



Consumer Dispute Resolution through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic in Indonesia

Nuzul Rahmayani, Benni Rusli, Jasman Nazar

Faculty of Law, Universitas Muhammadiyah Sumatera Barat, Sumatera Barat, Indonesia

Corresponding e-mail: nuzullaw05@yahoo.co.id

ARTICLE INFO

ABSTRACT

Keywords

Consumer; Dispute Resolution;
Consumer Dispute Resolution
Agency; Covid-19 Pandemic

Consumers are parties who are very vulnerable to the activities of business actors, so they are specifically protected through Law Number 8 of 1999 concerning Consumer Protection. One of the rights of consumers contained in these provisions is the right to be able to get access to proper consumer dispute resolution. On the other hand, the Covid-19 pandemic has had a significant impact on various aspects of life, including in terms of non-litigation consumer dispute resolution, where the government's policy to limit face-to-face interaction certainly affects the consumer dispute resolution process which is usually carried out face-to-face. This study aims to analyze the implementation of consumer dispute resolution through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic and the obstacles in implementing consumer dispute resolution through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic. This study uses empirical juridical research. The result shows that the dispute resolution in two methods: (1) Online Dispute Resolution (ODR) method, which is used to resolve disputes consumers whose offers and transactions are made online; (2) face-to-face method with strict observance of health protocols, which are used to resolve consumer disputes whose deals and transactions are carried out directly. BPSK faced several obstacles as well as: (1) There is no internet network facilitation to support dispute resolution through ODR, so the BPSK Assembly uses personal internet quotas; (2) BPSK operational funding that has not been disbursed since the beginning of this year.



This is an open access article
under the [CC-BY-SA](https://creativecommons.org/licenses/by-sa/4.0/) license.

© 2022 Published by UAD Press

Introduction

Technological developments in recent years have changed many things in the trade in the goods and/or services sector. One of them is by allowing face-to-face transactions through digital platforms with applications on computers or mobile phones. Data from the Center for the Study of Indonesian Law and Policy released in 2021 concluded that the intensity of transactions through digital platforms in Indonesia has been increasing since the Covid-19 pandemic that occurred from the end of 2019 until now. Where, the increase in transaction value ranges from 31% -61% or reaches US\$ 38.2 billion (as of January 2021), and is predicted to reach US\$ 150 billion. The high intensity of these transactions is of course also accompanied by the high potential for disputes between business actors and consumers (B2C). Of the total digital transactions, it is estimated that 3-5% of transactions will end in

disputes. Apart from using digital platforms, trading through manual/face-to-face methods of course also continues during the Covid-19 pandemic, with the potential for disputes that are no less numerous than through digital platforms.

Regarding the potential for consumer disputes during the Covid-19 pandemic, consumer protection efforts to protect the consumer's position tend to be weak compared to the position of business actors (Shinde, 2012). Consumer protection is one of the guarantees for the economic rights of Indonesian citizens as stated in Article 33 paragraph (4) of the 1945 Constitution of the Republic of Indonesia which was later revealed through Law Number 8 of 1999 concerning Consumer Protection (hereinafter referred to as UUPK).

One form of such protection is to ensure the settlement of consumer disputes that can guarantee the protection of consumer rights. Article 45 paragraph (2) of the UUPK divides consumer dispute resolution into two parts, namely, first, dispute resolution outside the court, and second, dispute resolution through the court. Furthermore, Article 47 of the UUPK explains that the settlement of consumer disputes out of court is held to reach an agreement on the form and amount of compensation and/or regarding certain actions to ensure that the losses suffered by consumers will not happen again or will not be repeated. For the settlement of disputes between business actors and consumers outside the court, according to Article 49 paragraph (1) of the UUPK, the Government establishes a Consumer Dispute Settlement Agency (hereinafter referred to as BPSK) in each Regency/City. BPSK is institutionally under the auspices of the Ministry of Trade of the Republic of Indonesia. The BPSK assembly consists of 3 elements, namely consumers, business actors, and the government, which in resolving disputes are carried out through conciliation, mediation, or arbitration.

