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A Digital-Financial Literacy Policy Framework to Prevent Online Gambling and Harm from Illegal Lending among Madrasah Students

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ABSTRACT

Mobile internet access among Indonesian adolescents creates plausible routes of exposure to online gambling (judi online, judol) and to unlicensed or predatory online lending (pinjaman online ilegal, pinjol), yet evidence specific to madrasah students remains limited. This article presents a normative policy analysis based on a purposive documentary study with a legal cut-off date of 19 October 2026. The corpus, inventoried in Table 1, comprises statutes and regulations, Ministry of Religious Affairs decisions, fatwas of the Indonesian Ulema Council (MUI), outreach reports, and empirical and conceptual studies. The legal baseline is updated to KMA 450/2024 as amended by KMA 1503/2025, Law 1/2023, Law 1/2024, and Law 1/2026. A clause-level audit of the current curricular documents has not yet been completed, so the earlier assumption that digital-financial literacy competencies are absent is treated as a hypothesis to be audited, not as a finding. Using maqashid al-shari'ah and sadd al-dhara'i as normative lenses and the 4Cs typology as a conceptual risk classification, the article proposes a two-level framework: ministerial technical guidance with a mapped referral architecture, and proportionate madrasah-level measures comprising acceptable-use rules, teacher and counsellor preparation for supportive referral, and caregiver engagement. The framework is a proposal supported by documentary and normative analysis. It has not been field-tested, and its effectiveness, feasibility, acceptability, cost, and equity effects remain to be evaluated through staged piloting.

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A. INTRODUCTION

Digital transformation has changed the environment in which madrasah students learn, socialize, and manage money. Mobile internet access among Indonesian youth is widespread, and the relationship between digital literacy, online opportunities, and online risks has been examined among Indonesian youth (Luthfia et al., 2021). This article does not estimate smartphone ownership or internet access among madrasah students. It distinguishes four levels of evidence that are often conflated: access to devices and platforms, exposure to gambling or lending content, participation (actual wagering or borrowing), and harmful gambling or clinically assessed gambling disorder. Two phenomena are examined. Online gambling, known in Indonesia as judi online or judol, is prohibited conduct under national criminal law. Pinjaman online (pinjol) is a broader term that covers online lending generally, including services licensed by the Financial Services Authority (OJK); pinjaman online ilegal covers unlicensed services. Predatory terms, abusive collection, and misuse of personal data are attributes of particular practices, not of online lending as such. For this reason the article refers to harm from illegal lending, and it does not use addiction as a label for borrowing or exposure.

Evidence on school-age exposure is indicative and limited. Annisa et al. (2025) report an awareness activity for students of SMA Negeri 2 Palangka Raya, and Humaira et al. (2026) report an educational programme at MA Al-Huda Bengkalis in which participants' understanding was compared before and after the sessions. Neither is a multi-school prevalence study, and neither establishes a pathway from exposure to gambling to borrowing. Administrative statements by Indonesia's financial intelligence unit (PPATK), as relayed in national media, indicate that players in the 10–20 age band appear in online-gambling records (Antara, 2024) and that deposits by players aged 10–16 were recorded in the first quarter of 2025 (Infobanknews, 2025). These figures do not identify madrasah students; they are used here only to show that participation by minors has been reported. Madrasah students share the digital environment of other adolescents, but how far their exposure differs is an empirical question that this article does not answer.

The regulatory baseline on which an earlier version of this analysis relied has changed. The Ministry of Religious Affairs' curriculum implementation guideline is now KMA 450/2024, as amended by KMA 1503/2025 of 22 September 2025 (Kementerian Agama Republik Indonesia, 2024, 2025). KMA 183/2019 and 184/2019 are retained as historical instruments (Kementerian Agama Republik Indonesia, 2019a, 2019b); their relationship to the current guideline has not been established here and is not assumed. In criminal law, Law 1/2023 on the Criminal Code, in force since 2 January 2026, now governs gambling offences (Articles 426 and 427), and Law 1/2026 on Criminal Adjustment adjusted criminal provisions in other statutes. The Electronic Information and Transactions (ITE) Law was amended a second time by Law 1/2024, whose Article 27(2) addresses electronic content with gambling content. These instruments prohibit or regulate conduct; none is a classroom-level educational measure. Whether the current curricular documents contain operational digital-financial literacy or cyber-ethics competencies has not yet been established by a clause-level audit. The question is therefore treated here as a hypothesis, and Section C.1 states what an adequate audit requires.

