

REGULATION AND APPLICATION OF FAIR USE DOCTRINE ON THE YOUTUBE PLATFORM: A COMPARATIVE STUDY OF INDONESIAN AND UNITED STATES LAWS

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ABSTRACT

YouTube has implemented a fair use policy that allows YouTubers to reuse copyrighted material under certain categories and limitations without obtaining permission from the copyright owner. This policy aligns with the US Copyright Law of 1976, which provides clear parameters for fair use. However, Indonesia's copyright law takes a different approach to regulating videos uploaded to the YouTube platform and the fair use of copyrighted material, with less explicit restrictive parameters outlined in Articles 43 and 44 of Law No.28 of 2014. This research employs a normative legal method, utilizing library research and a comparative approach. The findings indicate that both countries adhere to the same international conventions and recognize fair use categories such as education, criticism, and knowledge in videos uploaded to the YouTube platform. Indonesia can learn from the United States' regulations, particularly the clearly defined parameters of limitation outlined in the US Copyright Act of 1976.

Keywords: *Fair use doctrine, YouTube, Indonesia, United States.*

INTRODUCTION

In the era of digitalization, information and communication have advanced concurrently with technological advancement. This has influenced the development of intellectual property rights law¹. One of the digital platforms present in the digital is YouTube. YouTube is an internet platform where videos are often submitted, watched, and shared.² In recent years, YouTube has implemented a fair use policy, allowing YouTubers to reuse copyrighted material without getting permission from the copyright owner under certain categories and limitations. The term "fair use" refers to a legal doctrine in United States law. YouTubers can make video content using video clips or other copyright material without getting permission from the copyright owner. Fair use is not the same as reuploading; when a reuploaded reuploads someone else's full video, fair use is cutting out someone else's video and making changes to the background song, narration, and certain video combination.³

¹ Law Journal and Mikayla Spencer, 'The University of Cincinnati Intellectual Property and Computer "Storytime: We're Being Sued" – Copyright Infringement and Fair Use in the Digital Era' 6, no. 1 (2021), p.2.

² Fitri Astari Asril, Rika Ratna Permata, and Tasya Safiranita Ramli, 'Perlindungan Hak Cipta Pada Platform Digital Kreatif YouTube' 10, no. 2 (2020), p.147.

³ <https://ogc.harvard.edu/pages/copyright-and-fair-use>. Accessed on 27 March 2023.

This policy follows U.S. law and differs from fair use inferior Indonesian copyright law. The United States has clearly defined parameters of limitation under the Copyright Act of 1976. Under Law 28 of 2014, Indonesia's definitions of restriction and fair use are less clear. Indonesia has less clearly defined limitations for the public in order to apply the fair use doctrine on the YouTube platform, which causes problems in society. Many people, especially YouTubers, don't understand regulation and the application of the fair use doctrine.⁴

YouTube does not determination included fair use or copyright infringement. Different countries have different rules. In the United States only the court can decide a video that upload on the YouTube platform included fair use or infringement copyright. While YouTube has a "Content ID" copyright protection that automatically detects copyright violations, it cannot determine fair use, which is a subjective , case by case determination that can only be made by the court.⁵

METHODS

The article uses normative method. It focuses on written legal norms, with main data from International laws, Indonesia and United Laws, and other related government regulations. This research uses library research includes laws, journals, and books related to analysis of regulation and application of fair use doctrine on the YouTube platform. This research also compares the Indonesia and United State copyright law regarding regulation and application of fair use doctrine under Indonesian Copyright Law and the United States Copyright Law. Data for this thesis consists of primary legal authorities, secondary legal authorities and tertiary legal authorities. The data technique used is qualitative analysis.

RESULTS AND DISCUSSION

A. Regulation and application of fair use doctrine on the YouTube platform

1) Indonesia Law

The term "fair use" refers to restrictions that allow other parties to reuse a work in different categories, with restrictions, without asking the copyright owner's permission. According to Article 1(1), of Law No. 28 of 2014, copyright is the exclusive right of the author, which automatically

⁴ Nathania Abigail Hanson, Rika Ratna Permata, and Tasya Safiranita Ramli, 'Protection of Video Copyright On The Platform In Fair Use Principle' 15, no. 2 (2016), p.108.

