance. But KHI doesn't control how other faiths' heirs get their hands on inheritances.

The rules of Article 171 letter c KHI specify that: "An heir is a person who at the time of death is related by blood or marriage to the testator, is a Muslim and is not prevented by law from becoming an heir." Therefore, studying this topic is extremely significant. The requirements for heirs to be Muslims are laid forth in this article. In actuality, though, there are a number of instances involving the distribution of wealth to heirs of various faiths. One such case is the Religious Court Decision No. 14/Pdt.G/1994/PTA Jakarta regarding Inheritance, which is an appeal against the Religious Court Decision No. 337/Pdt.G/1993/PA Central Jakarta.

The appellant in this case, Sri Widyastuti, is a Christian who happens to be the son of a Muslim heir, the late H. Sanusi. It was determined by the Jakarta High Religious

Court's panel of judges that Defendant II needed the opportunity to inherit some of his parents' wealth. Despite not being legally entitled to it, Defendant II obtained  $\frac{3}{4}$  of the part that a female successor to the late H. Sanusi would have had according to an obligatory will that his parents left him. Along with that, there are a number of decisions concerning mandatory wills, including those from the Supreme Court of the Republic of Indonesia (Decision 368 K/AG/1999, Decision 51 K/AG/1999, Decision 16 K/AG/2010, Decision 721 K/AG/2015, Decision 218 K/AG/2016, and Supreme Court Jurisprudence Number 1/YUR/AG/2018).

Limited research exists on the legal complexities and challenges in dealing with inheritance across multiple jurisdictions, especially when heirs follow diverse religious beliefs. Investigate how different legal systems handle cross-border inheritance, considering the nuances of various religious practices and requirements.

In contrast to Islamic law, which states that non-Muslim heirs are not allowed to inherit property from Muslim heirs, the Supreme Court of the Republic of Indonesia has ruled that families or heirs of various faiths are required to have a will. The study topic is formulated as follows: (1) How is Islamic law applied to the regulation of wills of Wajibah heirs of different religions, given this background? Secondly, why should we take into account the judge's ruling on the wills of non-religious heirs.

## 2. Materials and Methods

Legal normative research is what this study is all about. Finding norms, principles, and doctrines in the law to address current legal problems is what normative legal study is all about, says Peter Mahmud Marzuki (Mahmud, 2016). This type of normative legal theory can be traced from legal literature and legal science (Jurisprudence and Law and Legal Science (Atmadja & Budiarta, 2018)). I used a card system to collect primary and secondary legal materials for my research, which included reading and quoting from a variety of sources. I then inventoried and classified the materials according to the formulation of each problem (Muhaimin, 2020).

Next, the legal documents are thoroughly examined, evaluated, and organized into a coherent framework for debate. This framework is designed to address the study subject and the issues that have been identified (Abdussamad, 2021). The Statute Approach, which places an emphasis on legislation as the foundational legal material, and the Case Approach, which makes use of printed documents pertinent to the topic, are the two research methods employed in this study. works of literature and study.

To analyze the sources, the step are : define research object, establish inclusion and exclusion criteria, and cross validation.

## 3. Results and Discussion

The Originally meaning "to give a message," the Arabic word "wasiyya" is the origin of the English term "wasiat." (Mas'ud & Abidin, 2007). Will means to arrange, decide, and place an order in its many contexts (Arafat & Syibli, 2023). One kind of will found in civil law is the testament, which is a written document outlining the intentions of the testator about his or her own distribution of assets upon death (Raharjo & Putri, 2019). A will is a legal document that specifies the distribution of assets upon the testator's death; it contains washiiyyat (Suwarna, 2018). According to scholars of fiqh, a will is a written document that transfers ownership of property, whether tangible or intangible, from one person to another and becomes legally binding upon the deceased's death (B.s & Hariyati, 2020).

A needed will, in theory, is an official decree or order by a court or monarch to force or determine the terms of an obligatory will for a dead person, given to certain persons under specified circumstances. Muhibuddin states that in order for a will to be deemed an obligatory will, two conditions must be satisfied. Firstly, the testator's wish to

leave something behind must be satisfied. Secondly, the components of obligation must be established by a law or decree that is apart from the testator's and beneficiary's wants. The second is that it's not too different from the regulations for distributing inherited wealth so that men get 50% and women receive 50%.