Existing work on gambling and lending harms in Indonesia can be sorted, provisionally, into several strands, although this classification rests on the sources reviewed here and not on a systematic search. A first strand analyses gambling and predatory lending as legal and consumer-protection problems. A second strand, from counselling and psychology, studies gambling behaviour and its treatment, for example the group cognitive-behavioural counselling study by Isnan and Prasetya (2024) in a village setting and the study of university students' gambling behaviour from a personal-finance perspective by Nurlaila et al. (2025). A third strand, in Islamic legal and economic studies, examines maysir and riba, including through maqashid al-shari'ah (Anisa, 2024; Zubaidi & Azkar, 2025). A fourth, small and mostly outreach-based body of work applies education directly to students, including Annisa et al. (2025) and Humaira et al. (2026). The last of these, a financial-literacy programme at a madrasah aliyah, shows that school-based education on lending and gambling risks is already delivered in at least one madrasah, so the gap addressed here cannot be that no such activity exists. What this article adds is narrower: a documentary mapping of the current legal and curricular instruments, a normative analysis that separates legal, sharia, and educational questions, and a proposed two-level framework with explicit authority, safeguards, and evaluation criteria. Whether this combination is absent elsewhere has not been established by a systematic search.

The article is a research article presenting policy analysis; it is not an official policy brief or a journal decision. Its aim is to analyse the current legal and curricular baseline and to propose, for evaluation, a preventive digital-financial literacy framework for

madrasah. Two questions guide it: first, which vulnerabilities to online gambling and illegal lending are reported in the secondary evidence on adolescents and school settings, and how far does that evidence apply to madrasah students; and second, what two-level policy framework, judged against explicit criteria, can be proposed within the legal and administrative constraints of Indonesian madrasah governance. The scope is madrasah tsanawiyah and madrasah aliyah (approximately grades 7–12), in boarding and day settings. The intended policy audiences are the Ministry of Religious Affairs and its provincial and district offices, madrasah heads, and teachers and counsellors. A desk study can identify vulnerabilities reported in secondary sources and formulate proposals; it cannot establish their prevalence or implementation capacity across all Indonesian madrasah.

B. RESEARCH METHODOLOGY

This study uses a normative legal and educational policy design, conducted as a documentary (desk) study without primary data collection from students, teachers, or officials. The design suits questions about what legal and curricular texts provide and about normative arguments. It cannot establish feasibility, lived experience, or uptake, which require stakeholder or field evidence; those questions are left to the staged evaluation proposed in Section C.4. The choice of design is therefore not treated as evidence that the proposed measures are practical.

Four approaches are combined. A statutory approach examines the instruments listed in Table 1 as in force at the legal cut-off date of 19 October 2026 and treats them according to their different roles: criminal prohibitions (Law 1/2023, Articles 426–427; Law 1/2024, Article 27(2)); educational duties and curriculum authority (KMA 450/2024 as amended by KMA 1503/2025); regulation of lending (OJK Regulation 40/2024); and the protection of students' personal data (Law 27/2022, including Article 25 on children's data). A conceptual approach uses the 4Cs typology of online risk (Jang & Ko, 2023) as a classification of risk categories. In the coding it is operationalised as follows: content risk is exposure to gambling or lending advertising and content; contact risk is approach by agents, peers, or referral links; conduct risk is the student's own wagering or borrowing; and contract risk is exposure to unfair commercial terms and data consent. This is a coding frame; it does not show that a particular exposure sequence occurs in madrasah. Digital literacy and digital resilience are used as concepts (Marín & Castañeda, 2023; Radebe, 2026). An Islamic jurisprudential approach examines maysir and riba through the Qur'anic texts, MUI fatwas, and the maqashid al-shari'ah and sadd al-dhara'i frameworks, using classical formulations by al-Ghazali (the five necessities), al-Shatibi (maqasid), and al-Qarafi and Ibn Qayyim (sadd al-dhara'i). These frameworks are presented as the author's normative lens; their limits and alternative interpretations are discussed in Section C.3.

The corpus is secondary and was selected purposively, not through a systematic search. Legal and regulatory instruments were taken from official or authoritative legal databases and issuing-body publications; fatwas from MUI texts; and empirical, conceptual, and outreach sources for direct relevance to adolescents or students, madrasah or Islamic-school settings, online gambling, illegal lending, or digital-financial literacy. Table 1 inventories every document analysed and states its evidential function, because different document types support different claims. Laws and administrative instruments establish what is authorised or prohibited. Fatwas provide normative religious guidance and do not bind in the way statutes do. Empirical studies can support claims about the populations and settings they study. Conceptual papers supply

categories. Outreach reports describe activities and, at most, short-term changes in participants' reported understanding. Sources were appraised qualitatively for currency, legal authority, methodological quality, and direct relevance to minors and madrasah. Because no systematic search protocol (platforms, search strings, date limits, inclusion and exclusion criteria) was applied, the corpus is not claimed to be exhaustive, and inclusion in a database or journal index was not treated as evidence that a source supports a given claim.

