

# The Protection of International Humanitarian Law against Child Sexual Violence in Armed Conflict: A Case Study of Sudan

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## Abstract

This study examines the protection of international humanitarian law for child victims of sexual violence in Sudan's armed conflict, particularly in the context of the use of sexual violence as a weapon of war by the Rapid Support Forces (RSF) since April 2023. Using normative legal research methods with legislative, conceptual, and comparative approaches, this study analyzes applicable international legal instruments, international criminal tribunal jurisprudence, and available law enforcement mechanisms. The results of the study show two main findings. First, the normative framework of international humanitarian law including the 1998 Rome Statute, the 1949 Geneva Convention, the 1989 Convention on the Rights of the Child, and the UN Security Council Resolutions have provided a juridically adequate legal basis for establishing criminal accountability against RSF perpetrators through the ICC mechanism based on the referral jurisdiction of Resolution 1593 (2005), as reinforced by the precedent of the Ali Kushayb ruling (October 2025). Second, effective protection for child victims of sexual violence faces serious implementation gaps due to four structural barriers: state non-cooperation in the execution of arrest warrants, limitations of UN Security Council mechanisms, barriers to proof on the ground, and the



inadequacy of Sudan's national justice system. The study concludes that the continued impunity is not a reflection of the inadequacy of legal norms, but rather a failure of the political will of the international community to implement them consistently.

## KEYWORDS

International Humanitarian Law, Sexual Violence, Children, Armed Conflict, Sudan

## Introduction

The armed conflict in Sudan has been a global concern for a long time. This civil war has been going on since 1955 until now and is one of the longest wars to occur on the African continent. The conflict left many people dead and thousands injured, and displaced more than 11 million people. This has led to a humanitarian crisis that results in malnutrition and disease. This war is between the Sudanese *Armed Forces (SAF)* and the paramilitary group better known as *the Rapid Support Forces (RSF)* which is an armed group with an Arab majority aimed at suppressing the South Sudanese insurgency and participating in the Darfur War. The RSF has often carried out sadistic attacks in the Darfur region ranging from sexual violence, kidnappings, ethnic massacres to the International Criminal Court (ICC) condemning it as genocide targeting non-Arab populations. Linda Thomas-Greenfield, who is the United States ambassador to the United Nations (UN), emphasized that there is a lot of data that shows sexual violence committed by the RSF in April 2024.<sup>1</sup>

The most worrying dimension of RSF's sexual violence in Sudan is its deliberate function as a weapon of ethnic cleansing to permanently expel non-Arab indigenous people from their lands. *Human Rights Watch* in a report titled *The Massalit Will Not Come Home* concluded that RSF and its

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<sup>1</sup> Agbor Itu Bassey, "AN APPRAISAL OF AFRICAN UNION'S LEGAL REGIME FOR THE MAINTENANCE OF AFRICAN REGIONAL SECURITY AND SOCIO-POLITICAL STABILITY: THE SUDANESE CONFLICT IN PERSPECTIVE\*," *Law and Social Justice Review (LASJURE)* 6, no. May (2025): 95–103.

allied Arab militias are waging a structured campaign of ethnic cleansing in El Geneina, the capital of West Darfur, with the apparent goal of permanently expelling the Masalit community and other non-Arab groups from the region. Sexual violence includes mass rape, sexual torture, and the abduction of women and children as sexual slaves used not as an excesses of war, but as an instrument of terror calculated to break community bonds and force people to flee.<sup>2</sup>

The strongest evidence of the use of sexual violence as a weapon of ethnic expulsion by the RSF comes from the report of the UN Independent Fact-Finding Mission to Sudan released in February 2026. The UN mission found that RSF specifically targeted women and girls from the Zaghawa and Fur communities for sexual violence, while women perceived as Arabs were consistently untouched by an ethnically biased pattern of victimization that clearly proved the discriminatory intent behind the violence. The statements of RSF perpetrators captured by eyewitnesses, such as the words "we want to erase all black people from Darfur", reinforce the conclusion that sexual violence is part of a conscious policy to physically and demographically destroy certain ethnic groups.<sup>3</sup> This pattern is in line with the doctrine known in international humanitarian law as "*gender-based persecution*" of gender-based persecution combined with ethnic motives, which cumulatively meet the elements of crimes against humanity and even genocide.<sup>4</sup>

Sexual violence functions as a weapon of expulsion through several mutually reinforcing mechanisms. First, the mass rapes carried out openly

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<sup>2</sup> Jean-Baptiste Gallopin, "'The Massalit Will Not Come Home' Ethnic Cleansing and Crimes Against Humanity in El Geneina, West Darfur, Sudan," *Human Rights Watch*, May 9, 2024, <https://www.hrw.org/report/2024/05/09/massalit-will-not-come-home/ethnic-cleansing-and-crimes-against-humanity-el>.

<sup>3</sup> Vibhu Misra, "Sudan: 'Hallmarks of Genocide' Found in El Fasher, UN Investigators Detail Mass Killings and Ethnic Targeting," *UN News*, February 19, 2026, <https://news.un.org/en/story/2026/02/1166997>.

