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FROM SANDER'S DREAM TO SINGAPORE'S REALITY: THE EVOLUTION OF MULTI-DOOR JUSTICE

At a moment marked by two significant milestones – the 50th anniversary of Prof Frank Sander's multi-door courthouse vision and the bicentennial arc of Singapore's legal development – Singapore's dispute resolution journey invites reflection. Viewed through the prism of Prof Sander's vision, this article traces Singapore's transformation from a litigation-centric system to an integrated ecosystem of courts, arbitration, mediation, specialist tribunals and digital platforms. It argues that Singapore's evolution represents not just procedural diversification but the steady embedding of proportionality, contextuality and user-centred justice as organising principles. Looking ahead, it considers the next phase of reform: a technologically-enabled, multi-platform architecture that preserves legitimacy, fairness and access while reimagining how disputes would be resolved in decades to come.

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I. Introduction

1 At the 1976 National Conference on the Causes of Popular Dissatisfaction with the Administration of Justice, popularly referred to as the Pound Conference, Prof Frank E A Sander proposed an idea[2] that would reverberate through legal systems worldwide: the "multi-door

1 The author is grateful to Chief Justice Sundaresh Menon for his considerable encouragement, guidance and thoughts on the matter, as well as to Senior Judge Andrew Phang for his feedback, guidance and assistance. The author would also like to acknowledge his law clerks, Au Wei Hoe and Kit Pang, for their excellent assistance in the research for, and preparation of, this article. The author is also grateful to Prof Robert Bordone and the late Prof Frank Sander, who were instrumental figures in shaping his experiences in mediation and alternative dispute resolution. Finally, the author is grateful to the anonymous referee for the thoughtful comments provided on a draft of this article. As is the case with these things, all errors remain the author's own.

2 Frank E A Sander, "Varieties of Dispute Processing" (1976) 70 *Federal Rules Decisions* 111 in *The Pound Conference: Perspectives on Justice in the Future* (A Leo Levin & Russell R Wheeler eds) (West Publishing Co, 1979).

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courthouse".[3] His vision was elegant in its simplicity but nonetheless revolutionary, and as prosaic as it now seems, was heretical at the time.[4] Instead of funnelling all disputes into a one-size-fits-all court-based litigation model, he suggested that courthouses offer a range of dispute resolution options, each tailored to the nature of the dispute and needs of the parties. The role of the legal system would be to direct disputes towards the most appropriate "door", whether it be litigation or otherwise. Over time, Prof Sander's central thesis developed into a more expansive proposition: that the animating ideal is not simply a court-centric reconfiguration of pathways, but a commitment to "fitting the forum to the fuss".[5]

2 In its Golden Jubilee year, Prof Sander's vision remains just as relevant as ever. Numerous jurisdictions have sought to move beyond the traditional adversarial model towards more nuanced and party-centric systems. This evolution has been driven by two concurrent developments: first, a growing recognition that the complexity of modern society necessitates a more variegated spectrum of dispute resolution mechanisms; and second, the increasingly unsustainable caseloads faced by courts,[6] coupled with the downsides of litigation, making it imperative to explore complementary pathways for the effective resolution of disputes.

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3 The term "multi-door courthouse" was in fact not invented by Prof Sander but coined by the American Bar Association (as a result of the graphics accompanying Frank E A Sander, "The Multi-Door Courthouse" (1976) 3(3) *Barrister* 18), with Prof Sander initially calling it the "comprehensive justice centre"; see Frank Sander & Mariana Hernandez Crespo, "A Dialogue Between Professors Frank Sander and Mariana Hernandez Crespo: Exploring the Evolution of the Multi-Door Courthouse" (2008) 5 *University of St Thomas Law Journal* 665 at 670.

4 See, *eg*, Owen M Fiss, "Against Settlement" (1984) 93 Yale LJ 1073. Prof Sander has called Prof Fiss's critique "misguided" as it primarily focused on just one type of dispute, *ie*, large scale public litigation; see Frank E A Sander, "Future of ADR – The Earl F Nelson Memorial Lecture" (2000) *Journal of Dispute Resolution* 3 at 4–5.

5 Frank E A Sander & Stephen B Goldberg, "Fitting the Forum to the Fuss: A User-Friendly Guide to Selecting an ADR Procedure" (1994) *Negotiation Journal* 10. The author should clarify that Prof Sander's advocacy of the multi-door courthouse was not a defence of the courthouse *per se*, or the primacy of the court, but rather an argument for retooling legal institutions to *fit* the dispute. As he has pointed out, there is no "inherent relationship" between alternate dispute resolution and the courts; see Frank Sander & Mariana Hernandez Crespo, "A Dialogue Between Professors Frank Sander and Mariana Hernandez Crespo: Exploring the Evolution of the Multi-Door Courthouse" (2008) 5 *University of St Thomas Law Journal* 665 at 671.

6 This, in large part, motivated Prof Sander's proposal; see Frank E A Sander, "Varieties of Dispute Processing" (1976) 70 *Federal Rules Decisions* 111 at 111.

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3 The trajectory of Singapore's dispute resolution landscape provides a useful case study of how such a transformation may be pursued in a sophisticated and comprehensive manner. Singapore's legal landscape has, over time, developed a rich array of dispute resolution pathways.[7] In many ways, it has brought Prof Sander's multi-door courthouse vision to life.

4 The purpose of this article is twofold. First, it seeks to honour Prof Sander's enduring legacy by reflecting on Singapore's journey towards a multi-door dispute resolution ecosystem. Second, it attempts to look forward – "crystal ball"-gazing as it were – to envisage how Singapore may continue to build on this foundation in years to come. As with all exercises in foresight, this inevitably involves a degree of speculative guesswork. Nonetheless, this is no reason to shy away from the task. On the contrary, the very act of thoughtful projection can potentially serve to sharpen the vision needed for principled and future-facing reform.

5 Given the centrality of Prof Sander's inspiration for the present article, some background is apposite. Early in the author's journey as a legal professional, he had the privilege of working alongside Prof Sander and supporting his teaching and academic initiatives at the Program on Negotiation.[8] In helping to develop Prof Sander's ideas in that setting, the author came to appreciate not only his pioneering vision for dispute resolution, but also his deep commitment to education and mentorship. Despite his standing as one of the foremost thinkers in the field,[9] he remained remarkably generous with his time. The author had

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7 For a sampling of some of the literature on the development of the alternate dispute resolution scene in Singapore, see Eugene Tan, "Harmony as Ideology, Culture and Control: Alternative Dispute Resolution in Singapore" (2007) 9(1) *Australian Journal of Asian Law* 120 and Joel Lee, "The ADR Movement in Singapore" in *The Singapore Legal System* (Kevin Y L Tan ed) (Singapore University Press, 2nd Ed, 1999).

8 The Program on Negotiation is a consortium involving Harvard University, Massachusetts Institute of Technology and Tufts University, that run programmes on executive education in negotiation, mediation and conflict management; see Harvard Law School, "The Program on Negotiation" <https://www.pon.harvard.edu/> (accessed 6 March 2026). For context, at the time of the author's involvement in the Program on Negotiation, he had just graduated from Harvard Law School and was based in Cambridge, Massachusetts and worked with Prof Sander in his work for the Program.

9 Prof Sander has been described as the "father of court-based dispute resolution"; see Deborah Thompson Eisenberg, "Frank Sander: Father of Court-Based Disputed Resolution" in *Discussions in Dispute Resolution: The Foundational Articles* (Art Hinshaw, Andrew K Schneider & Sarah R Cole eds) (Oxford University Press, 2021) and Carolyn Kelley, "In Memoriam: Frank EA Sander '52, a Pioneer in the Field of Alternative Dispute Resolution (1927–2018)" *Harvard Law Today* (27 February 2018).

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the privilege of many discussions with Prof Sander, over many weeks and months. In every exchange, he displayed a boundless intellectual curiosity and an unwavering commitment to reimagining how dispute resolution systems might compassionately and effectively serve human needs. This article therefore serves as a reflection on Singapore's legal evolution with an eye to how Prof Sander's philosophical approach has informed Singapore's development as a dispute resolution hub.[10]

6 Through an examination of the key milestones in Singapore's dispute resolution history, its current landscape, and the emerging trends that shape the future, this article seeks to celebrate not only an intellectual contribution of profound impact but also the Singaporean spirit of adaptation, pragmatism and foresight that has brought Prof Sander's vision vividly to life.

II. Early days of dispute resolution in Singapore

7 In understanding Singapore's journey towards a multi-door dispute resolution system, it is necessary to appreciate the foundations from which it emerged. Singapore's early legal landscape was largely rooted in the traditional adversarial system inherited from its British colonial masters.[11] Nonetheless, the adversarial system presented significant limitations. This section examines the characteristics of Singapore's early litigation-centric model, its strengths and weaknesses, and how recognition of its limitations catalysed the shift towards a more multifaceted approach to dispute resolution.

8 Following its independence in 1965, Singapore continued to build upon its long-standing reliance on British common law traditions. Civil disputes – encompassing matters from contract claims to property disputes and tortious wrongs – were resolved primarily through the court process. Such an approach placed a premium on procedural rigour and evidentiary rules.

9 As time went on, the Singapore courts grew, both in caseload and in stature. By the 1980s, Singapore's courts were regarded as

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10 Prof Sander was a consultant to the Singapore Government; see Frank Sander & Mariana Hernandez Crespo, "A Dialogue Between Professors Frank Sander and Mariana Hernandez Crespo: Exploring the Evolution of the Multi-Door Courthouse" (2008) 5 *University of St Thomas Law Journal* 665 at 667.

11 For an excellent conspectus of how the inherited structures from the UK took root in Singapore and were subsequently adapted to Singapore's unique context, see Andrew Phang, "The Singapore Legal System – History, Theory and Practice" (2000–2001) 21 Sing LR 23.

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independent, competent and incorruptible,[12] and an increasingly critical factor in the country's efforts to attract foreign investment and establish itself as a global business hub. Nonetheless, the reliance on litigation as the primary form of dispute resolution reflected certain assumptions about justice, and in particular, implicitly suggested that judicial determination was the most optimal method of resolving civil disputes. Consequently, formal alternative forms of dispute resolution were limited. The influence of the cultural and societal context of that time must be acknowledged. Singapore's legal culture, shaped in large part by its British colonial heritage and the early nation-building years, placed strong emphasis on the rule of law, judicial independence and respect for formal processes. For a fledgling nation establishing its credibility domestically and internationally, the centrality of the courts represented a logical and necessary step.[13]

10 This, however, bore unintended consequences. For one, rising caseloads inevitably led to congestion and delays. By the early 1990s, there was a backlog of over 2,000 cases in the High Court, with trial dates only available three years after cases were ready, and half of the cases taking between five and ten years to be dealt with,[14] with Singapore's second Chief Justice Yong Pung How observing this to be a "large and embarrassing" problem.[15] For another, disputes varied enormously in complexity, emotional intensity and subject matter. A "one-size-fits-all" approach was consequently unsuited to address the range of parties' needs. Three principal challenges stood out: high costs, time-consuming processes, and the emotional toll on parties.