The author coded the documents alone, so no inter-coder agreement is reported. Categories were developed first deductively, from the four protective interests used in the maqashid mapping (financial, moral-religious, cognitive-psychological, and family-social protection) and from the 4Cs, and then adjusted inductively when a document raised a point that did not fit, such as privacy and student rights. For each document, the analysis recorded the source and version, the relevant provision or passage, the coding category, the identified gap or issue, the policy implication, and a note on confidence or limitation; Tables 1 and 2 report this record in condensed form. Evidence that qualified or counted against a proposed measure was retained and discussed in the relevant section. Policy options were compared against seven criteria: legal authority, evidence of effectiveness where any exists, cost and resource demands, equity across madrasah types, acceptability, privacy and proportionality, and administrative feasibility. 'Most plausibly implementable' is used in a limited sense: an option that rests on an identifiable authority, needs resources within existing staffing and structures, and meets the privacy and proportionality criteria. This is a qualitative judgement from documents, not an empirical test. Findings from document analysis, normative interpretations, and proposed policy actions are reported separately in Section C.

C. RESULTS AND DISCUSSION

1. Legal and Curricular Baseline as at 19 October 2026

Criminal prohibitions. Since 2 January 2026 the gambling offences of the former Criminal Code (the Wetboek van Strafrecht applied under Law 1/1946, Articles 303 and 303 bis) have been replaced by Articles 426 and 427 of Law 1/2023 (Republik Indonesia, 2023). Article 426(1) penalises anyone who, without a permit, offers or provides an opportunity to gamble as a livelihood or participates in a gambling enterprise, offers the opportunity to the public, or makes participation in gambling a livelihood. Article 427 penalises using an opportunity to gamble that is held without a permit. Law 1/2026 on Criminal Adjustment adjusts criminal provisions in laws outside the Code (Republik Indonesia, 2026); its effect on the sanction provisions of the ITE Law should be confirmed in the authoritative text before any operational guidance quotes penalties, and penalties are therefore not analysed here. Law 19/2016 was the first amendment of the ITE Law; the second amendment is Law 1/2024, whose Article 27(2) prohibits intentionally and without right distributing, transmitting, or making accessible electronic information or documents with gambling content (Republik Indonesia, 2024). The relationship between these provisions and the new Criminal Code, and their application to minors, are not resolved in this article. These provisions concern conduct such as supplying gambling content or gambling without a permit; they do not address how a school should educate, protect, or support a student.

Education, lending, and personal data. The instrument governing curriculum implementation in madrasah is KMA 450/2024 (2 May 2024), as amended by KMA 1503/2025 (22 September 2025). Secondary descriptions indicate that the current structure includes co-curricular and local-content components and an optional subject on

coding and artificial intelligence, but these descriptions were not verified against the decision text and are mentioned only to locate candidate implementation routes. KMA 183/2019 and 184/2019 are cited as historical instruments; whether the current decisions replace, retain, or leave them untouched has not been established and is not assumed either way. Online lending is regulated by OJK Regulation 40/2024 on information-technology-based joint funding services, which replaced OJK Regulation 10/2022 and addresses, among other matters, licensing and a minimum age for prospective borrowers (Otoritas Jasa Keuangan, 2024). Licensing status under this regulation is a separate question from sharia compliance (Section C.3). Students' personal data are protected by Law 27/2022, which classifies children's data as specific personal data (Article 4) and requires that its processing be carried out in a special manner with the consent of a parent or guardian (Article 25) (Republik Indonesia, 2022). This bears directly on any school-held record of student disclosures (Section C.4).