<sup>4</sup> Anthony J. Blinken, "Genocide Determination in Sudan and Imposing Accountability Measures," *U.S. Department of State*, January 7, 2025, <https://2021-2025.state.gov/genocide-determination-in-sudan-and-imposing-accountability-measures/>.

in front of families and communities as *documented by Médecins Sans Frontières (MSF)* on the streets of Darfur's cities and refugee camps are designed to destroy the collective dignity of communities in such a way that victims and their families find it impossible to stay. Second, the abduction of women and girls for sexual slavery creates a demographic vacuum that forces families to leave their hometowns in search of safety. Third, the *Office of the United Nations High Commissioner for Human Rights (OHCHR)* in November 2023 expressed deep concern over reports that "women and girls are abducted and detained in conditions such as inhumane and degrading slavery in RSF-controlled areas of Darfur" a practice that effectively transforms women's bodies into a tool of elimination of the presence of non-Arab communities.<sup>5</sup>

The effectiveness of this strategy is evident from the scale of the mass displacement that it causes. Nearly half a million refugees from West Darfur have fled to Chad since April 2023, 75 percent of them from El Geneina, making it one of the largest population exodus in Africa's modern history. The Masalit, Zaghawa, Fur, Berti, and other non-Arab communities that for centuries inhabited Darfur have been effectively uprooted from their ancestral lands through a combination of mass killings, systematic sexual violence, village burning, destruction of agricultural infrastructure, and the use of hunger as a weapon. Official recognition of these crimes came gradually but increasingly firmly: in December 2023 the United States Secretary of State, Antony Blinken determined that the RSF had committed crimes against humanity and ethnic cleansing, and in January 2025 he announced the determination of genocide against the RSF's actions in Sudan, making Sudan the first conflict to receive an official genocide designation from the United States since Darfur 2004.<sup>6</sup>

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<sup>5</sup> U.S. Senate Resolution 559, "S.Res.559 - A Resolution Recognizing the Actions of the Rapid Support Forces and Allied Militia in the Darfur Region of Sudan against Non-Arab Ethnic Communities as Acts of Genocide.," 2024, <https://www.congress.gov/bill/118th-congress/senate-resolution/559/text>.

<sup>6</sup> Office of the High Commissioner for Human Rights, "Sudan: UN Report Details Horrific Patterns of Violations Committed during RSF Takeover of Zamzam IDP Camp," December 18, 2025.

Data collected by various UN agencies shows how children are the most exposed group in this sexual violence crisis. The UN Independent Fact-Finding Mission found plausible grounds that the RSF committed war crimes that included rape, sexual slavery, and the recruitment of children under 15. At the March 2025 UN Security Council meeting, the Executive Director of UNICEF revealed 221 cases of child rape were reported in nine states through 2024, 16 of which involved children under the age of five, including four one-year-old babies.<sup>7</sup> *Médecins Sans Frontières (MSF)* noted that of the 659 survivors of sexual violence dealt with in South Darfur between January 2024 and March 2025, 31 percent were children under the age of 18, with 7 percent under the age of 10 and 2.6 percent under the age of 5 the picture of destruction that knows no age limit.<sup>8</sup>

International humanitarian law (IHL) has actually provided a comprehensive legal framework to protect children and civilians from such practices. The 1949 Geneva Convention and its Additional Protocols explicitly prohibit sexual violence, forced displacement of civilians, and ethnic cleansing, and provide special protection for women and children in both international and non-international armed conflicts.<sup>9</sup> The 1998 Rome Statute categorizes rape, sexual slavery, deportation or forced displacement of populations, as well as persecution based on ethnicity as crimes against humanity.<sup>10</sup> The United Nations Convention on the Rights of the Child (CRC) and its Optional Protocols set universal standards for the protection of children from sexual exploitation and violence.<sup>11</sup> UN Security Council Resolutions 1820 (2008), 1888 (2009), and 2467 (2019) specifically

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<sup>7</sup> UN News, "Sudan: Children as Young as One Raped during Conflict, UNICEF Warns," March 4, 2025, <https://news.un.org/en/story/2025/03/1160761>.

<sup>8</sup> Médecins Sans Frontières (MSF), "Sexual Violence in Sudan: They beat us and they raped us right there on the road in public," 2025, <https://share.google/SqEnRKXY8BvXpLoY9>.

<sup>9</sup> "The Geneva Conventions of 12 August 1949" (1949).

<sup>10</sup> *Rome Statute of the International Criminal Court*, n.d.

<sup>11</sup> Adoption Nationally, "Convention on the Rights of the Child," no. September (1990).

recognize conflict-related sexual violence as a threat to international peace and security.<sup>12</sup>

This study intends to examine in depth how international humanitarian law provides protection for children victims of sexual violence in Sudan's armed conflict, especially in the context of RSF's strategy of using sexual violence as a tool of ethnic cleansing since April 2023, to the extent to which existing international legal instruments can be effectively applied, as well as what structural barriers have led to the gap between norms and implementation continues. Thus, this research is expected to make an academic and practical contribution in efforts to strengthen legal protection for child victims in the Sudanese armed conflict and modern armed conflicts in general.

