



Integrative Resolution of Toba Batak Customary Inheritance Disputes Involving Female Adopted Children and Legal Protection

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Abstract

This study examines the legal position of female adopted children in Batak Toba customary inheritance disputes and proposes a dispute settlement model that ensures legal protection while preserving customary principles. The research employs a normative juridical method using statutory, case, and conceptual approaches, analysing legal materials through qualitative interpretation and deductive reasoning. The findings indicate that female adopted children are not automatically recognised as heirs due to the patrilineal kinship system, while inheritance disputes are driven by legal pluralism, weak adoption evidence, competing claims from paternal relatives, and unclear classification of inheritance property. The study introduces an integrative dispute settlement model consisting of verification of adoption status, classification of ancestral and self acquired property, customary deliberation through Dalihan Na Tolu, written settlement agreements, and judicial resolution as a final mechanism. The novelty of this research lies in its property based analytical approach and the formulation of a tiered legal model that integrates customary and formal legal systems. The findings contribute to strengthening legal pluralism theory and offer practical guidance for improving dispute resolution mechanisms in customary inheritance cases.

INTRODUCTION

Inheritance law in Indonesia does not operate within a single unified legal system; rather, it exists within a plurality of legal systems, including customary inheritance law, Islamic inheritance law, and civil inheritance law. In the context of customary law, inheritance is not merely understood as the transfer of property from the deceased to the heirs, but is also closely related to the continuity of kinship relations, social status, and the equilibrium of life within indigenous communities. Customary law, as a *living law*, is dynamic in nature because it develops from practices and values maintained by the community. At the same time, however, it continues to confront social change, education, gender equality, and the development of national law. Therefore, issues concerning customary inheritance often cannot be resolved

solely by examining customary rules textually; rather, they must be analysed in relation to the principles of justice, legal certainty, and the protection of every person's civil rights (Hajati, 2021; Poespasari et al., 2020).

In the Batak Toba customary community, inheritance issues have distinctive characteristics because the kinship system is patrilineal. Descent is traced through the male line, so sons occupy an important position as successors of the *marga* and as the principal heirs. Within this framework, the position of daughters, including female adopted children, is more limited compared with that of sons. Adoption in the Batak Toba community may indeed create a familial social relationship between the adopted child and the adoptive parents. However, the adopted child's position in inheritance is not always automatically equal, particularly when the adopted child is female (Mahargiani et al., 2025; Melynda et al., 2025; Ismail et al., 2022). Research by Naibaho and Sihombing shows that the position of adopted children in Batak Toba customary inheritance has become an important issue because it relates to the requirements for adoption, the status of adopted children, and the distribution of inherited property according to local custom (Naibaho & Sihombing, 2021). Nevertheless, in the context of female adopted children, the issue becomes more complex because they are not regarded as successors of the *marga*, although socially they may have been cared for, raised, and acknowledged as part of the adoptive family (Luntajo & Hasan, 2025; Mero, 2024).

Inheritance disputes involving female adopted children commonly arise when social recognition within the family is not accompanied by strong recognition of property rights (Anggraeni, 2023; Fahimah et al., 2024; Preston-Whyte, 2024; Intan et al., 2026). In practice, a female adopted child may be the person who cares for the adoptive parents, fulfils their daily needs, and even carries out customary obligations when the adoptive parents pass away. However, when the deceased leaves no son, the paternal family or *dongan tubu* may assert claims over the estate on the grounds of preserving the property within the *marga* line (Indradewi et al., 2024; Saraswati et al., 2026; Indradewi et al., 2024). Such circumstances reveal a conflict between the principles of patrilineal custom and demands for justice based on the actual devotion of the female adopted child. The study by Harahap et al., (2025) on the settlement of inheritance disputes in Batak society shows that inheritance disputes are often resolved through customary deliberation involving elements of *Dalihan Na Tolu*, and that customary negotiation is considered important for maintaining the balance of family relations (Harahap et al., 2025; Fatmawati et al., 2025; Taufika et al., 2025). These findings are relevant in demonstrating that the settlement of customary inheritance disputes concerns not only who is entitled to the property, but also how kinship relations can be restored after conflict occurs (Celestin, 2022; Suwarno et al., 2023; Nguyen, 2024; Joireman & Tchatchoua-Djomo, 2023; Tedla & Mekonen, 2023; Abbasov, 2025).