(a) Legal representation was, and remains, costly.[16] Moreover, the "loser pays" (or "costs follow the event") principle,

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12 Then Prime Minister Lee Kuan Yew regarded allegations of executive interference in the Judiciary as "totally treasonable", and by the 1990s, the Singapore Judiciary was said to be "attaining an extremely high degree of independence in their functions"; see Mya Saw Shin, "Singapore: Judicial System" *Law Library of Congress, Global Legal Research Directorate* (January 1993).

13 This is in line with Prof Sander's own observation that the instinct in a legal mind is to seek recourse in court; see Frank E A Sander, "Varieties of Dispute Processing" (1976) 70 *Federal Rules Decisions* 111 at 115.

14 Justice Steven Chong, Supreme Court of Singapore, "Judicial Reform: Reshaping the Civil Justice System in Singapore", speech delivered at The Judicial Conference of the Supreme Courts of the G20 (10 October 2018) at para 7.

15 Chief Justice Yong Pung How, Supreme Court of Singapore, speech delivered at the Opening of the Legal Year 1992 (4 January 1992) in Speeches and Judgments of Chief Justice Yong Pung How (Hoo Sheau Peng *et al* gen eds) (FT Law & Tax Asia Pacific, 1996).

16 For a detailed discussion of the costs involved and the challenges it poses to segments of society, see Helana Whalen-Bridge, "Court Backlogs, Balancing Efficiency and Justice in Singapore" (2017) 7(4) *Oñati Socio-Legal Series* 879. The problem is of

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where the unsuccessful party typically bears part of the costs of the other side, created substantial financial risk for litigants and deterred the bringing of smaller-value meritorious claims by less-resourced parties.[17] This economic inefficiency highlighted the need for more proportionate and cost-effective dispute resolution methods.

(b) Litigation is, by its nature, time-intensive. As observed earlier, the steady increase in the volume of cases led to delays. Such delays were exacerbated in the early years where the parties often dictated the pace with which the cases progressed.[18] While reforms such as the case management system and the introduction of pre-trial conferences enhanced efficiency, the structural demands of adversarial litigation limited how much streamlining could occur without compromising fairness. Particularly for businesses engaged in cross-border commerce, prolonged litigation was commercially undesirable, thereby prompting calls for swifter and more flexible dispute resolution mechanisms.[19]

(c) Beyond financial and temporal costs, litigation imposed a significant emotional burden, with the adversarial system positioning parties as opponents locked in zero-sum contestation. This often exacerbated the conflict rather than defused it. In relational disputes, such as those involving families, neighbours, or small businesses with ongoing relationships, litigation could irreparably damage relationships. Even in purely commercial contexts, the confrontational nature of court proceedings strained professional ties. The experience of litigation therefore often felt disempowering.

11 The early days of dispute resolution in Singapore, marked by an almost exclusive reliance on adversarial litigation, laid a strong

course not unique to Singapore – see Christopher Hodges, Stefan Vogenauer & Magdalena Tulibacka, "Costs and Funding of Civil Litigation: A Comparative Study" (Oxford Legal Studies Research Paper No 55-2009) (2 December 2009).

17 A striking illustration of how excessive the costs of litigation can in extreme cases be is found in *Lock Han Chng Jonathan (Jonathan Luo Hancheng) v Goh Jessiline* [2008] 2 SLR(R) 455.

18 Justice Steven Chong, Supreme Court of Singapore, "Judicial Reform: Reshaping the Civil Justice System in Singapore", speech delivered at The Judicial Conference of the Supreme Courts of the G20 (10 October 2018) at para 8.

19 Chief Justice Yong Pung How, Supreme Court of Singapore, "Justice 21@ Subordinate Courts: Administering Justice in the Knowledge Society", keynote address at the Subordinate Courts 8th Workplan Seminar (10 April 1999) in *Speeches and Judgments of Chief Justice Yong Pung How* (Audrey Lim *et al* eds) (SNP Reference, 2006).

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foundation of procedural integrity, judicial excellence and public trust in the courts. Yet, the inherent limitations of the litigation-centric model gradually illuminated the need for a more diversified approach to justice.

12 Consequently, by the late 1980s and early 1990s, Singapore's Judiciary and legal community began harbouring serious concerns about the sustainability of a largely litigation-driven dispute resolution model.[20] In the broader global context, developments elsewhere, most notably the alternative dispute resolution ("ADR") movement in the US and the early adoption of mediation and arbitration reforms in Australia and the UK, started to influence domestic thinking. These international trends demonstrated that the diversification of dispute resolution processes could coexist with, and even enhance, a strong rule of law culture.

13 Singapore's subsequent transformation into a jurisdiction that fully embraced the multi-door courthouse did not arise from a wholesale rejection of its adversarial roots. Rather, it evolved through a recognition that different disputes require different processes – a recognition that lies at the heart of Prof Sander's vision. In the words of Chief Justice Yong Pung How, for Singapore to reach its next stage of development, it needed to "[o]ffer a menu of high quality dispute resolution programmes to the public and members of the Bar", thereby "assist[ing] the parties in selecting the most suitable dispute resolution mechanism" for their dispute.[21] As a result of these efforts, Singapore is now recognised as one of the leading dispute resolution hubs in the world, with courts well-regarded for their efficiency,[22] and with a myriad of dispute resolution mechanisms that are regarded as world-class in their ability to dispense justice.

14 As we turn to examine Singapore's journey towards building a holistic and integrated dispute resolution ecosystem, it is important to remember that the seeds of reform were sown in these early experiences – experiences that reflected both the strengths and the blind spots of a purely litigation-based conception of justice. In

20 Chief Justice Yong has been credited with a variety of reforms of the Singapore legal process and was instrumental in Singapore's journey into a multi-door courthouse; see Karen Blöchlinger, "*Primus Inter Pares*: Is the Singapore Judiciary First Among Equals?" (2000) 9(3) *Pacific Rim Law & Policy Journal* 591.

21 Chief Justice Yong Pung How, Supreme Court of Singapore, "Subordinate Courts 21: Leading Justice into the New Millennium", keynote address at the Introduction of the Seventh Workplan 1998/1999 Subordinate Courts (4 April 1998) in *Speeches and Judgments of Chief Justice Yong Pung How* (Audrey Lim *et al* eds) (SNP Reference, 2006).

22 As one author notes, the "Singapore courts are understood to be one of the most efficient in the world"; see Helana Whalen-Bridge, "Court Backlogs, Balancing Efficiency and Justice in Singapore" (2017) 7(4) *Oñati Socio-Legal Series* 879 at 881.

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hindsight, they created the very soil in which Prof Sander's multi-door courthouse vision could meaningfully take root.

III. Opening doors: evolution of Singapore's multi-door courthouse

15 As explained above, the recognition of the limitations inherent in a litigation-centric model of dispute resolution provided the impetus for Singapore's legal transformation. Consistent with its ethos of pragmatic innovation, Singapore did not merely import structures from other jurisdictions. Instead, it thoughtfully integrated a variety of processes into its legal system, creating a nuanced multi-door approach tailored to local conditions and international ambitions alike.

16 This section traces Singapore's transformation into a sophisticated dispute resolution ecosystem, through the deliberate cultivation of its multi-door courthouse. What began as a "pilot project" to establish "the first such multi-door courthouse in the Commonwealth and Asia-Pacific region",[23] a project that culminated in the eventual setting up of the Primary Dispute Resolution Centre,[24] has since organically developed into a carefully designed system of justice reflective of Prof Sander's call for varied entry points, while remaining tethered to its purpose and principles.

A. Arbitration

17 In the early 1990s, arbitration began to develop in Singapore as the preferred pathway for binding adjudication, particularly for international commercial disputes.

18 The establishment of the Singapore International Arbitration Centre ("SIAC") in 1991 represented a watershed moment. The SIAC provided an institutional framework for administering arbitrations with rules aligned to international best practices. Singapore's strategic location, coupled with its reputation for neutrality, efficiency and

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23 Chief Justice Yong Pung How, Supreme Court of Singapore, "Subordinate Courts 21: Leading Justice into the New Millennium", keynote address at the Introduction of the Seventh Workplan 1998/1999 Subordinate Courts (4 April 1998) in *Speeches and Judgments of Chief Justice Yong Pung How* (Audrey Lim *et al* eds) (SNP Reference, 2006).

24 Dorcas Quek Anderson & Sahiba Shiraz, "Ch 03 Mediation" (30 December 2018) <https://www.singaporelawwatch.sg/About-Singapore-Law/Overview/ch-03-mediation> (accessed 6 March 2026).

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a supportive Judiciary, positioned SIAC as a serious contender in the global arbitration market.

19 The opening of Maxwell Chambers in 2010 marked a further pivotal moment. It represented the architectural realisation of Prof Sander's multi-door courthouse, a physical space reflecting the pluralism of process that his vision demanded. As the world's first integrated dispute resolution complex,[25] it brought together hearing facilities, arbitral institutions and support services under a single roof. Its creation signalled Singapore's intent to build a full and integrated framework for ADR. The results soon followed: the Permanent Court of Arbitration established a hearing facility (recently expanding it),[26] and the International Court of Arbitration of the International Chamber of Commerce launched a regional office in Singapore. With each such development, Singapore's arbitration landscape became more textured.

B. Mediation

20 A further significant step towards a multi-door system was the institutionalisation of mediation as a legitimate, credible and often preferred mode of resolving disputes.

21 The Singapore Mediation Centre ("SMC") was established in 1997 under the auspices of the Singapore Academy of Law.[27] Its formation constituted a response to growing concerns about the adversarial nature and costs of litigation. It was conceived not merely as an adjunct to the courts but as a stand-alone institution, offering parties a credible alternative for the resolution of disputes. Much like the SIAC, the SMC has gone from strength to strength.[28] Key to its success hitherto is its emphasis on professionalism, neutrality and enforceability. Panels of trained mediators are assembled to provide expert facilitation

25 Professor S Jayakyumar, Senior Minister, speech at the Grand Opening of Maxwell Chambers (21 January 2010) at para 7.
26 Ministry of Law, "Expansion of Permanent Court of Arbitration Singapore Office", press release (5 September 2025).
27 For a detailed longitudinal discussion on Singapore's mediation journey, and on how the Singapore Mediation Centre was conceived, see Siddharth Jha & Carina Lim, "Evolution of Mediation in Singapore" (2023) 5(9) *Revista Brasileira de Alternative Dispute Resolution* 121.
28 By 2017, the Singapore Mediation Centre was handling $2.7bn in disputes and had 548 matters filed for mediation; see Tan Tam Mei, "Singapore Mediation Centre Saw Record Number of Cases and Disputed Sums in 2017", *The Straits Times* (16 January 2018).

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and institutional rules ensure procedural fairness, and confidentiality provisions encourage candid negotiation.[29]

22 In a similar vein, Singapore established the Community Mediation Centres (CMCs) in 1998. Conceived as a low-cost and community-embedded platform for resolving neighbour, family and interpersonal conflicts,[30] it drew on trained volunteer mediators and informal dialogic processes designed to empower parties to craft their own solutions.[31] This initiative reflected a nuanced understanding that many relational disputes are best resolved through conversation and mutual accommodation. In doing so, Singapore translated Prof Sander's insight into the vernacular of everyday life, bringing ADR closer to the communities that need it most.