## Methods

This research uses a type of normative legal research, which is research that examines law as norms, principles, doctrines, and legal instruments that apply to answer the legal issues faced. This type of research relies on secondary data in the form of literature materials, not on field data, so that the entire research process is carried out through tracing and analysis of relevant legal materials. This research was chosen because it is prescriptive, meaning that it does not only describe the existing legal situation, but also provides a normative assessment and produces arguments or legal concepts as a solution to the problem studied, namely the gap between international humanitarian law norms regarding the protection of children from sexual violence in armed conflict and the reality of its implementation in the case of Sudan since April 2023.<sup>13</sup>

This study uses three approaches simultaneously. First, the statute

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<sup>12</sup> Amy Barrow, "UN Security Council Resolutions 1325 and 1820 : Constructing Gender in Armed Conflict and International Humanitarian Law" 92, no. 877 (2010): 221–34, <https://doi.org/10.1017/S1816383110000081>.

<sup>13</sup> M.Hum. Dr. Muhaimin, S.H., *Legal Research Methods* (Mataram: Mataram University Press, 2020).

approach, which examines all international legal instruments relevant to the issues under consideration, including the 1949 Geneva Convention and its Additional Protocols, the 1998 Rome Statute, the 1989 Convention on the Rights of the Child, and the UN Security Council Resolutions on conflict-related sexual violence, taking into account the hierarchy of norms, consistency between norms, and the philosophical content behind each of these instruments. Second, the conceptual approach, which is used to construct and analyze the concept of sexual violence as a weapon of war in the framework of international humanitarian law, by relying on the views and doctrines that have developed in international law as the basis for argumentation. Third, the comparative approach, which is used to examine the jurisprudence of relevant international criminal tribunals, especially the ICTY decision in the Kunarac case and the ICTR decision in the Akayesu case, in order to obtain similarities and differences in criminal accountability standards for systematic sexual violence that can be used as a benchmark for analysis in the Sudanese case.<sup>14</sup>

The legal materials used in this study are divided into three categories. Primary legal materials are authoritative and binding, including international legal instruments such as the 1949 Geneva Convention, the 1998 Rome Statute, the 1989 Convention on the Rights of the Child, UN Security Council Resolutions 1820, 1888, and 2467, as well as official reports of UN agencies. Secondary legal materials provide explanations of primary materials, including international law textbooks, scientific journals, doctrines of humanitarian legal experts, OHCHR, UNICEF, Human Rights Watch, Amnesty International, and the report of the UN Independent Fact-Finding Mission to Sudan. Tertiary legal materials include international law dictionaries, legal encyclopedias, and language dictionaries that serve as support for conceptual understanding. These three layers of legal material are compiled and arranged coherently based on the

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<sup>14</sup> Nur Solikin, *Introduction to Legal Research Methodology*, ed. Qiara Media Team (Pasuruan: Qiara Media Publisher, 2021).

hierarchy of norms to avoid contradictions between norms in the analysis process.

The collection technique of legal materials was carried out through bibliography studies and document studies, by searching legal materials from the UN Treaty Collection, UN Digital Library, databases of international legal journals (HeinOnline, Westlaw), as well as official publications of the ICRC and trusted international human rights organizations. All the collected legal materials are then analyzed using qualitative analysis methods that are inductive and prescriptive: conclusions are built gradually from the collected legal materials without testing the hypotheses that are first established, and the analysis does not stop at the description of existing norms but is directed at a critical assessment of the adequacy and effectiveness of international humanitarian legal instruments in providing protection for child victims of violence in Sudan's armed conflict, as well as structural barriers that lead to gaps between norms and their implementation on the ground.<sup>15</sup>

## **Result and Discussion**

### **1. Law Enforcement Mechanism for Perpetrators of Sexual Violence as a Weapon of War in the Sudan Conflict**

Sexual violence in armed conflict is one of the most serious violations of international humanitarian law (IHL) and international criminal law. International humanitarian law and international human rights law absolutely prohibit all forms of sexual violence at any time and against anyone in armed conflict, both international and non-international.<sup>16</sup> The Rome Statute of the International Criminal Court (ICC) of 1998 explicitly

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<sup>15</sup> Adhi Kusumastuti and Ahmad Mustamil Khoiron, *Qualitative Research Methods*, ed. Fitriun Annisya and Sukarno (Semarang: Sukarno Pressindo Education Institute, 2019).

<sup>16</sup> Gloria Gaggioli, "Sexual Violence in Armed Conflicts: A Violation of International Humanitarian Law and Human Rights Law" 96 (2014): 503–38, <https://doi.org/10.1017/S1816383115000211>.

lists rape, sexual slavery, forced prostitution, forced pregnancy, forced sterilization, and various other forms of sexual violence into the list of crimes against humanity (Article 7) and war crimes (Article 8), both in the context of international and non-international armed conflicts.<sup>17</sup> In the context of the RSF operating in Sudan since the outbreak of conflict in April 2023, this normative framework is the main foundation for establishing legal accountability for a series of documented systematic acts of sexual violence.

From the perspective of international criminal law, there are two main pillars of accountability that are relevant to RSF perpetrators. The first pillar is direct individual criminal responsibility, which is that any RSF member who directly commits an act of sexual violence can be held criminally liable regardless of rank or position. This fundamental principle of HHI has been strengthened through ICTY and ICTR jurisprudence and codified in the Rome Statute.<sup>18</sup> The second pillar is command responsibility under Article 28 of the Rome Statute, which affirms that a military commander is criminally liable for crimes committed by forces under his command and effective control if the commander knows or should have known of the crime and fails to take all necessary measures to prevent, stop, or refer the matter to the competent authorities.<sup>19</sup>

The development of international jurisprudence provides a strong normative foundation for the prosecution of RSF perpetrators. Akayesu's case before the ICTR in 1998 was the first historical milestone in the enforcement of the law on sexual violence in armed conflict, which stipulated that sexual violence can constitute an act of genocide if

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<sup>17</sup> "Rome Statute of the International Criminal Court, July 17, 1998, Art. 7(1)(g) and Art. 8(2)(b)(Xxii) and Art. 8(2)(e)(Vi)" (n.d.).