Another issue that intensifies such disputes is the weak evidentiary basis for customary adoption. Many adoptions in indigenous communities are carried out based on family agreement and recognition by the customary environment, but they are not always accompanied by an authentic deed or a court determination. When disputes are brought before the court, this situation may disadvantage female adopted children because civil procedural law places written evidence as a highly important means of proof (Irianto, 2024). Keumala explains that inheritance certificates or deeds related to inheritance have an important function in proving a person's legal status as an heir. However, the practice of preparing and proving such documents is not always straightforward because it must confront the diversity of customary inheritance laws in Indonesia (Keumala, 2023). This is where the research gap becomes apparent: previous studies have discussed the position of adopted children in Batak Toba customary inheritance and the mechanisms for resolving

customary inheritance disputes in general, but few have specifically positioned female adopted children as the main subjects of dispute, particularly by linking the evidentiary problems of customary adoption, *dongan tubu* claims, and the distinction between ancestral property and self-acquired property.

Based on the foregoing discussion, this research is important for formulating a model for resolving Batak Toba customary inheritance disputes that continues to respect the patrilineal customary structure while not neglecting legal protection for female adopted children who, in reality, have social and emotional relationships with, and have shown devotion to, their adoptive parents. The novelty of this research lies in its normative juridical analysis, which not only examines the position of female adopted children in inheritance but also analyses dispute settlement mechanisms through two avenues: customary deliberation based on *Dalihan Na Tolu* and litigation before the courts. In addition, this study proposes the separation of disputed objects as the basis of analysis, namely ancestral property, which is related to the continuity of the *marga*, and self-acquired property, which is more closely connected to the protection of the civil rights of female adopted children. The normative juridical method is employed because this research is grounded in the examination of norms, legal principles, doctrines, and court decisions in order to address the legal issues at hand (Muhaimin, 2020). Thus, this study is expected to contribute to the development of customary inheritance law that is more just, certain, and responsive to societal development.

METHODS

Research Design

This study employed normative juridical legal research (doctrinal legal research), which examines law as a system of norms embodied in legislation, legal doctrines, judicial decisions, and customary legal principles rather than investigating empirical social behaviour. Normative legal research is appropriate because the present study focuses on analysing the legal position of female adopted children in Batak Toba customary inheritance disputes and developing an integrative dispute settlement model capable of providing legal protection while preserving the patrilineal customary system. The research does not seek to measure social perceptions or collect field evidence but instead evaluates the consistency of legal norms, customary principles, judicial reasoning, and legal doctrines governing inheritance disputes. According to Muhaimin (2020), normative legal research aims to formulate legal arguments through the interpretation of legal materials and legal principles, while Deplano and Tsagourias (2021) explain that doctrinal legal research enables scholars to analyse legal systems through conceptual reasoning, interpretation, and legal scholarship. Consequently, the normative approach is considered the most appropriate method for resolving legal uncertainty arising from the interaction between customary inheritance law, national law, and the legal protection of adopted children.

Research Approaches

To obtain a comprehensive legal analysis, this study combined three complementary legal research approaches, namely the statutory approach, the case approach, and the conceptual approach. The statutory approach was employed to analyse Indonesian legal provisions governing adoption, inheritance, civil rights, and evidentiary principles, including constitutional recognition of customary law communities under Article 18B paragraph (2) of the 1945 Constitution. The case approach examined judicial decisions concerning Batak Toba inheritance disputes involving adopted children in order to identify patterns of judicial reasoning and legal interpretation regarding inheritance rights, evidentiary standards, and property classification. Meanwhile, the conceptual approach explored legal doctrines and

theoretical concepts related to customary inheritance, patrilineal kinship, legal pluralism, substantive justice, legal protection, *Dalihan Na Tolu*, ancestral property (*harta pusaka*), self acquired property (*harta pencaharian*), and the legal status of female adopted children. The integration of these three approaches enables legal issues to be examined from normative, jurisprudential, and theoretical perspectives, thereby producing a more comprehensive legal analysis.

