

“Alternative Dispute Resolution (ADR): Concept, Development, Methods, and Role in India”

Karishma Singh

Research Scholar, Oriental University, Indore

Dr. Jyoti Garg

Associate Professor, Faculty of Law, Oriental University, Indore

“In the last 25 years, throughout the common law world, traditional arrangements for the delivery of civil justice have come under scrutiny, challenge and change. The search for alternative processes to litigation in the resolution of disputes gained momentum and a great debate has ensued.” - David Simmons¹

Abstract:-

As the judicial system continues to be burdened with increasing litigation, the traditional judicial system is unable to resolve disputes quickly and expeditiously. Years-long court backlogs, high costs, and difficulties in accessing justice challenge the fundamental goal of achieving justice for the common citizen. In this context, Alternative Dispute Resolution (ADR) emerges as the best solution. It is a method that resolves disputes through mutual negotiation and compromise, without resorting to lengthy legal processes. The primary goal of ADR is to resolve disputes "outside the court" in a quick, cost-effective, and amicable manner, ensuring access to justice and the concept of social justice. Mediation is a form of dispute resolution. If two or more parties have a dispute that they cannot resolve on their own, instead of going to court, they can appoint a third party as an arbitrator to resolve the dispute. They can appoint a panel of arbitrators to act as an arbitral tribunal.

Considered a fast-track system for delivering justice, Alternative Dispute Resolution (ADR) is one of the primary alternatives to the age-old court system. With the primary objective of reducing the overburdened Indian judiciary, the Arbitration and Conciliation Act, 1996, was introduced. This introduction created space for arbitration and conciliation, which were seen as the primary methods of dispute resolution. Along with these, negotiation and mediation, although not governed by laws, are also considered ADR methods. The ADR mechanism can be seen as a result of the desire to resolve disputes amicably and in a shorter time with greater efficiency, and it is clearly enshrined in Articles 39A and 21 of the Indian Constitution that India, being a welfare state, has the provision of free legal aid and speedy and effective justice to all its citizens. Amidst this effective alternative to the court system, one thing that needs to be known is the challenges that surround this mechanism. With every new introduction, there are a series of drawbacks that can lead to unwanted difficulties. This article will delve into the origins, basic concepts, types, advantages, disadvantages, drawbacks, and solutions of alternative dispute resolution.

Keywords: Alternative Dispute Resolution (ADR), History and Development, the Indian system, Major Challenges, Resolutions to Obstacles

Introduction:

For a complete transformation of the judicial system in India, it is also necessary to strengthen the current judicial system and enrich it with diverse mechanisms. Many eminent jurists have highlighted this. The principle of Panch Parmeshwar, which incorporates the principle of collective consensus in dispute resolution, should be promoted to promote Alternative Dispute Resolution (ADR) mechanisms. The basic concept: "Alternative Dispute Resolution (ADR)" literally means "dispute resolution through alternative means," that is, resolution of disputes through alternative means without litigation or going to court. This process encompasses all means that resolve a problem through mutual understanding, compromise, and consensus among the parties, instead of traditional court decisions. In this context, we can consider the concept of

¹ Albert Fiadjoe(former Chief Justice Supreme Court of Barbados), *Alternative Dispute Resolution: A Developing World Perspective* (Cavendish Publishing Ltd. 2004)

'multi-door court'² [1], which was first proposed by Frank Sander, who stressed the need to provide various avenues to citizens to resolve their disputes in an amicable and informal manner.

The basic concept of ADR is processes for resolving disputes outside the courts, providing a speedy, cost-effective, and collaborative alternative where parties work together to reach the best solution. The constitutional basis for ADR in India lies in Article 39A³, which ensures equal justice and free legal aid, and is recognized under Section 89 of the Criminal Procedure Code, 1908. Arbitration, mediation, conciliation, negotiation, and Lok Adalat are legally recognized methods of dispute resolution. The Arbitration and Conciliation Act, 1996 (amended 2021), allows for binding settlement of civil and compoundable offenses and establishes the Indian Arbitration Council with a 180-day limit for dispute resolution to ensure speedy justice.