<sup>18</sup> Nunung Nurjanah et al., "Journal of Social Sciences and Humanities ENFORCEMENT OF INTERNATIONAL HUMANITARIAN LAW IN WAR CRIMES IN THE SYRIAN CONFLICT BASED ON THE 1949 GENEVA CONVENTION" 2 (2024): 230–38.

<sup>19</sup> Etienne Kuster, "INTERNATIONAL HUMANITARIAN LAW: A COMPREHENSIVE INTRODUCTION," 2019.

committed with the intention of destroying a particular group. This precedent paved the way for a legal construction that recognized sexual violence not as a side effect of war, but as an instrument of planned and organized crime.<sup>20</sup> Kunarac's case in the ICTY further expands this doctrine by asserting that military-organized systematic rape constitutes a crime against humanity, provided that there is a nexus between such acts and widespread or systematic attacks directed against the civilian population. This doctrine is directly relevant in constructing the accountability of RSF commanders, given that sexual violence has been proven to occur widely and systematically as part of the force's operational strategy.<sup>21</sup> The Bemba Gombo case at the ICC in 2016 was the first to apply the doctrine of full command accountability for systematic sexual crimes, establishing the 'knew or should have known' standard as an important reference for the prosecution of RSF leaders, given that the widely documented pattern of sexual violence is difficult to claim to be unknown to field commanders.<sup>22</sup>

In the context of the Sudanese conflict, the international law enforcement mechanism of the RSF against perpetrators of sexual violence committed by the RSF is primarily based on the jurisdiction of the ICC obtained through a referral to the UN Security Council based on Resolution 1593 (2005). This jurisdiction covers the situation in Darfur and, since July 2023, was expanded by the ICC Prosecutor to include investigations into crimes committed since the outbreak of a new conflict in April 2023. Based on Article 17 of the Rome Statute on the principle of complementarity, the ICC only exercises its jurisdiction if the state concerned is *unwilling* or *unable to* conduct a serious investigation and prosecution. The Sudanese government's unwillingness and inability to prosecute perpetrators of

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<sup>20</sup> Tanja Altunjan, "The International Criminal Court and Sexual Violence: Between Aspirations and Reality" 29 (2021): 878–93, <https://doi.org/10.1017/glj.2021.45>.

<sup>21</sup> ICTY, "Prosecutor v. Dragoljub Kunarac et al., Case No. IT-96-23&23/1-A, Appeal Judgment" (2002).

<sup>22</sup> Andi Bintang, Satrih Hasyim, and Arfah Tjolleng, "The Role of the International Criminal Court (ICC) in Law Enforcement Against War Crimes" I, no. 1 (2025): 1–18.

systematic sexual crimes committed by RSF has confirmed the applicability of ICC jurisdiction over these cases.<sup>23</sup>

Since 2023, the ICC through *the Office of the Prosecutor* (OTP) has developed a comprehensive gender-competent policy through *the Policy Paper on Gender-Based Crimes* (December 2023). The policy integrates a gender perspective across all lines of investigation and prosecution, including the development of evidentiary strategies that are sensitive to specific barriers to the disclosure of sexual crimes. The implementation of this policy in the Darfur investigation reflects the evolution of the ICC's institutional capacity to deal with systematic sexual crimes as a weapon of war, by establishing a Darfur Unified Team that has special expertise in dealing with gender-based crimes.<sup>24</sup> A report by the UN Independent Fact-Finding Mission published in September 2024 states that there are reasonable grounds to believe that the RSF and its allied militias are committing rape, sexual slavery and various other forms of sexual violence as part of a widespread and systematic attack on non-Arab groups, particularly the Masalit community in El Geneina, West Darfur.

The OHCHR's follow-up report titled "*A War of Atrocities*" in September 2025 further reinforces these findings by documenting that the RSF and its allies during the siege of El Fasher committed a range of crimes against humanity, including rape, sexual slavery, sexual violence, and persecution based on ethnicity, gender, and political affiliation.<sup>25</sup> The report also found that the RSF uses hunger as a method of warfare and deprives them of access to humanitarian aid, a condition that exacerbates the vulnerability of women and children to sexual violence. This documented pattern of violence is crucial evidence for prosecutions at the ICC. In the

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<sup>23</sup> Hermansyah, "International Humanitarian Law under Pressure: Legal Responses to 21st Century Armed Conflicts," *Legalis : Journal of Law Review* 2, no. 1 (2024).

<sup>24</sup> International Commission of Jurists, "Towards Gender Inclusive Justice and Accountability for Serious Crimes under International Law Committed in Myanmar," 2024.