Sources of Legal Materials

The study relied exclusively on secondary legal materials, which are commonly used in doctrinal legal research. Primary legal materials consisted of constitutional provisions, statutory regulations governing inheritance and adoption, relevant judicial decisions, and recognised principles of Indonesian customary law. Secondary legal materials comprised scholarly books, peer reviewed journal articles, legal commentaries, and previous research discussing Batak customary inheritance, legal pluralism, adopted children's inheritance rights, gender justice, and dispute resolution mechanisms. Tertiary legal materials, including legal dictionaries, encyclopaedias, and academic indexing databases, were utilised to clarify legal terminology and strengthen conceptual understanding. The selection of legal materials was based on their relevance, credibility, academic authority, and direct relationship with the legal issues under investigation.

Collection of Legal Materials

Legal materials were collected through a systematic literature review of legal documents and academic publications. The collection process began by identifying relevant legislation and constitutional provisions regulating inheritance rights, adoption, and customary law recognition in Indonesia. Subsequently, judicial decisions concerning Batak Toba customary inheritance disputes were examined to understand how courts have interpreted customary inheritance principles involving adopted children. Academic books and peer reviewed journal articles published in reputable national and international journals were then reviewed to obtain theoretical perspectives and empirical discussions supporting the legal analysis. During the collection process, all legal materials were organised according to research themes, including adoption status, inheritance rights, evidentiary requirements, property classification, legal pluralism, customary dispute settlement, and substantive justice. This thematic organisation facilitated systematic comparison among various legal sources and ensured that legal arguments were supported by consistent doctrinal evidence.

Data Analysis

Legal materials were analysed qualitatively using doctrinal legal analysis supported by legal interpretation and deductive reasoning. The analysis followed several sequential stages. First, all legal materials were classified according to their legal authority and thematic relevance. Second, statutory provisions, judicial decisions, and legal doctrines were interpreted using grammatical, systematic, and teleological methods of legal interpretation to identify their meaning within the broader framework of Indonesian inheritance law. Third, comparative analysis was conducted to examine the interaction between Batak Toba customary inheritance principles and national legal protection for adopted children. Finally, deductive reasoning was employed to synthesise legal findings into an integrative dispute settlement model that balances customary continuity, legal certainty, protection of civil rights, and substantive justice. The proposed model distinguishes ancestral property from self acquired property while incorporating customary deliberation through *Dalihan Na Tolu*, written settlement agreements, and judicial proceedings as the final mechanism for dispute resolution.

Research Validity and Trustworthiness

The rigour of the study was ensured through methodological consistency and legal source triangulation. Legal triangulation was conducted by comparing statutory regulations, judicial precedents, customary legal doctrines, and contemporary academic literature to minimise interpretative bias and improve analytical reliability. Interpretive validity was maintained by applying established principles of legal interpretation consistently throughout the analysis, while analytical consistency was strengthened by systematically cross checking legal arguments across different categories of legal materials. Furthermore, the proposed dispute settlement model was developed through logical synthesis rather than subjective opinion, ensuring that each component was supported by relevant legal doctrines, customary principles, and judicial reasoning. Such procedures enhance the credibility, dependability, and confirmability of normative legal research and ensure that the resulting legal recommendations remain theoretically sound and practically applicable.

RESULTS AND DISCUSSION

The analysis of statutory regulations, judicial decisions, legal doctrines, and scholarly literature generated four principal findings concerning the legal protection of female adopted children within the Batak Toba customary inheritance system. First, the legal status of female adopted children remains closely tied to the patrilineal structure that characterises Batak Toba customary law, resulting in limitations on their inheritance rights despite evolving constitutional values promoting equality and legal protection. Second, inheritance disputes are primarily triggered by legal pluralism, the absence of formal evidence of customary adoption, competing claims by the deceased's paternal relatives (*dongan tubu*), and the lack of clear differentiation between ancestral property and self acquired property. Third, the analysis of legal materials reveals that statutory provisions, judicial decisions, and legal doctrines have not yet produced a uniform legal standard for resolving inheritance disputes involving female adopted children. Finally, this study formulates an integrative dispute settlement model that combines customary deliberation, legal documentation, property classification, and judicial mechanisms to balance customary continuity with substantive justice. These findings are presented systematically in the following sections.