The term "justice"⁴ in the Preamble to the Constitution of India refers to the political, social, and economic aspects that are secured through the Fundamental Rights and the Directive Principles of State Policy. This constitutional promise of ensuring social, economic, and political justice for all citizens, enshrined in the Preamble to the Constitution of India, is realized when all three organs of the state—the legislature, the executive, and the judiciary—work together to provide equal access to justice to the poor⁵.

The State shall ensure that the operation of the legal system promotes justice on a basis of equal opportunity, and, in particular, shall provide free legal aid through suitable legislation or schemes or in any other way, so that no citizen is denied the opportunity of access to justice by reason of economic or other disabilities.

Objectives:

- I. To explain the concept of Alternative Dispute Resolution (ADR) and understand its theoretical foundation.
- II. To study the historical development of ADR, especially in the Indian context.
- III. To conduct a comparative analysis of the major ADR methods—mediation, conciliation, arbitration, and Lok Adalat.
- IV. To evaluate the role and utility of ADR in the context of the increasing burden on courts in India.
- V. To critically examine the benefits and limitations of ADR.
- VI. To analyze how ADR helps provide speedy, accessible, and cost-effective justice.
- VII. To offer suggestions for reforms to make ADR more effective in the Indian legal system.

Scope:

The scope of this study is limited to the concept, nature, and methodology of Alternative Dispute Resolution (ADR), with particular attention to its development, legal framework, and practical application in India. The study provides a general analysis of the major ADR methods—such as mediation, conciliation, arbitration, and Lok Adalat—and examines how ADR can help resolve civil, family, commercial, and labor disputes. It also attempts to understand the role of ADR in the Indian judicial system in the context of the increasing burden on courts and the need for speedy and accessible justice.

Methodology:

This research is a doctrinal and library-based study that provides a simple and analytical examination of the concept, development, methods, and role of Alternative Dispute Resolution (ADR) in India. Information for this research was primarily obtained from legal texts, research papers, journals, statutes, court judgments, and reliable online legal sources.

² 'The concept of multi-door court establishes courts not merely as adjudicating forums but as holistic and multi-faceted dispute resolution centers.'

³ 'Article-39A:-Equal justice and free legal aid.—The State shall secure that the operation of the legal system promotes justice, on a basis of equal opportunity, and shall, in particular, provide free legal aid, by suitable legislation or schemes or in any other way, to ensure that opportunities for securing justice are not denied to any citizen by reason of economic or other disabilities.'

⁴ The Indian constitution 1950.

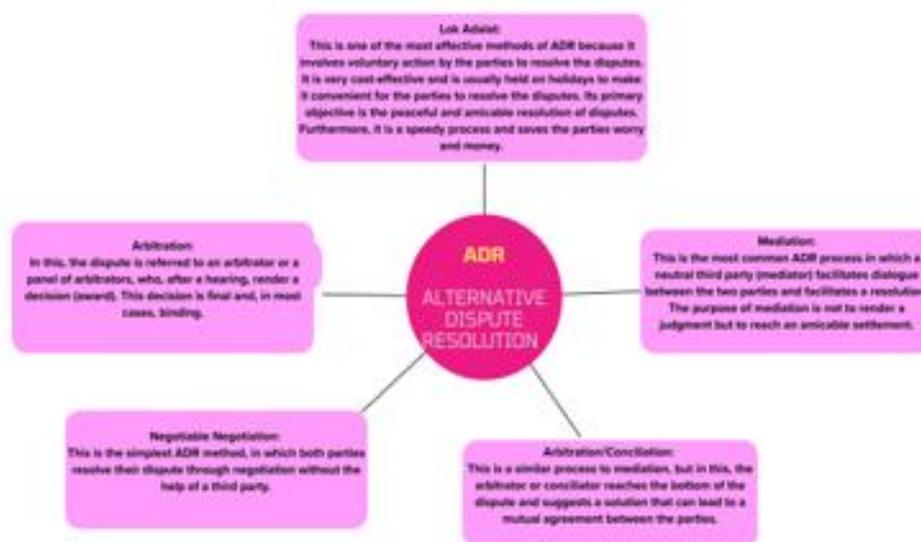
⁵ Amrita Singh, Nachiketa Mittal: Discourse on Access to Justice in India and Rise of Gram Nyayalayas at the Grass-Root Issue - RLR (2016) Volume III Issue II

The study is descriptive and qualitative in nature, comparing and analyzing available data. No field surveys or statistical data were used.

