



Analysing Bullying as a Human Rights Violation: A Phenomenological Study of Law Students' Perspectives in Higher Education

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Abstract

Every individual is entitled to a sense of security within their academic pursuits; however, bullying continues to threaten safety in educational environments, including higher education institutions. Despite its prevalence, research on bullying at the university level remains relatively limited compared to other educational settings. This study aims to explore students' perceptions of bullying from a human rights perspective. Employing a qualitative approach with Creswell's phenomenological method, data were collected through in-depth, semi-structured interviews with five law students selected using purposive sampling. The findings reveal that bullying is perceived as a complex phenomenon involving not only physical and verbal abuse but also power imbalances between perpetrators and victims, with impacts on psychological, social, and academic aspects. Moreover, students view bullying as a violation of human rights, particularly the rights to security, protection, and human dignity. These findings highlight the need for higher education institutions to establish preventive and educational strategies to address bullying, as well as to encourage active student involvement in creating a safer academic environment.

[Setiap individu berhak memperoleh rasa aman dalam menjalani aktivitas akademiknya. Namun, bullying masih menjadi ancaman terhadap keamanan di lingkungan pendidikan, termasuk di perguruan tinggi. Meskipun fenomena ini cukup prevalen, kajian mengenai bullying di tingkat perguruan tinggi masih relatif terbatas dibandingkan dengan jenjang pendidikan lainnya. Penelitian ini bertujuan untuk mengeksplorasi persepsi mahasiswa terhadap bullying dalam perspektif hak asasi manusia. Penelitian ini menggunakan pendekatan kualitatif dengan metode fenomenologi Creswell. Data dikumpulkan melalui wawancara mendalam dengan



panduan semi-terstruktur terhadap lima mahasiswa hukum yang dipilih melalui teknik purposive sampling. Hasil penelitian menunjukkan bahwa bullying dipersepsikan sebagai fenomena kompleks yang tidak hanya melibatkan kekerasan fisik dan verbal, tetapi juga ketimpangan kekuasaan antara pelaku dan korban, dengan dampak pada aspek psikologis, sosial, dan akademik. Selain itu, mahasiswa memandang bullying sebagai bentuk pelanggaran hak asasi manusia, khususnya terhadap hak atas rasa aman, perlindungan, dan martabat manusia. Temuan ini menegaskan pentingnya perguruan tinggi untuk mengembangkan strategi preventif dan edukatif dalam menangani bullying, serta mendorong keterlibatan aktif mahasiswa dalam menciptakan lingkungan akademik yang aman.]

Keywords: Bullying, Human Rights, Law Students, Phenomenology, Student

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INTRODUCTION

Bullying is defined as a form of intentional and repeated intimidation directed at an individual, manifesting in physical, psychological, or verbal forms. Typically, perpetrators aim to inflict harm and humiliation upon the victim while simultaneously establishing a sense of dominance or social standing among their peers (Kamran, 2025). Based on this definition, three primary criteria characterize bullying behavior. First, intimidation presupposes a power imbalance between the perpetrator and the victim, which often renders the latter unable to retaliate or effectively defend themselves. Second, the repetitive nature of the act indicates that bullying is not an isolated incident but a recurring pattern. Finally, intentionality signifies a deliberate intent on the part of the perpetrator to inflict harm upon the victim. (Andrews et al., 2023).

Every individual is entitled to a sense of security, particularly within their academic endeavors. Regrettably, according to data from the World Health Organization (WHO) in 2020, at least one in three students worldwide has experienced bullying. Such incidents across various educational levels manifest in diverse forms, ranging from social exclusion and physical violence to digital harassment or cyberbullying (Maylafaenza et al., 2024). Within the Indonesian context, bullying is officially categorized as one of the 'three major sins' of the national education system, alongside sexual violence and intolerance. (Muslim et al., 2024).

In light of the pervasive scale of these occurrences, bullying can no longer be viewed as a mere interpersonal conflict between the perpetrator and the victim. It has evolved into a systemic social issue that necessitates a concerted, collective response. Beyond its detrimental effects on the individual, bullying fundamentally undermines the stability and security of the educational milieu as a whole (Nugraha et al., 2024). For victims, the repercussions of bullying are both physical and psychological in nature. While physical harassment inflicts tangible bodily harm, all forms of bullying whether overt or covert exert a profound toll on a victim's mental well-being. This psychological strain often manifests as depression or trauma and, in its most severe stages, may lead to suicidal ideation.