Legal Position of Female Adopted Children within the Batak Toba Patrilineal Inheritance System

The legal position of female adopted children within the Batak Toba customary inheritance system is primarily determined by the patrilineal character of Batak kinship. Under this system, lineage, family identity, and succession are transmitted through the male line, making sons the principal successors to the *marga* and the primary recipients of ancestral inheritance. Consequently, although adoption establishes a recognised social relationship between the adopted child and the adoptive parents, such recognition does not automatically confer equal inheritance status under customary law. The normative analysis indicates that inheritance rights remain closely associated with genealogical continuity rather than solely with emotional attachment or caregiving relationships. This legal construction explains why female adopted children frequently experience uncertainty regarding their inheritance rights despite being fully integrated into the adoptive family during the lifetime of their adoptive parents.

To obtain a comprehensive understanding of the applicable legal framework, this study synthesised statutory provisions, customary legal principles, judicial tendencies, and legal doctrines concerning inheritance rights of female adopted children. The synthesis demonstrates that no single legal instrument explicitly

regulates the inheritance position of female adopted children within Batak Toba customary law. Instead, their legal position is constructed through the interaction between customary norms, constitutional recognition of indigenous communities, judicial interpretation, and broader principles of legal protection.

Table 1. Synthesis of Legal Sources Governing the Position of Female Adopted Children

Legal Source	Principal Legal Finding	Implication for Female Adopted Children
Batak Toba customary law	Inheritance follows the patrilineal lineage through the <i>marga</i> .	Female adopted children are not automatically recognised as customary heirs.
Article 18B paragraph (2) of the 1945 Constitution	The State recognises customary law communities provided that their practices remain consistent with constitutional principles.	Customary inheritance rules remain applicable but are subject to constitutional values of justice and legal certainty.
Judicial practice	Courts evaluate disputes based on available legal evidence and the characteristics of disputed property.	Recognition of inheritance rights depends upon legal proof rather than solely customary acknowledgement.
Legal doctrine	Legal protection may be provided through civil law mechanisms without eliminating customary principles.	The distinction between ancestral property and self acquired property becomes fundamental in determining legal protection.

Source: Authors' legal analysis, 2026

Table 1 demonstrates that the legal position of female adopted children is shaped by the interaction between customary inheritance principles, constitutional recognition of indigenous communities, judicial interpretation, and contemporary legal doctrine. Although Batak Toba customary law continues to prioritise patrilineal succession, constitutional principles require that the application of customary law remains compatible with legal certainty and substantive justice. Consequently, inheritance disputes involving female adopted children cannot be resolved solely through customary norms but require a broader legal assessment that incorporates multiple sources of law. The analysis further indicates that the legal status of female adopted children depends not only on their social acceptance within the adoptive family but also on the legal classification of the disputed property and the strength of evidence establishing the adoption. This finding highlights the importance of distinguishing ancestral property from self acquired property as the primary legal basis for balancing the preservation of customary traditions with the protection of individual civil rights.

Juridical and Sociological Factors Triggering Inheritance Disputes

The analysis of legal materials indicates that inheritance disputes involving female adopted children in the Batak Toba customary community are influenced by both juridical and sociological factors. Juridical factors originate from inconsistencies in the application of inheritance law, weaknesses in proving customary adoption, and uncertainty regarding the legal classification of inherited property. Meanwhile, sociological factors arise from the persistence of patrilineal values, competing family interests, and changing social expectations concerning the rights and responsibilities of adopted children. These factors interact simultaneously and contribute to legal uncertainty in the settlement of inheritance disputes.

Table 2. Classification of Juridical and Sociological Factors Triggering Inheritance Disputes

Category	Legal Finding	Consequence in Inheritance Disputes
Juridical	Legal pluralism in the Indonesian inheritance system	Different legal bases create conflicting claims among disputing parties.
Juridical	Weak formal evidence of customary adoption	Female adopted children experience difficulties proving their legal status before the court.
Juridical	Unclear distinction between ancestral property and self acquired property	The object of inheritance frequently becomes the principal source of legal disagreement.
Sociological	Strong adherence to the patrilineal kinship system	The deceased's paternal relatives tend to prioritise clan continuity over adopted daughters' interests.
Sociological	Competing moral and customary claims	Female adopted children rely on caregiving contributions, while paternal relatives rely on genealogical rights.
Sociological	Social transformation regarding gender equality	Traditional inheritance practices increasingly encounter demands for more equitable legal protection.

