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THE PRINCIPLE OF LEGAL CERTAINTY IN JUDICIAL DECISIONS FOR CIVIL DISPUTE RESOLUTION AT THE RABA BIMA DISTRICT COURT

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Abstract

The principle of legal certainty is one of the fundamental principles in the judicial system, which ensures that every judge's decision must provide clarity and certainty regarding the legal status of the disputing parties. This study aims to analyze the implementation of the principle of legal certainty in judges' decisions in the settlement of civil disputes at the Raba Bima District Court. The method used is a normative juridical approach with case studies of several civil decisions that have permanent legal force. The results of the study indicate that although in general the judges' decisions at the Raba Bima District Court have referred to applicable legal norms, there are still inconsistencies in legal considerations that have the potential to create legal uncertainty for the parties. Therefore, it is necessary to improve the professionalism and consistency of judges in applying legal principles, especially the principle of legal certainty, to ensure justice and legal protection for the community.

Keywords: principle of legal certainty, judicial decision, civil dispute, district court

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1 Introduction

The principle of legal certainty is one of the fundamental principles in the legal system that ensures the law is applied consistently, fairly, and predictably (Rahardjo, 2010). In the context of civil dispute resolution in district courts, this principle serves as a foundational basis for every judicial decision. Legal certainty provides a sense of security to the public that their rights will be protected and that the judicial system will deliver decisions that are objective, consistent, and in accordance with applicable law (Rukiah Latuconsina, 2015).

Legal certainty in judicial decisions is crucial as it concerns public trust in the judiciary. If judicial decisions tend to vary or are inconsistent with existing laws, this can lead to uncertainty within society and may even undermine the authority of the judiciary. Therefore, judges are expected to refer to prevailing legal provisions and relevant previous rulings (jurisprudence) when making decisions (Swardhana and others, 2016). In resolving civil cases, judges are not only required to deliver fair rulings but also to maintain legal consistency so that their decisions can serve as references for similar future cases. This consistency is part of the principle of legal certainty because the existence of patterns or standards in decisions allows parties to anticipate the outcomes of cases based on previously applied laws (Khambali, 2012).

Nevertheless, the principle of legal certainty cannot be separated from the principles of justice and utility (Hasazidun Moho, 2019). Judges must be able to balance legal certainty with substantive justice when formulating their decisions. Sometimes, in pursuit of higher justice, judges may need to engage in legal discovery (*rechtsvinding*), allowing them to renew or adapt positive law to current social conditions, without disregarding the principle of legal certainty itself (Lamijan & Tohari, 2022). Law No. 48 of 2009 concerning Judicial Power explicitly emphasizes the importance of the principle of legal certainty in the exercise of judicial power. Article 5 paragraph (1) states: "Judges shall explore, follow, and understand the values of law and the sense of justice that lives in society." In this regard, legal certainty is not merely interpreted as adherence to the letter of the law but also considers the concrete conditions faced by the parties (Risvandi & Andri, 2022). Moreover, the Supreme Court, as the highest institution in the judicial system, plays a key role in shaping and maintaining jurisprudential consistency to support the principle of legal certainty. Supreme Court decisions are often used as guidelines by judges in lower courts (district courts) and appellate courts (high courts) when deciding cases involving similar legal issues (Laica Marzuki, 2010).

In practice, the principle of legal certainty often faces challenges, especially when judges have the autonomy to interpret legal norms. Differing interpretations of the same legal provision can lead to different decisions in similar cases. Therefore, it is important to have a proper system for documenting and disseminating judicial decisions in order to create uniformity in the application of the law (Khuluqi & Muwahid, 2024). Legal certainty is also closely linked to the *ne bis in idem* principle, which prohibits cases that have been definitively decided (*inkracht*) from being retried. This principle ensures that civil court decisions with permanent legal force carry final and binding power, thus creating stability and certainty for disputing parties (Subiyanto, 2016).