What is and is not established. The documents reviewed do not allow a conclusion that digital-financial literacy or cyber-ethics competencies are absent from current madrasah curricular materials. Absence from one decree is not evidence of absence from the curriculum as a whole, because learning-outcome documents, subject guides, the co-curricular guide, and local content may contain relevant material. A defensible audit would (a) obtain the authoritative texts of KMA 450/2024 and KMA 1503/2025 and their attachments from the Ministry's legal documentation network (JDIH), together with the current learning-outcome documents for Islamic religious education and Arabic, the learning and assessment guide, and the co-curricular guide; (b) search each in full for defined terms (for example digital, online, judi, pinjaman, riba, maysir, data pribadi, and literasi keuangan); (c) record each occurrence by clause or page, subject, and phase; and (d) report null results together with the search terms used. Until such an audit is completed, the proposals in Section C.4 are conditional. If a gap is confirmed, they indicate how it might be addressed; if relevant content already exists, they become proposals for strengthening, aligning, and evaluating it.

Table 1. Documentary corpus, evidential function, and limitations

Source and version	Type and evidential function	Provision or passage used	Coding category and use	Limitation
Law 1/2023 (Criminal Code), in force 2 Jan 2026	Statute; establishes criminal prohibitions	Arts 426–427 (gambling); Art 624 (entry into force)	Criminal prohibition; legal baseline	Does not address education; application to minors not analysed
Law 1/2026 (Criminal Adjustment), in force 2 Jan 2026	Statute; adjusts criminal provisions in other laws	General adjustment provisions	Legal baseline	Effect on ITE Law sanction provisions to be confirmed in the authoritative text
Law 1/2024 (second amendment of ITE Law; Law 19/2016 was the first)	Statute; content-distribution offence	Art 27(2) (gambling content)	Criminal prohibition; legal baseline	Sanctions and relation to Laws 1/2023 and 1/2026 not analysed

Source and version	Type and evidential function	Provision or passage used	Coding category and use	Limitation
KMA 450/2024 as amended by KMA 1503/2025 (22 Sep 2025)	Ministerial decision; curriculum implementation authority	Not yet audited at clause level	Curricular baseline; candidate implementation route	Clauses, attachments, and learning-outcome documents not audited; authority for a technical guideline unconfirmed
KMA 183/2019 and 184/2019	Ministerial decisions (historical)	Previously cited curriculum and character-education content	Historical context only	Status relative to KMA 450/2024 not established
OJK Regulation 40/2024	Regulator's regulation; lending	Licensing; minimum borrower age	Lending regulation; licensing versus sharia status	Article-level provisions and implementing circulars not analysed
Law 27/2022 (Personal Data Protection)	Statute; data protection	Art 4 and Art 25 (children's data)	Privacy safeguards for school records	Application to madrasah as data controllers not analysed
DSN-MUI Fatwa 117/2018; Ijtima Ulama VII (2021) ruling on online lending	Fatwas; normative religious guidance, not statutory	Requirements for sharia-based technology financing; ruling on loans containing riba; collection conduct	Normative rationale; sharia status	Exact clause numbers to be cited from the primary texts
Qur'an 2:219, 2:275, 5:90–91; al-Ghazali, al-Shatibi, al-Qarafi, Ibn Qayyim	Primary religious and jurisprudential sources	Maysir, riba; five necessities; sadd al-dhara'i	Normative lenses	The mapping to madrasah harms is the author's interpretation; alternatives exist
Annisa et al. (2025); Humaira et al. (2026)	Outreach reports	Awareness activity at SMA Negeri 2 Palangka Raya; programme at MA Al-Huda Bengkalis with pre- and post-test	Exposure; existing school activity	Short-term understanding only; no prevalence or sustained prevention
Isnan & Prasetya (2024); Nurlaila et al. (2025)	Empirical studies (village adolescents; university students)	Group CBT counselling; gambling and personal finance	Clinical and psychological strand; transfer by inference	Not madrasah or classroom studies; transfer to minors is an inference

Source and version	Type and evidential function	Provision or passage used	Coding category and use	Limitation
Jang & Ko (2023); Carcelén-García & Márquez (2026); Luthfia et al. (2021); Marín & Castañeda (2023); Radebe (2026)	Conceptual and empirical studies (not madrasah)	4Cs typology; adolescents' risk perception (Spain); digital literacy and resilience concepts	Conceptual coding frame	Do not show exposure sequences in madrasah
Anisa (2024); Zubaidi & Azkar (2025)	Islamic legal and economic analyses	Maysir through maqashid; illegal lending in Islamic economics	Normative strand	Analytical, not empirical
PPATK statements reported by Antara (2024) and Infobanknews (2025)	Media reports of official administrative statements	Age bands of gambling depositors; loans among players	Participation indicator	Secondary reporting; not madrasah-specific; not independently verified