<sup>25</sup> OHCHR, "A War of Atrocities: Sudan Civilians Deliberately Targeted," UN Fact-Finding Mission Report to the UN Human Rights Council," 2025.

latest development, ICC Deputy Prosecutor Nazhat Shameem Khan in his statement before the UN Security Council in July 2025 emphasized that the ICC has reasonable grounds to believe that war crimes and crimes against humanity have been and continue to be committed in El Fasher, including the systematic use of sexual violence as an instrument of war. The Darfur Unified Team has collected more than 7,000 items of evidence from various field missions to refugee camps in Chad, and this undeniable pattern of criminal acts leads directly to the responsibility of those individuals who hold command control of RSF forces.<sup>26</sup>

One of the most significant judicial developments that provided a direct precedent for the prosecution of RSF perpetrators was the ICC ruling in the case of Prosecutor v. Ali Muhammad Ali Abd-Al-Rahman (known as Ali Kushayb) handed down in October 2025. The ICC convicted the defendant, a Janjaweed militia leader who was RSF's predecessor, of 31 counts of war crimes and crimes against humanity committed between August 2003 and April 2004 in Darfur, including rape, murder and torture. In December 2025, the Panel of Judges sentenced him to 20 years in prison taking into account the large number of victims, discriminatory motives, and the high level of participation and intention of the defendants.<sup>27</sup> This ruling has three very significant legal implications. First, this is the first ruling resulting from the Security Council's referral to the ICC, confirming that the referral mechanism is not just a political instrument but can result in concrete criminal accountability. Second, this ruling is the first in the ICC to cover gender-based persecution of men, expanding the scope of protection for victims of sexual violence regardless of gender. Third, this ruling stipulates that the ICC Prosecutor has and is able to establish a criminal case for crimes

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<sup>26</sup> PICC, "Deputy Prosecutor Nazhat Shameem Khan, Statement before UN Security Council, 10 July 2025, "International Criminal Court: War Crimes, Systematic Sexual Violence Ongoing in Darfur," *UN News*, 2025.

<sup>27</sup> Abdel Raheem Hussein, "FORTY-SECOND REPORT OF THE PROSECUTOR OF THE INTERNATIONAL CRIMINAL COURT TO THE UNITED NATIONS SECURITY COUNCIL PURSUANT TO RESOLUTION 1593 (2005 )" 1593, no. 2005 (2023): 1–23.

committed by Janjaweed/RSF militia leaders, thereby creating jurisprudence that can be directly applied against RSF commanders for similar patterns of crimes committed since April 2023.<sup>28</sup>

As a follow-up, in January 2025, the ICC prosecutor stated that his office expects to apply for arrest warrants against individuals responsible for crimes committed in West Darfur since April 2023. This statement, combined with the collection of evidence that has reached more than 7,000 items, indicates that the ICC's prosecution mechanism is moving towards the stage of formalizing the criminal accountability of RSF leaders for the sexual violence they ordered or allowed to occur.<sup>29</sup>

Despite a strong normative framework and promising judicial developments, the law enforcement mechanism against RSF perpetrators faces a number of serious structural challenges. The first challenge is the issue of state cooperation and the execution of arrest warrants. As of early 2026, four ICC arrest warrants against Sudanese figures issued previously against Omar Al-Bashir, Ahmad Muhammad Harun, Abdel Raheem Muhammad Hussein, and Abdallah Banda have not been executed. Former President Al-Bashir and several other suspects were even released from prison after the outbreak of the conflict in April 2023, further complicating the prospect of surrender to the ICC.<sup>30</sup>

The second challenge relates to the limitations of the UN Security Council mechanism as an enabling mechanism of ICC jurisdiction. Under Article 16 of the Rome Statute, the Security Council has the right to suspend the ICC's investigation for 12 months, while permanent members who do not ratify the Rome Statute can use the veto to prevent the expansion of the

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<sup>28</sup> ICC, "Forty-Second Report of the Prosecutor Pursuant to UNSC Resolution 1593 (2005)," *Daily Sabah*, 2026.

<sup>29</sup> Muhammad Wildan Mufti, "Redesigning the Authority of the UN Security Council in the Rome Statute as an Effort to Strengthen the Independence of the ICC" 4, no. 1 (2025): 617–26.

<sup>30</sup> Martinius Rambe Purba and Wiwi, "ANALYSIS OF THE AUTHORITY OF THE INTERNATIONAL CRIMINAL COURT (ICC) ON THE HANDLING OF PALESTINIAN CASES FROM THE PERSPECTIVE OF INTERNATIONAL CRIMINAL LAW," *Bhinneka Multidisciplinary Journal* 1, no. 1 (2024).

ICC's jurisdiction or the application of collective measures. This creates institutional uncertainty that can be exploited by perpetrators to avoid accountability, especially given the sanctions against the ICC imposed by the United States in February 2025 including asset freezes and entry bans for ICC officials that could potentially threaten the operational capacity of the Darfur investigation.<sup>31</sup>

The third challenge is the evidentiary barriers inherent in the prosecution of conflict-based sexual crimes. Empirical research shows that the accountability of armed groups for sexual violence in conflict depends largely on the presence or absence of leadership that implements zero tolerance, investigators' access to conflict areas, and the availability of willing and safe witnesses to testify. In Sudan's case, deteriorating security conditions in Darfur, obstructions of investigators on the ground, and witness fears of reprisals make evidence collection a formidable challenge. The ICC Deputy Prosecutor himself acknowledged that there are obstacles in the form of obstruction and hostility to investigators in the field, limited funding, and difficulties around the arrest and transfer of suspects.<sup>32</sup>

