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MAKING A CASE FOR VIRTUAL COURTS IN INDIA: AN INTERNATIONAL PERSPECTIVE'

INTRODUCTION AND BACKGROUND

The age of the internet has led to significant improvement in communication and information technologies, at the same time it has posed risks such as identity theft and data privacy.¹ The era of change has donned on public institutions as well which have atleast transferred some of their functions to their online sphere of websites,² resulting in savings of time and money and minimising backlog works in public institutions.³ The courts have taken note of the process and as an institution plagued with backlog cases and procedural delays, they need to embrace technology in a cohesive manner, minimising the risks it poses to make justice speedy and accessible.

Indian judiciary had already started the process of modernization before the pandemic, with the E-Courts Project it has achieved substantial success in integrating ICT (Information and Communication Technology) in the court setup. With 837 million Indian internet users,⁴ the idea of virtual courts is more viable now than ever before. The pandemic gave the necessary push for Indian Courts to look into the international framework and canvass and implement reforms in introducing ICT reforms in the institution. Erstwhile CJI SA Bobde, in his

¹ Maureen K. Ohlhausen & Alexander P. Okuliar, *Competition, Consumer Protection, and the Right [Approach] To Privacy*, 80 ANTITRUST L. J. 121, 123 (2015).

² Digital Government: Building a 21st Century Platform to Better Serve the American People: [Digital Government: Building a 21st Century Platform to Better Serve the American People \(archives.gov\)](#) (Accessed 12-09-2023)

³ *id*

⁴ World Population Review: [Internet Users by Country 2023 \(worldpopulationreview.com\)](#) (Accessed 12-09-2023)

constitution day speech highlighted the same vision. He expressed his optimism on how AI, and more conventional technology interventions, can transform Indian courts.¹

The following paper analyses the concept of virtual courts and their implementation in India, first providing a background on the development of virtual courts and Online Dispute Resolution, then charting the progress of the e-courts project, which is almost approaching culmination. Further, it evaluates the processes and frameworks of digital courts in advanced jurisdictions like the United Kingdom (which has a similar model program for judicial reform² and has considered a three-pronged process for limited suits to be transferred to online mediums³) Singapore and China. Finally, the paper examines the systems in place in India, and recommends a roadmap for implementation of virtual courts as a model of dispute redressal, citing supreme court cases, law commission reports, news reports, international reports and research papers. The paper seeks examine what is hindering the implementation of the concept in India and whether the e-courts project lacks essential framework on the concept? What mechanisms exist internationally on virtual court systems and finally, what steps need to be taken to implement the system in India coherently in context of study of international development of the concept.

BACKGROUND: ODR TO VIRTUAL COURTS

The UNCITRAL was the pioneer convention to define ODR as a mechanism for resolving disputes facilitated through the use of electronic communications and other information and

¹ The Print: ['AI can improve judicial system's efficiency' — full text of CJI Bobde's Constitution Day speech \(theprint.in\)](#) (Accessed 12-09-2023)

² Her Majesty's Court and Tribunals Service, HM Courts and Tribunals Service Reform Programme Framework Document: [HM Courts and Tribunals Service: framework document - GOV.UK \(www.gov.uk\)](#) (Accessed 12-09-2023)

³ BIGGS LJ. CIVIL COURTS STRUCTURE REVIEW: FINAL REPORT 58-59 (Judiciary of England and Wales 2016).

communication technology.⁴ It was the need of globalization and amping up of international commercial disputes and rise of online trading. E bay was the first platform to facilitate ODR

in consumer disputes with individuals of different countries and different monetary values involved.⁵

Since then, ODR that is ADR in an online format has become increasingly popular across jurisdictions with every judiciary facing backlogs of cases, and the ability of the platform to bring together individuals from different nations with ease. This successful integration of technology to improve efficiency in ADR has led to experimentation of a phenomenon of a fully virtual court across nations including India.⁶

ODR in practice has now taken three forms - private ODR using ADR mechanisms, courtannexed ODR and virtual courts. Realising the vision of virtual courts will be the focus of this strategy paper. Usually ODR platforms are procedurally agnostic, thus the same platform can be used for many institutions like ombudsmen etc. However, UNCITRAL has recommended that if virtual courts are to be derived from an ODR based approach, there needs to be some additional features present in the platform⁷ (Integration of different offices like registrar; and other institutions like prisons and remand centres; scope of open courts principle etc.)