Source: Authors' legal analysis, 2026

Table 2 shows that inheritance disputes do not arise from a single legal issue but rather from the interaction between juridical uncertainty and sociocultural dynamics within the Batak Toba customary community. Legal pluralism, evidentiary limitations, and ambiguity regarding property classification create uncertainty in determining applicable inheritance rules, while the continuing influence of the patrilineal kinship system reinforces competing claims over inherited property.

The findings further indicate that legal disputes frequently involve both normative and relational dimensions. Female adopted children generally base their claims on long-term caregiving, emotional attachment, and family recognition, whereas the deceased's paternal relatives emphasise genealogical continuity and customary succession. Consequently, effective dispute resolution requires consideration of both legal evidence and the broader customary context in which inheritance rights are contested

Findings from Statutory, Doctrinal, and Judicial Analysis

The statutory, doctrinal, and judicial analyses reveal that the legal protection of female adopted children in Batak Toba customary inheritance disputes remains fragmented across different legal sources. Statutory provisions recognise the existence of customary law communities while simultaneously requiring that customary practices conform to constitutional principles and the protection of civil rights. Judicial decisions generally adopt a case by case approach by assessing the validity of adoption, the evidentiary strength presented by the parties, and the legal characteristics of the disputed property. At the doctrinal level, contemporary legal scholarship increasingly supports a balanced interpretation that preserves customary inheritance principles while accommodating the need for greater legal protection for adopted children. These findings demonstrate that no single legal source independently resolves inheritance disputes, making legal integration essential for achieving fair and consistent outcomes.

Table 3. Comparative Analysis of Legal Materials in Batak Toba Customary Inheritance Disputes

Analytical Aspect	Statutory Analysis	Judicial Analysis	Doctrinal Analysis
Adoption status	Adoption is recognised through applicable legal procedures.	Courts require convincing evidence to establish the legal status of an adopted child.	Legal scholars emphasise that adoption should ensure both legal certainty and child protection.
Inheritance rights	No specific statutory regulation governs female adopted children's inheritance under Batak customary law.	Decisions vary depending on the facts of each dispute and the available legal evidence.	Inheritance rights should be interpreted by considering customary values and substantive justice.
Classification of property	Legislation does not specifically distinguish customary ancestral property from self acquired property.	Courts examine the origin and legal character of disputed assets before determining ownership.	The distinction between ancestral property and self acquired property is fundamental for equitable dispute settlement.
Dispute resolution	State law recognises judicial mechanisms while respecting customary dispute settlement.	Litigation generally becomes the final mechanism after customary settlement fails.	Contemporary legal doctrine supports integrating customary deliberation with formal legal procedures.

Source: Authors' legal analysis, 2026

Table 3 indicates that each category of legal material contributes a distinct perspective to the resolution of inheritance disputes involving female adopted children. Statutory provisions establish the general legal framework, judicial decisions provide practical applications of legal principles, and legal doctrines offer conceptual guidance for interpreting unresolved legal issues. The interaction of these legal sources reflects the pluralistic nature of Indonesian inheritance law and explains why dispute resolution frequently requires a comprehensive legal assessment rather than reliance on a single source of law. The comparative analysis also demonstrates a consistent pattern across legal materials regarding the importance of adoption evidence and property classification. Although legal reasoning may differ among statutory provisions, judicial practice, and scholarly opinions, all sources recognise that determining the legal status of the adopted child and distinguishing ancestral property from self acquired property are decisive factors in achieving legal certainty and balancing customary continuity with substantive justice.

Integrative Model for Resolving Batak Toba Customary Inheritance Disputes

The synthesis of statutory provisions, judicial decisions, customary legal principles, and legal doctrines resulted in the formulation of an integrative dispute settlement model for inheritance disputes involving female adopted children within the Batak Toba customary community. The proposed model seeks to balance the preservation of the patrilineal inheritance system with the constitutional obligation to ensure legal

certainty, fairness, and the protection of individual civil rights. Rather than positioning customary law and national law as competing legal systems, the model integrates both frameworks into a sequential dispute resolution process that prioritises consensus while maintaining access to judicial protection when necessary.