2. Exposure, Access, and Vulnerability: What the Documentary Evidence Supports

The evidence reviewed supports a distinction between reported routes, plausible inferences, and unsupported claims. Outreach reports document awareness activities and students' short-term responses, not the routes students actually take. Annisa et al. (2025) describe a socialisation activity at one senior secondary school and report improved understanding; they do not document a pattern across several schools or regions, or a pathway from exposure to borrowing. Humaira et al. (2026) report a programme at MA Al-Huda Bengkalis evaluated by pre- and post-test comparison of participants' understanding. The 4Cs typology (Jang & Ko, 2023) offers categories through which exposure could occur (content, contact, conduct, and contract), but these are conceptual categories and not evidence that a particular sequence occurs among madrasah students. This article therefore does not treat awareness-programme descriptions as proof of algorithmic targeting, of aggressive marketing aimed at students, or of a typical progression from games to betting. Small in-game purchases (microtransactions) and wagering should also be distinguished: legitimate gaming and gambling are not equivalent, and an argument that particular game mechanics resemble gambling needs its own evidence. Carcelén-García and Márquez (2026), a study of Spanish adolescents, report that adolescents perceive lower risk in leisure activities such as video games and following influencers than in activities that endanger their privacy; this is an inference from another country and age range, relevant only to the design of risk-recognition teaching.

Access and supervision. It is sometimes assumed that students in boarding or semi-boarding madrasah have weaker mediation because guardians are physically distant. The evidence reviewed does not support that assumption in either direction: device access and supervision differ between institutions, and staff supervision or institutional restrictions may substitute for parental mediation. The framework therefore does not

treat boarding status as a risk marker. It asks each madrasah to describe its own device and supervision arrangements (Section C.4). Smartphone ownership and the age at which students obtain independent access are not established here for madrasah populations.

Debt and gambling. A cycle in which gambling losses prompt borrowing from illegal lenders, and debts prompt further gambling, is plausible and is discussed in connection with adult and university populations. Nurlaila et al. (2025) concern university students, and a PPATK statement relayed in the media indicates that a large share of online-gambling participants hold loans outside banks, cooperatives, and credit cards (Infobanknews, 2025); neither documents the sequence among school-age students. Access by minors also needs careful treatment. Because the lending regulation sets a minimum borrower age (Otoritas Jasa Keuangan, 2024), access by a minor would involve another person's identity or credentials or other circumvention; the extent of this is not documented in the sources reviewed, and it cannot be assumed that all students hold the relevant credentials. Reports of debt-collector harassment of family members or educators, of diverted tuition funds, and of strained family relationships were asserted in an earlier version without a traceable source and are not repeated here as findings. The debt-gambling cycle is presented as a plausible pathway for which direct evidence on school-age students is needed.

Academic and psychological consequences. Statements that gambling-affected students show measurable declines in concentration, attendance, and academic performance, that moral distress is frequently observed among madrasah students, or that counsellors report such patterns could not be traced to identifiable reports, populations, measures, or locations in this corpus, and they are withdrawn as findings. Isnan and Prasetya (2024) studied group cognitive-behavioural counselling for gambling among adolescents in one village; it is not a study of classroom performance. Counsellors' anecdotal observations are not used, because no collection method or ethics procedure is documented. Religious guilt may be experienced by some students who gamble or borrow; this is a possibility to be explored in future research and not an established pattern. Whether a religiously framed intervention works better than a secular digital-safety intervention has not been tested, and no claim is made that secular approaches are insufficient.

3. Normative Evaluation: Maqashid al-Shari'ah, Sadd al-Dhara'i, and Student Rights

Maysir, riba, and related categories. The Qur'an prohibits maysir together with wine (Surah al-Baqarah 2:219; Surah al-Ma'idah 5:90–91) and prohibits riba (Surah al-Baqarah 2:275). Classical jurists generally describe maysir (or qimar) as an arrangement in which participants stake property on an uncertain outcome so that one party's gain corresponds to another party's loss. A definition of maysir as any gain by chance rather than productive effort is too broad, because it does not account for stakes, the transfer of property, or the criteria that jurists apply, and it is not adopted here. How those criteria apply to particular digital mechanics, such as paid random rewards in games, is contested and outside the scope of this article. For lending, four categories should be kept apart because they are not interchangeable: legal status (whether a provider is licensed by OJK); sharia status (whether the contract is free of riba, gharar, and maysir); collection conduct (including threats and disclosure of a debtor's private matters); and gambling itself. DSN-MUI Fatwa 117/2018 sets out requirements for technology-based financing under sharia principles, including freedom from riba, gharar, and maysir (Majelis Ulama Indonesia, Dewan Syariah Nasional, 2018). The Ijtima Ulama VII ruling of 2021 on online lending declares loan

services that contain riba impermissible even when consensual, and it also addresses threats and the disclosure of debtors' secrets (Majelis Ulama Indonesia, Komisi Fatwa, 2021). A licensed lender may therefore charge riba, and a service marketed as sharia-compliant may be unlicensed; sharia branding guarantees neither regulatory authorisation nor suitability for minors. Fatwas also differ in status from statutes: they guide religious practice and inform institutional values, but they do not create legal obligations in the way Law 1/2023 or an OJK regulation does.

