
ONLINE DISPUTE RESOLUTION: ASSESSING THE IMPACT OF TECHNOLOGY ON ACCESS TO JUSTICE IN INDIA

Kanakshi Nema, LLM, Hidayatullah National Law University, Uparwara, Nava Raipur-Atal Nagar, Chhattisgarh

ABSTRACT

Online Dispute Resolution (ODR), is a rapidly evolving field, provides an opportunity to revolutionize the way disputes are resolved. This research paper explores the dynamic landscape of ODR and analyses its impact on the accessibility of justice. The paper tries to develop basic understanding of the concept of ODR and its evolution. Subsequently the paper dealt with its adoption and development in India, through help of various factors and its impact on access to justice. With an emphasis on the legal system and court precedents, it analyzes the state of ODR in India at present. Finally, the paper offers suggestions to overcome the challenges faced by ODR in India and optimize the potential of ODR in India. The paper concludes by arguing that ODR has the potential to significantly improve access to justice in India. ODR can assist in guaranteeing that everyone can access justice by offering a more beneficial, affordable and accessible alternative to settle disputes.

Introduction:

Traditionally, disputes were resolved only in courts and this idea has been changed by “Alternative Dispute Resolution” (ADR) mechanisms. Due to the situation created by COVID-19 pandemic physical presence of parties for the dispute resolution before the authorities became concern. This brought technology revolution and as a result of it Online Dispute Resolution – ODR is developed. Millions of disputes, be it of private nature or international, are resolved online with the aid of technology globally.

ODR is an evolving method and is considered as subset of ADR because it may be characterized as the creation of computer networks, apps and software for using ADR techniques to settle disputes. It actively employs technology for hearings, electronic document sharing and more. It leverages AI/ML-powered tools such as automated dispute resolution, script-based solutions, intelligent decision-making systems and customized platforms, potentially acting as a “fourth party.”

There are barriers in accessibility to justice, for example, to those who belongs to underprivileged section of the society has fear about the system; judicial system is expensive and time-consuming; non-accessibility of the Advocates; unawareness of the legal rights; pendency of cases in the courts; jurisdictional issues due to cross-border disputes. ODR is therefore necessary in present and the greatest remedy for the saying “justice delayed is justice denied.”

This paper aims to delve deeper into the intricate relationship between ODR and technology, examining its evolution both globally and within the Indian context. It will explore the methods, processes, judicial precedents, legislations, reasons for its development in India, challenges, recommendations; ultimately, the transformative potential of ODR in enhancing access to justice.

Origin of ODR:

ODR has its origins in evolution of the internet and the need for accessible methods for providing justice in the digital age. Here's a brief overview of the origins of ODR:

1st Phase	1989	Development of World Wide Web
	1992	Introduction of first Internet Service Provider
	1996	□ University of Massachusetts and University of Michigan launched ODR projects □ National Centre for Automated Information Research(NCAIR) hosted the initial ODR conferences
	1999	eBay started a pilot mission to offer online mediation centres for disputes arising on their platform
2nd Phase	1999-2000	21 new ODR initiatives established during internet bubble(including cybersettle and smartsettle)
	2001	"Ethan Katz and Prof. Riffin co-authored ODR: Resolving Conflicts in cyberspace(2001)" - 1st book on ODR to personify technology as 'fourth party' in online disputes
3rd Phase	2004	Approximately 115 ODR services launched worldwide
	2007	Government of Netherlands launched Rechwijzer to provide ODR services for family disputes

	2009	European committee for standardization releases report on standardization of ODR
	2010	UNCITRAL establishes a working group to create standards for ODR
	2012	□ British Columbia enacts law to establish Civil Resolution tribunal to provide ODR services for small claim disputes □ 11th international conference on ODR was conducted in Prague with aim of development of a world dispute resolution system to deal with cross border high volume low value disputes
	2013	European Union enacts regulation to establish an ODR platform at the union level to offer single point dispute resolution services
	2015	Committee of HRs and Legal Affairs of the Council of Europe published a report on adoption of ODR
	2016	UNCITRAL finalised and adopted the technical notes for ODR
	2018	Asia Pacific Economic Cooperation (APEC) adopted ODR framework to address business disputes.
	2020	Hong Kong launched ODR scheme to address disputes arising due to Covid-19 pandemic

Relationship between ODR and Technology:

Technology can be divided into two:

- **Information Technology Law:** It is supported by law and emphasizes the legal ramifications of IT. It covers topics like digital signatures, computer contracts, online copyright, data security, and cybercrime.
- **Artificial Intelligence (AI) and Law:** It fosters technology and examines how to use IT in the legal field. It entails the creation of knowledge management systems, legal argumentation model development, and legal knowledge systems.