History and Development of ADR

The history of ADR predates the principles of modern justice. In ancient India, disputes were resolved through 'Panchas', Gram Panchayats, and social conferences. In the times of kings, disputes were resolved by judges, but self-governance within society also resolved disputes.

Lok Adalats governed by the Legal Services Authorities Act, 1987, were first held in Gujarat in 1999. ADR in India has its roots in ancient times, when the Panchayat system was an important method of resolving disputes. In modern India, ADR began to develop in the 1980s, when courts began to be overburdened. Its decisions are final, and there is no appeal because they resolve disputes before formal litigation, although their powers are not absolute.



The Need for ADR

Court Backlog: Courts are grappling with a large backlog of cases, making justice a lengthy process. ADR is crucial to mitigate this.

Time and Cost Saving: The ADR process is less time-consuming and more economically cost-effective than traditional litigation.

Protecting Social Peace and Relationships: The aim of ADR is not only to resolve disputes but also to preserve relationships between parties—a goal often not achieved in criminal and civil litigation.

The various provisions that talk about mediation are:

- Section 89⁶ of the civil procedure code,

⁶CPC sec. 89. Settlement of disputes outside the Court.—(1) Where it appears to the Court that there exist elements of a settlement which may be acceptable to the parties, the Court shall formulate the terms of settlement and give them to the parties for their observations and after receiving the observations of the parties, the Court may reformulate the terms of a possible settlement and refer the same for:— (a) arbitration; (b) conciliation; (c) judicial settlement including settlement through Lok Adalat; or (d) mediation. (2) Where a dispute has been referred— (a) for arbitration or conciliation, the provisions of the Arbitration and Conciliation Act, 1996 (26 of 1996) shall apply as if the proceedings for arbitration or conciliation were referred for settlement under the provisions of that Act; (b) to Lok Adalat, the Court shall refer the same to the Lok Adalat in accordance with the provisions of sub-section (1) of section 20 of the Legal Services Authority Act, 1987 (39 of 1987) and all other provisions of that Act shall apply in respect of the dispute so referred to the Lok Adalat; (c) for judicial settlement, the Court shall refer the same to a suitable institution or person and such institution or person shall be deemed to be a Lok Adalat and all the provisions of the Legal Services Authority Act, 1987 (39 of 1987)

- Sections 442, 446, and 449 of the Companies Act 2019⁷.
- Sections 37⁸, 38, 39, and 40 of the Consumer Protection Act 2019.
- Sections 30⁹ and 31 of the Arbitration and Conciliation Act, 1996.
- Section 12¹⁰ of the Commercial Courts Act 2015. Etc.

shall apply as if the dispute were referred to a Lok Adalat under the provisions of that Act; (d) for mediation, the Court shall effect a compromise between the parties and shall follow such procedure as may be prescribed.]