23 Over time, mediation shed its image as a "soft" alternative to litigation. In line with Prof Sander's observation that "public education is a key issue" in ensuring the success of a variegated dispute resolution landscape,[32] public education campaigns, judicial endorsement and the success of high-profile mediations (such as those which successfully resolved large commercial disputes) have contributed to a cultural shift. Today, mediation is not only an accepted pathway, but often the first option considered by parties (or required by the courts – a point elaborated on later) in a wide range of disputes.

IV. Refining doorways: specialisation, cross-pollination and technological integration in Singapore's multi-door courthouse

A. Specialisation in Singapore courts

24 If Singapore's bold embrace of arbitration and mediation reflects its commitment to *expanding the doors* of justice, then its judicial innovations speak to an equally important ambition: reimagining what lies *behind the doors of the courts*. It is in this spirit that Singapore has

29 Dorcas Quek Anderson & Sabiha Shiraz, "Ch 03 Mediation", *Singapore Law Watch* (30 December 2018) <https://www.singaporelawwatch.sg/About-Singapore-Law/Overview/ch-03-mediation> (accessed 6 March 2026).
30 Pitamber Yadav, "Affordability, Accessibility and Reliability – The Community Mediation Model of Singapore" (20 May 2022).
31 Sundaresh Menon, "Building Sustainable Mediation Programmes: A Singapore Perspective" [2015] *Asian Journal on Mediation* 1.
32 Frank E A Sander, "The Courthouse and Alternative Dispute Resolution" in *Negotiation: Strategies for Mutual Gain* (Lavinia Hall ed) (Sage Publications, 1993) at p 59.

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transformed its court system, not by abandoning the adjudicative model, but by diversifying it. Recognising that different disputes call for different approaches, Singapore has developed a myriad of specialised courts and tribunals.

25 The Small Claims Tribunals ("SCT") was established under the auspices of the Small Claims Tribunals Act 1984[33] to provide for a fast and accessible forum to resolve, *inter alia*, low-value consumer and commercial disputes.[34] These are often claims pertaining to contracts for goods and services, minor damage to property and disputes arising from residential tenancy agreements.[35] Procedures in the SCT are deliberately informal and without counsel,[36] and with hearings taking on a more inquisitorial posture[37] and limited appellate recourse.[38] All of these revisions to the conventional processes embody the principle of proportionality in dispute resolution, *ie*, calibrating the litigation process to the nature, value and complexity of the dispute. Over decades, refinements were made to both the procedural aspects and to widen the jurisdiction of the SCT.[39] A recent study suggests that this experience has been profitable, as the SCT has struck a good balance between meeting the demands of natural justice and promoting access to justice in a speedy and inexpensive way.[40]

26 Similar motivations underpinned the launch of the Community Disputes Resolution Tribunals ("CDRT") in 2015. This was driven by a recognition that disputes between neighbours and within communities are qualitatively distinct from conventional commercial conflicts.[41] Such disputes, while often modest in monetary value, can have

33 2020 Rev Ed.

34 For some initial impressions of the legislation in question, see Ho Peng Kee, "Legislation Comments: The Small Claims Tribunal Act 1984" (1984) 26 Mal LR 287. For a historical perspective, see ch 1 of *Small Claims Tribunals in Singapore: Accessible, Affordable, Empowering* (Thian Yee Sze & Sandra Looi eds) (Academy Publishing, 2025).

35 See paras 1(*a*), 1(*b*) and 1(*c*) of the Schedule of the Small Claims Tribunals Act 1984 (2020 Rev Ed) ("SCT Act"). See also Singapore Courts, "File a Small Claim" <https://www.judiciary.gov.sg/civil/file-small-claim> (accessed 6 March 2026).

36 See ss 22(1) and 23(3) of the SCT Act.

37 See ss 22(2)–22(5) and 28 of the SCT Act.

38 See s 38 of the SCT Act.

39 For a more granular understanding of some of these changes, see ch 4 of *Small Claims Tribunals in Singapore: Accessible, Affordable, Empowering* (Thian Yee Sze & Sandra Looi eds) (Academy Publishing, 2025).

40 Johan Ding, "Singapore Informal Justice Experience: Evaluating the Practice of the Small Claims Tribunal" (2024) 41 Sing LR 109 at 140.

41 Ministry of Law, "Building More Gracious and Harmonious Communities: Facilitating Effective Resolution of Neighbour Disputes", press release (12 August 2024).

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a disproportionate corrosive effect on the fabric of communal life.[42] The need to address these matters constructively is of especial importance in one of the most densely populated cities in the world.[43] The CDRT was thus conceived as a specialised forum designed to offer an accessible and pragmatic avenue for resolving such disputes. It embodies a deliberate shift towards promoting harmony and social cohesion through tailored processes that combine legal structure with a focus on practical resolution.

27 The establishment of the stand-alone Family Justice Courts ("FJC") in 2014 was underpinned by a long-standing recognition that disputes involving the family unit are of a fundamentally different character from those arising in the commercial or civil spheres.[44] Beyond questions of legal right and entitlement, such disputes often implicate deep emotional undercurrents, long-standing relational dynamics, and the welfare of vulnerable parties, particularly children.[45] A specialised forum, with its own procedures and ethos, and which integrates proceedings with counselling, mediation and other family support services, was therefore viewed as necessary to ensure that family disputes are resolved in a manner that is attuned to the complexities of human reality.[46]

28 Singapore's commitment to ADR is perhaps most powerfully demonstrated by the establishment of the Singapore International Commercial Court ("SICC") in 2015. Its creation responded directly to the increasing internationalisation of commercial disputes, which by their nature typically involves multi-jurisdictional parties and claims in the billions of dollars.[47] Traditional domestic litigation mechanisms are often ill-suited to address such complex transnational issues, while arbitration, though popular, is not always ideal for parties who desire

42 Indeed, at times, such frictions manifest themselves in fatal outcomes; see Nadine Chua, David Sun & Zaihan Mohamed Yusof, "Yishun Knife Attack: Woman Dies after Noise Dispute between Neighbours; Man Arrested for Murder", *The Straits Times* (24 September 2015).

43 Niel Bhavsar, "One of the Densest Countries in the World is Going Green", *Futurism* (10 March 2018).

44 The Family Justice Courts is itself a culmination of long-standing efforts to adopt an interdisciplinary and therapeutic approach to family law. See Kevin Ng *et al*, "Family Justice Courts – Innovations, Initiatives and Programmes: An Evolution over Time" (2018) 30 SAcLJ 617.

45 For these reasons, one of Singapore's foremost experts in this area has said that requiring reasonable behaviour from either spouse at this stage is a "tall order"; see Leong Wai Kum, *Marriage, Spouses and Assets* (Academy Publishing, 2025) at para 9.3.

46 Leong Wai Kum, *Marriage, Spouses and Assets* (Academy Publishing, 2025) at para 9.5.

47 The first ever case before the Singapore International Commercial Court involved a claim exceeding $1bn; see *BCBC Singapore Pte Ltd v PT Bayan Resources TBK* [2016] 4 SLR 1.

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open justice or the rigour of formal adjudication. As part of Singapore's evolving multi-door courthouse, the SICC functions as the high-arched international door, offering global parties a forum where diverse legal traditions, specialist procedures and judicial excellence converge under a single thoughtfully engineered roof. In March 2024, Singapore and Bahrain signed a bilateral treaty under which the SICC will hear appeals from the newly constituted Bahrain International Commercial Court ("BICC"), forging a unique transnational judicial bridge.[48] This arrangement, in some senses, illustrates how Singapore's multi-door vision is being exported across borders. The BICC was formally launched in November 2025 and prescribed appeals will be heard by the International Committee of the SICC. Together, these institutions have "extraordinary potential as catalysts of legal convergence and as standard bearers for the continued development of the transnational system of commercial justice".[49]

29 More broadly, the Singapore Judiciary has increasingly been characterised by specialisation and responsiveness. The General Division of the High Court developed specialist tracks in key areas such as intellectual property, construction law and admiralty, thereby enabling parties to have their disputes resolved by judges familiar with the commercial and technical nuances of those fields.[50] In a sense, the court process, and the *coram* itself, is being differentiated, offering users tailored pathways responding to the demands of particular types of disputes.

B. Cross-pollination across the multi-door courthouse

30 Perhaps the most insightful development in recent years is the growing recognition that the various "doors" in Singapore's dispute resolution ecosystem cannot function as hived off forums ignorant and agnostic to each other. By adopting best practices from mediation and arbitration, Singapore has enhanced its traditional offerings to respond

48 Ministry of Law, "Singapore and Bahrain Sign Bilateral Treaty on Appeals from the Bahrain International Commercial Court", press release (20 March 2024). See also Jan Paulsson, "Altering a Landscape – The Bahrain International Commercial Court" at para 6.26 in *Charting New Waters: The Singapore International Commercial Court After Ten Years* (Philip Jeyaretnam & Francis Xavier gen eds) (Academy Publishing, 2025).

49 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "International Commercial Courts as Catalysts of Legal Convergence ", welcome remarks at the Conference on the Future of International Commercial Courts: Towards Transnational justice (6 November 2025) at para 21.

50 SG Courts, "Role and Structure of the Supreme Court" <https://www. judiciary.gov.sg/who-we-are/role-structure-supreme-court/role> (accessed 6 March 2026).

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better to the unique needs of various parties. Likewise, the development of hybrid processes gives parties in a dispute the opportunity to capitalise on the strengths of multiple dispute resolution forums.

31 For instance, court-annexed mediation has, over time, become a norm in the court process. The Subordinate Courts (subsequently renamed the State Courts in 2014) pioneered the Court Dispute Resolution ("CDR") framework, under which the first port of call for suitable civil cases is to attempt amicable resolution during the initial case conference, before the trial process is defaulted to if parties are unable to reach settlement. In subsequent years, neutral evaluation was introduced, allowing parties to obtain a non-binding assessment of their case's strengths and weaknesses from a judge or evaluator, so as to encourage parties to seriously consider settlement.[51] The institutionalisation of the CDR framework marked a fundamental philosophical shift: dispute resolution in the court process was no longer equated solely with adjudication. Judges are now tasked with assuming an active role in promoting settlement where appropriate, balancing efficiency with the preservation of justice.[52] The success of the CDR framework, reflected in high settlement rates,[53] prompted the extension of mediation into more areas, including family disputes and employment matters.[54] Over time, the courts actively encouraged litigants to attempt mediation before proceeding to trial, embedding mediation into the court's procedural DNA.

32 The FJC exemplifies the integration of therapeutic justice principles in its day-to-day proceedings. The FJC has developed more accessible and less diffused processes,[55] addressing a bug-bear characteristic of numerous advanced jurisdictions the world over.[56] Early

51 Dorcas Quek Anderson & Seah Chi-Ling, "Finding the Appropriate Mode of Dispute Resolution: Introducing Neutral Evaluation in the Subordinate Courts", *Singapore Law Gazette* (November 2011).

52 *A Guide to Judge-Led Court Dispute Resolution* (Tan Boon Heng gen ed) (Academy Publishing, 2025) at paras 1.10–1.11.

53 More than 85% of cases handled by way of Court Dispute Resolution (which itself forms 40% of the caseload in the State Courts) are resolved without trial; see *A Guide to Judge-Led Court Dispute Resolution* (Tan Boon Heng gen ed) (Academy Publishing, 2025) at paras 1.12–1.14.