Within the academic setting specifically, empirical evidence indicates that victims

often experience a decline in scholastic performance. Furthermore, they frequently encounter difficulties in fostering healthy peer connections (Nugraha et al., 2024). Ultimately, these individuals are stripped of a core human right: the fundamental right to live and learn in safety

From a Human Rights perspective, bullying constitutes a definitive violation of personal dignity and integrity, both of which are safeguarded under Law No. 39 of 1999. To tolerate such acts is to neglect a child's right to be free from cruel and inhumane treatment. Consequently, both the state and educational institutions must take decisive action against any human rights infringements to ensure the physical and mental protection of every individual within the academic sphere. The state's commitment to bullying prevention is manifested in Minister of Education and Culture Regulation (Permendikbud) No. 30 of 2021. This policy mandates the establishment of Task Forces for the Prevention and Handling of Sexual Violence (Satgas PPKS) within higher education and provides reporting channels for victims through educational institutions or the Women and Children's Protection Unit (PPA) (Muslim et al., 2024)

In alignment with these efforts, student awareness serves as a pivotal factor in breaking the cycle of human rights violations in education. By internalizing the values of Pancasila, students are encouraged to uphold the dignity of others and reject bullying, acting as agents of change who proactively prevent misconduct. Ultimately, a collective consciousness will foster an educational environment that is secure, inclusive, and just (Hararap & Paturochman, 2024).

Research by Hesti et al., (2021) reveals a rising trend in university-level bullying, attributed to toxic social environments, a deficit in empathy, and lax regulatory enforcement. Such conditions stand in stark contrast to the expected maturity and cognitive development of higher education students. Consequently, victims endure trauma, anxiety, and severe mental health challenges. These findings underscore the necessity of human rights values as a fundamental framework for preventing violations and fostering a secure, equitable academic atmosphere.

In a similar vein, a study by Oktaviani et al., (2024) illustrates the detrimental effects of bullying on student mental health, notably through diminished self-esteem, persistent restlessness, and social tension. The manifestations observed include cyberbullying such as the unauthorized distribution of personal photos and verbal harassment targeting ethnicity, race, or religion (SARA). This study emphasizes that robust legal enforcement serves as a critical instrument in addressing the complexities of bullying within higher education institutions.

While bullying in primary and secondary education has been extensively documented, scholarly attention directed toward higher education remains relatively sparse (Harrison et al., 2022). This gap is even more pronounced when narrowing the focus to bullying as a human rights violation, particularly from the vantage point of students. As an intellectual cohort, university students are expected to possess a more nuanced understanding of social and legal complexities, including the human rights implications inherent in bullying practices.

Consequently, exploring how university students perceive and conceptualize

bullying as a human rights infringement is pivotal. Such insights serve as a foundation for building collective awareness and fostering proactive student engagement in eradicating bullying within the academic sphere.

Against this backdrop, the present study aims to analyze student perspectives on bullying as a manifestation of human rights violations. This research is expected to elucidate student comprehension of the phenomenon and contribute to broader efforts in mitigating bullying within the educational landscape.

METHOD

This research uses a qualitative approach with a phenomenological method. The phenomenological approach was chosen because this study aims to understand the subjective experiences and meanings given by students to the phenomenon of bullying as a violation of human rights. This approach allows researchers to deeply explore individual perspectives based on lived experiences, making it relevant to the research objectives. The research subjects are law students selected using purposive sampling technique. The criteria for informants in this study include: (1) active students in the law program, (2) having an understanding of the concept of bullying, (3) having witnessed or experienced bullying phenomena in the educational environment, and (4) being willing to be informants and provide data openly. Based on these criteria, five informants were obtained who are considered capable of providing in-depth and relevant information to the focus of the research.

The number of informants in this study was determined based on the principle of data saturation, which is when the data obtained shows recurring patterns and no significant new information is found. Therefore, five informants were deemed sufficient to represent the phenomenon being studied in the context of this research. Data collection was conducted through in-depth interviews using a semi-structured interview guide. Each interview lasts approximately 30–60 minutes and is conducted in person. The interview aims to comprehensively explore the informants' understanding, experiences, and views on the phenomenon of bullying from a human rights perspective.