⁷ 442. Mediation and Conciliation Panel.—(1) The Central Government shall maintain a panel of experts to be called as the Mediation and Conciliation Panel consisting of such number of experts having such qualifications as may be prescribed for mediation between the parties during the pendency of any proceedings before the Central Government or the Tribunal or the Appellate Tribunal under this Act. (2) Any of the parties to the proceedings may, at any time during the proceedings before the Central Government or the Tribunal or the Appellate Tribunal, apply to the Central Government or the Tribunal or the Appellate Tribunal, as the case may be, in such form along with such fees as may be prescribed, for referring the matter pertaining to such proceedings to the Mediation and Conciliation Panel and the Central Government or the Tribunal or the Appellate Tribunal, as the case may be, shall appoint one or more experts from the panel referred to in sub-section (1). (3) The Central Government or the Tribunal or the Appellate Tribunal before which any proceeding is pending may, suo motu, refer any matter pertaining to such proceeding to such number of experts from the Mediation and Conciliation Panel as the Central Government or the Tribunal or the Appellate Tribunal, as the case may be, deems fit. (4) The fee and other terms and conditions of experts of the Mediation and Conciliation Panel shall be such as may be prescribed. (5) The Mediation and Conciliation Panel shall follow such procedure as may be prescribed and dispose of the matter referred to it within a period of three months from the date of such reference and forward its recommendations to the Central Government or the Tribunal or the Appellate Tribunal, as the case may be. (6) Any party aggrieved by the recommendation of the Mediation and Conciliation Panel may file objections to the Central Government or the Tribunal or the Appellate Tribunal, as the case may be.

⁸ 37. Reference to mediation.—(1) At the first hearing of the complaint after its admission, or at any later stage, if it appears to the District Commission that there exists elements of a settlement which may be acceptable to the parties, except in such cases as may be prescribed, it may direct the parties to give in writing, within five days, consent to have their dispute settled by mediation in accordance with the provisions of Chapter V. (2) Where the parties agree for settlement by mediation and give their consent in writing, the District Commission shall, within five days of receipt of such consent, refer the matter for mediation, and in such case, the provisions of Chapter V, relating to mediation, shall apply.

⁹ 30. Settlement.—(1) It is not incompatible with an arbitration agreement for an arbitral tribunal to encourage settlement of the dispute and, with the agreement of the parties, the arbitral tribunal may use mediation, conciliation or other procedures at any time during the arbitral proceedings to encourage settlement. (2) If, during arbitral proceedings, the parties settle the dispute, the arbitral tribunal shall terminate the proceedings and, if requested by the parties and not objected to by the arbitral tribunal, record the settlement in the form of an arbitral award on agreed terms. (3) An arbitral award on agreed terms shall be made in accordance with section 31 and shall state that it is an arbitral award. (4) An arbitral award on agreed terms shall have the same status and effect as any other arbitral award on the substance of the dispute.

¹⁰ 12. Determination of Specified Value.—(1) The Specified Value of the subject-matter of the commercial dispute in a suit, appeal or application shall be determined in the following manner:— (a) where the relief sought in a suit or application is for recovery of money, the money sought to be recovered in the suit or application inclusive of interest, if any, computed up to the date of filing of the suit or application, as the case may be, shall be taken into account for determining such Specified Value; (b) where the relief sought in a suit, appeal or application relates to movable property or to a right therein, the market value of the movable property as on the date of filing of the suit, appeal or application, as the case may be, shall be taken into account for determining such Specified Value; (c) where the relief sought in a suit, appeal or application relates to immovable property or to a right therein, the market value of the immovable property, as on the date of filing of the suit, appeal or application, as the case may be, shall be taken into account for determining Specified Value; 1 [and] (d) where the relief sought in a suit, appeal or application relates to any other intangible right, the market value of the said rights as estimated by the plaintiff shall be taken into account for determining Specified Value; 2*** 3* * * * * (2) The aggregate value of the claim and counterclaim, if any as set out in the statement of claim

ADR primarily focuses on the following:

1. Mediation: This is the most common ADR process in which a neutral third party (mediator) facilitates dialogue between the two parties and facilitates a resolution. The purpose of mediation is not to render a judgment but to reach an amicable settlement.
2. Arbitration/Conciliation: This is a similar process to mediation, but in this, the arbitrator or conciliator reaches the bottom of the dispute and suggests a solution that can lead to a mutual agreement between the parties.
3. Negotiable Negotiation: This is the simplest ADR method, in which both parties resolve their dispute through negotiation without the help of a third party.
4. Arbitration: In this, the dispute is referred to an arbitrator or a panel of arbitrators, who, after a hearing, render a decision (award). This decision is final and, in most cases, binding.