⁵ Gretchen L. Casey, 'Courts React', *Texas A&M Journal of Property Law* 5, no. 3 (2019), p.601–613.

arises based on the principle of declaration after the work is realized in material form, without any reduction in compliance with legal provisions.⁶

The regulation and application fair use based on copyright law Indonesia regulated in title IV of Copyright Restrictions of the Copyright Law No.28 of 2014, particularly article 43 and 44 suitable of regulation and application fair use on digital platform YouTube.⁷

The regulation of fair use doctrine on the YouTube platform not copyright infringement as long as the source is clearly, non-commercial or education purpose, including categories of fair use doctrine such as education, knowledge, research and development. As well as, the copyright owner is not detrimental and has no objection to its production and distribution⁸.

The Application of fair use doctrine in creating and publishing a content video on the YouTube less clearly parameter of limitation fair use because it does not provide specific regarding fair use on the YouTube platform. Law No. 28 of 2014 has just explained the application of fair use in written material, lecture or student needs references in order to written paper.⁹

Indonesia does not have comprehensive regulations to address fair use. There is no legal practice regarding fair uses on YouTube. If a fair use case arises on YouTube in the future, judges will have difficulty resolving it because the current regulations are unclear.¹⁰

2). United States Law

The regulation and application fair use on the YouTube platform based United States law Regulated in United States of copyright Act 1976 (US Copyright Act) particularly section 106 and 107 and The Digital Millenium Copyright Act (DMCA) 1998. The term "fair use" refers to a legal doctrine in United States law, allowing YouTubers to reuse copyrighted material without getting permission from the copyright owner under certain categories and limitations.¹¹

The regulation of fair use on the YouTube Platform based US law it found in Copyright Act 1976 particularly under section 106 and 107. Especially under section 106 allowing categories fair

⁶ Raden Radisa Difa Devina and Tatty Aryani Ramli, 'Bandung Conference Series: LawStudies Penggandaan Dan Pengumuman Karya Cipta E-Book Berdasarkan Prinsip Fair Use Ditinjau Dari Hukum Positif', p.457.

⁷ Margaritha Rami Ndoen, Hesti Monika, 'Prinsip Fair Use Terhadap Cover VersionLagu Dalam Perspektif Perlindungan Hak Cipta (Perbandingan Antara Undang-Undang Hak Cipta Indonesia Dengan Amerika Serikat)', *Paulus Law Journal* 1, no. 1 (2020), p.8.

⁸ Article 44 of the law of the republic of Indonesia Number 28 of 2014

⁹Hanson, Permata, and Ramli, 'Protection Of Video Copyright On The YouTubePlatform In Fair Use Principles

¹⁰ Ervizar et al., 'Analisis Penerapan Doktrin Penggunaan Wajar Pada Kebijakan HakCipta Youtube Sebagai Wujud Perlindungan Hukum'.¹¹ <https://ogc.harvard.edu/pages/copyright-and-fair-use>. Accessed on 27 march 2023.

use of a copyrighted work purpose for criticism, comment, news, reporting, teaching or education.. Section 107 specifies limitations based on four determining factors, including fair use or copyright infringement. In the United States, judges decide a case that includes fair use copyright infringement based on four factors outlined in Section 107, including: purpose and nature of use 107 (1), nature of the copyrighted work 107 (2), amount and importance of the portion used 107 (3), effect of potential harm on the market school.¹²

The application of fair use on the YouTube platform in the United States, YouTubers can application fair use in their videos as long as not outside parameter of limitation fair use regulation. This includes adding new content be differently character with original, being non-commercial. YouTube can copyright material for commentary, research, teaching or education , news, reporting, it has clearly parameter of limitation determining included fair use or infringement copyright. ¹³

As a product of the DMCA, Internet Service Providers (ISPs) limit their liability for fair use of YouTube videos. Content ID is a safe harbor that automatically detects copyright violations and cannot determine fair use, which is a subjective, case-by-case determination that can only be made by a court . Different countries have different regulations. In the United States, fair use can only be determined by a judge in court.¹⁴

B. Similarities and Differences of regulation and application fair use on the YouTube platform between Indonesia and United States Laws