The data analysis technique in this study refers to the stages of phenomenological analysis proposed by Creswell, which include: (1) organising and preparing the data, (2) reading the entire data, (3) conducting the coding process, (4) grouping codes into categories and themes, (5) describing the findings, and (6) interpreting the meaning of the obtained data. The selection of Creswell's analysis model is based on its suitability with the phenomenological approach, which emphasises the systematic and in-depth exploration of participants' experience meanings.

To maintain data validity, this research uses triangulation and member checking techniques. Triangulation is conducted by comparing data between informants to see the consistency of the obtained information. Meanwhile, member checking is carried out by reconfirming the interview results with the informants to ensure that the obtained data aligns with the experiences and intentions conveyed by the informants. This research also adheres to the principles of research ethics. Before the interview is conducted, the researcher explains to the informants the purpose of the study and the data collection process. The informants

were then asked to give their consent to participate in the research (informed consent). Additionally, the informants' identities are kept confidential using initials or codes to protect their privacy.

RESULTS AND DISCUSSION

Human rights are understood as a set of fundamental rights that are inherent in every human being by nature, so that their existence cannot be revoked by any power and their protection must be guaranteed in every aspect of life (Setyawan & Asyrofudin, 2025). Based on interviews with five informants who are law students, it was found that the informants have a fairly good understanding of the concept of bullying in the educational environment. The informants define bullying as actions deliberately carried out to hurt and harm others, whether physically, verbally, or emotionally. One of the informants stated:

"Bullying is an act that is not allowed or normalised even if it is just for fun because it will cause trauma and harm others physically, verbally, or emotionally." (I3)

Another informant also revealed that bullying still often occurs in educational environments, especially where the victim is made the subject of jokes by their peers and is not spoken to or included by them.

"There is a friend who is often made the butt of excessive jokes by their friends and is frequently not invited to talk or hang out with them." (I1)

The description of the experience shows that the phenomenon of bullying is still found in educational environments. Bullying can occur in various forms, both directly and indirectly.

Table 1. Research Informant Profiles

No	Informant Code	Gender	Major/ University	Semester
1	I1	Woman	Islamic Family Law/ UIN Raden Mas Said Surakarta	6
2	I2	Woman	Islamic Family Law/ UIN Raden Mas Said Surakarta	6
3	I3	Man	Islamic Family Law/ UIN Raden Mas Said Surakarta	6
4	I4	Man	Sharia/ Al-Ahgaff University Yemen	10
5	I5	Man	Law/ Al-Ahgaff University Yemen	10

Theme of Student Experiences with Bullying

Based on the results of interviews with five informants, the data analysis refers to the stages of qualitative analysis according to Creswell. Each informant was assigned the codes I1, I2, I3, I4, and I5 to maintain confidentiality. Next, the relevant data is coded, then grouped based on similarities in meaning until it produces categories and main themes. These themes illustrate the informants' experience patterns and are supported by direct quotes accompanied by codes (I1-I5).

Table 2. Main Themes and Synthesis of Research Findings

No	Theme	Synthesis of Findings
1	Understanding Bullying	Understood as an act of intentional, repeated harm that involves a power imbalance between the perpetrator and the victim.
2	Forms and Experiences of Bullying	Appears in verbal, social (exclusion), and physical forms, both directly and indirectly.
3	The Impact of Bullying	Causing psychological impacts (trauma, low self-esteem), social (isolation), and academic (decreased motivation to learn).
4	Bullying as a violation of human rights	Considered a violation of human rights, especially the right to security, dignity, and self-protection.
5	Student Agency	Students play a role as agents of change through prevention efforts, victim assistance, and reporting.

The Meaning of Bullying from the perspective of Student

Based on Table 2, students interpret bullying as an act that is not only aggressive but also involves a power imbalance between the perpetrator and the victim. This interpretation shows that students have understood bullying as a complex social phenomenon. This finding aligns with the concept of bullying as an abuse of power, where the dominance relationship is the main factor. However, there are differing views among the informants regarding the element of intention. Some informants emphasise that bullying is always done consciously, while others see that the act can occur without the perpetrator's full awareness. This difference indicates the presence of a non-singular meaning dynamic.