ADR has several important advantages:	Limitations of ADR
<p>1. Low Cost: ADR does not involve high court fees like litigation, significantly reducing costs.</p> <p>2. Time Saving: The ADR process is simple and quick, allowing for faster resolution of disputes.</p> <p>3. Confidentiality: ADR is both transparent and practically confidential—it protects the sovereignty and privacy of the parties.</p> <p>4. Relationship Protection: The ADR process emphasizes mutual cooperation, ensuring that family or professional relationships are not harmed.</p> <p>5. Control and Decision Making: Parties have both the opportunity and the support to control their mutual problem-solving process and find solutions.</p>	<p>1. Lack of legal precedents - ADR decisions do not serve as legal precedents for courts to reference and guide.</p> <p>2. Power imbalance - Sometimes one party can exert mental and physical pressure on the other, which can compromise impartiality.</p> <p>3. Judicial review is limited - Arbitration or conciliation decisions cannot be comprehensively reviewed by the courts.</p>

Finality of Judgment as an Attribute of Judicial Power

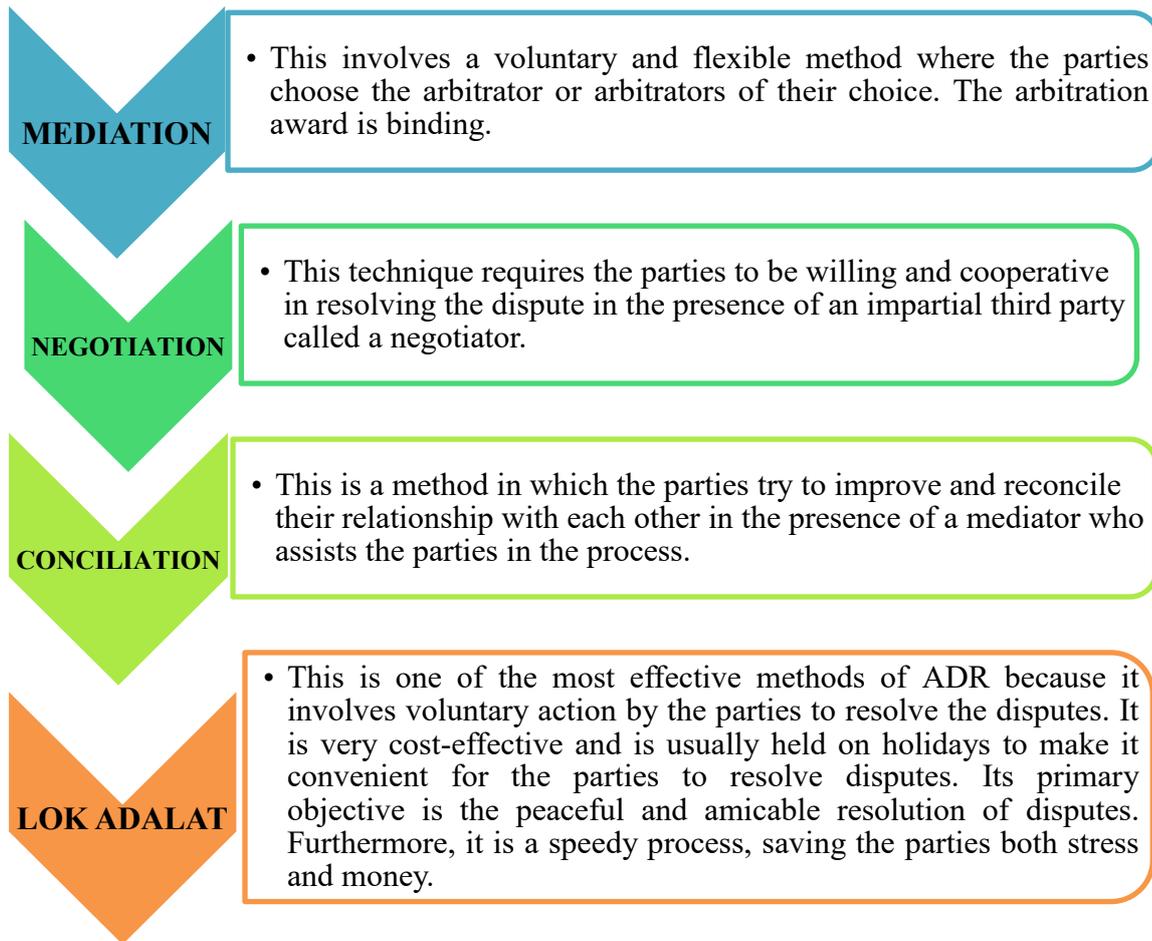
The fundamental principles of justice administration include natural justice, the right to a fair trial, the right to judicial review, and transparency. The principle of finality and speedy justice means that a decision reached through mediation or conciliation is final and binding and cannot be challenged in court, except under certain limited circumstances. This principle somewhat contradicts the principles of justice administration in courts, as it limits the right to judicial review.