1). Similarities

1. Agree the same treaties, including the 1886 Berne Convention, TRIPS especially article 13 and WIPO.¹⁵
2. Categories of fair use doctrine , allowing YouTuber or creator apply of fair use in video for the purpose of education , criticism, and knowledge (section 106 of us copyright 1976 and article 44 of copyright act 2014).¹⁶
3. Reason adopted of fair use doctrine regulation and application to balance the right of the

¹² U S Copyright, Copyright Law of the United States and Related Law Contained in Title 17 of United States Code, vol. 8.(2022). ¹³ Solomon, 'Fair Users or Content Abusers? The Automatic Flagging of Non-Infringing Videos by Content ID on

YouTube'¹⁴ Lauren B Patten, 'From Safe Harbor to Choppy Waters : YouTube , the Digital Millennium Copyright Act , and a Much Needed Change of Course From Safe Harbor to Choppy Waters : YouTube , the Digital Millennium Copyright Act , and a Much Needed Change of Course' 10, no. 1 (2020).

¹⁵. Rahmanissa, 'Konten Video Parodi Pada Platform Digital Dalam Perspektif Pelindungan Hak Cipta Dan Doktrin Fair Use' ¹⁶ *Ibid*.

copyright owner and the interests of society, especially for beginner YouTuber they have referensi to making video and modification with their video.¹⁷

4. creator or YouTuber allow make videos using other people's copyrighted material as long as it is not commercial and educational purposes..¹⁸ .
5. Allowing to modification their video with application of fair use doctrine¹⁹
6. Authority YouTube takedown video if they receive copyright infringement after the court decide that application fair use outside certain limitation and categories²⁰

2. Differences

NO	Differences	Indonesia Law	United States Law
1.	Regulation	Law Number 28 of 2014 (article 43 and 44).	Copyright act of 1976 (106 and 107) and DMCA.
2.	Parameter of Limitation to determination included fair use	It has a less clearly parameter of limitation	It has a clearly parameter of limitation in order to determination of fair use doctrine based section 107 copyright Act 1976.
3.	The regulation to mention clearly the sources	Must to mention clearly the sources of copyright original	US law must not to mention clearly the sources
4.	Amount and substantiality of fair use doctrine of the portion used in video.	not regulated	US regulated in 107 (3) of copyright act 1976
5.	The effect of application fair use against potential market in a video content work that	not regulated	US regulated in section 107 (4) of copyright act 1976.

¹⁷ Rani, 'Copyright Protection Aspects of Other Party's Video Game as Youtube Content'.

¹⁸ *Ibid.*

¹⁹ 17 U.S.C. § 107(1)

²⁰ Timothy S. Chung, 'Fair Use Quotation Licenses: A Private Sector Solution To DMCA Takedown Abuse on YouTube', *The Columbia Journal of Law & the Arts* 44, no. 1 (2020) .

	detrimental copyright owner		
6.	To resolve dispute fair use case	Indonesia law has not comprehensive to resolve of fair use doctrine case	The US has comprehensive regulated to resolve dispute fair use case, legal adviser and judges determined based parameter four factors in section 107 of copyright act 1976.

Table Differences in Analysis of regulation and application fair use on the YouTube platform (A comparative study of Indonesia and United States Law)

C. Lesson Learned from United States Copyright Law of Regulation and Application fair use on the YouTube Platform

Indonesia's learning from the United States on regulation and enforcement on the YouTube platform is considered according to Mochtar Kusumaatmadja's theory, Good law is dynamic (moving) law that follows the development that exists in human life. Laws must not hinder the development of society. U. S. regulations set clear limits on decisions, including fair use, based on four factors, Section 107 of the Copyright Act of 1976, which outlines the amount and importance of fair use in videos, measuring the impact of fair use on the potential market. in the case of working with video content uploaded to YouTube this is not a disadvantage. In the United States, the DMCA has comprehensively regulated digital copyright terms to provide legal certainty. US has comprehensive regulated to resolve of fair use case, legal adviser and judge determination parameter of limitation fair use based four factor in section 107 of copyright Act 1976.

CONCLUSION

Based on Indonesian law, specifically Title IV of Copyright Law No. 28 of 2014, fair use on the YouTube platform is regulated. Articles 43 and 44 of this law outline the conditions under which the use of copyrighted material is not considered infringement. According to the analysis of these regulations, copyright infringement is not deemed to occur as long as the source of the copyright owner is clearly acknowledged, the usage is non-profit or commercial with social purposes such as education, knowledge, research, and development. Additionally, it is important that the copyright owner is not adversely affected and does not object to the production and distribution of the content.