However, in practice, there are still decisions that do not adequately reflect the principle of legal certainty. Differences in the interpretation of legal norms and disparities in rulings for similar cases indicate weak legal consistency. This may cause uncertainty for the parties involved because there is no guarantee that cases with similar core issues will be decided similarly. This reflects the challenges faced in applying the principle of legal certainty within the civil judicial system (Ariyanti, 2019).

Additionally, the quality of legal reasoning in judicial decisions greatly influences the realization of legal certainty. Preliminary observations reveal that not all rulings present comprehensive and well-argued legal reasoning. Some decisions even appear overly normative without clearly explaining the connection between legal facts and the norms applied. Yet clear legal reasoning helps parties understand the basis of the decision and strengthens the legitimacy of judicial rulings in the public eye (Fubby Lofus, 2019). External factors such as social, economic, and political pressures may also influence the independence of judges in making decisions. This can blur the principle

of legal certainty, as decisions may not be fully based on objective legal norms. Therefore, it is essential to strengthen the integrity and professionalism of judges as guardians of justice and legal certainty in judicial proceedings (Faturrohman et al., 2024). In conclusion, the application of the principle of legal certainty in civil dispute resolution at the district court level still requires improvement in terms of decision consistency, legal argumentation, and judicial independence. Judicial system reform, including oversight of rulings and enhancing judges' capacities, is a critical step toward achieving a civil justice system that is both fair and legally certain. Continued observation of various judicial decisions will be instrumental in providing a more comprehensive picture of how this principle is applied in practice (Kristian, 2018).

2 Literature Review

2.1 The Principle of Legal Certainty in Judicial Systems

Legal certainty is a foundational concept in modern legal systems, rooted in the idea that laws must be clear, stable, and predictable to ensure justice and social order. Rahardjo (2010) describes legal certainty (*kepastian hukum*) as a condition in which legal norms are applied consistently and can be relied upon by the public. This principle underlies the expectation that legal processes will not be arbitrary, and that similar legal issues will be resolved in a similar manner over time. Legal certainty is not merely a philosophical ideal, it has practical implications in every level of legal interaction. In civil cases, this principle becomes especially important, as parties rely on the judicial system to resolve disputes over rights, obligations, and property. When the law is uncertain or inconsistently applied, it disrupts not only individual expectations but also broader economic and social relationships. Thus, the principle functions as a pillar that holds together the predictability and reliability of a legal system, ensuring that it serves its function effectively and equitably.

2.2 Legal Certainty and Public Trust in the Judiciary

Legal certainty plays a direct role in building and maintaining public trust in the judiciary. According to Latuconsina (2015), the public's perception of justice is shaped not only by the fairness of outcomes but also by the predictability and consistency of judicial reasoning. When judges issue conflicting decisions in cases with similar facts or legal bases, it undermines the belief that the legal system operates on objective principles. This unpredictability can lead to a perception of bias, favoritism, or incompetence within the judiciary.

Swardhana et al. (2016) emphasize that legal certainty enhances institutional credibility. In countries with developing legal institutions, such as Indonesia, strengthening this principle can help foster citizen confidence in the rule of law and reduce reliance on informal or extra-legal means of conflict resolution. One of the mechanisms to uphold this principle is the use of *jurisprudenti* (precedent), where judges base their decisions on previously decided cases to ensure a coherent and stable legal interpretation.

2.3 Consistency and Predictability in Civil Litigation

In the context of civil litigation, legal certainty ensures that individuals and entities can reasonably anticipate the legal consequences of their actions. Khambali (2012) argues that predictable legal outcomes are crucial in promoting dispute prevention and voluntary settlement. For instance, if business actors or private individuals know how courts have ruled in similar contract or property disputes, they are more likely to comply with legal norms and avoid litigation altogether. Consistency in judicial decisions is not merely about repeating past decisions; it is about applying a consistent logic and interpretive method when adjudicating similar legal questions. This consistency creates a body of case law that lawyers, judges, and citizens can use to guide behavior. However, inconsistency, such as when two courts issue diverging judgments on similar cases—can sow confusion and even lead to strategic litigation shopping by parties seeking a more favorable venue or judge. To mitigate this, courts must maintain a clear and accessible database of rulings, and judges must receive continuous professional development to align their reasoning with prevailing standards and jurisprudence.