The ineffectiveness of the judicial system in India is due to the time-consuming, laborious, and expensive process of pending cases and proceedings in Indian courts. Furthermore, there is a dearth of quality legal professionals due to the severe lack of institutions capable of training a sufficient number of skilled lawyers. Furthermore, the inherent

and the counterclaim, if any, in an arbitration of a commercial dispute shall be the basis for determining whether such arbitration is subject to the jurisdiction of a Commercial Division, Commercial Appellate Division or Commercial Court, as the case may be. (3) No appeal or civil revision application under section 115 of the Code of Civil Procedure, 1908 (5 of 1908), as the case may be, shall lie from an order of a Commercial Division or Commercial Court finding that it has jurisdiction to hear a commercial dispute under this Act.

shortcomings of the legal aid system in India force potential litigants to seek a select few established lawyers. The combination of these factors has forced a large segment of the general public to abandon some grievances and resolve their disputes only as a 'last resort.' The adversarial nature of legal proceedings, which is generally considered the only means of dispute resolution, and the insular behavior of lawyers who focus excessively on procedure are among the many causes of alienation among the people. Furthermore, the extremely high cost of obtaining civil justice and the complex functioning of the justice system, which are natural consequences of the adversarial mechanism, discourage people from going to the courts.

The Indian system recognizes five types of ADR methods:



Due to the large number of pending cases and the high judge-to-population ratio, settlements take decades. However, ADR resolves disputes in a much shorter time.

The court's final decision applies to both parties. One party always feels defeated. However, in ADR, both parties feel satisfied with the final award, and the relationship between the two parties is not strained.

ADR is less technical and procedural than the litigation process. ADR saves the parties the exertion that litigation entails.

Major Challenges in the ADR System in India

Despite its many advantages, the ADR system faces several challenges in its development in India. The following factors have virtually hindered the growth of ADR in India:

Lack of government support: As a developing country, India is experiencing uneven development. Some regions are more developed than others, and ADR is an area that receives limited government support.

Lack of infrastructure and reliable mediation institutions: Even after 27 years of the passage of the Arbitration and Conciliation Act, 1996, there are not enough ADR centers in India. This is primarily due to a lack of funding. Small towns and cities are deprived of such methods of dispute resolution. To access ADR, parties must travel from their localities to cities where such facilities are available. The purpose of ADR was to relieve parties of the worry about cost, but the lack of infrastructure defeats this purpose. This is one of the most significant obstacles to the growth of ADR in India.

Court scrutiny of mediation proceedings: Courts in India often interfere with mediation and ADR proceedings. Although courts do this to ensure fair justice for parties, it also hampers the autonomy of the ADR system and makes ADR less effective. One advantage of ADR was that parties were free to choose their own procedures and conduct, but excessive court interference has hampered this advantage.

Execution Proceedings: After an award is passed, parties must approach the courts again for execution. There is no other way to achieve execution in the ADR system. Now both parties are locked in the same litigation process, which ADR was supposed to bypass.