The fourth challenge relates to the limitations of international legal mechanisms in reaching lower-level individual perpetrators. International prosecutions by the ICC structurally focus on the most senior leaders responsible for crimes, while enforcement of lower-level perpetrators is essentially dependent on the capacity of Sudan's national justice system which is currently unable to function independently in the context of the ongoing conflict. Alternative mechanisms such as individual sanctions targeted by the UN Security Council through the sanctions regime Resolution 1672 (2006) including asset freezes and travel bans have been

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<sup>31</sup> Ariesta Wibisono Anditya and Wahyu Adi Mudiparwanto, "REFERRAL RIGHTS AND DEFERRAL SECURITY COUNCIL RIGHTS AND THE INDEPENDENCE OF THE INTERNATIONAL CRIMINAL COURT," *TIRTAYASA JOURNAL OF INTERNATIONAL LAW* 1, no. 2 (2022).

<sup>32</sup> Elizabeth Brannon and Sumin Lee, "Ruling Rebel Parties and Accountability for Wartime Sexual Violence, *Security Studies*" 34, no. 3 (2025): 564–89.

implemented against some individuals, but their effectiveness in encouraging real accountability for sexual violence remains very limited.<sup>33</sup>

The above analysis shows that the law enforcement mechanism against perpetrators of sexual violence as a weapon of war carried out by the RSF is multi-layered and complementary. In the first layer, international criminal law, especially through the Rome Statute, provides an adequate normative framework to establish individual criminal accountability for both direct perpetrators and senior commanders who fail to prevent or punish the sexual crimes of their subordinates. The jurisprudence of the ICTY in Kunarac, the ICTR in Akayesu, and the ICC in Bemba became solid pillars of argument, while the Ali Kushayb verdict in October 2025 set a direct precedent that suggests that leaders of the Janjaweed-RSF militia can be punished for systematic sexual crimes in Darfur.<sup>34</sup>

In the second layer, non-judicial mechanisms such as the UN Security Council's sanctions regime, Independent Fact-Finding Mission reporting, and collective diplomatic pressure can serve as complementary instruments that reinforce the deterrence effect on potential perpetrators and commanders. Recent research suggests that the UN's targeted sanctions regime against individuals responsible for sexual violence in conflict can be an effective pressure mechanism beyond formal criminal prosecution channels, especially in situations where ICC access to conflict territories is severely limited. This multi-track approach is also supported by the recommendations of the UN Fact-Finding Mission which call for the expansion of the ICC's jurisdiction to the entire territory of Sudan, the

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<sup>33</sup> Overton, K., & Sharif, S. (2023). Agents with Principles? Preventing Conflict-Related Sexual Violence with Human Rights Laws and Norms. *Human Rights Quarterly*, 45, 487-512., n.d.

<sup>34</sup> Chhandosi Roy, Mehwish Sarwari, and Chhandosi Roy, "Rebel Sexual Violence and UN Targeted Sanctions Rebel Sexual Violence and UN Targeted Sanctions," *International Peacekeeping* 3312 (2025): 1–24, <https://doi.org/10.1080/13533312.2025.2595418>.

establishment of an internationalized judicial mechanism, and the use of universal jurisdiction by the domestic courts of other countries.<sup>35</sup>

Ultimately, the effectiveness of the law enforcement mechanism against perpetrators of sexual violence as a weapon of war committed by the RSF does not depend solely on the strength of the existing normative framework that is juridically adequate but on the collective political will of the international community to support its implementation consistently. Continued impunity is not a reflection of existing legal inadequacies, but rather of a gap between norms and implementation caused by political, structural, and operational barriers. In the Sudanese context, the pursuit of criminal accountability against RSF commanders for the systematic sexual violence they led or permitted was an inalienable international legal obligation, and the judicial momentum created by the Ali Kushayb verdict and the latest developments in the ICC investigation became a starting point for the international community to optimise.<sup>36</sup>

## **2. Humanitarian Legal Protection for Victims of Sexual Violence in Sudan's Conflict**

Children are the most vulnerable group in any situation of armed conflict, and this vulnerability reaches its most severe dimension when sexual violence is used as an instrument of war. International humanitarian law (HHI) and international human rights law provide layered protection for children in armed conflict. The 1989 United Nations Convention on the Rights of the Child (CRC) requires states parties to respect and ensure respect for the rules of human rights applicable to children in situations of armed conflict, while requiring the taking of all possible measures to protect and care for children affected by conflict.<sup>37</sup> At the level of HHI itself, the

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<sup>35</sup> "Roy, Chhandosi, and Mehwish Sarwari. 2025. 'Rebel Sexual Violence and UN Targeted Sanctions,' *International Peacekeeping*," n.d.

<sup>36</sup> Firman Gunawan et al., "NEW CHALLENGES FOR INTERNATIONAL HUMANITARIAN LAW IN THE FACE OF HYBRID THREATS AND ASYMMETRIC CONFLICTS," *Journal of Law and Nation (JOLN)* 4, no. 2 (2025).

<sup>37</sup> "United Nations Convention on the Rights of the Child (CRC)" (1989).