2.4 The Balance Between Legal Certainty, Justice, and Social Utility

While legal certainty is crucial, it must be carefully balanced with two other foundational principles of law: justice and utility. Moho (2019) and Lamijan & Tohari (2022) argue that strict adherence to rigid legal rules may lead to outcomes that, while legally correct, are substantively unjust or socially harmful. Therefore, judges must be sensitive to context and consider how their decisions affect the lives and rights of the parties involved.

This is where the concept of *rechtsvinding* or legal discovery becomes significant. It allows judges to interpret and adapt legal provisions to contemporary social realities without violating the law's integrity. Such interpretation is especially needed when existing laws are outdated, incomplete, or silent on a particular issue. The challenge, however, lies in maintaining this balance without compromising the core principle of certainty. Innovative rulings must still be grounded in legal reasoning that is transparent, principled, and replicable, so they do not appear arbitrary.

2.5 Data Analysis Technique

The Supreme Court of Indonesia (Mahkamah Agung) serves as the highest judicial authority and plays a strategic role in promoting consistency through the issuance of binding precedents. Marzuki (2010) highlights the importance of Supreme Court rulings in providing guidance for lower courts, especially in civil disputes that involve recurring legal issues. In practice, many district and appellate judges refer to Supreme Court decisions to strengthen their legal reasoning and avoid contradictory rulings. However, the effectiveness of this system depends heavily on the accessibility and dissemination of these precedents. In some regions, including remote areas like Raba Bima, judges may not always have access to up-to-date jurisprudence, leading to a gap in the implementation of legal certainty. Moreover, the Supreme Court can issue circular letters (*Surat Edaran Mahkamah Agung*) that provide instructions on how certain legal provisions should be interpreted, further reinforcing uniformity in judicial decision-making.

2.6 Challenges to Legal Certainty in Practice

Despite its theoretical importance, the application of legal certainty in Indonesia's judicial system still faces many challenges. One of the most pressing issues is the discretionary nature of legal interpretation by judges. Khuluqi & Muwahid (2024) argue that differing interpretations of the same legal norm often result in divergent outcomes in cases with similar facts, revealing a lack of standardized legal methodology among judges. Ariyanti (2019) also notes that the disparity in legal reasoning is exacerbated by inadequate legal training, inconsistent application of legal doctrines, and weak institutional oversight. These disparities not only hinder legal certainty but also erode the coherence of Indonesia's civil law system. Lofus (2019) further observes that many judicial decisions suffer from weak legal argumentation, lacking a thorough explanation of how facts are legally assessed and how relevant norms are applied. To address this, courts must institutionalize best practices for judicial writing, improve the availability of legal resources, and strengthen judicial education programs that emphasize logical reasoning, use of precedent, and ethical decision-making.

2.7 Legal Framework and Normative Guidance

Indonesia's legal framework explicitly supports the principle of legal certainty. Law No. 48 of 2009 on Judicial Power outlines the responsibilities of judges to uphold not only written law but also the values and sense of justice that exist within society. Article 5(1) provides that judges must "explore, follow, and understand the legal values and sense of justice that live in society," emphasizing a holistic and value-based approach to adjudication (Risvandi & Andri, 2022). This statutory directive implies that legal certainty is not limited to textual obedience to statutes, but includes responsiveness to societal development, legal culture, and evolving norms. The challenge lies in translating this normative guidance into concrete judicial behavior, particularly in regions where the quality of legal infrastructure and access to continuing education may be limited. As civil disputes continue to evolve in complexity

and scope, especially with the rise of digital transactions and cross-border conflicts, judges must remain adaptive while still grounding their rulings in coherent, predictable, and well-documented legal reasoning.