Lack of Professionally Skilled Lawyers: Due to the generalized theoretical system of education in India, there are very few skilled mediators, negotiators, and arbitrators. The lack of proper institutions for such skill development leads to a lack of skill development and awareness among students and lawyers. A large number of cases fail in ADR settlements due to unskilled professionals in the field.

Setting aside the award and appeal: Courts can set aside an arbitration award on certain grounds, and the dispute will then be decided by the courts themselves. This adds further complexity and delay to the adversarial process. Furthermore, the ADR process leaves a very narrow scope for appeal after the award. Parties have very few remedies.

Lack of Awareness: A large segment of our society lives in poor conditions, where earning a decent income is their primary focus. In such a situation, a lack of awareness about such mechanisms is expected. Lack of legal education in society is a major obstacle to the development of ADR in India.

Thought Process of the Parties: While the Arbitration and Conciliation Act was passed in 1996 and the courts have only recently focused on promoting the ADR system, it has not become a very popular method among Indian society. Furthermore, Indian society has more faith in the traditional judicial system than in the newly developed system of dispute resolution. While it is good to cherish the judicial system, it is equally important to accept new changes. Today, there are many instances where courts themselves refer parties to mediation instead of the lengthy court process.

Presence of an Influential Party: There is a possibility of pressure in cases where one party is more influential than the other. This is one of the major drawbacks of the ADR system. If the weaker party is negatively affected by the other party, it makes a mockery of the justice system and renders the ADR mechanism ineffective.

Inability to reach a compromise: If both parties are unwilling to resolve the dispute through mutual agreement, the ADR system fails, and the parties will have to return to the adversarial system after suffering the consequences of the ADR process. This will resolve the dispute. There is no certainty about the final award in ADR. It all depends on the will and conduct of the parties. Both parties must reach an agreement at every stage of the proceedings, such as the selection of the arbitrator or the law by which they will be governed. If the parties disagree, the case will return to court.

Other Factors

Increasing Costs: Due to the lack of skilled professionals in the field of ADR, many retired judges and senior lawyers are acting as mediators, negotiators, or arbitrators, charging exorbitant fees. This makes the ADR system expensive and inaccessible to economically weaker sections of society.

Ineligibility in Criminal Cases: Not all cases are suitable for the ADR process. Serious cases of heinous crimes and fraud, and certain issues of national and social importance, are not suitable for the ADR mechanism. While it is a positive thing that serious issues should not be resolved as mere disputes, it is a drawback of ADR that the system is ineffective in such cases.

Resolutions to Obstacles to the Growth of ADR

Minimum Court Intervention: Courts in India need to limit their interference in the ADR process to a reasonable level to make it more effective and protect the interests of justice.

Building Infrastructure: There is a pressing need to establish ADR tribunals in every district of the states to make it more accessible to every citizen of India.

Creating awareness in society: Legal education should be part of the school curriculum to make all citizens aware of their rights and remedies for legal issues.

Regulation of fees for ADR: The fees of mediators, negotiators, and conciliators should be regulated to make the ADR process accessible and affordable to every section of society.

Proper training programs for legal professionals: Legal professionals who wish to work in providing ADR solutions to parties should be provided with appropriate training.

Conclusion

In the modern era of globalization, AI, and technology, there is a need to find better methods of dispute resolution. Although the ADR system is relatively new, it has a significant role to play in the judicial system of the future. Developed countries already prefer such systems and methods for dispute resolution because time is of the essence in the modern era. Our society and government should also recognize this need and address the challenges and shortcomings of ADR in a positive and more effective manner. Alternative Dispute Resolution (ADR) has developed as a complement to the traditional judicial system, and today, in a country like India, the primary goal of ADR is to simplify, afford, and expedite access to justice. Its key methods, such as mediation, arbitration, conciliation, and negotiation, make justice more accessible. Effective use of ADR not only resolves disputes but also ensures social peace and preserves relationships. For this reason, ADR is considered a crucial step towards justice. The success of ADR depends on how many people are familiar with it, how effectively they adopt the process, and whether it delivers the justice they expect. Due to this, time and money have been saved in many sections, and brotherhood has also been created, but there are still challenges in its spread and awareness.