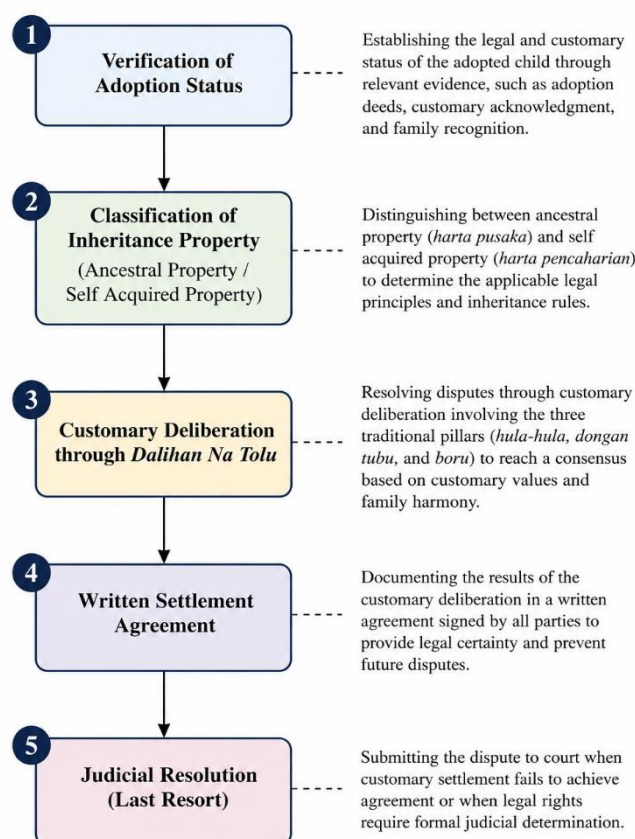


Figure 1. Integrative Model for Resolving Batak Toba Customary Inheritance Disputes

Source: Authors' legal analysis, 2026

The model presented in Figure 1 illustrates a tiered dispute resolution process beginning with verification of the legal and customary status of the adopted child. Once adoption status has been established, the disputed assets are classified according to their legal characteristics, distinguishing ancestral property from self acquired property. This classification serves as the basis for determining the appropriate customary and legal mechanisms applicable to each category of property before the parties proceed to deliberation through *Dalihan Na Tolu*.

Table 4. Synthesis of the Proposed Integrative Legal Protection Model

Model Component	Primary Function	Expected Legal Outcome
Verification of adoption status	Establish the legal and customary status of the adopted child	Greater legal certainty regarding inheritance claims
Classification of inheritance property	Distinguish ancestral property from self acquired property	More appropriate application of customary and civil law principles
Customary deliberation through <i>Dalihan Na Tolu</i>	Facilitate consensus among family members and customary authorities	Preservation of family harmony and customary values

Written settlement agreement	Record the outcome of customary deliberation in legally accountable form	Stronger evidentiary value for future legal disputes
Judicial resolution	Provide formal legal protection when customary settlement fails	Final legal certainty through judicial determination

Source: Authors' legal analysis, 2026

Table 4 demonstrates that each stage of the proposed model performs a distinct legal function while remaining interconnected within a unified dispute resolution framework. The model prioritises customary settlement as the primary mechanism for resolving family disputes but simultaneously strengthens legal certainty through documentation and judicial review where necessary

Integrating Customary Inheritance Principles with Constitutional Justice for Female Adopted Children

The findings demonstrate that inheritance disputes involving female adopted children in the Batak Toba customary community cannot be adequately understood through a single legal perspective. Instead, they reflect the interaction between customary inheritance principles, constitutional guarantees, judicial interpretation, and evolving concepts of substantive justice. The continued dominance of the patrilineal kinship system confirms that genealogical continuity remains the principal basis for determining inheritance rights within Batak Toba customary law. However, this study also indicates that constitutional recognition of customary law under Article 18B paragraph (2) of the 1945 Constitution requires that customary practices remain compatible with broader principles of legal certainty and justice. This finding is consistent with recent scholarship arguing that legal pluralism should not be interpreted as competition between legal systems but as an opportunity to harmonise customary norms with constitutional values (Febrianty et al., 2024; Siems & Yap, 2024; Akib et al., 2026).