Students' understanding of bullying is a synthesis of various perspectives that emphasise actions, the awareness of the perpetrator, and its impact. Overall, bullying can be defined as:

"Bullying is an action that is not permitted or normalised even if it is just for fun because it will cause trauma and harm others physically, verbally, or emotionally."
(I3)

This definition encompasses three aspects from the perspective of students:

1. Characteristics of bullying actions and their impact
Students view this situation as *"an aggressive and deliberately repeated act that can damage the mental/psychological and academic health of the victim."* (I2). The emphasis here is on the continuous pattern and the impact that not only affects the current situation but also the future of someone's education.
2. Spectrum of behaviour and awareness of the perpetrator
Bullying often occurs in a grey area (an unclear situation), namely when bullying is defined as *"bullying actions commonly carried out by an individual or group or others, either intentionally or sometimes the perpetrator does not realise they are doing it,*

whether in the form of speech, attitude, or physical actions." (I1). This emphasises the importance of self-awareness that the absence of malicious intent does not eliminate the fact that bullying behaviour exists.

3. Ethics and Consequences

As an intellectual group, students assert that bullying is an act that *"harms others physically, verbally, or emotionally"* (I3), so there is no room to tolerate such behaviour in social or academic environments.

This understanding shows that students are aware that bullying is a multidimensional aggressive behaviour (physical, verbal, attitude) that can damage mental and academic health. Because the trauma caused is real, this action should not be normalised even if done unconsciously or under the pretext of entertainment.

The Impact of Bullying on Victims

Referring to Table 2, the impact of bullying is not only individual but also social and academic. Psychologically, victims experience a decrease in self-confidence, anxiety, and a tendency to withdraw from social environments. In the perspective of trauma theory, the experience of bullying can be understood as a form of repeated psychological pressure, potentially leading to long-term trauma. Additionally, the social impact of isolation indicates that bullying functions as an exclusion mechanism in social relationships.

Bullying has serious impacts, especially for victims who experience psychological trauma, decreased self-confidence, depression, or even the risk of suicide. Physically, this action can result in injuries or even death, and can hinder the victim's academic performance. For the perpetrator, the long-term impact includes psychological issues such as social anxiety or antisocial behaviour (Sitinjak, 2024). In this study, the informant had experienced bullying and expressed that bullying can have a significant impact on the victims. The victims become silent and have difficulty interacting.

"When I was a victim, I realised that the impact of bullying is very significant; usually, one will experience difficulties in social interactions, and more dangerously, one may become withdrawn."(I3)

Other informants also revealed that bullying can have an impact on victims in the form of a loss of self-confidence. The victim feels afraid to socialise, stressed, or even experiences a decrease in learning motivation.

"First, he lost his self-confidence, then he felt afraid to interact with others, experienced stress/mental pressure, had a decreased motivation to study, and was reluctant to go to school/university because he felt unsafe." (I1)

Table 3. Impact of Bullying

Impact Category	Manifestation/ Form that is Felt
Psychological	Loss of self-confidence, severe stress, mental pressure, and trauma
Social	Becoming quiet, afraid to interact, and finding it difficult to build relationships with others.

Self-Security	Feeling unsafe and always feeling threatened in the surrounding environment
Academic	The motivation to study has drastically decreased, and there's a reluctance to go to school/campus.

Ijra' wal Iqab (Procedures and Sanctions)

The informant, as a law student, studies ijra' wal iqab. In brief, ijra' wal iqab is the study of the application of legal procedures and the imposition of sanctions within the Islamic legal system (Zuhriati et al., 2023). The informant revealed that in the study of criminalisation, everyone certainly has both good and bad traits, the rest depends on the environment and the individual's self-control. Similarly, in cases of bullying, when someone is bullied, a desire for revenge arises within them. That desire for revenge can trigger the person to become a criminal. The informant in their statement:

"So the impact can change the personality of the person being bullied, at the very least, it can damage their mental health." Doesn't want to socialise with people or is afraid to try new things. This is for bullying with words, even worse if it's physical. It can cause stress to the point of madness." (I5)

The informants interpret that bullying has a serious impact on the psychological condition of the victims, such as fear, low self-esteem, and even trauma. Additionally, bullying also affects the victims' social relationships and academic processes, which can hinder their overall personal development.