Maqashid mapping. The five necessities (religion, life, intellect, lineage, and wealth) are classical formulations associated with al-Ghazali and developed by al-Shatibi. Mapping the harms discussed here onto these objectives is the author's normative interpretation; the cited jurisprudential sources do not state this mapping themselves. Hifz al-mal (wealth) is directly implicated by gambling losses and by exploitative lending terms. Hifz al-'aql (intellect) is invoked on the premise that gambling features exploit reward mechanisms and impair risk assessment; that premise requires behavioural evidence on gambling, which the general online-risk literature reviewed here does not provide, so it is stated as a hypothesis. Extending hifz al-nasl (lineage) to family relationships is a conceptual extension and not an equivalence: classical usage concerns lineage and the protection of offspring, and applying it to family strain from financial distress requires explicit justification. Normative convergence across these objectives supplies a rationale for action; it is not evidence that the proposed educational intervention will work. Other framings are possible, such as a rights-based or child-protection framing, or a framework that weighs the objectives differently.

Sadd al-dhara'i and proportionality. Sadd al-dhara'i (blocking the means to harm) is a recognised principle discussed by classical authors such as al-Qarafi and Ibn Qayyim. It holds that an act that is itself permitted may be restricted when it leads, with sufficient likelihood, to a prohibited result. Its use calls for an evidential threshold (the probability that the means leads to harm), an assessment of proportionality, and attention to the benefits of the permitted act; legal schools differ in how widely they apply it, and it is generally associated most strongly with the Maliki and Hanbali schools. It does not automatically authorise monitoring or restriction. Applied to student devices, it must be paired with tests of necessity, proportionality, age appropriateness, student voice, accessible alternatives, and the least intrusive effective measure. Acceptable-use supervision (for example, supervised device storage during lessons or rules for boarding facilities) is a different kind of measure from access to students' private messages or financial data, which this article does not recommend. Restrictions affect students' autonomy and privacy, and that trade-off is acknowledged; the safeguards specified in Section C.4 (written rules, consultation with students and caregivers, review dates, and a complaint route) address it. An earlier proposal to require instruction before students typically acquire independent smartphone access is dropped, because the age and access assumption behind it has not been substantiated.

Table 2 shows, for each issue, whether it is an established gap, a plausible diagnosis, or a hypothesis, and it distinguishes normative rationale from evidence of intervention efficacy. The concept of fard kifayah (a communal obligation that is discharged when enough members of the community fulfil it) is used in the last row in a limited analogical sense, to frame the protection of minors as a shared institutional responsibility; this is the author's interpretation and is not derived from a specific fatwa.

Table 2. Diagnosis, evidential status, normative rationale, and proposed measure

Issue and evidential status	Source anchor	Normative rationale (not efficacy evidence)	Proposed measure
Possible absence of digital-financial literacy competencies in current curricular documents. Status: hypothesis pending clause-level audit; not an established gap	KMA 450/2024 as amended by KMA 1503/2025 (not yet audited)	Sadd al-dhara'i (preventive logic); hifz al-'aql and hifz al-mal (author's interpretation)	Complete the audit first; if a gap is confirmed, an age-banded minimum unit through the authorised route
Exposure to gambling content and unlicensed lending offers. Status: reported in outreach settings; prevalence among madrasah students not established	Annisa et al. (2025); Humaira et al. (2026); PPATK statements via media	Hifz al-mal; hifz al-din	Age-appropriate teaching on recognising content, contact, conduct, and contract risks; verifying OJK licence status and treating sharia status as a separate question
Device access and supervision. Status: varies between institutions; no madrasah-specific evidence reviewed	Carcelén-García & Márquez (2026) (Spanish adolescents; inference only)	Sadd al-dhara'i, subject to necessity and proportionality tests	Least intrusive acceptable-use rules developed with students; no access to private messages or financial data
Possible borrowing-gambling pathway. Status: plausible; sequence among school-age students not documented in the corpus	Nurlaila et al. (2025) (university students); PPATK statement via media	Hifz al-mal	Teach help-seeking and lender-licence checks; non-punitive disclosure routes; mapped referral
Family and personal distress. Status: possible; not documented for madrasah students	No direct source in the corpus	Hifz al-nafs; hifz al-nasl (conceptual extension to family relationships)	Caregiver information through existing forums, with alternatives; supportive referral to counselling, not teacher diagnosis
Fragmented referral and early-support mechanisms. Status: requires mapping of existing mechanisms	OJK, Ministry of Communication and Digital Affairs, counselling and child-protection services (to be confirmed from official sources)	Fard kifayah (communal responsibility; author's analogical use)	Map existing mechanisms before proposing new protocols; treat takedown and cooperation protocols as proposed agreements