As stated in paragraph one of article 209 of the Compilation of Islamic Law, the *Wajibah Will* is meant for adopted children whose adoptive parents passed away without a will, or vice versa, it is provided to adoptive parents whose adopted kid passed away without a will. The preceding paragraphs highlight that adopted children's inherited assets are split according to articles 176–193. However, adoptive parents who refuse to accept a will are compelled to leave up to one third of their adopted child's inherited assets to a third party (Nofitasari, 2021).

A Muslim who is a direct descendant of the testator by blood or marriage and who is not otherwise barred from inheriting under Islamic law is considered an heir. The term "al-Waris" refers to the individuals who have a legal right to inherit from a deceased person due to a connection to that person's ancestry, marriage, or guardianship. In inheritance law, a difference in religion between the heirs and muwarriths (heirs) is a factor. An successor must be a practicing Muslim according to Islamic Inheritance Law. Nonetheless, bequests made by will or obligatory will might pass to members of various faiths. According to Article 832 of the Civil Code, the right to inherit is conferred to blood relations, whether legally recognized or not, of the spouse who lives the longest, regardless of whether they are married or not.

The term obligatory will was first used in Egypt through the 1946 Inheritance Law to uphold justice and help grandchildren who did not obtain their inheritance rights (Izhar & Tanjung, 2023). The main provisions of a will must be followed by the terms and conditions of a will. After paying the *tahjiz*, or the expenditures of caring for the deceased from the moment of death until burial and any debts, the mandatory will is also decided within a limit of one third.

First, looking at the legal basis, Article 209 paragraphs (1) and (2) of the Compilation of Islamic Law clearly regulates the existence of a mandatory will. It states that adoptive parents who do not accept a will must be given no less than one third of their adopted child's inherited assets, and adopted children who do not receive a will must be given no less than one third of their adoptive parents' inherited assets.

One third of an inheritance is based on a hadith by the Prophet's companion Sa'ad bin Abi Waqash. I have a lot of money, but I only have one lady to inherit it from," the Messenger of Allah questioned Sa'ad bin Abi Waqash while he was ailing. Just over two-thirds of my fortune is going to charity. Without hesitation, the prophet said, "No." "Half?" "Again?" Sa'ad inquired. Once again, the Prophet's response was "Don't." "How about adding a third?" "Again?" Sa'ad inquired. To which the Prophet Muhammad said, "Indeed, a third is actually better if you leave your child well off."

In Islamic African nations including Egypt, Tunisia, Morocco, and Syria, a required will is a legal document that must be drawn out in order to settle any disputes over an heir's inheritance that may arise between the heir and his or her grandchildren or great-grandchildren who were born before the heir. To facilitate *mawali*, or change of location, the state makes use of the local compulsory will institutions. The only people who may be legally required to make a will in Egypt are the grandkids of the heir who have already passed away and who are not eligible to inherit anything else due to being *zawil arham* or being concealed by other relatives. Article 209 of the KHI formalized Indonesia's adoption of this rule.

After the original parents' responsibilities for their children's daily needs and educational expenses were transferred to their adoptive parents, one of the reasons for regulating mandatory wills for adopted children was to level the playing field. However, from 1991 to 1998, there was no requirement for a mandatory beneficiary in mandatory wills. without a Muslim faith (Raharjo & Putri, 2019).

The following regulations apply to heirs of other faiths, and this is based on the ongoing adaptation of Islamic law and its principles, whereby only Muslim heirs may receive an inheritance according to M. Anshary's view: (a) Heirs of different religions do not receive inheritance rights from the assets left by deceased Muslim heirs, (b) Heirs of different religions, because they do not receive inheritance rights from the assets inherited from Muslim heirs, a solution is sought for them so that they can still receive a share, namely through compulsory wills. (c) The amount obtained by a non-Muslim heir from the testator's inheritance is as much as what he would have obtained if he had been Muslim (Anshary, 2013).

This is in contrast to the idea of obligatory wills governed by fiqh, which restricts the beneficiaries of such wills to those who are directly descended from the testator. Due to the inclusion of the adoption connection in the KHI, the legal foundation for Muslims in Indonesia, laws pertaining to the law of compulsory wills are put in place to address demands and overcome societal challenges. Because of the complexities of Indonesian culture, judges must go beyond their legal authority and use the *rechtsvinding* function, which is supported by positive law in cases when no legislation governs it. Article 5 of Law No. 48 of 2009, which deals with the power of the judiciary, grants this authority. That being said, judges are also granted the power to handle cases in line with a sense of fairness by KHI in article 229, which requires them to pay strict regard to societal legal standards.