The application of fair use doctrine in creating and publishing a content video on the YouTube less clearly parameter of limitation fair use because it does not provide specific regulation regarding fair use on the YouTube platform. The impact of less clearly limitation for creator or YouTuber to application fair use in creating video and publishing on the YouTube platform. Indonesia law not completely regulation for resolving cases of copyright infringement because application of fair use outside limitation. The judge will find it difficult to resolve it because the existing regulations less clearly. From of The regulation and application fair use on the platform YouTube based US Law it found in copyright Act 1976 particularly section 106 and 107 and DMCA 1998. Section 106 allowing categories fair use of a copyrighted work purpose for criticism, comment, news, reporting and teaching or education. Section 107 provides clearly parameter of limitation based four factors to determined include fair use or copyright infringement. In the US a judge to decide a case include fair use or infringement copyright considered based four 72 factors in section 107 (1-4). YouTubers can apply fair use in their videos as long as they don't violate copyright infringement regulations. The Digital Millennium Copyright Act (DMCA) limits ISP liability for fair use. Content ID is a safe harbor, but fair use determination is subjective and court-based.

Indonesia and the United States share certain similarities in their adherence to international conventions and the recognition of fair use categories for educational, critical, and knowledge purposes. However, differences arise when it comes to the clarity of parameters that determine fair use inclusion. In Indonesia, these parameters are less defined, whereas the United States has a clear framework for determining fair use without infringing on copyright. Indonesia can draw lessons from U.S. law, which establishes clear parameters for fair use based on four factors. Section 107 of the U.S. Copyright Act of 1976 provides judges with a framework to address fair use cases, allowing legal advisors and judges to determine fair use restrictions based on these four factors.

BIBLIOGRAPHY

Journals Article

Alam Moch Zairul.(2019) “ Perbandingan Perlindungan Sarana Kontrol Teknologi Atas Ciptaan Menurut Ketentuan Hak Cipta di Indonesia dan Amerika Serikat .

Asril, Fitri Astari, Rika Ratna Permata, and Tasya Safiranita Ramli.(2020). ‘Perlindungan Hak Cipta Pada Platform Digital Kreatif YouTube’ 10, no. 2 .

Casey, Gretchen L(2019). ‘Courts React: Popularity of YouTube’s Reaction Video Genre Sparks New Discussion on Fair Use Defence’. *Texas A&M Journal of Property Law* 5, no. 3 .