4. Proposed Two-Level Framework: Authority, Actors, Safeguards, and Evaluation

Ministerial level. The first step is the clause-level audit described in Section C.1 and the identification of the provision, if any, in KMA 450/2024 as amended by KMA 1503/2025 that authorises a technical guideline, together with the decision-maker, the approval route, and the scope of discretion left to madrasah. Administrative feasibility

cannot be inferred from the similarity of this proposal to the character-education guideline of 2019, because that guideline belongs to an earlier instrument. If the audit confirms a gap and an authorised route exists, the guideline would define teachable competencies and a minimum instructional unit by age level. Illustrative examples are recognising gambling and lending content and offers (lower secondary), and checking an OJK licence, understanding data consent, and separating licensing status from sharia status (upper secondary); at both levels students would learn where to seek help. The guideline should also specify teacher preparation and assessment, with competency assessed formatively and not through disciplinary measures, and it should distinguish regulatory authorisation from sharia compliance throughout. Device and acceptable-use guidance should be offered as options of graded intensity, proportionate to resources and subject to the safeguards in Section C.3.

Referral architecture. New cooperation structures should be proposed only after existing mechanisms have been mapped: the complaint and consumer-contact channels of OJK, the content-reporting channels of the Ministry of Communication and Digital Affairs, school and regional counselling services, and child-protection services. The mapping should state who receives a disclosure, how urgency is assessed, what information may be shared, and who follows up. Reporting a suspected unlawful platform, which concerns the platform, should be kept separate from seeking care for a student, which concerns the student's wellbeing. A disclosure should not automatically lead to disciplinary action or to broad data sharing. Operational reporting channels should be confirmed from the regulators' official sources when guidance is issued, and they are therefore not specified here. Expedited takedown arrangements, and formal protocols with OJK, the Ministry of Communication and Digital Affairs, and regional Ulema Council offices, are proposed agreements; they are not presented as existing or already authorised.

School level. The basis and limits of a madrasah head's authority to issue an internal digital-safety regulation should be confirmed with the relevant district or provincial office before adoption. Such a regulation might specify acceptable device use during lessons and in boarding facilities, a designated and supportive reporting channel, and rules on records. Confidentiality should not be promised without qualification. The protocol should state who may access a disclosure, how records are stored and for how long, and the exceptions needed to protect a student, consistent with Law 27/2022. Teacher preparation should focus on supportive response and referral, not diagnosis. Sudden decline in grades, borrowing among peers, and secretive device use are nonspecific signs with many possible causes; they are not diagnoses of gambling addiction, and a teacher's role is to respond with concern and refer to counselling without labelling a student. The protocol should provide for false positives and for student or caregiver complaints. Training workload and counsellor capacity need to be assessed before adoption, and immediate adoption cannot be assumed.

Caregivers, cost, and acceptability. Using existing parent associations and study groups may reduce the need for new organisational structures, but it does not make the intervention cost-free: staff time, materials, training, follow-up, and accessibility still require resources. Some caregivers have limited time or connectivity, and some students could be at risk if a disclosure reached home; the protocol should therefore offer alternative channels and a counselling route that does not depend on caregiver involvement where home disclosure may be unsafe. The proposition that religiously embedded messaging secures greater acceptance than a secular framing is an

acceptability hypothesis to be tested through consultation with students, caregivers, teachers, and religious leaders. It is not an established finding.