The risks posed by the pandemic have hastened the idea of the virtual court setup, but there are inherent issues attached to the same, like the issue of consent of the parties to be subjected to the proceedings, the examinations of witnesses, internet issues, and the most glaring issue being privacy concerns as the judiciary doesn't have its own platform to hear cases and has to rely on platforms like Zoom to hear matters. It is imperative for judiciary across jurisdictions to have its own platform for hearings which is entirely under its control.

⁴ United Nations Commission on International Trade Law: [v1700382_english_technical_notes_on_odr.pdf](https://www.un.org/odhpn/odr/technical_notes_on_odr.pdf) ([un.org](https://www.un.org/)) (Assessed 12-09-2023)

⁵ Colin Rule, *Designing a Global Online Dispute Resolution System: Lessons Learned from eBay*, 13 U. St. Thomas L.J. 354 (2017).

⁶ *Id.*

⁷ *Supra note 8*

The following section of the paper examines some international jurisdictions to figure out a manner to approach the virtual courts concept after that it evaluates the technological capacity of the Indian judiciary in form of the E-courts project, to recommend changes.

INTERNATIONAL PERSPECTIVE

The following section focuses on the United Kingdom as an example of a structured approach to implement online court mechanism in India in brief, it further looks at various other jurisdictions with regards to their responses to the pandemic and presents key takeaways from the same.

3.1. The United Kingdom: On the Way to Implement Virtual Courts

The UK has been at the forefront of judicial reform since before the pandemic and has introduced a sweeping reform programme after a report on the overhaul of the civil justice

system authored by Lord Justice Biggs.⁸ It proposes a three-pronged process for the purposes of online court adjudication.¹³ Online Dispute resolution has been proposed in the country for low value civil claims and torts with the cap value ranging from £ 3,000-20,000 in various recommendations.⁹

Based on the report, the HMCTS (Her Majesty's Court and Tribunal Service) has been working on an ambitious reform program, which aims to modernize the English judiciary through funding from the ministry of justice and a coherent structural mechanism.¹⁰ The main objectives of the programme include digitalization (accessible court documents, e-filing of cases); Introduction of Online Courts (for civil disputes only and developing coherent platform for them in the long-run with ministry of technology and ministry of justice's collaboration, keeping in mind the privacy aspect and autonomy of judiciary); Flexible operating hours for courts, centralization of court systems; Training of judges and clerks to adapt to the new technology; investment in latest research and development in the field of court-sponsored online dispute resolution; and to improve overall access to justice.¹¹

The report by justice Biggs has proposed a three-staged procedure for online court adjudication¹², the HMCTS's aim is to codify the same into guidelines for online courts in the country once they are firmly established. The stages can be simply described as under:

(1) Automated Online Triage Stage: Has been designed to help litigants articulate their claim in a form which the court can resolve, and to upload their key documents and evidence: assuming that there is an issued claim, and a real dispute about it, between litigants all of whom need interactive triage. But none of those assumptions cover the whole ground. There needs to be a stage 0, a stage 0.5 and by-passes. Stage 0 will have to include, for claimant and defendant,

⁸ *Supra note 7*¹³

Id.

⁹ Online Dispute Resolution Advisory Group: [Online Dispute Resolution \(judiciary.uk\)](https://www.judiciary.uk) (Accessed 12-09-2023)

¹⁰ Her Majesty's Courts and Tribunals Service: <https://www.gov.uk/guidance/the-hmcts-reform-programme> (Accessed 12-09-2023)

¹¹ *Id.*

¹² *Supra note 7*

all those pieces of vital guidance about treating litigation as a last resort, about the sources of affordable or free advice, and perhaps some commoditised summaries of the essential legal principles. Stage 0.5 will have to include provision for a short exchange between the parties designed to find out whether there really is a dispute which the court needs to resolve. This recognises the fact that the majority of claims issued in the civil courts are undisputed.

(2) **Conciliation Stage, handled by a Case Officer:** a clerk receives the documents and inspects them to ensure all forms have been properly filled out and all necessary documents have been submitted. Each party can amend and complete missing details and documents. Similar to the current procedure, the court can offer arbitration.

(3) **Determination Stage:** where those disputed cases which cannot be settled are determined by a Judge, by whichever of a face-to-face trial, video or telephone hearing or determination on the documents is the most appropriate, in the long run this should be substituted with a platform developed solely for judicial purposes, keeping in mind various stakeholders.

The model presents a blend of ODR and Online Civil court system that has been the base of the HCTMS reform programme.