54 Dorcas Quek Anderson & Sabiha Shiraz, "Ch 03 Mediation", *Singapore Law Watch* (30 December 2018) <https://www.singaporelawwatch.sg/About-Singapore-Law/Overview/ch-03-mediation> at paras 3.5.1–3.5.4.

55 Chen Rui, "Hope for Less Contentious Divorce under Family Justice Courts Approach of Therapeutic Justice", *The Straits Times* (28 November 2023).

56 The former President of the UK Supreme Court Baroness Hale of Richmond recently made the point that the UK family law regime remains too diffused for justice to be meted out effectively; see Amol Rajan, "Law and Order: How to Fix Britain's Courts (Lady Hale)", *Radical with Amol Rajan: A Today Podcast* (3 July 2025).

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case management conferences in family proceedings focus not merely on procedural timelines but also on the emotional and relational dynamics at play, encouraging parties to engage in counselling, mediation or parenting co-ordination. Judges trained in mediation techniques facilitate non-adversarial dialogue between parties wherever possible.

33 More broadly, the Singapore courts in general have actively incorporated court-annexed ADR processes into their case management frameworks. In civil matters, case conferences routinely explore the possibility of mediation, and many categories of disputes are referred to mediation almost as a matter of course. In the criminal sphere, the Criminal Case Resolution ("CCR") process allows for early dialogue between prosecution and defence, facilitated by a judge, to explore the possibility of plea bargains or resolution without the need for full trials.[57] While the CCR does not substitute adjudication where necessary, it provides a structured avenue for early case disposition so as to focus judicial resources where it is most needed.[58]

34 The SICC is itself a hybrid forum of sorts – one that retains the legitimacy and enforcement mechanisms of the courts, while integrating features drawn from international arbitration and transnational best practices. It draws upon a diverse panel of eminent judges hailing from both civil and common law traditions.[59] It offers flexible procedural tools, such as bespoke disclosure regimes, liberal allowance for foreign lawyers to have rights of audience, and tailored case management tracks, reflecting the complexity and expectations of sophisticated international litigants.[60] Of particular significance is its costs regime, which allows for more liberal costs recovery than in conventional civil litigation[61] – an important consideration in high-value disputes involving significant legal expenditure. By offering these features within the context of a court framework, the SICC fills a strategic gap between litigation and

57 For a broad overview of the Criminal Case Resolution regime in Singapore, see Kessler Soh, "'Criminal Case Resolution' in the Subordinate Courts of Singapore" [2011] *Journal of Commonwealth Criminal Law* 209.

58 The question of whether small-scale criminal matters can be resolved without the courts is an interesting one that merits further study. Prof Sander hinted that this was a worthwhile venture; see Frank E A Sander, "The Multi-Door Courthouse" (1976) 3(3) *Barrister* 18 at 41.

59 The SICC bench includes jurists from a remarkably broad array of jurisdictions to complement those from Singapore – Australia, UK, France, Hong Kong, Japan, US, Germany and India, to state but a few – reflecting its design as a truly international court mechanism.

60 See O 3, O 6–O 8 and O 12 of the Singapore International Commercial Court Rules 2021.

61 The motivations for this are explained in some depth in *Senda International Capital Ltd v Kiri Industries Ltd* [2023] 1 SLR 96 at [51]–[59].

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arbitration, allowing parties to select a process that blends the virtues of both.[62]

35 The recognition that different dispute resolution forums have their unique strengths that can be leveraged on can also be seen in the institutionalisation of innovative hybrid processes. For example, Singapore embraced hybrid processes such as Med-Arb and Arb-Med-Arb across numerous settings and industries.[63] The Singapore International Mediation Centre ("SIMC") and the SIAC jointly developed the Arb-Med-Arb Protocol, offering an efficient and flexible process particularly attractive for cross-border commercial parties.[64] Hybrid models combine the benefits of consensual resolution with the assurance of binding enforceability, exemplifying Singapore's pragmatic and innovative spirit.

C. Online dispute resolution and technological integration

36 Technology is, in many senses, the master key to the robust multi-door courthouse. It is critical to unlocking new pathways, lowering thresholds for entry, and recalibrating processes to the lived realities of users. As Prof Sander's vision evolved over the decades, it became clear that his concern was not primarily with logistics or institutional design but about justice as a service that is responsive to its users. In Singapore, this ideal finds expression not only in the diversity of forums, but in the tools used to support them. Increasingly, the question is no longer *whether technology should be used* (a given), but *how to ensure that its deployment honours the deeper values of the justice system*.[65] The Singapore courts' conception of justice aligns with this, with Chief Justice Sundaresh Menon noting that technology is an obvious modality by

62 Toby Landau & Jennifer Lim, "Advocacy Before the Singapore International Commercial Court" at para 4.40 in *Charting New Waters: The Singapore International Commercial Court After Ten Years* (Philip Jeyaretnam & Francis Xavier gen eds) (Academy Publishing 2025).

63 These are specifically tailored to the type of dispute at hand, and there are a myriad of institutional schemes catered towards different types of disputes, including for disputes involving real estate, private education, medical treatment and athletes, to name a few.

64 This process has generally been lauded, though it is, of course, not without its own unique challenges and imperfections. See *eg*, Paul Tan & Kevin Tan, "Kinks in the SIAC-SIMC Arb-Med-Arb Protocol", *Singapore Law Gazette* (January 2018).

65 Interestingly, it was not likely that Prof Sander envisioned the rise of the online space, or its future central role, when he delivered his seminal speech in 1976 – see Colin Rule, "Integrate Technology into the Practice of Dispute Resolution", *Theory of Change Symposium* (12 November 2019).

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which the courts can provide "a cheaper and more convenient means of accessing court or other legal services".[66]

37 The experience of the Community Justice and Tribunals System ("CJTS"), an online platform for parties to file and manage their cases in, *inter alia*, the SCT and the CDRT discussed above, exemplifies the Singapore court's shift towards technology. Initially designed for small claims and community disputes, it has evolved into a seamless digital platform that allows users to file claims, upload evidence, negotiate settlements, participate in mediation and receive tribunal orders, all without entering a physical courtroom. For thousands of users each year, it is their first and often only touchpoint with the justice system, and the experience is intentionally designed to be intuitive and accessible.

38 The broader Judiciary has, over the years, likewise integrated technology across every phase of the dispute resolution lifecycle.[67] The eLitigation platform has rendered paper filings less relevant; asynchronous hearings and videoconferencing are now commonplace; and smart scheduling tools increasingly optimise judicial resources. These shifts, while admittedly catalysed by the COVID-19 pandemic,[68] were not simply reactive, but the result of over three decades of sustained investment, strategic planning and inter-agency co-ordination. Importantly, these reforms have not compromised procedural fairness: safeguards such as digital evidence protocols, virtual court etiquette guidelines, and the need to adhere to principled evidential norms ensure that the medium does not distort the message of justice. As a result of the push towards the embracing of technology, Singapore is said to be the "most comprehensively digitalized justice system in the world" and one which stands as "a clear global leader".[69]

66 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "The JDRN: Remoulding the Justice System", speech at the Inaugural Meeting of the International Judicial Dispute Resolution Network (18 May 2022) at para 13.
67 For a conspectus of some of the earlier initiatives, see Richard Magnus, "The Confluence of Law and Policy in Leveraging Technology: Singapore Judiciary's Experience" (2004) 12 *William & Mary Bill of Rights Journal* 661 and Tan Boon Heng, "E-Litigation: The Singapore Experience", *Singapore Law Gazette* (November 2001).
68 Yeo Mui Lin, "The Online Court and Remote Hearings: Enhancing the Administration of and Access to Justice in Singapore" (2025) 37 SAcLJ 281.
69 Dick Hartung *et al*, "The Future of Digital Justice" (June 2022) <https://ink.library.smu.edu.sg/cgi/viewcontent.cgi?params=/context/sol_research/article/6589/> (accessed 6 March 2026).

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V. Architects behind Singapore's multi-door courthouse

A. Judicial philosophy of alternate dispute resolution

39 Perhaps one of the most profound shifts in Singapore's dispute resolution landscape is the repositioning of complementary forms of dispute resolution from the periphery to the mainstream. A defining feature of this development is the Judiciary's explicit endorsement of the principle that ADR is better understood as "appropriate dispute resolution" rather than "alternative dispute resolution".[70] Unlike earlier eras when litigation was the dominant, if not exclusive, method of dispute resolution, the courts today encourage a philosophy where disputes are actively directed towards the most suitable process. This shift is most clearly articulated in the speeches and policies championed by Chief Justice Menon, who has repeatedly emphasised the importance of contextuality, proportionality and accessibility in dispute resolution.[71]

40 In practice, this philosophy manifests through various judicial and administrative mechanisms. Judges are empowered to recommend mediation at early stages of proceedings,[72] and indeed they often do so at all stages, including at appellate levels. Procedural rules now require parties to consider amicable resolution of the dispute, and for their counsel to inform the court early in the proceedings, in a pre-case conference questionnaire, whether amicable resolution has been attempted.[73] As touched on earlier, court annexed services are integrated into the litigation process, allowing for seamless referrals without sacrificing procedural fairness. To incentivise the use of such services, it is often provided on a complementary (or low-cost) basis.[74] As to the arbitration front, the Singapore courts have also, over time, honed a reputation for

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70 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "Shaping the Future of Dispute Resolution & Improving Access to Justice", speech at the Global Pound Conference Series 2016 (17 March 2016) at paras 23–27. See also Edwin Tong, Minister for Law, speech at Appropriate Dispute Resolution: The Singapore Way (12 January 2023) at para 5.

71 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "Reimagining the Rule of Law: A Renewed Conception" speech at Conversations with the Community (20 September 2024) at para 26.

72 For a discussion of the philosophy underpinning judicial mediation, see Jean-François Roberge & Dorcas Quek Anderson, "Judicial Mediation: From Debates to Renewal" (2018) 19(3) *Cardozo Journal of Conflict Resolution* 613.

73 See O 5 r 1(1) of the Rules of Court 2021 and para 53 of the Supreme Court Practice Directions 2021. There are also potential cost implications arising from the failure to offer or consider amicable resolution; see O 21 r 2(2)(*a*) and O 21 r 4(*c*) of the Rules of Court 2021.

74 Charmaine Ng, "Selected Litigants at Supreme Court to get Free Mediation Option under SGUnited Initiative", *The Straits Times* (29 May 2020).

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a pro-arbitration stance, with minimal curial intervention except where necessary to uphold public policy or procedural integrity.

41 This has required the Judiciary to reflect upon its role. As Chief Justice Menon has observed extra-judicially, judges should not be seen as just adjudicators, but as problem-solvers.[75] Far from compromising neutrality, this approach reflects a deeper judicial philosophy: that, at its core, the judge's role is to help parties resolve their differences efficiently, fairly and with dignity.

42 Importantly, the promotion of ADR does not imply any diminution in the value of litigation. Rather, it acknowledges that litigation remains critical for certain disputes, particularly in cases involving constitutional questions, public law issues, the need for authoritative precedent, or the need for sanctions to be imposed on an individual or entity,[76] while recognising many private disputes can and should be resolved more efficiently and constructively through other platforms. To put it another way, it is imperative that we "move away from our traditional and rigid ideas of how disputes should be resolved, towards a flexible and option-laden model where disputants are well-placed to choose the ideal mode of dispute resolution from a suite of options".[77]

B. Legislative and executive support for multi-door justice

43 For any justice system to truly reflect the ethos of ADR, the architecture of law must match the ambition of its institutions. In Singapore's case, legislative reform has played an important, if not catalytic, role. Rather than treating mediation and arbitration as peripheral, the legal framework has recognised these dispute resolution forums as core modalities, entitled to the same predictability, enforceability and respect as litigation. This reflects what one can only assume Prof Sander would have regarded as the maturing of a multi-door courthouse: not just an array of options, but a commitment to legitimacy across all doors.