Staged implementation. Table 3 sets out an indicative sequence with accountable actors, resources, safeguards, and review points. It replaces an earlier proposal to adopt school-level measures within the current academic year, which assumed an authority that has not yet been demonstrated. Process and outcome indicators include competency assessment and appropriate referral follow-through, together with measures of privacy incidents and unintended effects such as stigmatisation. An increase in disclosures after rollout may reflect improved trust and should not be read as higher prevalence without other evidence. Evaluation should examine effectiveness, feasibility, acceptability, costs, and equity. The timings are proposals for discussion and are not derived from evidence on implementation capacity.

Table 3. Indicative staged implementation plan (proposed; for discussion)

Stage and indicative timing	Accountable actors	Actions	Resources, preparation, and safeguards	Indicators and review point
0. Audit and authority (months 0–3)	Ministry of Religious Affairs (curriculum directorate) with its legal unit	Clause-level audit of KMA 450/2024 as amended and related documents; identify authorising provision, decision-maker, and approval route; map existing referral mechanisms	Small working group; access to authoritative texts; publish audit method and null results	Audit report; authority route identified; referral map. Review: proceed, revise, or stop
1. Consultation and drafting (months 3–9)	Ministry; provincial offices; sample boarding and day madrasah; students, caregivers, counsellors; OJK and communications-ministry liaison	Draft age-banded competencies and minimum unit; acceptable-use options; supportive referral protocol; privacy rules; test acceptability	Facilitation time; child-safeguarding and privacy review; student voice	Consultation records; acceptability feedback. Review: approve draft for piloting
2. Pilot (months 9–21)	Provincial and district offices; heads, teachers, and counsellors of pilot madrasah	Teach the unit; adopt the protocol; prepare teachers and counsellors; operate referral routes	Teacher time, materials, training, counsellor capacity; data minimisation; no discipline for disclosure; complaint route	Competency assessment; appropriate referral follow-through; privacy incidents; unintended effects (stigma, complaints); workload. Review: interim check at month 15

Stage and indicative timing	Accountable actors	Actions	Resources, preparation, and safeguards	Indicators and review point
3. Evaluation (months 21–30)	Independent evaluators with the Ministry	Assess effectiveness, feasibility, acceptability, costs, and equity; interpret rising disclosures with care	Evaluation budget; comparison across madrasah types	Evaluation report; cost per student; equity comparisons. Review: decision meeting
4. Decision (after evaluation)	Ministry of Religious Affairs	Revise, scale, or discontinue through an authorised instrument	Authorised instrument; resource plan	Documented decision; scheduled periodic review

D. CONCLUSION AND SUGGESTIONS

This article has analysed the legal and curricular baseline for preventing online gambling and harm from illegal lending among madrasah students, and has proposed a two-level framework for evaluation. Three kinds of statement are kept apart. Findings from document analysis are that the legal baseline has changed since the 2019 instruments (KMA 450/2024 as amended by KMA 1503/2025; Law 1/2023; Law 1/2024; Law 1/2026); that criminal prohibitions, curriculum authority, lending regulation, and data protection play different roles; and that a clause-level audit of the current curricular documents has not been done, so the presence or absence of relevant competencies remains unestablished. Normative interpretations are that maqashid al-shari'ah and sadd al-dhara'i provide a rationale for a preventive, proportionate, and rights-respecting response, within the limits stated in Section C.3. Proposed policy actions are the audit; an authorised technical guideline defining age-banded competencies; a mapped referral architecture; proportionate school-level measures with privacy safeguards; and a staged pilot and evaluation. The evidence reviewed does not establish a nationwide madrasah exposure cycle, a pattern of moral distress, or administrative capacity for these measures.

Limitations. The corpus was selected purposively without a systematic search protocol; the audit of current curricular documents is incomplete; evidence on adolescents comes largely from outreach reports and small studies, and some derives from adult, university, village, or non-madrasah samples (including a Spanish sample), so transfer to madrasah students is an inference; coding was done by a single author; and there was no field validation. Implementation capacity, effectiveness, and equity effects are uncertain. Recommendations. For the Ministry of Religious Affairs, the first priority is to complete the audit and identify the authorised route; if a gap is confirmed, the next step is to draft age-banded competencies and a referral map in consultation with madrasah, students, and caregivers. For madrasah heads, the priority is to review existing acceptable-use rules and counselling arrangements against the safeguards in Section C.3, subject to confirmation of their authority. For teachers and counsellors, the priority is preparation in supportive response and referral, not diagnosis. For parent associations, the priority is to receive information through existing forums, with alternatives for caregivers who cannot attend. Future research should include stakeholder consultation, prevalence studies with madrasah samples, and a staged pilot evaluating effectiveness, feasibility, acceptability, costs, and equity.

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