3.2. Reforms in Response to the Pandemic

1. **The United Kingdom:** In the UK, the Ministry of Justice and the courts¹³ urged for the adoption of remote hearings. Further, provision was made to allow the access to media whenever possible, in lieu of the public courts principle and private hearings were allowed to be recorded and a fully video-conferencing based court system was mandated temporarily with guidelines under statute.¹⁴

¹³ HM Courts and Judiciary (UK): [Review of court arrangements due to COVID-19, message from the Lord Chief Justice - Courts and Tribunals Judiciary](#) (Accessed 12-09-2023)

¹⁴ Coronavirus Act, 2020, § 55-56, No. 7, Acts of Parliament, 2020 (United Kingdom).

2. **Singapore:** The Supreme Court of Singapore, too, issued guidelines for using audio and video conferencing for hearing matters using Zoom.¹⁵ It has introduced in the COVID-19 (Temporary Measures) Act 2020, allowed court proceedings to be conducted using remote communication technology such that physical attendance in the courtroom can be minimised or dispensed with.¹⁶
3. **China:** There has been an ecosystem-based approach followed with internet courts set up across Hangzhou, Beijing and Guangzhou using AI and blockchain adjudication,

mobile Courts have also been launched using WeChat with the Chinese Supreme Court mandating all litigation to be online.¹⁷

3.3. Key Learnings

The above models allow us to see that the online court jurisprudence has evolved in two separate models:

- The first one is the English Model, which is partially automated, preserving the traditional mechanisms like serving of evidences and decrees and others offline unless emergency provides otherwise. The second one is the Chinese Model, based on a fully developed ecosystem, with social media apps helping the government to dispense justice in a fully online manner.
- Virtual courts need substantial research and development and funding to materialise into a potent institution as highlighted by the UK's case. They need to be phased in a coherent manner first foraying into civil matters only.
- Legislations laying down concrete measures in emergency for the judiciary to follow during pandemic were far more efficient to lay down the framework of a future online

¹⁵ Supreme Court of Singapore: [Singapore Courts \(judiciary.gov.sg\)](https://www.judiciary.gov.sg) (Assessed 12-09-2023)

¹⁶ COVID-19 (Temporary Measures) Act, 2020, § 28, No. 13, Acts of Parliament, 2020 (Singapore).

¹⁷ China People's Daily Online: [Smart courts in China provide efficient, convenient judicial services online - People's Daily Online](#) (Assessed 12-09-2023)

court even though they were made on an ad-hoc basis, unlike India where the process wasn't streamlined. Thus, a legislative framework is needed to regulate the online courts as efficiency of the platform doesn't really guarantee justice.

- Court-annexed ODR like in UK, has great potential to resolve COVID-19 related disputes efficiently without burdening traditional courts and same should be adopted in India.

Considering this the next section assesses the existing framework planning and implementing e-courts project and the technological capabilities achieved under it. After that it goes on to recommend the need of a 'suitable implementing body' and implementation framework for the same.

EVALUATION OF THE E-COURTS PROJECT: A CRITICAL ANALYSIS

4.1. Background

The project, starting in 2005 transformed the judicial landscape of India with many plaintiffcentric services like finding out the case status, electronic cause lists, and access to daily orders in PDFs and the creation of the National Judicial Data Grid (NJDG).¹⁸

Phase I was a centralized, preparatory automation stage, with focus on deploying adequate hardware and software, internet and connecting facilities in lower judiciary.¹⁹ While in phase II High Courts were given flexibility in implementation and were responsible for procurement and dealing with vendors.²⁰ Other work included the beginning of a unified Case Information System (CIS) and centralised filing centres, video conferencing (VC) facilities, modernization of judicial academies, e-filing, e-payment, and use of mobile applications fostering greater connectivity and citizen centric services.²¹ Virtual courts were started on experimental basis by this phase in high courts, to adjudicate traffic and motor vehicle matters, with one judge nominated for the same by high courts.²² The phase was labelled as ‘Establishing Systems Phase.’²⁸ The third phase is yet to commence with the cabinet allocating it the budget of 7210 crores.²³ Phase III is being called the ‘Ecosystems Phase’ and envisions the implementation of digital courts, a court live audio-visual streaming system (CLASS), and institutional mechanisms for the implementation of digital judiciary with open, interoperable digital infrastructure allowing for unified, evolutionary systems.³⁰ However, the following two weaknesses of the project are glaring:

¹⁸ E-Committee, Supreme Court of India: <https://cdnbbsr.s3waas.gov.in/s388ef51f0bf911e452e8dbb1d807a81ab/uploads/2023/04/2023042088.pdf> (Accessed 12-09-2023)

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² *Id.*

²⁸ *Id.*

²³ Money Control: <https://www.moneycontrol.com/news/trends/legal/cabinet-approves-phase-3-of-e-courtsproject-alocates-rs-7210-crore-11359461.html> (Accessed 12-09-2023) ³⁰ *Supra note 23*

4.2. Limited Adoption

The main issue with the project is its limited adoption and wide scope. As per a report by the E-Committee in 2019, only 600 cases were filed through the e-filing module in the High Courts of Punjab and Haryana,²⁴ while 2 lakh cases were registered traditionally in the same court in 2019.²⁵ This can be attributed to lack of digital literacy to people and unreliable interfaces and internet connectivity issues, lack of awareness and education regarding the scheme and general scepticism about online dispute redressal. The aspects have not been included in institutional framework and vision documents of the project and are thus not having the desired impact on the overall system. Experts have said that long-term behavioural change is needed to ensure adoption of technology in judiciary.²⁶ Thus, Behavioural preference for traditional litigation has been the primary reason for Indian judiciary falling on its face in the pandemic. In the lockdown, even when primary digital systems were readily at disposal because of the ongoing phase II of the project, the functioning of most district courts was suspended during lockdown and where courts were functioning, hearings were restricted to grave matters only.²⁷

4.3. Lacunae in Implementation, Budgeting and Planning

Phase I of the project was approved in 2007 with an estimated budget of Rs. 442 crores. While it was originally intended to be completed within two years, the project incurred cost and time overruns. Consequently, budget was revised to Rs. 935 crores, which is more than double the original. Studies have pointed out; imprecise budgeting has been one of the deficiencies of the project.^{28,29}

²⁴ *id*

²⁵ *id*

²⁶ See for Example: Allahabad High Court (Order Dated 25.03.2020): [event_7390_25-03-2020.pdf](#) ([allahabadhighcourt.in](#)) (Accessed 12-09-2023)

²⁷ *Supra note 9*

²⁸ Vidhi Centre For Legal Policy: https://vidhilegalpolicy.in/wpcontent/uploads/2019/05/eCourtsinIndia_Vidhi.pdf (Accessed 12-09-2023)

²⁹ th Report on Demand for Grants (2020-2021) of the Ministry of Law and Justice (2020): https://rajyasabha.nic.in/rsnew/Committee_site/Committee_File/ReportFile/18/125/101_2020_3_13.pdf (Accessed 12-09-2023)

The timelines originally contemplated under the project were revised drastically; Phase I took 8 years to complete. The total cost of Phase I was Rs. 639.144 crores, which indicates underutilisation compared to the approved amount, phase II had a budget of Rs 1670 crores of which 955.82 crores have been released out of which only Rs 716.42 crores has been utilised.³⁶ Thus

the project is prone to time and budgetary miscalculations, reflecting its poor administration overall. Budgeting and planning have been the weakest point of the judiciary in India. While they demand more autonomy financially in the project, instances like these, manifest into largescale delay and pendency on their side of the bargain, leaving the government reluctant to do so.

4.4. Administration and Board of the Project

The E Committee is the executory body of the project comprising the Chief Justice, Judge Incharge Four Regular Members for Processes, Project Management, Human Resources and Systems³⁰ Invitee Members (Solicitor general, HC judges, senior advocates etc.).³¹ However, its informed and regulated by the justice department and the NIC and therefore there is a constant tussle and debate between the two entities.³² Thus, the following shortfalls emerge:

- Between the Government and the Judiciary, there is no room for experts in the fields of public behaviour, education and other stakeholders that are needed to make the body holistic.
- Lack of body whose fundamental objective is to think and cater to the evolving needs of the judiciary and people. The judge-centered composition reflects the ideology of dispute resolution and not primarily modernization of the institution.

³⁰ Members Processes, Project Management, Human Resources are judicial officers called on deputation, generally of the rank of a District and Sessions Judge. Member Systems is an officer on deputation or on post retirement assignment of the rank of Deputy Director General, NIC (or equivalent)

³¹ Supreme Court of India: https://main.sci.gov.in/pdf/ecommittee/PolicyActionPlanDocument-PhaseIIapproved-08012014-indexed_Sign.pdf (Accessed 12-09-2023)

³² *Id.*

This is hindering the process of virtualization of Indian judiciary and thus the following section puts forth the framework needed for the same, with the principles of the same enunciated and elaborated through judicial pronouncements. The section also envisions improvement mechanisms for implementing phase III of the project in brief with learnings from the above analysis.