Bibliography:

Books

- I. Keshav, K. (2022). *Singhal's alternative dispute resolution: Arbitration, conciliation, negotiation and mediation*. Allahabad, India: Singhal Law Publications.
- II. Sridhar, M. (2017). *Alternative dispute resolution, negotiation and mediation*. New Delhi, India: LexisNexis.
- III. Subhashchandra, S., & Gupta, S. (2016). *Alternative dispute resolution system*. New Delhi, India: Himalaya Publishing House.
- IV. Paranjape, N. V. (2020). *Arbitration, conciliation and alternative dispute resolution*. Allahabad, India: Central Law Agency.
- V. Garg, S. (Ed.). (2018). *Alternative dispute resolution: The Indian perspective*. New Delhi, India: Oxford University Press.
- VI. Iyer, V. R. K. (1982). *Justice and the poor*. New Delhi, India: Indian Social Institute.
- VII. Lahoti, R. C. (2005). *Pursuit of justice*. Lucknow, India: Eastern Book Company.
- VIII. Venkatachaliah, M. N. (2004). *Alternative dispute resolution and access to justice*. New Delhi, India: Supreme Court of India.
- IX. Myneni, S. R. (2024). *Alternate dispute resolution: Arbitration and conciliation act, 1996 & mediation act, 2023* (6th ed.). Hyderabad, India: Asia Law House.

1. Christian Albanesi, *International Commercial Mediation* (2018).
2. Justice R.F. Nariman, *The Mediation Act 2023: A Commentary* (Oxford Univ. Press 2023).
3. A.K. Bhattacharya, *Mediation Act 2023: An Analytical Approach* (Commercial Law Publishers 2023).

Journal Articles & Research Papers

1. Michael Teitz, *Towards a Theory of Urban Public Facility Location*, 21 *Papers Reg'l Sci. Ass'n* 36 (1968).
2. R.C. Bhatia, *The Mediation Act 2023: A Paradigm Shift in Dispute Resolution*, *J. Indian L. Inst.* (2023).
3. S.S. Singh, *An Analysis of the Mediation Act 2023*, *Nat'l L. Sch. India Rev.* (2023).
4. A.K. Jain, *Mediation Act 2023: Challenges and Opportunities*, *Indian J. Arb. L.* (2023).
5. P. Kumar, *The Mediation Act 2023: A Comparative Study*, *Int'l J. Alternative Disp. Resol.* (2023).

Online Articles

1. *The Mediation Act 2023: Understanding the Key Features*, Mondaq (2023), <https://www.mondaq.com>.
2. *Mediation Act 2023: Easing Judiciary Workload*, Drishti IAS (2023), <https://www.drishtiias.com>.
3. *Understanding Mediation*, Legal Service India (2023), <https://www.legalserviceindia.com>.
4. *Analyzing the Impact of the Mediation Act 2023*, The Legal Quorum (2023), <https://www.legalquorum.com>.
5. *International Journal of Law, Management, and Humanities*, IJLMH (2023), <https://www.ijlmh.com>.

Online Resources

1. Mediate.com, *Mediation Act 2023 (Articles and Analysis)*, <https://www.mediate.com>.
2. Int'l Mediation Inst., *Mediation Act 2023 (News and Updates)*, <https://www.imimmediation.org>.
3. Indian Mediation Centre, *Mediation Act 2023 (Resources and Guidelines)*, <https://imc.gov.in>.
4. Law Ministry, Gov't of India, *Mediation Act 2023 (Official Notifications and Circulars)*, <https://lawmin.gov.in>.

Journals

1. *Indian Journal of Arbitration Law*.
2. *National Law School of India Review*.
3. *Journal of Indian Law Institute*.
4. *International Journal of Alternative Dispute Resolution*.

Websites

1. Indian Mediation Centre, <https://imc.gov.in>.
2. Mediate.com, <https://www.mediate.com>.
3. International Mediation Institute, <https://www.imi-mediation.org>.
4. Law Ministry, Government of India, <https://lawmin.gov.in>.