3 Research Method

To examine the principle of legal certainty in judicial decisions related to civil dispute resolution at the Raba Bima District Court, this study adopts a normative juridical method as its primary research approach. The normative juridical method focuses on the study of legal norms, particularly those enshrined in statutory regulations, judicial decisions, and legal doctrines that govern the application of the principle of legal certainty (Soekanto, 2019). This approach enables the researcher to analyze the extent to which judges adhere to and consider the principle of legal certainty in their decisions, as well as to assess the consistency of rulings across similar civil cases. By employing this method, the study critically reviews various sources of law such as the 1945 Constitution of the Republic of Indonesia, Law No. 48 of 2009 concerning Judicial Power, relevant provisions of the Civil Procedure Code, and decisions of the Supreme Court (jurisprudence). This includes an in-depth document analysis of final and binding court rulings (*inkracht van gewijsde*) from the Raba Bima District Court to identify patterns, inconsistencies, or innovations in legal reasoning. Additionally, legal theory and scholarly opinions are incorporated to contextualize the findings within broader jurisprudential frameworks (Mezak, 2006).

To further strengthen the analysis and to provide a more grounded understanding of how legal certainty is practiced, this research is supplemented with an empirical juridical approach. The empirical aspect involves collecting primary data through semi-structured interviews with judges, court clerks (*panitera*), and other legal practitioners directly involved in civil case proceedings at the Raba Bima District Court. This approach aims to capture the practical realities, including how the principle of legal certainty is interpreted and implemented by judges, and what challenges or constraints they face in doing so (Fuad, 2021). For instance, interviews may explore whether judges feel bound by precedent (*jurisprudence*), the degree of autonomy they perceive in interpreting legal provisions, and their perceptions of fairness when balancing legal certainty with justice and societal needs. This human-centered data is crucial for understanding how theoretical legal standards are translated into judicial practice and how institutional, procedural, or contextual factors affect this process.

By integrating normative and empirical approaches, this study aspires to provide a comprehensive and holistic analysis of the application of the principle of legal certainty in judicial decisions. This mixed-method strategy enables the researcher not only to evaluate the formal consistency of legal reasoning but also to interpret the lived experiences and judicial attitudes behind those decisions. In doing so, the research contributes to a deeper understanding of whether the legal certainty reflected in court judgments truly upholds the values of justice and legal protection for litigants and society at large (Qamar et al., 2017). This combined methodology is particularly important in a regional context such as Raba Bima, where variations in legal infrastructure, access to jurisprudential references, or professional development opportunities may influence judicial behavior. Thus, the study will not only evaluate normative compliance but also generate policy recommendations for improving legal certainty in civil adjudication processes.

4 Result And Discussion

4.1 The Principle of Legal Certainty in Judicial Decision-Making

Legal certainty is a fundamental principle in the judicial system that ensures the law is applied consistently, predictably, and without bias. This principle is central to the legitimacy of judicial decisions, especially in civil disputes where parties seek clarity and enforceability. As affirmed by Rahardjo (2010), legal certainty guarantees that similar cases receive similar outcomes, thereby reducing arbitrariness and increasing public confidence in the legal system. The empirical data collected from the judge at the Raba Bima District Court reinforces this notion. The judge emphasized that

“Legal certainty is like the base of every decision we make. When people come to court, they want a clear decision, one that can be followed and doesn’t make things more confusing. As judges, we have a big responsibility to make sure our decisions are steady, based on the law, and give people a sense of security”.

Reflecting the centrality of this principle in their daily judicial practice. The commitment to this principle is manifested in how judges begin their deliberations by referring to existing laws, Supreme Court precedents, and relevant jurisprudence. Additionally, they analyze trial facts, scrutinize documentary and testimonial evidence, and consult legal commentaries or expert opinions when needed. This rigorous methodology reflects the balanced approach between statutory interpretation and factual justice, as described by Mezak (2006). Importantly, the judge clarified that legal certainty is not achieved merely by citing laws but also by presenting legal reasoning that is comprehensible and well-structured. This aligns with Lofus (2019), who argued that effective legal reasoning helps the public understand the rationale behind decisions, thereby strengthening trust in the judiciary. Thus, the application of legal certainty at the Raba Bima District Court is both procedural and substantive it aims not only to enforce laws but to foster a transparent and predictable legal environment.