RECOMMENDATIONS AND CONCLUSION

5.1. Statutory Body

In order to virtualize courts as seen above, a regulatory body under statute is needed, in other countries this has been the case, in UK, Her Majesty's Courts and Tribunal Services (HMCTS) is steered by the office of Chief Executive and the Board to deliver objectives of the programme. It receives inputs from a range of stakeholders and partners.³³

Thus, a steering committee should be established in the short run to be replaced by a statutory body in the long run to implement virtual courts in India. The committee must be a mix of public-spirited people, experts, public behaviour analysts, educators, representatives of legal services authorities (to promote digital legal education) and judges to make a case for implementation and full use of virtual legal platforms.

5.2. Principles of the Framework

The Supreme Court via guidelines has authorized High Courts to adopt measures required to ensure functioning of their systems, by video conferencing technologies. However, this leads to uncertainty and leads to fulfilment of immediate needs only, while the larger matter remains unaddressed.³⁴ Thus, the following set of principles are proposed to regulate any inclusion of

³³ *Supra note 6*

³⁴ In Re: Guidelines for Court Functioning Through Video Conferencing During Covid-19 Pandemic, *Suo Motu Writ (Civil) No.5/2020*.

technology into the judiciary, they are backed by judicial pronouncements and should act as foundations of a safe and potent virtual court:

- **Speedy Justice:** In *Hussainara Khatoon*³⁵ it was held that an individual had a fundamental right to a speedy trial under Article 21. Thus, in *All India Judges' Association*³⁶, it was that there is a constitutional obligation for speedy trial and disposal, the framework is in view of the same.
- **Equal Access:** It is essential to translate the rights to equality, inclusion and nondiscrimination, into the virtual and digital world as well.⁴⁴ The access to internet, digital

³⁵ *Hussainara Khatoon v Home Secretary, State of Bihar* (1980) 1 SCC 98.

³⁶ *All India Judges' Association v Union of India* (2002) 4 SCC 247. ⁴⁴ *Navtej Singh Johar v Union of India* AIR 2018 SC 4321.

education and training to all especially the disabled, preferably by DLSAs is required to make the institution familiar.

- **Fairness and Due Process:** Efficiency can't be placed above due process that has been read into article 21.³⁷ Due process provides individuals immunity against arbitrary search of their data without reasonable warrant. Therefore the access of courts to communications and documents in virtual world needs regulation by due process.
- **Principles of Natural Justice:** One of the key principles of natural justice is that all parties should be given fair and equal hearing. Audio delays, bias in cases of physical and virtually appearing parties and virtual witnesses, easy virtual access to judges causing malfeasance are some points that need to be kept hinged in any virtual setting.
- **Open Justice and Transparent Algorithm:** Court is a public place and thus would follow the open courts principle as highlighted in UK's Covid legislations too. In Swapnil Tripathi case³⁸ the court held that the live streaming of court proceedings is an extension of the 'open court' principle. While maintaining the limitations of confidentiality, the courts have to tread a path of caution in the virtual setting.
- **Privacy and Data Protection:** Large database of information would follow any technological endeavour by the judiciary and thus, data protection needs to be ensured by not only creating an exclusive judicial platform for the hearings to take place as highlighted by Biggs LJ. in his report as platforms like zoom are managed by datahungry tech companies. Thus, the courts need to be transparent about data use and storage under coherent guidelines to safeguard the fundamental right to privacy under article 21 as said by the court in 2017.³⁹

The above principles along with the learnings from the international perspective of virtual court debate would allow the civil jurisprudence in India to be revitalized and would pave the way for the future adoption of virtual court mechanism with comparative ease in India to foster a fast and efficient judicial system in the world's largest democracy.

³⁷ Maneka Gandhi v UOI 1978 AIR 597.

³⁸ Swapnil Tripathi v Supreme Court of India (2018) 10 SCC 639.

³⁹ Justice K.S. Puttaswamy (Retd.) v Union of India (2017) 10 SCC 1.