ODR is combination of these two technologies. Thus, they are important tool for resolution of disputes. Infact, recently the role ICT has become important in resolving disputes in physical mode as well.

Features of ODR are:

- It meets the **existing socioeconomic system** of the society.
- It is **voluntary** in nature where parties themselves choose that whether to pursue the dispute resolution through ODR or not.
- It is mostly **informal and casual** unlike traditional in-person processes.
- It follows **principles of natural justice**.
- Its success is based on the premise of **trust, convenience and expertise**.
- There is **intersection of different ICT** tools on or over “ODR platforms”.
- There is a **different from virtual courts**, as the usage of ICT tools is separate from regular court proceedings.
- It is **not fully new method** of dispute resolution; rather it is informed by traditional

processes backed up by technology.

The Methods of ODR:

ODR is one the method which is derived from existing typologies of ADR i.e. it is developed stage of ADR. Therefore, various methods of ADR are employed with aid of technology in ODR system. By adopting new features of the online system, ODR is also an option to help traditional methods for dealing with disputes. In short, ODR is a process whereby disputes can be resolved using information technology and AI in the wide range of issues relating to different areas of law. The methods of ODR are as follows:

1. **Automated Negotiation:** In this method, a complainant approaches an automated negotiating service provider, who subsequently sends a message to the opposite party so that they can acknowledge or decline institution's jurisdiction. It is an ODR technique in which two disputing parties engage in a blind bid in which each offers or demands a specific sum of money (only a few institutions even permit non-monetary parameters of settlement). They submit bids for what they believe would be a fair and reasonable sum to pay in order to resolve the claim, without knowing what the opposing party is proposing or requesting. If parties accept and some within specified range of each other, then the programme will automatically resolve the dispute of the parties by giving a figure that it deems fair and reasonable. It is also known as '**Blind-bidding**' services. It is popularly used in settling insurance disputes. This method excludes human being from dispute resolution, judgment making process as computer is considered judge and is still successful to resolve issues.

“Automated negotiations” are of two types:

- a. **“Double Blind-bidding”:** A procedure for individual financial conflicts involving two parties; and
- b. **“Visual Blind-bidding”:** A conflict resolution technique that may be used with any number of parties

2. **Assisted Negotiation:** Assisted negotiation, also known as ‘enhanced negotiation’, ‘mediated negotiation’, ‘direct negotiation’ or ‘technologically facilitated negotiation,’ is a negotiation process that uses software tools to assist the parties in reaching an agreement.¹ It comprises tools such as threaded message board systems, secure sites, storage means, online meeting management devices, software for setting up the communication, engaging in productive discussions, identifying and assessing potential solution, and writing agreements. Online assistance is provided by non-partisan facilitator to the parties wherein parties try to achieve an agreement through direct, bilateral or multilateral communications.
3. **Online Mediation:** In mediation, a neutral third-party, called the mediator, communicates with the parties to a disagreement to help them come to an amicable conclusion. Online mediation is mediation only but taking place fully online and on digital platforms. The parties don't actually get together in person; rather, they communicate online using means like video conferencing, chat rooms, email, and specialists “ODR platforms”. The mediator promotes communication between the parties, facilitates in identifying their interests and issues, and directs them in coming up with potential solutions.
4. **Online Arbitration:** Arbitration is considered most popular method of ADR, therefore online arbitration is also considered as trustworthy by the parties. It is also referred to as virtual arbitration or e-arbitration. It promotes parties to participate in arbitration processes without having to be present in person, facilitating the quick and inexpensive settlement of disputes cross borders. Online platforms are used for all phases of arbitration, including the submission of claims, the exchanging of evidence, the presenting of arguments, and the issuing of awards. Online arbitration has benefits like adaptability, less travel expenses, and speedier hearings, but it also faces challenges about cyber security, secrecy, and the validity of virtual decisions in many countries.
5. **The ICANN UDRP process:** The UDRP² is an ICANN³-approved ADR process to resolve domain name disputes. If a trademark owner can prove that a domain name is identical or

¹ “Online Dispute Resolution: Challenges for Contemporary Justice” by Gabrielle Kaufmann-Kohler and Thomas Schultz (2004)

² Uniform Domain Name Dispute Resolution Policy

³ Internet Corporation for Assigned Names and Numbers

confusingly similar to their trademark and was registered and used in bad faith, the domain name may be transferred or canceled by this process. However, the UDRP is a large success in resolving internet-related disputes, but few objections are raised in this process in matters like due process, transparency, and the application of judgments in other legal contexts.