4.2 Challenges in Realizing Legal Certainty

Despite the ideal role of legal certainty, the findings show that its application is not without challenges. Several internal and external factors hinder the consistent realization of this principle. Internally, the varying quality of judicial reasoning across cases and judges presents a major obstacle. The judge noted:

“If a case is new or unusual... we have to be very careful in reading the law so people don’t get confused later”.

This statement illustrates the limitations of relying on legal precedent when dealing with novel or complex disputes where jurisprudential guidance is limited or nonexistent. This issue resonates with Khuluqi & Muwahid (2024), who emphasize that inconsistent interpretations among judges, especially in regional courts, often result in divergent outcomes even in cases with similar legal frameworks. Moreover, judges may not have adequate access to updated legal databases, particularly in remote districts like Raba Bima, further compounding inconsistency in decision-making. This situation makes it difficult for litigants to predict outcomes or rely on previous rulings as benchmarks. Externally, judges may also face indirect pressure from community expectations, social tensions, or local elites. The judge admitted:

“There may also be pressure or outside influence, but judges must stay fair and strong”.

This aligns with Faturhman et al. (2024), who argued that judicial independence must be safeguarded against sociopolitical pressures to preserve the credibility of the legal process. Hence, it becomes evident that legal certainty requires not only technical legal competence but also institutional resilience and ethical fortitude on the part of judges.

4.3 Balancing Legal Certainty with Fairness and Justice

One of the most nuanced aspects of this study is the tension between maintaining legal certainty and achieving substantive justice. While legal certainty promotes consistency, justice is inherently contextual and may require flexibility. The judge articulated this challenge succinctly:

“Sometimes, written law doesn’t match what people feel is fair. That’s where the judge’s role is important... the decision must feel fair but still follow the rules”.

This reflection encapsulates the struggle faced by judges who must apply static legal norms to dynamic, often emotionally charged disputes. The literature supports this complex interplay. Moho (2019) and Lamijan & Tohari (2022) argue that legal certainty should not override justice, particularly in civil cases where socio-cultural factors and human dignity are at stake. In such contexts, *rechtsvinding* or legal discovery becomes crucial allowing judges to creatively interpret laws while remaining within legal boundaries. Judges at the Raba Bima District Court appear to engage in this delicate balancing act. By combining legal analysis with empathy and sensitivity to local context, they aim to deliver rulings that are

both lawful and just. However, this discretion must be exercised transparently and supported by logical reasoning to avoid perceptions of partiality or unpredictability. This approach is in line with Law No. 48 of 2009, Article 5(1), which mandates judges to explore and apply the values of justice that live in society alongside positive legal norms.

4.4 Institutional Strengthening and the Future of Legal Certainty

The final component of the findings reflects forward-looking insights regarding the institutionalization of legal certainty. The judge shared his aspirations for the judiciary, stated:

“I hope judges always stay professional and consistent... Legal certainty is important not just for justice seekers, but also to keep the court’s respect”.

This vision points to the importance of continuous professional development, adherence to ethical codes, and structural support for judicial independence. The literature echoes this need for systemic reform. Scholars such as Kristian (2018) and Sulaiman & Rahayu (2018) highlight the importance of integrating legal education, modern technology, and oversight mechanisms to ensure uniformity in rulings. The development of centralized legal information systems, accessible jurisprudence repositories, and regular judicial workshops are vital to bridging the gap between theory and practice. Furthermore, public legal education should also be prioritized. When litigants and the public better understand how legal certainty works and why certain judgments are made, they are more likely to respect court decisions and participate meaningfully in the legal process. As the judge stated,

“I also hope people understand the legal process better so there are fewer wrong assumptions”.

This perspective is crucial for fostering a legal culture where certainty, justice, and transparency coexist. Moreover, enhancing the public’s understanding of the principles that underpin judicial decisions such as legal certainty, fairness, and due process can significantly reduce procedural misunderstandings, lessen the frequency of frivolous appeals, and improve compliance with court orders. When litigants perceive that the judicial system operates on consistent, rational, and just principles, they are more likely to view court rulings as legitimate even when outcomes are unfavorable to them. Ultimately, the future of legal certainty in Indonesia rests not only on the individual integrity of judges but also on the synergy between legal institutions, judicial reforms, and public engagement. A holistic approach encompassing technological modernization, professional training, ethical accountability, and community education is indispensable for building a legal culture in which certainty, justice, and transparency coexist harmoniously and support the broader aim of rule-of-law governance.