75 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "The JDRN: Remoulding the Justice System", speech at the Inaugural Meeting of the International Judicial Dispute Resolution Network (18 May 2022) at para 7.
76 Stephen B Goldberg, Frank E A Sander & Nancy H Rogers, *Dispute Resolution: Negotiation, Mediation, and Other Processes* (Wolters Kluwer, 7th Ed, 2020) at p 394.
77 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "Shaping the Future of Dispute Resolution & Improving Access to Justice", speech at the Global Pound Conference Series 2016 (17 March 2016) at para 25.

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44 For instance, legislative developments have underpinned the growth of arbitration in Singapore. The Arbitration Act 2001[78] ("AA") and the International Arbitration Act 1994[79] ("IAA") provide a clear, modern and supportive legal environment of routing appropriate disputes to arbitration. Key features include party autonomy, minimal curial intervention and strong enforceability of arbitral awards under the Convention on the Recognition and Enforcement of Foreign Arbitral Awards (commonly known as the New York Convention).[80] Singapore has continued to refine both the AA and the IAA to remain in step with evolving international norms. These updates allowed arbitration to thrive as a peer institution to the courts delivering justice albeit through a different platform. This confidence is very much borne out by the numbers: Singapore is now the second most preferred arbitration seat in the world,[81] and the number of cases at SIAC have more than doubled over a decade.[82]

45 Another key example of this evolution is the Mediation Act 2017[83] ("MA"), which enhances the legal enforceability of mediated settlement agreements.[84] Under the MA, mediated settlement agreements can be recorded as an order of court, allowing parties to rely on those agreements with certainty – a reassurance particularly vital in commercial disputes.[85] Perhaps most emblematic of Singapore's vision was its role in launching the United Nations Convention on International Settlement Agreements Resulting from Mediation (commonly known as the Singapore Convention)[86] – a treaty that enables cross-border

78 2020 Rev Ed.
79 2020 Rev Ed.
80 (10 June 1958), 330 UNTS 38 (entered into force 7 June 1959).
81 Abby Cohen Smutny, Charles Nairac & Norah Gallagher, "The Path Forward: Realities and Opportunities in Arbitration", *2025 International Arbitration Survey* <https://www.qmul.ac.uk/arbitration/media/arbitration/docs/White-Case-QMUL-2025-International-Arbitration-Survey-report.pdf> at pp 7–8 (accessed 6 March 2026).
82 Singapore International Arbitration Centre, *Annual Report 2024* at pp 30–31.
83 2020 Rev Ed.
84 An excellent overview of the Mediation Act 2017 can be found in Dorcas Quek Anderson, "A Coming of Age for Mediation in Singapore? Mediation Act 2016" (2017) 29 SAcLJ 275.
85 For a detailed description of the provisions in the Mediation Act 2017, see Nadja Alexander & Ong Kye Jing "Singapore's Mediation Act 2017" *Annotated Laws of Singapore (LexisNexis)* (1 October 2021).
86 (20 December 2018) (entered into force 12 September 2020). As of 6 March 2026, there are 62 signatories to the Singapore Convention. For a detailed breakdown, see Singapore Convention on Mediation, "Jurisdictions" <https://www.singaporeconvention.org/jurisdictions> (accessed 6 March 2026).

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enforcement of mediated settlement agreements.[87] In many ways, the Singapore Convention is a global expression of what Singapore had been practising: treating mediation as a serious, enforceable and exportable form of dispute resolution.[88]

46 As can be seen in the above discussion, Singapore's journey towards a multi-door dispute resolution system has been characterised by deliberate and integrated reform. The development of mediation and arbitration in Singapore, which has received robust legislative support, has transformed the dispute resolution landscape. In so doing, Singapore has not only realised the vision of Prof Sander's multi-door courthouse, but has adapted and extended that vision, demonstrating how a small jurisdiction can exercise global leadership in shaping the future of justice. It is worth recalling that Prof Sander, who recognised the importance of public financing to effect his vision,[89] had himself lamented how promising experiments in the US on dispute-resolution reform were stifled by uneven institutional support and budgetary cuts.[90] Singapore's experience is, thankfully, different. With sustained governmental commitment, it has played the long game, investing consistently in infrastructure and legislation so that what began as innovation has matured into institution.

C. Normalisation of alternate dispute resolution in legal culture and practice

47 The cultural normalisation of ADR has been both top-down and bottom-up. As discussed above, the Judiciary's advocacy for ADR has been mirrored by structural legislative reforms that make ADR procedurally integrated and legally enforceable. But perhaps just as significantly, the approach of the legal profession has evolved in tandem. This is, in Prof Sander's view, critical, as lawyers are often "dispute resolution gatekeepers" themselves.[91] All three local law schools now

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87 Nadja Alexander & Shouyu Chong, "Leading the Way for the Recognition and Enforcement of International Mediated Settlement Agreements: The Singapore Convention on Mediation Act 2020" (2022) 34 SAcLJ 1.

88 For some reflections on the Singapore Convention and its role in changing international perceptions of mediation, see Abigel Farkas, "Years of Progress: The Development of the Singapore Convention on Mediation", *International Mediation Institute* (13 October 2025).

89 Stephen B Goldberg, Eric D Green & Frank E A Sander, "ADR Problems and Prospects: Looking to the Future" (1986) 69(5) *Judicature* 291 at 299.

90 Frank E A Sander, "Alternative Methods of Dispute Resolution: An Overview" (1985) 37 *Florida Law Review* 1 at 18.

91 Frank E A Sander, "Future of ADR – The Earl F Nelson Memorial Lecture" (2000) *Journal of Dispute Resolution* 3 at 8.

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offer ADR courses as part of their legal education. From foundational courses in negotiation theory and mediation skills to specialised electives in arbitration practice, law students are exposed early to the idea that being a good lawyer means knowing how to approach a dispute and, importantly, when *not* to litigate.

48 Continuing legal education offerings, co-ordinated by institutions such as the Singapore Academy of Law, the Law Society of Singapore and a range of accredited training providers, reinforce this ethos throughout a lawyer's career. Specialist panels, including accredited mediators, arbitrators and neutral evaluators, now form part of structured career pathways.[92] In line with the desire to professionalise ADR pathways for professionals, the Singapore International Mediation Institute ("SIMI") was set up and has since become the premier independent professional standards body for the mediation industry in the region. With the rise of interpersonal conflicts requiring empathetic navigation, there is growing recognition that such expertise is going to be indispensable.

49 Crucially, this evolution is not confined to the legal profession. Singapore's wider business, public and civic sectors have internalised ADR as a principle of good governance and sound policy. Corporations routinely include multi-tiered dispute resolution clauses in contracts; statutory boards maintain standing panels of mediators and adjudicators; and community mediation is seen not just as a service, but as a social compact. These shifts underscore the emergence of a justice culture grounded not solely in rights and remedies, but in dialogue, resolution and the preservation of relationships. What we see today is a system in which ADR is no longer the alternative – it is embedded, endorsed, and, indeed, expected.

D. Quality assurance

50 A system of justice, no matter how innovative or advanced, ultimately turns on the quality of its people. The legitimacy of Singapore's multi-door courthouse model lies not merely in its architecture, but in the rigour with which each pathway is staffed, governed and quality-assured.

51 Within the courts, modalities such as judge-led mediation, neutral evaluation, and settlement conferencing are overseen by trained judges and registrars. To complement the developments in

92 There are even societies dedicated to the promotion of mediators (*eg*, Society of Mediation Professionals) and private enterprises promoting mediation training (*eg*, Sage Mediation).

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the FJC regarding therapeutic justice, certification programmes were established to ensure that the professionals involved in such proceedings are sufficiently well-versed with the nuances of the practice of family law and the therapeutic justice approach.[93] Outside the courtroom, institutions such as the SMC, the SIMC, and the SIAC maintain strict accreditation regimes, with SIMI adding an additional layer of quality assurance as an independent accreditation body, maintaining a structured tiering system and requiring ongoing professional development to ensure global best practices.

52 These safeguards are, of course, not static, nor can they ever be. Metrics such as settlement rates, user satisfaction, procedural compliance and where the system stands on an international level are not only tracked but actively shape institutional learning and systems design. This reflexivity strengthens public confidence and underscores the system's commitment to delivering better justice.

53 The result is a dispute resolution system that, despite its many forms, continues to rest on clear and consistent principles. It is not a loose collection of *ad hoc* fixes, but a deliberately built extension of the justice system designed to ensure that every process, or "door", serves the ideals of justice.

E. The multi-door dispute resolution landscape today

54 At its core, the multi-door courthouse represents a paradigm shift away from a monolithic and adjudication-centric conception of courts towards a more procedurally pluralistic model tailored to meet the needs of different kinds of disputes.[94] In Singapore, litigation, mediation, arbitration, neutral evaluation and hybrid processes coexist not in competition but in complementary synergy, offering parties meaningful choices tailored to their disputes' needs. Access to justice is enhanced, procedural efficiency is maintained, and the relational dimensions of conflict are acknowledged and respected.

55 As Singapore stands on the shoulders of this remarkable evolution, the natural question that arises is: what lies ahead? If the first chapters of the multi-door courthouse were about expansion and diversification (and legitimatisation) of process, the next few may well

93 See the Family Therapeutic Justice Certification Programme organised by the Singapore Academy of Law, the Family Justice Courts and the Law Society of Singapore <https://sal.org.sg/wp-content/uploads/2025/03/Flyer-Family-Therapeutic-Justice-Certification-Programme-Oct-2021_final.pdf> (accessed 6 March 2026).
94 Frank E A Sander, "The Multi-Door Courthouse" (1976) 3(3) *Barrister* 18 at 19–20.

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be about deepening and integration. The challenge now is not only to offer more doors, but to ensure that behind each door is a process that is intuitive, efficient and just. To some extent, Singapore has already foreseen this development, and has taken concrete steps in the right direction, but this is not a matter on which one can rest their laurels. As emerging technologies, shifting social dynamics and increasingly transnational disputes continue to reshape the contours of conflict, the future of Singapore's dispute resolution landscape will depend on its ability to adapt boldly yet wisely.

56 With that, we therefore turn to the next leg of Singapore's development, moving from a multi-door courthouse to a multi-platform and user-centric courthouse.

VI. Crystal ball-gazing: the future of dispute resolution in Singapore

57 If the past few decades marked Singapore's journey from a court-centric, monolithic model of dispute resolution to a vibrant, multi-door courthouse ecosystem, the coming decades promise an even more radical transformation. The question is no longer whether there are multiple doors to justice, but how these can be seamlessly integrated into a truly user-centric justice milieu, where every dispute finds its *optimal* pathway with minimal friction.