Geneva Convention IV and its Additional Protocols specifically stipulate that children have the right to special respect and must be protected from all forms of indecent assault, a formulation that in the development of international jurisprudence has been interpreted broadly to encompass the entire spectrum of sexual violence.<sup>38</sup>

Within the framework of international criminal law, the Rome Statute explicitly qualifies sexual violence against children as crimes against humanity and war crimes, both in the context of international and non-international conflicts. This provision not only prohibits acts of sexual violence itself, but also criminalizes any act that puts children at risk of sexual exploitation, including the systematic destruction of family and community protection systems, as documented in RSF's attacks on communities in Darfur. This protection is absolute, there is no military justification or operational necessity that can justify sexual violence against children in any situation of armed conflict, and no derogation is allowed against the prohibition.<sup>39</sup>

In the context of operationalization of protection, the UN Security Council through Resolution 1612 (2005) and Resolution 1882 (2009) has established a Monitoring and Reporting Mechanism (MRM) specifically designed to document six categories of gross violations against children in armed conflict, including sexual violence. This mechanism requires systematic monitoring, regular reporting to the UN Secretary-General, and the compilation of a list of parties to gross child abuses as an instrument of pressure intended to trigger accountability and encourage protective measures.<sup>40</sup> In the Sudanese context, the implementation of MRM faces acute access challenges. The RSF actively obstructs the presence of

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<sup>38</sup> "Geneva Convention Relative to the Protection of Civilian Persons in Time of War (Geneva Convention IV), August 12, 1949, Arts. 24 and 51; Protocol Additional to the Geneva Conventions of 12 August 1949, and Relating to the Protection of Victims of Internal Affairs" (n.d.).

<sup>39</sup> "Rome Statute, Arts. 7(1)(g), 8(2)(b) and 8(2)(E)," n.d.

<sup>40</sup> The Security Council, "Security Council" 1612, no. July (2005).

international monitors in the territory it controls, so the data collected on violations is almost certainly a far below true scale.

The reality of child protection of victims of sexual violence in the Sudanese conflict shows a striking contrast between the prevailing norms and the factual conditions on the ground. Since the outbreak of the conflict in April 2023, the UN Joint Office for Human Rights in Sudan has received credible reports of at least 19 children being victims of sexual violence committed by the RSF and its allied militias. This figure is almost certainly far below the real figure, given the entrenched culture of stigma, fear of retaliation from the RSF, the collapse of the health and child protection systems, and barriers to investigators' access to affected areas.<sup>41</sup> The OHCHR report "A War of Atrocities" (September 2025) documents that sexual violence perpetrated by RSF during the siege of El Fasher specifically targeted women and girls from the Masalit ethnic group and other non-Arab communities, demonstrating the dimensions of ethnic- and gender-based persecution that deliberately reach child victims as part of a broader strategy of community destruction.

Sudan has consistently been listed in the UN Secretary-General's Annual Report on Children and Armed Conflict as one of the monitored situations for serious violations against children, including sexual violence, forced recruitment, murder and mutilation, and attacks on schools and hospitals. Sudan's presence on this list legally obliges the UN Security Council to pay special attention and encourage concrete action for child protection. Nevertheless, the gap between formal monitoring obligations and the implementation of real safeguards remains enormous, especially due to the absence of the presence of peacekeepers with adequate child protection mandates in the areas most affected by RSF attacks.<sup>42</sup>

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<sup>41</sup> "Sudan: UN Fact-Finding Mission Outlines Extensive Human Rights Violations, International Crimes, Urges Protection of Civilians," March 6, 2024, <https://www.ohchr.org/en/press-releases/2024/09/sudan-un-fact-finding-mission-outlines-extensive-human-rights-violations>.

<sup>42</sup> United Nations and I Introduction, "General Assembly Security Council" 1998, no. June (2025).

Beyond prohibitions and prosecution mechanisms, international legal protection for children victims of sexual violence in conflict also includes an equally important dimension of recovery and reintegration. Article 39 of the CRC obliges the state to take all appropriate measures to improve the physical and psychological recovery and social reintegration of children who are victims of all forms of exploitation and violence. These obligations are progressive and include the provision of trauma-responsive physical and mental health services, educational continuity, and culturally sensitive dignity restoration mechanisms. In the context of Sudan, the severe humanitarian crisis including the collapse of the health system in Darfur, the mass displacement of more than eight million people, and the disruption of access to international assistance due to RSF obstructions make this recovery obligation almost impossible to meet without substantial and sustained international community intervention.

Within the framework of international accountability mechanisms, the protection of child victims of sexual violence and the prosecution of perpetrators are inherently interrelated. The ICC's Policy Paper on Gender-Based Crimes (December 2023) explicitly acknowledges the dual vulnerability of girls as victims of gender-based crimes, and requires investigative teams to integrate child protection perspectives into all evidence-gathering and prosecution strategies. Implicitly, in the investigation of RSF's crimes in Sudan, any evidence showing sexual violence against a child should be treated as an aggravating circumstance in the construction of the indictment, which significantly increases the weight of the punishment that can be imposed on the perpetrator and his commander.<sup>43</sup>

Effective protection for child victims of sexual violence in Sudan's conflict faces a series of structural barriers that exacerbate each other. First,

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<sup>43</sup> Benjamin Shifrel, "Framing Atrocity: The Life-and-Death Consequences of Language in Reporting on Mass Violence" (Wesleyan University, 2025).