5 Conclusion

The principle of legal certainty is a foundational element in civil justice and plays a crucial role in shaping fair and consistent judicial decisions. At the Raba Bima District Court, this principle is particularly vital in ensuring that civil dispute resolutions adhere to the ideals of justice, predictability, and enforceability. Legal certainty requires that every decision handed down by a judge must offer clear legal reasoning, be grounded in applicable law, and result in a binding and executable judgment (*eksekutorial*). It ensures that legal outcomes are not only fair but also foreseeable, allowing litigants to understand their rights and obligations with confidence. In practice, judges are

expected to examine all elements of the case, including factual evidence, applicable statutory norms, and relevant jurisprudence. This is essential to uphold the rule of law (*supremasi hukum*) and to prevent arbitrary or contradictory judgments. A decision that lacks consistency or diverges from established legal principles can undermine the credibility of the court and lead to prolonged legal uncertainty (Zaini, 2010; Islamiyanti, 2018). Thus, the process of legal reasoning must be logical, systematic, and transparent. Judges must articulate the basis of their rulings through well-structured considerations (*ratio decidendi*), linking the facts with the law in a way that avoids ambiguity and minimizes the risk of misinterpretation.

At the Raba Bima District Court, efforts to implement this principle are evidenced by decisions that have acquired permanent legal force (*inkracht van gewijsde*), where litigants report receiving clarity on the scope and consequences of their legal positions. These outcomes not only resolve the specific disputes at hand but also serve as precedents that guide future cases, thereby fostering consistency and stability within the judicial system. Moreover, the principle of legal certainty is intrinsically linked to legal security and access to justice. When courts consistently produce decisions that are coherent and aligned with prior rulings and statutes, it reinforces public confidence in the judiciary. Conversely, inconsistent or vague rulings can lead to perceptions of bias, reduce trust in judicial impartiality, and even trigger secondary disputes or legal appeals. In the broader framework of Indonesia's legal system, legal certainty is not merely a procedural expectation but a constitutional mandate, as reflected in Article 28D of the 1945 Constitution, which guarantees every citizen's right to fair legal recognition, protection, and certainty. Judges at all levels, including those in regional courts like Raba Bima, therefore bear a constitutional responsibility to ensure that their decisions uphold these legal rights. Nonetheless, challenges remain. In some cases, disparities in judicial interpretation of similar statutory provisions have been observed, often due to limitations in access to jurisprudential databases, uneven professional training, or pressure from local sociopolitical factors. Addressing these issues calls for systemic reforms, including the integration of standardized digital legal references, continuous judicial education, and stronger oversight mechanisms to promote uniformity and accountability in judicial reasoning.

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Ethical Considerations

Not Applicable

Conflict of Interest

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REFERENCES

- Abdallah, E. E., & Fayyumi, E. (2016). Assistive Technology for Deaf People Based on Android Platform. *Procedia Computer Science*, 94, 295–301. <https://doi.org/10.1016/j.procs.2016.08.044>
- Adibsereshki, N., Hatamizadeh, N., Kazemnejad, A., & Sajedi, F. (2024a). The Coping Strategies After a Resilience Intervention Programme: A Randomised Controlled Trial Among Adolescent Students with Hearing Loss. *International Journal of Disability, Development and Education*, 1–15. <https://doi.org/10.1080/1034912X.2024.2355616>