Process of ODR:

The key steps involved in ODR process are:-

1. **Initiation:** The ODR process starts by submitting a dispute online by one or both parties within a specified time period through a specialized ODR platform. The initiation of dispute involves the submission of claims, evidence and relevant information.
2. **Negotiation:** After initiation, parties might try to settle the dispute amicably by online negotiation. If the parties are satisfied and reach a mutual agreement, the dispute is closed.
3. **Mediation:** When negotiations fail, the parties may choose to engage in formal mediation, during which an impartial mediator helps the parties communicate and come to a resolution of their disagreement.
4. **Arbitration:** When mediation fails or is not suitable, parties can opt for arbitration as a means for resolving their differences. In arbitration, an arbitrator considers the arguments made by both parties and renders a binding decision that is similar to a court decision.
5. **Decision:** Once an agreement is reached to a point of final settlement, the matter is closed. A digital record of the judgments, agreements or awards is made available through the ODR platform, providing transparency and availability for all parties to the dispute.
6. **Enforcement:** Parties are often bound to comply by the terms of any judgment, agreement or award that they reach. The implementation depends and differs according to local laws and international agreements.

International Experience in ODR:

ODR has rapidly grown in last two decades across the globe by harnessing digital technologies to resolve cross-border disputes, including traditional disputes, effectively and conveniently. ODR is used in different areas globally and thus various organizations, platforms and initiatives have developed to assist the ODR processes.

The **UNCITRAL ODR Working Group** is entrusted with developing international ODR standards. It was formed when the UN Commission on International Trade Law (UNCITRAL) acknowledged the crucial role played by ODR in cross-border trade disputes. ODR services for intellectual property disputes are provided by platforms like the World Intellectual Property Organization's (WIPO) Arbitration and Mediation Center. Furthermore, to resolve disputes resulting from online marketplaces, e-commerce companies like eBay and Alibaba have smoothly executed ODR procedures. These examples illustrate how ODR has the ability to overcome geographical and legal barriers, enhance “access to justice”, and facilitate effective dispute resolution in a globalized world. However, obstacles including harmonizing legal requirements, securing enforcement, and adjusting to cultural variations continue to be crucial factors in the worldwide development of ODR.

Present Status in India:

ODR system is still in its nascent stage in India. All the three parts of the State i.e. the Judiciary, the Legislature and the Executive are contributing for the ODR integration in India.

Before 2003, India did not have any representation in the area of ODR. The evolution of ODR in India can be described as follows:

Evolution in India	
2003	“National Internet Exchange of India (NIXI)” was established with the goal of facilitating better internet services throughout the nation.

2006	NIXI adopted the '.in' "Domain Name Dispute Resolution Policy" for ODR.
2011	10th International ODR Forum was held in Chennai
2017	The government encouraged its organizations to use electronic arbitration.
2019	"E- ADR challenge" released to recognize and maintain ODR platforms.
Jul-20	First Virtual Lok Adalat held in Chhattisgarh permitted video conferencing for conciliation services.
Jul-20	To broaden the reach and application of ODR, "NITI Ayog" established a committee headed by Justice (Retired) A.K. Sikri.
Apr-21	In order to encourage corporate leaders to adopt ODR and using it to settle disputes outside of court, "NITI Ayog" published an ODR manual.
Nov-21	"Designing the Future of Dispute Resolution - The ODR Policy Plan for India" is the title of a report that the 2020 Committee published. It placed a strong focus on the action plan that would gradually be adopted into the Indian judicial system for ODR
Jul-23	Following the report's advice, SEBI issued a circular to update the "Market Infrastructure Institute's (MII)" grievance redressal procedures to include ODR for quick resolution of grievances by disputing parties.

Although ODR is not developed in India, some of the government departments have adopted ODR. In the future, such consistent efforts with government support could be required to accelerate

ODR's growth in India.