the collapse of the Sudanese state's capacity to carry out child protection functions in conflict areas creates an institutional vacuum that cannot be filled by international mechanisms with very limited physical access. Second, the still very strong social stigma against victims of sexual violence, especially girls in conflict-affected communities, causes most cases to go unreported and victims do not access the protection services that are actually available. Third, the RSF actively and systematically obstructs humanitarian operations and child protection, as documented in the OHCHR report documenting the use of starvation as a weapon of war and the planned destruction of access to humanitarian aid.<sup>44</sup>

The dimension of child protection in the Sudanese conflict cannot be separated from the long-term consequences of sexual violence experienced by children. Research in international human rights law shows that sexual violence against children in armed conflict produces intergenerational impacts that include prolonged psychological trauma, social stigmatization that results in permanent marginalization, impaired physical and reproductive development, and school dropouts that perpetuate cycles of poverty and vulnerability across generations.<sup>45</sup> In the context of RSF's systematic use of sexual violence as a strategy of community destruction, these impacts are a deliberate consequence — not just a side effect — of an operational policy designed to permanently destroy the social foundations of non-Arab communities in Darfur.<sup>46</sup>

The international community's responsibility for the protection of child victims of sexual violence in the Sudanese conflict goes beyond the obligation to prosecute perpetrators criminally. It includes a positive

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<sup>44</sup> United Nations Team of Experts Rule of Law/Sexual Violence in Conflict, "Annual Report 2023," 2024, <https://www.un.org/sexualviolenceinconflict/wp-content/uploads/2024/07/Annual-Report-TOE-2024SMALL.pdf>.

<sup>45</sup> Indah Sri Utari, Benny Sumardiana, and Universitas Negeri Semarang, "Prevention of Violence Against Children During the Covid-19 Pandemic Perspective of Criminology" 3, no. August 2021 (2022): 85–110.

<sup>46</sup> Pablo Castillo, "RETHINKING DETERRENCE: THE INTERNATIONAL CRIMINAL COURT IN SUDAN," 2007.

obligation to ensure unimpeded humanitarian access to all affected areas, finance a comprehensive recovery mechanism for child victims, support the capacity of local organizations capable of reaching affected communities in a safe and sustainable manner, and ensure that any peace process and political transition in Sudan compulsorily includes a binding child protection clause as a non-negotiable condition.<sup>47</sup>

Ultimately, the protection of humanitarian law for children victims of sexual violence in the Sudanese conflict cannot be seen as an issue separate from the accountability mechanism for the RSF as perpetrators. Both are two sides of the same international legal obligation: the obligation to protect the most vulnerable from the most unforgivable crimes, and ensuring that when that protection fails, accountability is fully and without exception. In the Sudanese context, the gap between universally applicable child protection norms and the reality of child suffering in Darfur is the sharpest reflection of the ongoing international law enforcement crisis — and the strongest argument for why the international community cannot allow RSF's impunity for systematic sexual violence against children to continue without a commensurate response.

## Conclusion

The study concludes that international humanitarian law has provided a juridically adequate normative framework to respond to the systematic sexual violence used by the RSF as a weapon of war in the Sudanese conflict, including layered protection for children as the most vulnerable victims. The 1998 Rome Statute, the 1949 Geneva Convention and its Additional Protocols, the 1989 Convention on the Rights of the Child, and the jurisprudence of international tribunals from Akayesu and Kunarac to Bemba Gombo and the Ali Kushayb verdict (October 2025) together

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<sup>47</sup> Diandra Preludio Ramada and Ridwan Arifin, "Legal Protection for Children as Victims of Economic Exploitation : Problems and Challenges in Three Major ASEAN Countries (Indonesia, Vietnam and Philippines)" 7, no. 2 (2023).

establish a framework of criminal accountability that includes both direct perpetrators and RSF commanders through two pillars: direct individual criminal accountability and commanding accountability under Article 28 of the Rome Statute. The Ali Kushayb verdict in particular is a judicial precedent that can be directly applied, considering that the defendant is the leader of the Janjaweed militia which is a direct predecessor of the RSF, so that similar patterns of crime and chain of command in the post-April 2023 era already have a concrete basis for prosecution through the ICC mechanism whose jurisdiction is obtained from the referral of the UN Security Council based on Resolution 1593 (2005).

However, this study also confirms that this normative adequacy does not necessarily result in effective protection for child victims of sexual violence in the field. The four structural obstacles of state non-cooperation in executing ICC arrest warrants, the limitations of the UN Security Council mechanism that is vulnerable to veto and sanctions against the ICC by the United States from February 2025, evidentiary obstacles due to the RSF's obstruction of investigators and the culture of victim stigma, and the cumulative collapse of Sudan's national justice system create serious and persistent implementation gaps. The ongoing impunity is not a reflection of the inadequacy of existing laws, but rather of the failure of the collective political will of the international community to enforce them consistently. In this context, a multi-track approach that integrates the ICC's prosecution, the UN's targeted sanctions regime, diplomatic pressure, the use of universal jurisdiction, and support for child victim recovery mechanisms is the most proportionate response and the judicial momentum created by the Ali Kushayb verdict as well as the collection of more than 7,000 items of evidence by the ICC's Darfur Unified Team team must be optimized by the international community before this window of accountability closes.

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