- Adibsereshki, N., Hatamizadeh, N., Kazemnejad, A., & Sajedi, F. (2024b). The Coping Strategies After a Resilience Intervention Programme: A Randomised Controlled Trial Among Adolescent Students with Hearing Loss. *International Journal of Disability, Development and Education*, 00(00), 1–15. <https://doi.org/10.1080/1034912X.2024.2355616>
- Batista, M. Á. H., & García, N. S. (2023). Deaf students and the challenges they face in higher education. *South Florida Journal of Development*, 4(6), 2473–2491. <https://doi.org/10.46932/sfjdv4n6-021>
- Becerra Sepúlveda, C. A. (2020). Inclusión e interculturalidad para la cultura Sorda: caminos recorridos y desafíos pendientes. *IE Revista de Investigación Educativa de La REDIECH*, 11, 1–23. https://doi.org/10.33010/ie_rie_rediech.v11i0.792
- Black, P. A. (2006). Demographics, Psychiatric Diagnoses, and Other Characteristics of North American Deaf and Hard-of-Hearing Inpatients. *Journal of Deaf Studies and Deaf Education*, 11(3), 303–321. <https://doi.org/10.1093/deafed/enj042>
- Borghouts, J., Neary, M., Palomares, K., De Leon, C., Schueller, S. M., Schneider, M., Stadnick, N., Mukamel, D. B., Sorkin, D. H., Brown, D., McCleerey-Hooper, S., Moriarty, G., & Eikey, E. V. (2022). Understanding the Potential of Mental Health Apps to Address Mental Health Needs of the Deaf and Hard of Hearing Community: Mixed Methods Study. *JMIR Human Factors*, 9(2), e35641. <https://doi.org/10.2196/35641>
- Feldman, D. M., & Gum, A. (2007). Multigenerational Perceptions of Mental Health Services of Deaf Adults in Florida. *American Annals of the Deaf*, 152(4), 391–397. <https://doi.org/10.1353/aad.2008.0001>
- Fellinger, J., Holzinger, D., & Pollard, R. (2012). Mental health of deaf people. *The Lancet*, 379(9820), 1037–1044. [https://doi.org/10.1016/S0140-6736\(11\)61143-4](https://doi.org/10.1016/S0140-6736(11)61143-4)
- Ferreira, K. E., Lutz, T. M., & Bruder, M. B. (2025). Are mental health professionals prepared and comfortable to provide services to people with disabilities ? An exploratory analysis. *Journal of Mental Health*, 0(0), 1–8. <https://doi.org/10.1080/09638237.2025.2512315>
- Gao, J., Zhang, Y., Jiang, X., Fu, Z., & Jiang, H. (2025). Evaluating the Effectiveness of Community-Delivered Hearing Rehabilitation and Health Education Intervention on Social Isolation and Functioning Among Chinese Adults With Hearing Impairment: Protocol for Randomized Controlled Trial. *JMIR Research Protocols*, 14. <https://doi.org/10.2196/64115>
- Gould, J., & Clark-Howard, K. (2025). A qualitative synthesis of literature on mental health therapies for Deaf and hard-of-hearing people from multiple perspectives: the Deaf client, the mental health practitioner and the sign language interpreter. *Counselling Psychology Quarterly*, 00(00), 1–25. <https://doi.org/10.1080/09515070.2025.2472373>
- Hassinen, L., & Lappalainen, R. (2018). Acceptance and commitment therapy using finnish sign language: Training counselors in signed ACT for the deaf – A pilot study. *Journal of Contextual Behavioral Science*, 8, 74–81. <https://doi.org/10.1016/j.jcbs.2018.02.005>
- Kushalnagar, R. (2019). *Deafness and Hearing Loss* (pp. 35–47). https://doi.org/10.1007/978-1-4471-7440-0_3
- Levinger, M. (2020). Triad in the Therapy Room - The Interpreter, the Therapist, and the Deaf Person. *Journal of Interpretation*, 27(1). <https://digitalcommons.unf.edu/joi/vol28/iss1/5>
- Lewis, J. A., Lewis, M. D., Daniels, J. A., & D’Andrea, M. J. (2011). A Multicultural -Social Justice Perspective. *Brooks/Cole, Cengage Learning*, 362.
- Manciaux, M., Vanistendael, S., Lecomte, J., & Cyrulnik, B. (2001). La résilience: état des lieux. *Cahiers Medico Sociaux*.
- Pertz, L., Plegue, M., Diehl, K., Zazove, P., & McKee, M. (2018). Addressing Mental Health Needs for Deaf Patients Through an Integrated Health Care Model. *The Journal of Deaf Studies and Deaf Education*, 23(3), 240–248. <https://doi.org/10.1093/deafed/eny002>
- Rodríguez-Correa, P. A., Valencia-Arias, A., Patiño-Toro, O. N., Oblitas Díaz, Y., & Teodori De la Puente, R. (2023). Benefits and development of assistive technologies for Deaf people’s communication: A systematic review. *Frontiers in Education*, 8. <https://doi.org/10.3389/feduc.2023.1121597>