58 In truth, the evolution of any reform movement follows a rhythm of its own. As Prof Sander himself has noted about the ADR movement in the US, after the initial burst of exuberance came an equally vital phase of consolidation and reflection.[95] Singapore's dispute resolution ecosystem now stands at such an inflection point: confident enough to celebrate what has been built, but self-aware enough to interrogate its assumptions, refine its processes, and realign its ideals. It is from this more contemplative plateau that the next chapter of innovation must proceed. The author nonetheless should pause here to observe that these thoughts should not be taken to be prescriptions. The author is conscious that his vantage point is very much bounded. What follows, then, are no more than unvarnished reflections of an individual who is offering a set of musings, shaped by experience of course, but necessarily open to contestation, refinement and push-back. Ultimately, humility must attend any effort to anticipate the future of a system as vital and complex as justice.

95 Frank E A Sander, "Alternative Methods of Dispute Resolution: An Overview" (1985) 37 *Florida Law Review* 1 at 11.

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59 That caveat aside, this exercise is not, and should not be, an exercise in futurism for its own sake. It arises from the same pragmatic impulses that have guided Singapore's legal development since independence: a belief that the legitimacy of a justice system lies not merely in its doctrinal pedigree, but in its capacity to serve society's evolving needs with integrity, competence, and empathy. As Singapore continues to develop as a financial, technological, and cultural node, its dispute resolution ecosystem must similarly evolve to handle new categories of disputes, to meet rising expectations, and to responsibly deploy the tools of innovation. None of this should surprise us. Prof Sander's vision of the multi-door courthouse was never static but a human-centred architecture of justice that evolves to respond to ever-shifting social, economic, and political dynamics.[96]

60 Which brings us to the essential question: how can Singapore build not just more doors, but smarter ones? How can we harness technology, personalisation, and cross-border leadership to deliver a justice system that is faster, fairer, and more future-ready but that concomitantly nonetheless remains anchored in the values of impartiality, dignity, and the rule of law? Some tentative thoughts are offered below.

A. *Deeper integration of technology*

61 The integration of advanced technologies into the dispute resolution landscape is poised to accelerate dramatically. One obvious question arises: what kinds of disputes traditionally dealt with through the legal process can, and should, be resolved inexpensively, without the full machinery of lawyers or the courts? The uncomfortable truth is that, for many categories of conflict, the conventional justice system remains financially out of reach. As Chief Justice Menon has observed, access to justice today increasingly entails grappling with the rising number of self-represented litigants who simply cannot afford representation.[97] There is, therefore, a pressing "need for technology to supplement human efforts in closing the justice gap".[98] This is not an academic concern.

96 Frank Sander & Mariana Hernandez Crespo, "A Dialogue Between Professors Frank Sander and Mariana Hernandez Crespo: Exploring the Evolution of the Multi-Door Courthouse" (2008) 5 *University of St Thomas Law Journal* 665 at 673.

97 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "The Role of Technology in Justice Systems: A Vision of Accessible and Collaborative Justice", paper delivered at the Sejong International Judicial Conference (29 September 2025) at para 5.

98 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "Technology and the Changing Face of Justice", speech at the Negotiation and Conflict Management Group ADR Conference 2019 (14 November 2019) at para 4.

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Globally, it is estimated that nearly two-thirds of the world's population live with unmet justice needs – a stark reminder that even the most sophisticated legal systems risk irrelevance if they are accessible only to a privileged few. The continued integrity of our system therefore depends on whether we can ensure that our justice system (as a collective whole) is not just excellent, but affordably so.

62 There are promising shoots in this regard. As noted earlier, the CJTS platform is a contemporary iteration of this evolution, already enabling parties to file, negotiate, mediate, and resolve select disputes online.[99] Nonetheless, more can, and will, be done. For example, the SCT has tied up with Harvey.AI and aspires to use artificial intelligence ("AI") to assist parties with filing their claims, understanding the evidential landscape of their respective cases, preparing their submissions, and potentially even leading the parties to a sensible interest-based settlement of the matter.[100]

63 While these are laudable steps, the future portends much greater possibilities. To be sure, the deployment of AI in legal processes is not without challenge. Nonetheless, the problems posed by AI would seem to invite innovation. The emergence of platforms like Garfield AI – an AI-driven "law firm" operating under legal professional rules[101] illustrates that some of the risks of AI can be mitigated through thoughtful design, regulatory scaffolding, and domain-specific constraints, even if some constraints remain.[102] Be that as it may, such models demonstrate the promise that responsible deployment of generative tools is not only possible but increasingly plausible and offer, in my mind, an instructive path forward: to reimagine AI not as a threat to legal integrity, but as a regulated enabler of access, accuracy, and participation.

64 Equally significant is the potential of predictive outcome analysis to streamline the litigation journey or to circumvent it altogether. Artificial intelligence systems trained on historical case data can provide litigants with early, data-driven insights into the likely

99 See Chen Rui, "Navigating Civil Disputes: Initiatives that Improve Access to Community Justice", *The Straits Times* (8 February 2024).

100 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "The Role of Technology in Justice Systems: A Vision of Accessible and Collaborative Justice", paper delivered at the Sejong International Judicial Conference (29 September 2025) at paras 18–19.

101 Solicitors Regulation Authority, "News Release: SRA Approves First AI-driven Law Firm" <https://www.sra.org.uk/news/news/press/2025-press-releases/garfield-ai-authorised/> (accessed 6 March 2026).

102 Perhaps as a sign of the limitations of current technology, and the dangers of over-reliance on AI, Garfield AI is presently not allowed to propose case law.

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outcome of a dispute if pursued in court. One example is the Motor Accident Claims Online simulator,[103] which assists motorists and road users to estimate fault apportionment and quantum of damages in typical motor accident scenarios. A few years back, *DivSim*, a project developed by National University of Singapore Law students in collaboration with practitioners,[104] sought to simulate the division of matrimonial assets based on fact patterns conventionally experienced in divorce proceedings. There is much promise in such initiatives. Similar innovations abroad provide a tantalising glimpse of what the future might look like: in Australia, the *Split Wise* platform[105] is exploring AI-based tools that predict divorce settlement outcomes, with the ambition of offering parties practical guidance without the adversarial heat (and cost) of full-blown litigation. While still in its infancy, such technologies are unlikely to remain on the margins for long. None of this is to suggest that these predictive tools will *always* produce outcomes superior to those achieved through judicial processes. The promise of these AI-driven simulators lies not in perfection, but in pragmatic proximity. For many lower-value or standardised disputes, the outcomes generated by such tools, with relatively modest margins of error to those derived from adjudication, tend to approximate what a court might realistically award. The result is allowing for a realistic cost-benefit analysis for litigants: when the predicted result is sufficiently close to the likely judicial outcome, the added expense, emotional toll, and procedural complexity of litigation is simply unjustified. Indeed, even in higher-value claims, when deployed alongside complementary mechanisms such as negotiation or evaluative mediation, predictive tools encourage parties to anchor their expectations in realism, promote early settlement, and nudge disputes towards resolution pathways that are legally sound, commercially sensible, and procedurally efficient. If properly implemented, AI and technology can be at the heart of a dispute resolution ecosystem in which the gravitational pull is largely towards resolution, and, more often than not, at a small fraction of the cost, complexity, and emotional toll of litigation.

65 As we look to the future, it is also worth reflecting on a proposition that has informed our dispute resolution journey: not every dispute demands judicial determination. As was pointed by Prof Sander,

103 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "Reimagining Law and Technology", keynote address at TechLaw.Fest 2025 (10 September 2025) at para 16.

104 National University of Singapore Faculty of Law, "Media – News: Students Develop Simulator for Divorce Assets Division" (10 January 2018) <https://law.nus.edu.sg/media/students-develop-simulator-for-divorce-assets-division/> (accessed 6 March 2026).

105 Splitwise (2025) <https://www.splitwise.com.au/ai> (accessed 6 March 2026).

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such a seductive notion is a fallacy.[106] Our conception of justice must evolve to reflect the imperatives of cost, time, and proportionality. The challenge and opportunity lie in designing systems that calibrate process to problem, reserving human judgment for the most complex or value-laden controversies while allowing routine matters to be resolved through appropriately streamlined, accessible, and intelligent pathways. Indeed, even in its original conception, Prof Sander observed that "highly repetitive and routinized" tasks should be directed elsewhere.[107] This then naturally invites a somewhat provocative if vexing question: with the increasing sophistication of AI-assisted Online Dispute Resolution ("ODR") systems, which categories of disputes currently dealt with by the courts might sensibly be diverted altogether? At first blush, such a proposition may appear radical, even heretical. Yet legal history reminds us that much of what is orthodoxy today was once dismissed as heresy. There was a time when mediation was viewed as diluting judicial authority; when therapeutic justice was criticised as sentimentality; and when arbitration was viewed with deep suspicion. Today, these are the pillars of modern justice systems. So too, in time, AI-guided processes may come to be seen not as deviations from justice, but as refinements of it. What should matter is not *how* a dispute is resolved, but whether the process employed is fair, proportionate, and trusted.

66 ODR systems are not new, with their origins being traced back over three decades to pioneering experiments such as the University of Massachusetts' Online Ombuds Office[108] and eBay's automated dispute resolution platform.[109] These early projects laid the groundwork for the reimagination of what justice could look like beyond the courtroom: faster, cheaper, and, in most cases, not any less fair. Today, that reimagination continues to evolve. The Guangzhou Arbitration Commission has issued Online Arbitration Rules for arbitrations done over the internet and released its Arbitration Cloud Platform as a one-stop online service for conducting online arbitrations (including

106 In practice, most disputes never reach a fact-finder: they are settled, mediated, or abandoned long before trial. Formal adjudication, though symbolically central, is exceptional. See Frank Sander, H William Allen & Debra Hensler, "Judicial (Mis)use of ADR? A Debate," (1996) 27 *University of Toledo Law Review* 885 at 888.

107 Though in his original conception, he was of the view that this can be delegated to administrative agencies. See Frank E A Sander, "Varieties of Dispute Processing" (1976) 70 *Federal Rules Decisions* 111 at 118.

108 An article authored three decades ago spoke to the promise of the Online Dispute Resolution project: Ethan Katsh, "The Online Ombuds Office: Adapting Dispute Resolution to Cyberspace" <https://www.umass.edu/dispute/ncair/katsh.htm> (accessed 6 March 2026).

109 See Louis Del Duca, Colin Rule & Kathryn Rimpfel, "EBay's De Facto Low Value High Volume Resolution Process: Lessons and Best Practices for ODR Systems Designers" (2014) 6 *Yearbook of Arbitration and Mediation* 204.

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case filing, conducting the hearing and drafting the award),[110] the US has used algorithmic tools such as the Correctional Offender Management Profiling for Alternative Sanctions (COMPAS) system to assist sentencing decisions (albeit with mixed results), and British Columbia's Civil Resolution Tribunal (CRT) has established one of the world's most successful fully online courts, resolving strata and motor claims with human judges intervening only at predetermined (and typically final) stages.[111]

67 To be sure, these innovations are not without controversy. The concerns surrounding issues such as bias, opacity, and overreach are real. These reflect not a deeper human instinct for trust in systems that adjudicate our rights. Consider the trajectory of autonomous vehicles: despite being statistically safer than humans,[112] their adoption is often hampered by public unease. Perception tends to evolve more slowly than technology. The same is true of AI in justice. Its long-term success will depend not just on accuracy, but on legitimacy and empathy. People must feel justice remains just, even when rendered via digital means.