Perspective of the Indian Judiciary:

The Indian Judiciary has not explicitly recognized all the aspects of ODR system. However, the Courts have recognized various aspects of ODR in different cases. Few instances of such recognition are as follows:

☐ ***Acceptance of electronic arbitration-***

The validity of employing technology within arbitration proceedings was affirmed by the Supreme Court and also established the validity of online arbitration agreements contained in a standard form contract is valid and enforceable.⁴

☐ ***Allowing video-conferencing-***

Due COVID-19 pandemic, personal presence of parties became a challenge and therefore the Supreme Court issues guidelines allowing video-conferencing in court and ADR proceedings, with the consent of the parties.⁵

☐ ***Acknowledging the use of electronic mediums for summons-***

In “*Central Electricity Regulatory Commission v National Hydroelectric Power Corporation Ltd*”⁶, the court permitted service of summons through email or other electronic mode.

While analyzing the restrictions due to COVID 19 lockdown on physical service of summons, the Supreme Court allowed serving of summons and other documents through electronic medium such as email and messaging apps⁷.

⁴ *Envirad Projects Pvt. Ltd. v. NTPC Ltd.*, ARB.P. No. 27 of 2022”

⁵ IN RE: GUIDELINES FOR COURT FUNCTIONING THROUGH VIDEO CONFERENCING DURING COVID-19 PANDEMIC, SUO MORU WRIT (CIVIL) NO. 5/2020

⁶ (2010) 12 SCC 190

⁷ In re Cognizance for Extension of Limitation Suo Moto Writ Petition (C) No. 3/2020

□ ***Electronic records accepted as valid evidence-***

The Supreme Court clarified the requirements to be fulfilled for electronic evidences to be admitted⁸.

The Legal Framework in India:

1. **The Indian Constitution⁹:** “Article 21” guarantees the “right to life and personal liberty,” which includes the “right to a speedy trial”¹⁰. This means that ODR mechanisms should be designed to ensure that disputes are resolved quickly and efficiently.
2. **The Code of Civil Procedure, 1908¹¹:** The “Code of Civil Procedure, 1908,” governs the procedure for civil trials in India. Order 26 of the Code of Civil Procedure provides for the use of mediation in civil disputes. This means that ODR mechanisms can be used to conduct mediation in civil disputes.
3. **Indian Evidence Act 1872¹²:** It governs the admissibility of evidence in Indian courts. “Sections 65A¹³ and 65B¹⁴” provides that electronic records are admissible in evidence if they are authenticated in the prescribed manner. This means that ODR mechanisms should have robust procedures for authenticating electronic records and evidence.
4. **Arbitration and Conciliation Act, 1996¹⁵:** The Act's primary goal is to encourage peaceful resolution of disputes on a national and international scale. The Act provides a legal framework for arbitration in India. It also recognizes the validity of arbitration agreements as a court judgment, including those reached through electronic means.
5. **Information and Technology Act, 2000¹⁶:** It, is most important legislation while dealing

⁸ K.K. Velusamy Vs. N. Palanisamy; (2011) 11 SCC 275

⁹ 1950

¹⁰ Hussainara Khatoon (1) v. Home Secretary, State of Bihar (1980) 1 SCC 81

¹¹ ACT NO. 5 OF 1908

¹² ACT NO. 1 OF 1872

¹³ Special provisions as to evidence relating to electronic record

¹⁴ Admissibility of electronic records

¹⁵ ACT No. 26 OF 1996

¹⁶ ACT NO. 21 OF 2000

with ODR, provides a legal framework for electronic transactions and digital signatures. It also acknowledges the legality of electronic records and evidence. Further, it promotes e-commerce and provides e-transactions with legal force, India passed the Act.

- 6. Consumer Protection Act, 2019¹⁷:** It necessitates that internal grievance redressal systems be established by e-commerce platforms. ODR can be used by these grievance redressal processes to settle disputes between customers and e-commerce platforms.

These laws forms basis of ODR in India but are not sufficient, certain legal modifications and regulations are still required. The “Digital Personal Data Protection Act, 2023”¹⁸ provides provisions for data privacy and security in the digital realm, resulting in expansion of ODR in India.