BIBLIOGRAPHY

Case Laws:

- In Re: Guidelines for Court Functioning Through Video Conferencing During Covid19 Pandemic, Suo Motu Writ (Civil) No.5/2020.
- Hussainara Khatoon v Home Secretary, State of Bihar (1980) 1 SCC 98.
- All India Judges' Association v Union of India (2002) 4 SCC 247.
- Navtej Singh Johar v Union of India AIR 2018 SC 4321.
- Maneka Gandhi v UOI 1978 AIR 597.
- Swapnil Tripathi v Supreme Court of India (2018) 10 SCC 639.
- Justice K.S. Puttaswamy (Retd.) v Union of India (2017) 10 SCC 1.

Official Reports and Orders:

- 101th Report on Demand for Grants (2020-2021) of the Ministry of Law and Justice (2020):
https://rajyasabha.nic.in/rsnew/Committee_site/Committee_File/ReportFile/18/125/10_1_2020_3_13.pdf (Accessed 12-09-2023)
- Supreme Court of India:
https://main.sci.gov.in/pdf/ecommittee/PolicyActionPlanDocument-PhaseIIapproved-08012014-indexed_Sign.pdf (Accessed 12-09-2023)
- Vidhi Centre For Legal Policy:
https://vidhilegalpolicy.in/wpcontent/uploads/2019/05/eCourtsinIndia_Vidhi.pdf
(Accessed 12-09-2023)
- Allahabad High Court (Order Dated 25.03.2020): [event_7390_25-03-2020.pdf](https://allahabadhighcourt.in/event_7390_25-03-2020.pdf)
(allahabadhighcourt.in) (Accessed 12-09-2023)

- E-Committee, Supreme Court of India:
<https://cdnbbsr.s3waas.gov.in/s388ef51f0bf911e452e8dbb1d807a81ab/uploads/2023/04/2023042088.pdf> (Accessed 12-09-2023)
- HM Courts and Judiciary (UK): [Review of court arrangements due to COVID-19, message from the Lord Chief Justice - Courts and Tribunals Judiciary](#) (Accessed 12-09-2023)
- Supreme Court of Singapore: [Singapore Courts \(judiciary.gov.sg\)](#) (Assessed 12-09-2023)
- Online Dispute Resolution Advisory Group: [Online Dispute Resolution \(judiciary.uk\)](#) (Accessed 12-09-2023)
- Her Majesty's Courts and Tribunals Service: <https://www.gov.uk/guidance/the-hmctsreform-programme> (Accessed 12-09-2023)
- Digital Government: Building a 21st Century Platform to Better Serve the American People: [Digital Government: Building a 21st Century Platform to Better Serve the American People \(archives.gov\)](#) (Accessed 12-09-2023)
- World Population Review: [Internet Users by Country 2023 \(worldpopulationreview.com\)](#) (Accessed 12-09-2023)
- Her Majesty's Court and Tribunals Service, HM Courts and Tribunals Service Reform Programme Framework Document: [HM Courts and Tribunals Service: framework document - GOV.UK \(www.gov.uk\)](#) (Accessed 12-09-2023)
- BIGGS LJ. CIVIL COURTS STRUCTURE REVIEW: FINAL REPORT 58-59 (Judiciary of England and Wales 2016).
- United Nations Commission on International Trade Law: [v1700382_english_technical_notes_on_odr.pdf \(un.org\)](#) (Assessed 12-09-2023)

Statutes:

- COVID-19 (Temporary Measures) Act, 2020, § 28, No. 13, Acts of Parliament, 2020 (Singapore).
- Coronavirus Act, 2020, § 55-56, No. 7, Acts of Parliament, 2020 (United Kingdom).

News Reports:

- Money Control: <https://www.moneycontrol.com/news/trends/legal/cabinet-approvesphase-3-of-e-courts-project-allocates-rs-7210-crore-11359461.html> (Accessed 12-09-2023)
- China People's Daily Online: [Smart courts in China provide efficient, convenient judicial services online - People's Daily Online](#) (Assessed 12-09-2023)
- The Print: ['AI can improve judicial system's efficiency' — full text of CJI Bobde's Constitution Day speech \(theprint.in\)](#) (Accessed 12-09-2023)

Articles:

- Maureen K. Ohlhausen & Alexander P. Okuliar, *Competition, Consumer Protection, and the Right [Approach] To Privacy*, 80 ANTITRUST L. J. 121, 123 (2015).
- Colin Rule, *Designing a Global Online Dispute Resolution System: Lessons Learned from eBay*, 13 U. St. Thomas L.J. 354 (2017).