68 With this in mind, the next stage of Singapore's evolution may lie in identifying judicial work amenable to AI-assisted supplementation. Procedural directions, case triage, case management, and routine interlocutory decisions present, the author suggests, natural starting points. Within our system already lie opportunities to pilot such uses: to state some of the more obvious areas, automating transcription,[113] using AI or technology to vet procedural compliance in routine applications,[114] setting timelines algorithmically at case conferences and generating

110 Chen Zhi, "The Path for Online Arbitration: A Perspective on Guangzhou Arbitration Commission's Practice", *Kluwer Arbitration Blog* (4 March 2019) <https://legalblogs.wolterskluwer.com/arbitration-blog/the-path-for-online-arbitration-a-perspective-on-guangzhou-arbitration-commissions-practice/> (accessed 6 March 2026).

111 While not without its own problems, a survey suggests that the Civil Resolution Tribunal acquits itself relatively well when contrasted with conventional court services: see Katie Sykes *et al*, "Civil Revolution: User Experiences with British Columbia's Online Court" (2020) 37 *Windsor Yearbook of Access to Justice* 161 at 187 <https://wyaj.uwindsor.ca/index.php/wyaj/article/view/7192/5409>(accessed 6 March 2026).

112 Edd Gent, "Study Finds Self-Driving Cars Are Actually Safer Than Humans in Many (But Not All) Situations", *SingularityHub* <https://singularityhub.com/2024/06/24/study-finds-self-driving-cars-are-actually-safer-than-humans-in-most-situations/> (accessed 6 March 2026).

113 The costs of transcription in a trial before the High Court would typically start from a four-figure sum.

114 For example, in ensuring procedural compliance with winding-up applications under the Insolvency, Restructuring and Dissolution Act 2018 (2020 Rev Ed).

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first drafts for uncontroversial rulings.[115] These calibrated supports can free human judges to devote their energies to what genuinely requires significant human industry: developing doctrine, resolving ambiguity, and confronting the moral and constitutional challenges no algorithm can meaningfully answer.

69 Moreover, the evolution of AI offers new possibilities. The leap from generative models (*ie*, those that respond to prompts) to agentic AI (which can reason, act, and adapt autonomously) opens doors we barely dared imagine just a decade ago. An agentic system might co-ordinate procedural workflows, nudge parties towards realistic settlement options, or autonomously flag inconsistencies in pleadings, all while remaining under human oversight. But, to quote from popular culture, with great power comes great responsibility. As we walk down this journey, we must heighten standards of accountability, auditability, and corrigibility.

70 It warrants reiteration however that no machine, however sophisticated, can, or should, replace the human mind and spirit at the heart of adjudication. The cases that truly test the moral, constitutional, or societal fabric of a nation must remain the province of human judgment. Cases involving important questions of the day – such as the challenge of criminal laws designed for use in quite different times,[116] to the logic of the law when it comes to issues surrounding capital punishment,[117] to the question of the right of same-sex couples to undergo surrogacy overseas[118] – cannot be meaningfully outsourced by humanity. In such cases, the point that the law is not an algorithm but a living organism, one that is sustained by the interpretive imagination of those who practise it, comes into very sharp relief. In that sense, in the author's view, judges and lawyers remain, and will always remain, at its heart and as its conscience.

71 The role of technology, is therefore not to supplant them in these important debates, but to support them. It can filter noise from signal to surface what matters and democratise access to justice. Advanced large language models (LLMs) such as Syllo AI[119] and Claude

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115 Matthew Heaphy, "How Are Courts Adopting AI in the Asia Pacific Region?", *Thomson Reuters* (17 July 2025) <https://insight.thomsonreuters.com/sea/legal/posts/how-are-courts-adopting-ai-in-the-asia-pacific-region> (accessed 6 March 2026).

116 *Tan Seng Kee v Attorney-General* [2022] 1 SLR 1347.

117 See, *eg*, *Public Prosecutor v Kho Jabing* [2015] 2 SLR 112 and *Public Prosecutor v Azlin binte Arujunah* [2022] 2 SLR 1410.

118 *UKM v Attorney-General* [2019] 3 SLR 874.

119 The seemingly game-changing nature of Syllo AI for document review is discussed here (though note that the paper is, in part, authored by Syllo employees): Pei-Lun

(cont'd on the next page)

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AI[120] already hint at this possibility. Capable of digesting vast *corpora* of legal materials, these tools can generate coherent summaries, draft submissions, and even suggest strategic approaches to litigation and negotiation. In an age where evidentiary records can be expected to stretch to millions of pages regularly,[121] such capabilities will increasingly be seen as necessities. The sensible increasing use of such tools would enable the courts to focus on substance over form, ensuring that justice remains both efficient and comprehensible.

72 Thus far, this discussion has been anchored in the domestic. Yet the same principles must also govern Singapore's role on the international plane. The next part of the discussion, therefore, explores how this vision extends to the evolving landscape of cross-border dispute resolution, and to Singapore's emerging role as an international hub for principled, technologically enabled, and human-centred justice.

B. Cross-border dispute management leadership

73 If the domestic system is the laboratory in which new forms of justice are developed, then the international stage is where they would be most rigorously tested. To realise Prof Sander's vision of a truly responsive, human-centred dispute resolution ecosystem, Singapore must now extend its innovations into the international commercial plane – a milieu that is increasingly defined by polarisation, supply chain realignments, and fractured regulatory regimes.[122] Amid such uncertainty, and with real questions now being asked about the state of the international legal system,[123] parties will look not merely for efficiency,

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Tai *et al*, "Agentic AI Document Review Is Transformative for Complex Litigation" (21 March 2025) <https://www.quinnemanuel.com/media/q22idirc/agentic-ai-document-review-is-transformative-for-complex-litigation-syllo-quinn-emanuel.pdf> (accessed 6 March 2026).

120 See, for an in-depth analysis of the use case for Claude AI (and its limitations) by the State Bar of Nevada, David Rothenberg, Jennifer Shomshor & Marshal Willick, "AI Product Review for Solo Practitioners and Small Firms: Claude Pro, by Anthropic" (18 November 2024) <https://nvbar.org/wp-content/uploads/Claude-AI-Review_Final.pdf> (accessed 6 March 2026).

121 As an anecdotal example, the author presided over a matter where the documentary record involved hundreds of thousands of pages.

122 See *The New Global Economic Order* (Lili Yan Ing & Dani Rodrik gen ed) (Routledge, 2020) at ch 5.

123 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "International Law in Unprecedented Times – and our Role in Shaping It", keynote address at the International Law Association (Singapore Branch) Symposium 2025 (8 October 2025) at para 4.

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but for fora that offer predictability, stability, and principled neutrality. Singapore's strategic opportunity lies in offering just that.[124]

74 To remain relevant, and indeed, to lead, Singapore must take the necessary steps to leverage on its current posture as a neutral venue to become a global steward of procedural innovation. The country is uniquely positioned to do so. Its judicial system is trusted, its legal infrastructure mature, and its rule of law credentials unimpeachable.[125] But perhaps the true opportunity lies in shaping *how* international disputes are resolved: in essence, in developing globally harmonised procedures, shaping default protocols for complex transnational disputes, and curating dispute resolution pathways that reflect not just fairness, but commercial realism.

75 One area ripe for leadership is the creation of a more harmonised international architecture for dispute resolution, both procedurally and substantively. Disputes today routinely span jurisdictions with competing legal traditions, divergent rules of evidence, and varied procedural cultures. To reconcile these differences is not merely a technical challenge, but a normative one. Singapore could lead in articulating model protocols for case management, procedural bifurcation, hybrid mediation-arbitration frameworks, and even shared ethical standards across dispute resolution bodies. In this, Singapore's role would be not just as host, but as convener and architect.

76 The SICC, the author would suggest, can serve as a central anchor of such a next phase. Already distinct in its ability to draw upon international jurists and apply foreign law (as noted earlier) and seen by some as "the only example of a truly international commercial court that does not operate in an enclave",[126] its evolution must continue apace. Tomorrow's SICC will presumably expand on its already modular procedures, to tailor them even further to the parties' risk tolerances and timelines,[127] while seeking to avoid some of the

124 See Dawn Tan & Tony Grundy, "Current Perspectives on the Choice of Singapore Jurisdiction and Governing Law in Cross-Border Transactions in Asia" [2022] SAL Prac 19, at paras 1–3.

125 The World Justice Project in 2024 ranks Singapore 16th in the world in the rule of law, and in the top 10 in the world for civil and criminal justice. See World Justice Project, "Singapore Ranks 16 out of 142 in the World Justice Project Rule of Law Index" (23 October 2024) <https://worldjusticeproject.org/sites/default/files/documents/Singapore_2.pdf> (accessed 6 March 2026).

126 Lucas Alcolea, "The Rise of the International Commercial Court: A Threat to the Rule of Law" (September 2022) 13(3) *Journal of International Dispute Settlement* 413 at 420.

127 See *Charting New Waters: The Singapore International Commercial Court After Ten Years* (Philip Jeyaretnam & Francis Xavier gen eds) (Academy Publishing, 2025) at paras 5.31–5.33.

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problems critics have levelled at the rise of such courts.[128] A forum like the SICC builds its legitimacy not just through thoughtful design or the global stature of its judges, but also through the steady accretion of jurisprudence that arises from a meaningful docket of cases. While the first decade of its existence has left much room for confidence on this front,[129] credibility, in this sense, is cumulative: the authority of a court grows as it becomes a venue of choice for transnational disputes, and its decisions, over time, form a *corpus* that influences parties well beyond its shores. Ensuring a sustained pipeline of appropriate cases is thus not just a matter of prestige, but a structural imperative. In this respect, one is reminded of Prof Sander's broader insight that dispute systems must evolve organically, calibrated not just to form, but to function. The long-term vitality of the SICC depends on its ability to attract, resolve, and thereby shape the contours of commercial practice across borders, not by abstract (thoughtful) design alone, but by earning the trust of users through the consistency and clarity of its output. There is every reason to be confident of this, even if the work will never be fully done.

77 Part of cultivating that critical mass of cases will necessarily involve deepening strategic partnerships with like-minded jurisdictions. Singapore's treaty with Bahrain (alluded to earlier), allowing for final appellate recourse from the Bahrain International Commercial Court, offers a compelling example of this win-win dynamic: it leverages Singapore's judicial capital (and its international standing) while supporting the institutional growth of regional peers. More broadly, such collaborative arrangements echo the sensibilities of Singapore's foreign policy, one that balances principled internalism with an outward-looking ethos of interdependence and regional integration.[130] Just as Singapore seeks to safeguard its sovereignty while enhancing bilateral and multilateral ties, its dispute resolution institutions are increasingly being positioned as nodes within a global ecosystem, upholding international standards while remaining anchored in local legitimacy.[131] This alignment of legal diplomacy with broader statecraft not only strengthens Singapore's

128 See generally Lucas Alcolea, "The Rise of the International Commercial Court: A Threat to the Rule of Law" (September 2022) 13(3) *Journal of International Dispute Settlement* 413. The author is of the view that such criticism is misplaced.

129 Edwin Tong, Minister for Law, address at the Book Launch of *Charting New Waters – The Singapore International Commercial Court after Ten Years* (24 September 2025) at paras 16–18.