Factors Driving the Development of ODR in India and Its Impact on Access to Justice:

There are various reasons for development of ODR in India, which have relation with access to justice. The following are some of the primary factors for the development of ODR in India and how it relates to enhancing access to justice:

- **Geographic Distribution:** Due to huge geographical expansion of India, it make it difficult for some individuals to physically visit courts, accordingly online platforms are excellent means to bridge the gap and assure that those in remote and rural areas can access justice.
- **Overburden on Courts:** The Indian Judiciary has large backlog of cases, causing the delivery of justice to be interrupted. ODR provides a quick and effective means of resolving disputes, which could decrease the load on the existing judicial system.
- **Technological Intelligence:** The fast rise in Smartphone and internet usage in India has led to a scenario that is beneficial for the adoption of ODR, rendering ODR more widely

¹⁷ ACT NO. 35 OF 2019

¹⁸ Bill No. 113 of 2023; enacted on August 11, 2023

available.

- **Varying Legal Environment:** Using technology-driven methods which facilitate distant communication and documentation, India's diverse legal environment, languages and cultural diversity may be managed effectively.
- **Cost Effective:** ODR may greatly minimize the costs of traditional litigation, including as legal expenses, travel expenditures, lost time at the office and additional indirect expenses. For people and corporations, especially those with fewer facilities, this lowers the cost of justice.
- **Convenient and quick:** Due to the use of computers and automation, ODR can shorten the time of court proceedings with flexible schedules for virtual presence by promoting a quicker and more convenient method for dispute resolution. It is especially helpful in cross border disputes. Automation exhibits ease of use, adaptability and fosters “access to justice”.
- **Foster Dispute Resolution:** ODR overcomes various issues of ADR like lack of arbitration centers, cost involved in it other disabilities. ODR is more accessible as it can be accessed from place of party's convenience. Therefore, ODR encourages individuals to resolve their disputes rather than completely giving up on their rights.
- **Anonymity:** In ODR, communications happens online and this makes it “impersonal” in nature. Conventional ADR component is not considered unbiased since it has personal interaction between parties and neutrals, but this highlight of ODR has overcome this challenged.
- **Compatibility with electronic commerce:** ODR provides reliable and easy dispute resolution platform for consumers arising out of e-commerce, eliminating jurisdictional issues.
- **Government Support:** The Government of India's flagship “Digital India” campaign focuses on digitization and the convenience of conducting business. ODR emphasize this

backing.

- **Pandemic:** The COVID-19 pandemic highlighted the necessity of ODR underscored by lockdowns and social isolation tactics.

Challenges with ODR in India:-

- **Legal Recognition and Enforcement:** People have built trust and confidence upon the courts and their legal orders. However, ODR being new mechanism, their decisions may be in doubt before Indian courts and people. If the parties are concerned about the ultimate resolution's capacity to be enforced, they can be reluctant to participate in ODR.
- **Technical Infrastructure and Accessibility:** Technical infrastructure is well developed in the metropolitan areas while remote areas still face lack of technical infrastructure. Urban areas have 5G internet connectivity. Perhaps, in India there is technological illiteracy. This might create accessibility challenge leading to confusion and barriers in utilizing ODR services. It will be easy to exploit for the people having resources.
- **Fear of Unemployment:** Legal professionals will have a fear of unemployment due to elimination of their role in ODR. Even if they are bypassed, they face lack of ODR training which may curtail reliance on advocates.
- **Data Security and Privacy:** To overcome this challenge, “ODR platforms” must guarantee strong encryption, data security protocols and adherence to new Data Protection Act, 2023¹⁹.
- **Cultural Sensitivity:** In India, conflict resolution requires familiarity with cultural differences and interpersonal dynamics that might be difficult in this online mechanism.
- **Resistance to Change:** People who are familiar with conventional system, such as lawyers and judges, may be reluctant in accepting new techniques and technology. Also

¹⁹ Supra no. 23

people new to online processes or who do not have equal access to technological amenities, could believe ODR to be less fair or impartial than conventional system.

- **Lack of Uniformity:** India's ODR system may not be uniform in terms of practices, laws and platforms. Users may get misled and lose confidence as a result of this.

Suggestions and Conclusion:

To improve India's "access to justice" through ODR, many plans and suggestions might be taken into account:

- **Awareness Campaigns:** Initiate thorough education initiatives to inform people in both rural and urban areas about the advantages and methods of ODR. Workshops, seminars and educational materials in several languages may be a part of these initiatives.
- **Government Support:** By providing funds, infrastructure and incentives for the creation of 'ODR platforms,' the government may actively assist ODR activities. ODR adoption among legal practitioners may be encouraged by its incorporation into the legal curriculum.
- **Standardization:** Effort on creating uniform policies and guidelines for ODR in India can boost user trust and provide a unified user experience across all platforms.
- **Mobile-Friendly Solutions:** Create mobile-friendly 'ODR platforms' that can be accessed via smart phones to increase their accessibility to a bigger public in light of the increased use of mobile phones.
- **Localized Platforms:** As per the regional and linguistic diversity in India, specific 'ODR platforms' can be created, so as to promote cultural sensitivity and an understanding of regional issues.
- **Collaboration with Courts:** Work together with the courts to include ODR tools into their procedures. This may entail educating judges and court personnel about ODR, permitting cases to be forwarded to platforms for ODR and acknowledging ODR results.