Unlike previous studies that primarily examined the inheritance status of adopted children or customary dispute resolution separately, this research integrates statutory analysis, judicial reasoning, and legal doctrine into a unified analytical framework. Earlier research has emphasised the importance of customary recognition in determining inheritance rights (Naibaho & Sihombing, 2021; Nasution, 2024), while other studies have focused on customary mediation as a mechanism for maintaining family harmony (Harahap et al., 2025). The present study extends these findings by demonstrating that the legal status of female adopted children cannot be determined solely through kinship recognition or judicial evidence. Rather, inheritance disputes should first distinguish ancestral property from self acquired property before determining the applicable legal framework. This property based approach represents the principal theoretical contribution of the study because it provides a normative basis for reconciling customary continuity with the protection of individual civil rights.

The proposed integrative dispute settlement model also contributes practical value by establishing a sequential mechanism consisting of verification of adoption status, classification of inheritance property, customary deliberation through *Dalihan Na Tolu*, written settlement agreements, and litigation as a final remedy. This framework strengthens legal certainty while preserving customary institutions as the primary forum for dispute resolution. The model may therefore assist judges, customary leaders, notaries, and local governments in developing more consistent approaches to inheritance disputes involving adopted children. The novelty of this research lies not merely in examining female adopted children as the central legal subject but in formulating an integrative legal protection model that systematically combines

customary law, constitutional principles, evidentiary requirements, and judicial protection within a single dispute resolution framework.

This study has several limitations. As normative legal research, the analysis is confined to legal materials, judicial decisions, and scholarly literature without incorporating empirical evidence from customary leaders, judges, adopted children, or members of the Batak Toba community. Consequently, the practical implementation of the proposed model has not yet been empirically evaluated. Future research should therefore employ socio legal or empirical legal approaches involving interviews, focus group discussions, or case studies across different Batak communities to assess the applicability, effectiveness, and acceptance of the proposed dispute settlement model. Comparative studies involving other Indonesian customary inheritance systems would also enrich understanding of how legal pluralism may contribute to more inclusive and equitable inheritance protection.

CONCLUSION

This study concludes that the position of female adopted children within the Batak Toba customary inheritance system remains constrained by a patrilineal kinship structure that places men as successors to the clan. Social and familial recognition does not automatically confer the legal status of a customary heir. Legal protection for female adopted children should consider the validity of the adoption, the actual relationship with the adoptive parents, contributions made during the adoptive parents' lifetime, and the legal character of the disputed property. Ancestral property that is collectively controlled and connected to clan continuity must be distinguished from self-acquired property individually obtained by the adoptive parents. This distinction provides an essential basis for balancing respect for customary law, legal certainty, and substantive justice. An appropriate settlement mechanism is an integrative, tiered model involving verification of adoption status, property classification, deliberation through *Dalihan Na Tolu*, written agreements, and litigation as a final remedy.

Families undertaking adoption are advised to document and formalise the adoption through a judicial determination, authentic deed, family declaration, or accountable customary document. Adoptive parents should identify and distinguish ancestral property from self-acquired property during their lifetime. Any intention to transfer assets to a female adopted child should be expressed through a gift, testamentary instrument, or another legally recognised mechanism. Customary institutions and *Dalihan Na Tolu* representatives should conduct deliberations transparently by considering family relationships, the adopted child's devotion, the origin of the property, and the interests of all parties (Sirait et al., 2026). The outcome of customary deliberation should be recorded in a written agreement signed by the parties and customary witnesses to strengthen its evidentiary value if a subsequent dispute arises. Regional governments, customary institutions, and judicial authorities are recommended to formulate guidelines for resolving Batak Toba customary inheritance disputes. Such guidelines should regulate the verification of adoption, the classification of ancestral and self-acquired property, deliberation procedures, and minimum requirements for written agreements. The administration of adoption should integrate customary recognition with state registration to ensure consistency between the adopted child's social and legal status. Judges should also place the character and origin of inherited property at the centre of judicial assessment rather than applying patrilineal principles formally and uniformly. Future studies should empirically examine the integrative, tiered model among Batak Toba communities in regions of origin and migrant settings by involving female adopted children, customary leaders, paternal relatives, notaries, and judicial officers.

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