130 SG101, "Safeguarding our Sovereignty and National Interests" <https://www.sg101.gov.sg/foreign-policy/safeguardingoursovereigntyandnationalinterests> (accessed 6 March 2026).

131 See *Charting New Waters: The Singapore International Commercial Court After Ten Years* (Philip Jeyaretnam & Francis Xavier gen eds) (Academy Publishing 2025) at para 1.38.

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standing, but allows it to contribute meaningfully to the global project of just, efficient, and credible cross-border dispute resolution.

78 In saying this, the author would reiterate that Prof Sander's vision was never, as most assume, just about courts but about choice.[132] For Singapore to realise that vision internationally, its offerings must span arbitration, mediation, adjudication, and beyond. Institutions like the SIAC and SIMC have made strides, but the future lies in ensuring that the pathway chosen reflects the substance and complexity of the dispute. Tomorrow's international parties should be able to land in Singapore with a problem and be wisely guided to the process that best resolves it. In that sense, the same sensibilities that has hitherto animated Singapore's domestic reforms, efficiency, proportionality and procedural clarity must infuse its international work. As global and local disputes increasingly blur, Singapore is well-placed to develop interoperable pathways that reduce friction for parties navigating both spheres.

79 Ultimately, if Singapore is to remain an oasis of calm amid the rancorous noise of the current global disorder, it must offer not just procedural serenity, but meaningful choice. The internationalisation of Singapore's dispute resolution ecosystem is not a departure from Sander's vision, but its logical continuation. The multi-door courthouse, applied globally, requires that the oasis has many gates, each one open, each one guarded by principle, and each one fitted to the contours of the dispute at hand.

C. Focus on therapeutic and restorative justice models

80 A truly future-ready dispute resolution system must not only diversify its forums but also deepen its sensitivity to the human experience of conflict. Prof Sander's multi-door courthouse vision, while procedural in concept, was ultimately humanistic – grounded in the belief that the justice system should serve people, not processes. In this regard, Singapore's efforts in embedding therapeutic and restorative justice principles into its legal landscape stand as a significant step towards realising that vision in substance, not just in form.

81 As discussed earlier, the FJC has taken admirable steps in embedding therapeutic justice principles into family law, culminating in the formal adoption of the Therapeutic Justice Model in October 2024. In many senses, over the past decade, the FJC has reimagined the architecture of family litigation, placing emphasis on multidisciplinary

132 See n 5 above.

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support, early therapeutic interventions, and child-centric outcomes. Community courts and youth courts similarly reflect a shift in judicial philosophy, away from punitive impulses and towards rehabilitative, relational, and reintegrative objectives. These are not merely policy innovations; they seek to redefine the very purpose of legal institutions beyond resolving disputes to healing them – a distinctly Sanderian ambition.

82 Nonetheless, if Singapore is to fully realise that vision, the next decade must move beyond programme design into structural innovation. Therapeutic justice cannot remain a "soft touch" adjunct to adversarial litigation. It must shape the very architecture of family dispute resolution, from triage to resolution. And that means being bold.

83 One such move might be to adopt, or more accurately, adapt, the Divorce Surgery model offered in the UK, which adopts a "One Couple, One Lawyer" approach, to the Singapore context. This would involve carefully regulated pathways in which a single neutral lawyer, trained in family law and therapeutic practice, jointly advises both spouses on fair outcomes, and handles the divorce for both parties collectively. The potential benefits are considerable: lower legal costs, faster resolution, and reduced emotional strain.[133] Admittedly, this would require the introduction of rigorous safeguards including screening for power imbalances, proper conflict checks and careful consideration of the issues involved where parties have potentially divergent interests. Nonetheless, the UK experience suggests these are not insurmountable. With clearly delineated professional boundaries, strict conflict checks, and a robust regulatory framework, the hope is such a model can maintain professional integrity while prioritising amicable, child-focused outcomes.

84 Another step could be streamlining proceedings where the sole dispute is over the division of matrimonial assets, which anecdotally, are not uncommon.[134] While the FJC has released soft guidelines[135]

133 See Harry Gates & Samantha Woodham, "Someone! Do Something About Costs! The Single Lawyer Solution" (2022) 3 *Financial Remedies Journal* 181, albeit keeping in mind that the article is authored by the founders of The Divorce Surgery.

134 Interestingly, the 2014 Recommendations of the Committee for Family Justice on the framework of the family justice system did propose the creation of a dedicated track for cases where the issues are primarily financial in nature; see Ministry of Law, "Recommendations to Transform the Family Justice System", press release (4 July 2014) <https://www.mlaw.gov.sg/news/press-releases/recommendations-to-transform-family-justice-system/> (accessed 6 March 2026).

135 *Case Management Handbook for Divorce Matters* (Family Justice Courts Singapore, June 2020) <https://www.judiciary.gov.sg/docs/default-source/family-docs/handbook_divorce.pdf> (accessed 6 March 2026) at para 3.2.

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and set up panels of financial experts to expedite such proceedings,[136] Singapore could further consider the multipronged approach adopted by the Australian Federal Circuit Court.[137] First, the Federal Circuit Court has introduced a discrete property list where registrars closely manage property-only applications, monitoring compliance with disclosure obligations and referring parties to ADR without the involvement of judges. Second, Australia has introduced a simplified way of resolving property disputes under A$500,000 through an intensive registrar-led resolution phase, followed, where necessary, by a simplified judicial determination phase.[138] Third, Australia has introduced a specialist national arbitration list to promote arbitration for property matters, while assigning a dedicated judge to ensure that matters referred to arbitration remain closely managed.[139]

85 These are, of course, but examples. The point though is that to honour Prof Sander's legacy, Singapore must not simply fit the forum to the fuss, it must design forums that reimagine the fuss entirely. It is in this spirit that Singapore's therapeutic justice efforts must continue in its journey of evolution.

D. Directing to the appropriate door

86 To mitigate the confusion that may arise in the face of the many doors now available to court users, starting with parties receiving legal aid (whether from the Legal Aid Bureau or legal clinics), Singapore could also consider developing official pathways to transfer suitable cases to mediation or other ADR options from the outset. In the Netherlands, all personnel at the legal services counters are trained to identify cases ripe for mediation. Where suitable, parties receiving legal aid who were initially seeking legal advice would be referred to a mediator, instead of an attorney.[140]

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136 Leong Wai Kum, "Definition of Property as Matrimonial Asset Through the Lens of Therapeutic Justice" [2024] SAL Prac 4 at n 29.

137 Parliament of Australia's Joint Select Committee on Australia's Family Law System, "Chapter 5 Family Law System – Alternative Dispute Resolution and Support Services" (March 2021) at paras 5.50–5.52 <https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Family_Law_System/FamilyLaw/Second_Interim_Report> (accessed 6 March 2026).

138 Federal Circuit and Family Court of Australia "Priority Property Pool Cases (PPP Cases)" <https://www.fcfcoa.gov.au/fl/ppp> (accessed 6 March 2026); Family Law Practice Direction: Priority Property Pool Cases.

139 Federal Circuit and Family Court of Australia, "Family Law Practice Direction: Arbitration" (1 September 2021) <https://www.fcfcoa.gov.au/fl/pd/fam-arbitration> (accessed 6 March 2026).

140 *Mediation: Principles and Regulation in Comparative Perspective* (Klaus J Hopt & Felix Steffek gen ed) (Oxford University Press, 2012) at pp 707–708.

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VII. Concluding thoughts: reimagining justice through many doors

87 When Prof Sander sketched the contours of a "multi-door courthouse" at the 1976 Pound Conference, he was not merely proposing architectural reform but challenging legal systems to stop mistaking process for justice. His invitation was radical in its clarity: let courts become intelligent hubs that guide each disputant to the most appropriate mechanism – litigation where necessary, mediation where possible, innovation wherever helpful. It was a call for fit, for responsiveness, and above all, for humility.

88 In many places, this vision was received with polite applause and procedural inertia (even if the overwhelming reception was something that surprised Prof Sander[141]). The adversarial tradition, fortified by habit, training, and deep-seated traditions, proved slow to shift. However, over time, the pressures mounted with ballooning caseloads, spiralling costs, and increasingly complex disputes exposing the limits of a one-size-fits-all court model.

89 Singapore, somewhat uniquely, elected to lean in. It did not just import Prof Sander's vocabulary but reimagined its institutions in line with such philosophies. It built a justice ecosystem where litigation, mediation, arbitration, neutral evaluation, and hybrid pathways coexist as equal citizens. The transformation was neither easy nor inevitable. Singapore had to reckon with its own reverence for adjudication, with the economic interests of a legal profession built around courtcraft, and with a public accustomed to equating justice with judicial pronouncement. It also had to navigate a milieu where, as Prof Sander observed, "there are no ironclad, definitive answers".[142] But leadership mattered. The Judiciary led by example. The state supported those initiatives and legislated with purpose. Institutions were created not to dilute justice, but to deepen it, and to democratise access. Concerns about confidentiality, enforceability, and professional standards were resolved through careful design, accreditation regimes, and visible success stories. A culture of appropriate dispute resolution was seeded, and took root.

141 See Frank Sander & Mariana Hernandez Crespo, "A Dialogue Between Professors Frank Sander and Mariana Hernandez Crespo: Exploring the Evolution of the Multi-Door Courthouse" (2008) 5 *University of St Thomas Law Journal* 665.

142 Frank E A Sander & Lukasz Rozdeiczer, "Matching Cases and Dispute Resolution Procedures: Detailed Analysis Leading to a Mediation-Centered Approach" (2006) 11 *Harvard Negotiation Law Review* 1 at 41.

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90 However, no vision remains static. Nor can it. The challenges now facing Singapore's justice system are more textured and global. The rise of cross-border disputes, the fracturing of consensus in international law, the need for digital-first platforms that retain trust, the growing salience of empathy in family and community matters, and the imperative of cost-effective access for all. The future of the multi-door courthouse, then, cannot be about simply adding more doors. It must be about building *smarter passageways*. In so doing, we would do well to heed the suggestion by the Chief Justice that a variety of principles, not least, fairness, contextuality, proportionality, and accessibility, must inform these continuing efforts.[143]

91 Singapore is ready for that future. It has shown how bold experimentation can coexist with respect for legal tradition. Its approach has, of course, not been perfect but it has been coherent and deeply intentional. To be sure, all innovations come with risk. Nonetheless, in many ways, this represents the lesser of two evils, as it avoids, to use the parlance of Prof Sander, "the deadening dread of status quoism".[144]

92 Some fifty years ago, Prof Sander reminded us that the health of a justice system is not measured by how high its walls are, but how many pathways it opens. From the discussions the author had with Prof Sander at the time, it was clear that he believes that Singapore has taken such insights to heart and has served as an exemplar for others. Nonetheless, the work is not yet done. Singapore's next chapter must be one of deeper personalisation, stronger user agency, and greater openness to the lived realities of disputants. The multi-door courthouse must become a multi-voice one: open, flexible, and grounded in human experience.

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143 Chief Justice Sundaresh Menon, Supreme Court of Singapore, "Gateway to Justice: The Centrality of Procedure in the Pursuit of Justice", speech at the 36th Annual Lecture of the School of International Arbitration in Dispute Resolution (30 November 2021) at para 17.

144 Frank E A Sander, "Varieties of Dispute Processing" (1976) 70 *Federal Rules Decisions* 111 at 132.

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