- **Mediation First:** Some specific type of disputes may be resolved by mediation before moving to court. ODR can help in reaching a settlement and curtail the load on the courts.
- **Feedback Mechanisms:** Create feedback systems that allow users to rate their ODR experiences. It might inspire platforms to enhance their offerings and gain user confidence.
- **Enforceability Mechanisms:** Attempt need to be made to create systematic legal structures to ensure that the ODR's results can be enforced. This requires making new laws and setting methods for accepting and implementing ODR awards.
- **Capacity Building:** Train a pool of skilled mediators, arbitrators and legal professionals who specialize in ODR. This can enhance the quality of ODR processes and outcomes.
- **Developing a Plan:** The government may develop a national plan for ODR. Experts from the legal industry in all its facets, system designers, social workers, academics, ethical hackers, software developers and IT specialists need to be included in the team that creates the blueprint and specifications of the plan.
- **Expert Opinion:** IT expert opinions must be considered to create infrastructure. It should be created in such a way that it benefit maximum number of users at all times by requiring less internet storage, speed, easy interface and fast decision making.
- **Software and Applications:** Software and applications must be developed in such a way that it is easily available on mobile and tablet store to ensure “access to justice” swiftly and simply.
- **Installation of Virtual Infrastructure:** Necessary virtual infrastructure must be installed in the courts to ensure delivery of justice. High speed internet connection, email facilities, video calling may be included in the necessary virtual infrastructure.
- **Establish Legal Centers:** Perhaps in India, not everyone is technological advanced to access the websites and submit grievances. Techno Legal Centers need to be established so that anyone can register a complaint with the help of a technological or legal

professional. The filing may be done at any moment within office hours. They can be established in existing public buildings such as schools and banks.

In conclusion, ODR presents an innovative solution to bridge the gap between India's conventional judicial system, which often struggles with limited resources and the growing legal demands of the nation. In this ever-evolving technological landscape, embracing ODR becomes paramount in ensuring access to justice.

This research paper delves into the development, challenges and suggestions concerning ODR's role in granting "access to justice" in India. The suggestions highlight the need for a comprehensive approach to effectively integrate ODR as a viable and efficient alternative.

Key prerequisites include fostering cooperation among various stakeholders, securing legal recognition and promoting digital literacy to seamlessly integrate ODR into India's justice system. By putting these suggestions into action, India can offer its citizens a swift, cost-effective and reliable avenue for resolving disputes.

The pursuit of "access to justice" through ODR is undoubtedly a challenge, but it holds the potential to transform India into an egalitarian society that embraces digital technology. ODR possesses the capability to mitigate challenges and reshape the legal landscape, making it more equitable and accessible to all.

Bibliography:

Primary Sources:

Indian Legislations:

- ☐ The Constitution of India, 1950
- ☐ The Code of Civil Procedure, 1908
- ☐ The Indian Evidence Act, 1872
- ☐ The Arbitration and Conciliation Act, 1996
- ☐ The Indian Technology Act, 2000
- ☐ The Digital Personal Data Protection Act, 2023

Secondary Sources:

Book:

- ☐ Kaufmann-Kohler, G., & Schultz, T. (2004). *Online Dispute Resolution: Challenges for Contemporary Justice*. Kluwer Law International ; Schulthess, The Hague, Zürich

Government Report:

- ☐ NITI Aayog. (2021). *Designing the future of dispute resolution: The ODR policy plan for India*. NITI Aayog. <https://www.niti.gov.in/sites/default/files/2021-11/odr-report-29-11-2021.pdf>

Journals:

- ☐ Ebner, N., & Greenberg, E. E. (2020). Strengthening online dispute resolution justice. *Washington University Journal of Law & Policy*, 63(1), 65-117. https://openscholarship.wustl.edu/cgi/viewcontent.cgi?article=2166&context=law_journal_law_policy