- Chung S. Timothy.(2020). “ Fair Use Question Licenses: A Private Sector Solution To DMCA Takedown Abuse on YouTube.
- Devina Raden Radifa Difa, Ramli Tatty Aryani. (2022). “Pengadaan dan Pengumuman Karya Cipta E-Book berdasarkan Prinsip Fair Use Ditinjau dari Hukum Positif” . Vo 2, No 1.
- Grin Leah Chan, (2019). “Intellectual Property Law and the Right to Repair”. *UNLV William S. Boyd School Of Law*.
- Ginsburg Jace C, (2020) “Fair Use in the United States: Transformed, Deformed, Reformed?”, *Singapura Journal of Legal Studies* .
- Hariri, Rafik Al, and Sri Maharani. (2019). ‘Perlindungan Hukum Bagi Pencipta Yang Karya Videonya Diunggah Kembali (Reupload) di Youtube Secara Ilegal Menurut Undang-Undang Nomor 28 Tahun 2014 Tentang Hak Cipta’. *Simposium Hukum Indonesia* 1, no. 1.
- Indirakirana Ayu, (2020) (eds), “Upaya Perlindungan Hak Cipta Konten YouTube WNA Yang Dijiblak Oleh WNI Dalam Perspektif Bern Convention ‘Ganesha Law Review’. *Ganesha Law Review* 2, no. 2.
- Hanson, Nathania Abigail, Rika Ratna Permata, and Tasya Safiranita Ramli.(2016). ‘Protection Of Video Copyrights On The YouTube Platform In Fair Use Principles’ 15, no. 2.
- Journal, Law, and Mikayla Spencer. (2021) ‘The University of Cincinnati Intellectual Property and Computer “ Storytime : We ’ Re Being Sued ” – Copyright Infringement and Fair Use in the Digital Era’ 6, no. 1.
- Kamaru Yudo.(2019) “Legal Analysis of Copyright Issues in YouTube Content Reviewed From Law Number 28 of Copyright”. *Estudiante Law Journal* .
- Marzuki Assadallah, Al-Araf. (2014) ‘Kajian Yuridis Terhadap Karya Seni Musik yang Dinyanyikan Ulang (Cover Lagu) di Jejaring Media Sosial Terkait Dengan Prinsip Fair Use’ .
- Margaritha Rami Ndoen ,(2020) Hesti Monika. ‘Prinsip Fair Use Terhadap Cover Version Lagu Dalam Perspektif Perlindungan Hak Cipta (Perbandingan Antara Undang-Undang Hak Cipta Indonesia Dengan Amerika Serikat)’. *Paulus Law Journal* 1, no. 1.
- Nadiya Nurmaya, (et.all) (2020)., “Fair Use Doctrine in Photocopy Books For Educational Purposes: A Study of Copyright Acts in Indonesia and the United States”. *Indonesia Journal of Law and Society*.
- Permata Rika Ratna, (et.all) (2021). “ Regulasi Doktrin Fair Use Terhadap Pemanfaatan Hak Cipta Pada Platform Digital Semasa Dan/Atau Pasca Pandemi Covid- 19”. *Dialogi Iuridica*. Vo 13, No.1,.
- Rahmanissa, Shafira Shava. (2023) ‘Konten Video Parodi Pada Platform Digital Dalam Perspektif Pelindungan Hak Cipta dan Doktrin Fair Use’.

- Rani, Marnia. (2020) 'Copyright Protection Aspects of Other Party's Video Game as Youtube Content'. *Intellectual Property Rights Review* 3, no. 2 .
- Sahar, Nur Persmawati. (2020). 'Copyright Infringement on Parody Video: A Legal Perspective'. *Jurnal Media Hukum* 27, no. 2 .
- Scott Cole and Murnan John. (2021) "Defining Fair Use on YouTube : A Guide to Modern Copyright". Vol 10, no. 4 .
- Setiada Sinurat Tedy, (eds), (2020) "Perindungan atas Pelanggaran Pembajakan Hak Cipta Video di Situs YouTube" .
- Solomon, Leron. (2015) 'Fair Users or Content Abusers? The Automatic Flagging of Non-Infringing Videos by Content ID on YouTube'. *Hofstra Law Review* 44, no. 1 .
- Spencer Mikayla. (2021) "Storytime: We're Being Sued"- Copyright Infringement and Fair Use in the Digital Era". *The University of Cincinnati Intellectual Property and Computer Law Journal* vol 6, no. 1.
- Warassih, E., Sulaiman, & Fatimah, R. (2018). Empowering Local Wisdom in Regional Mining Policies: Study in Pati Regency, Central Java. *Environmental Policy and Law*, 48(5), 317-322.
- William Cornish dan David Llewelyn " Intellectual Property: Patents, Copyright, Trade Marks and Allied Rights". Sixth Edition. Cambridge and London : Sweet & Maxwell Limited 2007.
- Book**
- Damian Eddy, "Hukum Hak Cipta". Edisi Kedua-Cetakan Ke-3 Bandung: P.T. Alumni 2005.
- Lindsey, (et.all), "Suatu Pengantar Hak Kekayaan Intelektual". Edited by Utomo Suryo Tomi Lindsey, Tim, Damian Eddy, Simon Butt. 4th ed. Bandung: P.T. Alumni 2005.
- Mashdurohatun Anis, "Hak Kekayaan Intelektual Dalam Perspektif Sejarah Di Indonesia" Semarang: Madina Semarang 2013.
- Putrandi Ika Riswandi, "L.I.S.E.N.S.I Copyleft dan Perlindungan Open Source Software D.I. I.N.D.O.N.E.S.I.A". Yogyakarta: Gallery Ilmu 2010.
- Utomo Tomi Suryo, " Hak Kekayaan Intelektual (HKI) di Era Global ".
Yogyakarta: Graha Ilmu 2010.
- William Cornish dan David Llewelyn " Intellectual Property: Patents, Copyright, Trade Marks and Allied Rights". Sixth Edition. Cambridge and London : Sweet & Maxwell Limited 2007.