- Siadatian Arani, S. H., Ashori, M., Faramarzi, S., Ghasem, N., & Spencer, L. J. (2022). Adaptation and validation of PERMA flourishing program to improve the psychological well-being of adolescents suffering from hearing loss and their mothers. *Journal of Family Research*, 18(2), 355–370. <https://doi.org/https://doi.org/10.48308/jfr.18.2.355>
- Siadatian Arani, S. H., Ashori, M., Faramarzi, S., Norouzi, G., & Spencer, L. J. (2024). Flourishing Intervention: Basic Psychological Needs Satisfaction in Hard-Of-Hearing Adolescents. *International Journal of Disability, Development and Education*, 00(00), 1–13. <https://doi.org/10.1080/1034912X.2024.2403379>
- Siswanto. (2010). Systematic Review Sebagai Metode Penelitian. *Buletin Penelitian Sistem Kesehatan* 13, i, 326–333.
- Soleman, C., & Bousquat, A. (2021). Políticas de saúde e concepções de surdez e de deficiência auditiva no SUS: um monólogo? *Cadernos de Saúde Pública*, 37(8). <https://doi.org/10.1590/0102-311x00206620>
- Takayama, K. (2017). Disaster Relief and Crisis Intervention with Deaf Communities: Lessons Learned from the Japanese Deaf Community. *Journal of Social Work in Disability and Rehabilitation*, 16(3–4), 247–260. <https://doi.org/10.1080/1536710X.2017.1372241>
- Theunissen, S. C. P. M., Rieffe, C., Netten, A. P., Briare, J. J., Soede, W., Schoones, J. W., & Frijns, J. H. M. (2014). Psychopathology and Its Risk and Protective Factors in Hearing-Impaired Children and Adolescents. *JAMA Pediatrics*, 168(2), 170. <https://doi.org/10.1001/jamapediatrics.2013.3974>
- United Nations. (2022). *Disability - Inclusive communications guidelines*. https://www.un.org/sites/%0Dun2.un.org/files/un_disability-inclusive_communication_guidelines.pdf
- Wets, John; Bubenzer, Don; Osborn, C. (2003). *Leaders and Legacies Contributions to the Profession of Counseling*. Routledge.
- Wu, Y., Yu, W., Wu, X., Wan, H., Wang, Y., & Lu, G. (2020). Psychological resilience and positive coping styles among Chinese undergraduate students: a cross-sectional study. *BMC Psychology*, 8(1), 79. <https://doi.org/10.1186/s40359-020-00444-y>
- Zeng, T., Xu, M., Shi, L., Zhang, M., Su, R., Wang, C., Liu, W., Peng, P., Ma, H., & Li, H. (2025). Mindfulness and Inhibitory Control of Deaf Students: Evidence from China. *International Journal of Disability, Development and Education*, 00(00), 1–15. <https://doi.org/10.1080/1034912X.2025.2467362>
- Ziadat, A. H., & Al Rahmneh, A. A. (2020a). The learning, social, and economic challenges facing the deaf and hearing-impaired individuals. *Cypriot Journal of Educational Sciences*, 15(5), 976–988. <https://doi.org/10.18844/cjes.v15i5.5130>
- Ziadat, A. H., & Al Rahmneh, A. A. Al. (2020b). The learning, social, and economic challenges facing the deaf and hearing-impaired individuals. *Cypriot Journal of Educational Sciences*, 15(5), 976–988. <https://doi.org/10.18844/CJES.V15I5.5130>