Judges may, in theory, substitute their role as *rechtsvinding*, or *ijtihad* in Islamic law, for other (Jalil & Fahrudin, 2022). The judge must use the power of his *rechtsvinding* or *ijtihad* function when dealing with a limited obligatory will involving adoptive parents and children. Outside of the adoptive parents and the adopted kid, it will be difficult to exercise formal jurisdiction in KHI against any close relatives of the heir. The judge must use the power of his *rechtsvinding* or *ijtihad* function when dealing with a limited obligatory will involving adoptive parents and children. Outside of the adoptive parents and the adopted kid, it will be difficult to exercise formal jurisdiction in KHI against any close relatives of the heir.

Articles 194–209 of Chapter V of the Compilation of Islamic Law govern wills, including who may create a will, how a will should be structured, the many kinds of wills, and what may and cannot be included in a will. A few of these normative requirements are derived from venerable legal precedents; some of these provisions are mirrored in contemporary practices; and the remaining portion pertains to the matter of mandatory wills (Mutmainah & Sabir, 2019). A will gives preference to those who are not directly descended from the testator, such as adopted children, according to the article's central argument. In Islam, the idea of inheritance is directed towards both immediate and distant relatives, even those who do not possess inheritance rights (Al Amruzi & Sarmadi, 2012).

According to Islamic inheritance law, there are hurdles that a rightful inheritor must overcome before they may claim their share. If two potential heirs have fundamentally different religious beliefs, then one of them will never become an heir. The sentence is paraphrased as follows: "The heir is a person who at the time of death or who is declared dead based on a Muslim court decision, leaves heirs and inheritance." An individual who is Muslim is defined as the heir under Article 171 letter c of the KHI. "Heirs who are deemed to be Muslim if they are known from an identity card or confession or charity or testimony, while newborn babies or immature children, religion according to his father or his environment," states Article 172 KHI, which regulates how a person's religion can be inferred from their identity. This makes it quite clear that when people have different religious beliefs, their inheritance rights are instantly ended. Still, an obligatory will may help with inheritance distribution in cases when people have different religious beliefs. According to the requirements of the KHI, "the gift of assets through a mandatory will is carried out solely with considerations for the sake of hu-

manity, a sense of justice and the benefit of determining the obligation to make a will to heirs who are not intestate at the time of their lives."

As mentioned in the previous chapter, there are three things that might hinder an individual from inheriting wealth: religious differences, slavery, and murder. The ulama have unanimously agreed that these three factors constitute a barrier to inheritance (Syahr, 2016). One of the requirements to inherit is to be a Muslim, as stated in a hadith by Rasulullah SAW that is transmitted by Bukhari and Muslim, which goes something like this: "Muslims cannot inherit the property of non-Muslims and non-Muslims cannot inherit the property of Muslims."

Because settling disputes over who gets what after death falls squarely on the shoulders of close relatives, identifying and appointing heirs is of paramount importance when it comes to matters of succession and wills. 67 An heir in Islamic law is required to be a practicing Muslim for this reason. However, when there are religious disparities in carrying out inherited rights, such as in the case of gifts and wills, there are ways to overcome these difficulties, particularly when it comes to inheritance.

The Indonesian Compilation of Islamic Law is an effort to create a set of rules that all Muslims in the country must follow and to provide unified standards for judges of religious courts (Herawati, 2011). As a matter of fact, KHI has established a norm in the law, a yardstick by which the Religious Courts and Islamic communities and those seeking justice may be judged. In order to provide order, legal certainty, and security, it is believed that KHI may influence, motivate, and bring attention to the fact that the state must govern the social principles of Islamic law (Herawati, 2011).

According to Prof. Subekti, jurisprudence is the body of law that develops out of decisions made by lower courts that are either upheld by the Supreme Court as a cassation court or by the Supreme Court itself and so have long-lasting force of law. The goal of jurisprudence is to address the demands of those seeking justice via the evolution of the law. When the law is either nonexistent or out of date, it is the judge's responsibility to help fill in the blanks via jurisprudence.