Legislations

Indonesian Law number 28 Year 2014 Copyright (UUHC) United State Copyright Act 1976
Digital Millennium Copyright Act (DMCA) Berne Convention

The Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS)

Vienna Convention on the Law of Treaties between States and International
Organizations or between International Organizations of 1986

Theses

Adib Fakhruallah (2022). “Perlindungan Hak Cipta Software Dari Pembajakan Dan Pendistribusian Secara Ilegal Di Indonesia Berdasarkan Hukum International”, Fakultas Hukum Universitas Syiah Kuala, .

Anisa, Luthifyah (2021). “Perlindungan Hak Cipta Atas Konten Video YouTube Dalam Bentuk Podcast Pada Akun Spotify Wavesuara’. Fakultas Hukum Universitas Hasanuddin,.

Annas Tasyia Sakila (2018) “ Perlindungan Hukum Bagi Pengunggah Video di YouTube Atas Tindakan Reupload Video Untuk Monetize Perspektif Undang-Undang Nomor 28 Tahun 2014 Tentang Hak Cipta”, Fakultas Hukum Universitas Semarang.

Assadallah Marzuki Al-Araf, (et, all) (2014) “ Kajian Yuridis Terhadap Karya Seni Musik Yang Dinyajikan Ulang (Cover Lagu) Di Jejaring Media Sosial Terkait Dengan Prinsip Fair Use ”. Fakultas Hukum Universitas Brawijaya .

Evy Putri Soewardari (2019). “Perlindungan Bagi Pemegang Hak Cipta Terhadap Penggunaan Ciptaan Terkait Cuplikan Video Yang Diunggah Channel Calon Sarjana Di Platform Digital YouTube (Studi Komparasi : Undang-Undang Republik Indonesia Nomor 28 Tahun 2014 Tentang Hak Cipta dan U.S Copyright Act)”, Fakultas Hukum Universitas Gadjah Mada.

Mentari Sabilla Ervizar (2019): Thesis, “Analisis Penerapan Doktrin Penggunaan Wajar Pada Kebijakan Hak Cipta YouTube Sebagai Wujud Perlindungan Hukum”, Fakultas Hukum Universitas Semarang.

Nadia Nurmaya (2020). “ Pengaturan Doktrin Fair Use Dalam Hal fotokopi Buku Digunakan Untuk Kepentingan Pendidikan (Studi Perbandingan Hukum Antara Undang-Undang Republik Indonesia Nomor 28 Tahun 2014 Tentang Hak Cipta Dan United States Copyright Act 1976)”, Fakultas Jember Universitas Jember.

Ronal Agusmi (2019) “Perlindungan Hak Eksklusif Pencipta Yang Mengumumkan Ciptaannya Melalui Media YouTube”, Fakultas Hukum Universitas Syiah Kuala.

Websites

- <https://business-law.binus.ac.id/2015/01/31/fair-use-vs-penggunaan-yang-wajar-dalam-hak-cipta/>. Accessed on 3 April 2023.
- Laura Fitzpatrick, Brief History of YouTube, Time Magazine, May 31, 2010, <http://content.time.com/time/magazine/article/0,9171,1990787,00.htm>. Accessed on 5 April 2023.
- <https://business-law.binus.ac.id/2015/01/31/fair-use-vs-penggunaan-yang-wajar-dalam-hak-cipta/>. Accessed on 27 March 2023.
- <https://ogc.harvard.edu/pages/copyright-and-fair-use>. Accessed on 27 March 2023
<https://www.youtube.com/howyoutubeworks/policies/copyright/>. Accessed on 7 January 2023
- <https://www.copyright.gov/fair-use/>. Accessed on 15 June 2023.
- <http://www.copyright.gov/title17/92chap1.html>. Accessed on 17 June 2023.
- <http://www.copyright.gov/title17/92chap1.html>. Accessed 20 June 2023.
- <https://www.wipo.int/edocs/pubdocs/en/wipo-pub-rn2022-15-en-wipo-alternative-dispute-resolution-options.pdf>. Accessed on 22 June 2023.
- <https://youtu.be/1PvjRIkwI8>. Accessed on 24 June 2023