Bullying as a Violation of Human Rights

Human Rights (HAM) are rights possessed by every individual solely because they are human, not because they are granted by society or law. Human Rights are part of human dignity that must be protected by all parties, especially by the state. Human Rights encompass civil, political, economic, social, and cultural rights that guarantee freedom and protection from fear, torture, discrimination, and other violations (Farid & Imran, 2021). From the perspective of Human Rights, the informant stated that bullying is an act that does not respect human dignity. This is because everyone has the right to be treated well and to feel safe in their environment. The experience of someone being bullied shows that that person's basic rights as a human being are no longer respected by others.

Students interpret bullying as a form of human rights violation, particularly related to the right to safety and individual dignity. However, there are variations in how students articulate this. Some informants use a legal approach by referring to legal norms, while others emphasise moral and humanitarian aspects. This indicates a spectrum of understanding between formal and ethical approaches.

"Everyone has the right to be treated well, to be respected, and to feel safe in their environment. And when someone experiences bullying, it shows that their basic rights as a human being are no longer respected by others." (I1)

Another informant stated that the rights violated in bullying actions are the right to a comfortable life based on Article 3 of the Universal Declaration of Human Rights and the right to be free from violence as stated in Article 5 of the Universal Declaration of Human

Rights. Article 3 (Everyone has the right to life, liberty, and personal security) and Article 5 (No one shall be subjected to torture or to cruel, inhuman, or degrading treatment or punishment) (Assembly, 1948).

"Bullying violates human rights because it makes individuals feel unsafe and uncomfortable in exercising those rights; they also feel unfree. If we look at the rights being violated, there is also the right to live comfortably as stated in Article 3 of the Universal Declaration of Human Rights, and the right to be free from violence as stated in Article 5 of the Universal Declaration of Human Rights." (I3)

Then another informant also stated that bullying in the form of words violates a person's right to their good name because it can tarnish the victim's reputation and dignity. If bullying is physical, the violation becomes more serious because it touches on the right to life and bodily safety. In cases of physical bullying, the punishment will be adjusted according to the level of harm experienced by the victim.

"The rights that are violated when someone is bullied, the right to tarnish someone's name if the bullying is verbal." As for if it is "physical". Then this is even stronger, it can affect both the soul and the body simultaneously. Then it could fall under the human rights provisions related to bodily rights. And it will be returned to the judge regarding the decision because كل شيء بقدرها everything is according to its measure. If someone cuts off a hand, then the punishment will be like that too. (I5)

Student Agency in Preventing Bullying

As shown in Table 2, students do not only play the role of observers but also as agents of change. They demonstrate awareness to engage in efforts to prevent and address bullying. However, there is a dilemma between the desire to act and considerations of personal safety. This shows that student agency is contextual and influenced by the situations they face.

The informant revealed that handling bullying as an effort to restore the condition of victims who experience trauma, loss of security, and decreased self-esteem requires collaboration with psychologists to assist in the psychological recovery of the victims. Meanwhile, the perpetrators are given sanctions that not only serve as punishment but also as a form of human rights violation experienced by the victims.

"Supervision, of course, as law students, we must always combat bullying or similar acts that can damage someone's mental health and impose severe penalties on the perpetrators." Handling the victim, of course, the victim needs special treatment in the mental healing they are experiencing. As law students, it is necessary to take collaborative steps with psychological experts in addressing the mental health issues experienced by the bullying victim. (I2)

Another informant's perspective sees that handling bullying needs to be done objectively by understanding the perspectives of both the perpetrator and the victim. It is necessary to delve into the motives behind the perpetrator's actions and clarify with the victim to obtain a complete understanding. However, in other cases, bullying can occur without a clear reason, so a comprehensive approach is needed.

"Separating the two, then we need to know the POV of the perpetrator and the victim, because we cannot immediately judge the perpetrator as the bully, and the victim as the one being bullied. Then we need to ask what the perpetrator's motive is." (I4)

In dealing with bullying, preventive measures can be taken, such as intervening and giving warnings, while paying attention to personal safety. Reporting to the authorities is the appropriate step, especially if the situation is dangerous or leads to criminal acts. This is expressed by one of the informants, "*We can intervene, but we must be careful and it is better to contact the authorities*" (I5). In certain cases, direct intervention can be carried out as long as it does not endanger oneself. Additionally, handling of offenders who are still minors should prioritise a rehabilitative approach rather than punishment, unless the offender repeats their actions.