Principles of law, according to Paul Schoten, are the inclinations that are mandated by law according to our moral compass. Principles of law are the overarching ideas that constitute the basis of our legal system; these ideas are explicated in statutes, regulations, and judicial judgments (Taqiuddin, 2019). This means that the legal system's underlying ideas are elaborated by judicial judgments and legislative rules (Atmadja & Budiarta, 2018).

When it comes to shaping the laws of a country, jurisprudence plays a significant role. Judges are obligated to establish jurisprudence on matters that are either not addressed in statutes, have incomplete or unclear regulations, or do not address the broader interests of the public. This is in accordance with article 22, paragraph 2, of Law no. 30 of 2014 concerning Government Administration, which aims to support the development of the National Legal System and accomplish the following goals: (1) streamline government administration; (2) fill legal gaps; (3) provide legal certainty; and (4) overcome government stagnation in certain circumstances.

The highest state court of all lower-level legal organizations is the Supreme Court, henceforth shortened as MA. According to Law no. 3 of 2009 regulating the Supreme Court, among its responsibilities and powers are the following: a. hearing appeals for cassation; b. resolving conflicts involving judicial authority; and c. reviewing requests for review of decisions that have acquired permanent legal force.

The National Legal Development Agency (BPHN) has conducted legal research on developing jurisprudence as a source of law, and one of its projects included numerous definitions of jurisprudence, including: (a) The ultimate source of fairness and legal

precedent is jurisprudence. (b) Juridical doctrines are the body of rules that the courts have developed and upheld. (c) Juridical judgments are compiled from previous rulings by the Supreme Court and High Court, which other judges use as precedent when deciding cases involving the same topic. (d) The rules and principles of law that are established and upheld by the judicial branch are known as jurisprudence. (e) Jurisprudence is the documented body of precedent that judges look to when deciding cases with comparable facts, including rulings from the Supreme Court and the High Court. (f) According to R. Subekti, jurisprudence consists of the final rulings of lower courts that are upheld by the highest court in the land (either by the Supreme Court in its role as a cassation court or by the Supreme Court itself) (National, 1992).

To ensure that their rulings are consistent with the community's sense of justice, judges are encouraged to consider the values held by Muslims and incorporate them into their rulings under article 229 of the KHI, as shown above. In deciding a matter in accordance with Islamic law, judges essentially have the power to exercise *ijtihad*. Islamic scholars engage in *ijtihad* to establish a consensus based on the Al-Qur'an and Hadith when there is a difficulty that cannot be resolved from those sources. 70 Cases involving the distribution of *Wajibah* wills, particularly among heirs of different faiths, fall under one of these categories.

"An act of encumbrance by a judge or institution which has the right to allow the assets of a person who has died but who has not made a will voluntarily, to have their rights or inherited objects taken away to be given to certain people in certain circumstances," refers to a mandatory will, according to the Compilation of Islamic Law (Misno, 2017). The practice of making wills obligatory for members of many faiths is a topic of much legal debate. The following constitute the legal foundation of this body of law:

**Table 1.** Analysis of Decisions relating to *Wajibah* Wills of Heirs of Different Religions

No	Decision	The Judge's Basis for Consideration
1	Religious Court Decision No. 14/Pdt.G/1994 PTA Jakarta	Taking into account that regardless of religious differences, the child No. of an heir has the legal right to inherit from both parents—not as an heir per se, but rather as a portion based on the parents' necessary wills.
2	Supreme Court Decision No. 368/Aug/1995	No. Given that female heirs of any faith get one-third of the inheritance, it follows that heirs of other faiths also receive one-third.
3	Supreme Court Decision No. 16/K/Aug/2010	No. Given the length of the testator's marriage—eighteen years—to his non-Muslim wife, the court weighed the merits of getting an obligatory will.
4	Supreme Court Decision No. 721/K/Aug/2015	Yusuf AL Qardhawi's ruling that peaceful coexistence of non-Muslims does not constitute infidelity, allowing the applicant's children to legitimately inherit from the heir in a mandatory will.
5	Supreme Court Decision No. 218/K/Aug/2016	Humanitarian considerations dictate that heirs of a dead heir who practice other faiths are not legally considered heirs but do have the right to inherit a portion of the estate via a required will.
6	Supreme Court Decision No. 4/Pdt.P/2013/PA.Bdg	No. heirs does not extend to non-Muslim heirs. However, due to the egalitarian principles found in Islamic inheritance law in Indonesia, non-Muslim blood relatives of the testator still have the right to receive a portion of the inheritance through a mandatory will, as long as their share does not exceed that of equal heirs.

From an Islamic legal standpoint, it is not possible to inherit an heir's estate only because they have a different religion, according to the analysis of the six cases mentioned above. Though not as an inheritor, but rather by way of a legally binding will. As is customary, the judge takes into account the views of the *ulama* as well as principles of justice and humanity.

#### 4. Conclusions

If the text is very lengthy or complicated, this part might be included to the discussion, however it is not essential. Anyone whose heirs are prevented from receiving their rights due to a *syara'*, such as an adoptive parent, a child of an adoptive parent, or a person of a different faith, may be the beneficiary of an obligatory will. Concerning the issue of obligatory wills for adopted children and their parents, Article 209 of the Compilation of Islamic Law regulates the matter. Share amounts for non-Muslim heirs and the conditions for obligatory wills are not governed by the Compilation of Islamic Law.

When a legal void arises, judges may resolve the matter by relying on *rechtsvinding* or *ijtihad*. It is borne out by various rulings, including Religious Court Decision No. 14/Pdt.G/1994 PTA Jakarta, Supreme Court Decision No. 368/Ag/1995, Supreme Court Decision no. 16/K/Ag/2010, Supreme Court Decision No. 721 K/Ag/2015, and Supreme Court Decision No. 218 K/Ag/2016, which, among other things, establishes obligatory wills for heirs of various faiths grounded on principles of humanity and fairness. Because no rules govern the distribution of mandatory bequests to heirs of different faiths or the amount that must be received by heirs of different faiths, the government is anticipated to draught legal regulations pertaining to this matter.

Creating a mandatory testament that accommodates heirs of different religions involves both practical and theoretical considerations. Practical implications encompass challenges in legal systems, the need for cultural sensitivity, conflict resolution, implementation challenges tied to religious rites, and the importance of seeking professional guidance from legal and religious advisors.

On the theoretical side, the testament signifies a commitment to religious pluralism, embracing diversity within the family's belief systems. Ethical principles underpin the testament, prioritizing fairness and justice among heirs, irrespective of their religious affiliations. The document can foster interfaith dialogue by accommodating various religions, promoting understanding and appreciation among family members. Inclusivity is a key theoretical value, recognizing diverse belief systems while nurturing a sense of unity and shared responsibility. Achieving a balance between legal requirements and religious principles is a nuanced "balancing act," making the testament a theoretical model for harmonizing these aspects in the context of inheritance.

In summary, a mandatory testament for heirs of different religions poses practical challenges in legal compliance and cultural sensitivity. Theoretically, it embodies values such as religious pluralism, ethical considerations, and the promotion of interfaith understanding within families. Developing such a testament necessitates a thoughtful and collaborative approach, encompassing legal, cultural, and religious perspectives.

Author's Contribution, Laurensia Sherlyn Tania Ika Prabowo was responsible as the main researcher in this research. Contributions included planning, data collection, analysis, and writing of all or most of the research. In this role, he has a deep understanding of inheritance laws based on different religions and how these apply in the context of civil law in Indonesia.

Nyoman Arya Kusuma Wardana contributed to collecting data or information related to Islamic law in Indonesia. Analysis of the implementation of these laws in inheritance practices in society may also be the focus of his contribution. He may also provide insight into other cultural and religious perspectives regarding inheritance in Indonesia.

Dian Prastiyowati played a role in data analysis, especially related to legal cases relevant to this research topic. His contribution may also include an explanation of the

legal framework that applies to followers of other religions in the context of inheritance in Indonesia.

Amelya Rizky Indriarukmana may be involved in data collection and analysis related to inheritance law from the perspective of other religions in Indonesia. His contributions may include an in-depth understanding of the principles of inheritance law and how they influence legal practice in Indonesia.

Sofia Ramdhani Oliviantari contributed to literature research related to general civil law, especially in the context of inheritance law research in Indonesia. His contribution may include an in-depth understanding of Islamic legal views related to inheritance distribution and their implementation in the context of civil law in Indonesia

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