The informants believe that efforts to address bullying need to be carried out carefully, prioritising safety and involving the authorities. Additionally, legal and rehabilitative approaches, especially for underage perpetrators, are considered important to create justice and prevent the recurrence of bullying actions.

The Meaning of the Bullying Phenomenon from the Perspective of Students

Based on the interview results, students interpret the phenomenon of bullying not only as actions that cause physical or verbal harm but also as a social practice involving a power imbalance between the perpetrator and the victim. This interpretation shows that bullying is not merely an individual act but part of the social dynamics reflecting dominance and subordination in interactions between individuals.

These findings align with international literature that views bullying as a form of abuse of power, where the perpetrator exploits a stronger position whether social, psychological, or structural to control or oppress the victim. In this perspective, bullying can be understood as a manifestation of social hegemony practices, where certain norms and power are reproduced through everyday actions that seem "ordinary," such as teasing or exclusion.

Students also realise that bullying can occur repeatedly or in symbolic forms, such as social exclusion or cyberbullying. This shows that forms of violence are not always physical, but can also manifest in more subtle and invisible ways (subtle violence), which are often more difficult to recognise yet have a significant impact on the psychological condition of the victims. From the perspective of law students, bullying is not only positioned as a social issue but also as a violation of human rights, particularly related to the right to security, protection, and respect for human dignity. This interpretation reflects the integration between the empirical experiences of students and the normative legal framework they study.

However, there is variation in the way students articulate the phenomenon. Some students emphasise the formal legal aspects, while others highlight the moral and empathetic dimensions. This difference indicates that students' understanding lies on a spectrum between the legal-formal approach and the humanistic perspective, both of which complement each other in understanding the complexity of bullying.

Furthermore, students view the phenomenon of bullying as not standing alone, but rather influenced by emotional factors, the environment, and social relations. From this perspective, bullying can be understood as the result of the interaction between individuals and broader social structures. Therefore, addressing bullying is not enough to focus solely

on the perpetrator or the victim separately, but it is necessary to consider the context of power relations and the underlying social dynamics, so that it can produce more comprehensive and just interventions.

CONCLUSION

Based on the research findings, it can be concluded that students perceive bullying as a multidimensional phenomenon that not only includes physical and verbal violence but also involves an imbalance of power relations that impacts the psychological, social, and academic aspects of the victims. In the perspective of human rights, bullying is understood as a form of violation of the right to safety, protection, and respect for human dignity.

The findings of this study affirm that students' understanding is not singular, but rather exists on a spectrum between legal-formal and humanistic approaches. Moreover, students also show potential as agents of change in efforts to prevent bullying, although in practice they still face a dilemma between moral responsibility and self-security considerations.

Practically, this research has policy implications for higher education institutions. Higher education institutions need to develop policies that are not only repressive but also preventive and educational, such as strengthening a safe and responsive reporting system, providing psychological support services for victims, and integrating human rights education and social empathy into the curriculum. In addition, active involvement of students is needed as part of the prevention strategy through peer support programs or anti-bullying campaigns on campus.

However, this study has limitations in the relatively small number of informants and the specific research context of law students, so the research results cannot be widely generalised. Therefore, future research is recommended to involve participants from various academic backgrounds, as well as to use a more diverse approach, such as mixed methods, in order to obtain a more comprehensive understanding of the bullying phenomenon in higher education environments. Furthermore, further exploration of the role of student agency in real practices is also important to be studied in depth.

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AUTHOR CONTRIBUTIONS STATEMENT

- Nazla Audilla: Conceptualization; Methodology; Project administration; Data curation; Investigation (interviews); Formal analysis; Validation; Writing - original draft; Writing - review and editing; revise and translate the methodology, discussion, and conclusion
- Tafri Itsbatul Hukmi: Writing - abstract; Writing - review and editing; revise and translate abstract and introduction

- Mulyana: Investigation (data collection/interviews).
- Umami Hani: Validation and editing

AI USAGE STATEMENT

During the preparation of this work, the author used ChatGPT, Gemini AI, QuillBot, and Paraphrase Online Indonesia to assist in drafting and paraphrasing the manuscript. The author reviewed and edited the content and takes full responsibility for the final version.

CONFLICT OF INTEREST

The authors declare that there is no conflict of interest regarding the publication of this article.

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