BPSK is an adoption of the Small Claims Court/Small Claim Tribunal concept (Nugroho, 2008) so that its existence is expected to be part of equitable distribution of justice, especially consumers who are harmed by business actors because these disputes are usually small in nominal terms (Jeretina & Uzelac, 2015). If it is submitted to the court, it is certainly very detrimental to consumers because the comparison between the court fees and the losses demanded is not balanced (Shofie, 2013). In addition, the establishment of BPSK is also based on the tendency of the community to be reluctant to take proceedings in court because the position of consumers is socially and financially unbalanced with business actors. Court institutions that are considered unprofessional in handling business disputes are not even independent. As a result, the judiciary is considered ineffective and inefficient in examining, adjudicating, and resolving proposed business disputes (Suparman, 2004).

In addition, courts are not an effective option for simple and small-scale disputes. In addition to the relatively large court fees, the settlement process that uses formal procedural law, and takes a long time, the settlement of cases in court often does not provide justice or satisfaction for the disputing parties (Nugroho, 2008). Therefore, a simple, fast, and low-cost dispute resolution is needed, namely through alternative dispute resolution (Kurniawan: 2014). In the era of electronic and non-electronic transactions during the current Covid-19 Pandemic in Indonesia, of course, consumer dispute resolution must be carried out effectively and efficiently, and pay attention to health protocols (Sewu, 2020).

Regarding what has been described above, this study aims to explain how the implementation of consumer dispute resolution through the Consumer Dispute Settlement Agency in Indonesia during the Covid-19 Pandemic, from regulation to dynamics in its implementation.

Methodology

This type of research is empirical legal research, namely research that uses primary data/field data as the main data source (Bambang: 2003). Sources of data used in this study are primary data and secondary data. Primary data was obtained from an interview with one of the Heads of BPSK in Indonesia, namely the Head of BPSK in Bukittinggi. The secondary data in this study consist of: (1) Primary Legal Materials, which consist of legal materials that have binding force in general, such as Law Number 8 of 1999 concerning Consumer Protection; (2) Secondary Legal Materials, such as literature on official legal materials from government agencies, other legal materials published in the form of guidelines, books, scientific journals related to the theme of this research. (3) Tertiary legal materials, such as Indonesian language dictionaries, terminology dictionaries, etc.

The data collection technique in this study was carried out using a literature study. Literature study is the study of written information about the law that comes from various sources and is widely published and is needed in legal research. The sources of literature study are such as statutory regulations, judge's decisions, contracts, legal science books, legal journals or scientific articles, and publications in print and electronic media.

All materials obtained and collected will be analyzed using qualitative analysis, namely by describing or explaining existing theories with materials obtained from interviews, data, and literature studies from various sources, preceded by coding and editing data, then interpreting, namely giving meaning to the data analysis, explaining patterns or categories looking for relationships between various concepts. This qualitative method is used because this research does not use concepts that are measured or expressed by numbers or statistical formulas but are described in the form of sentences (Dewata & Achmad, 2010).

Results and Discussion

The Regulation of Consumer Dispute Resolution through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic

Consumer disputes are very likely to occur in the relationship between consumers and business actors. When a dispute occurs, consumers and business actors are strongly encouraged to be able to resolve it internally (internal dispute resolution), which is usually done through negotiation efforts (Nurhalis, 2015). However, if this effort is not successful, then the UUPK has provided an alternative dispute resolution. UUPK regulates this by dividing consumer dispute resolution into 2 (two) namely dispute resolution outside the court and through the courts. This is based on Article 45 of the UUPK which reads:

- (1) *"Every consumer who is harmed can sue business actors through institutions tasked with resolving disputes between consumers and business actors or through courts within the general judiciary.*
- (2) *Settlement of consumer disputes can be reached through the courts or outside the courts based on the voluntary choice of the disputing parties."*

The UUPK facilitates the settlement of consumer disputes out of court by establishing BPSK, where following the provisions of Article 49 paragraph (1) of the UUPK, BPSK is formed in every Regency/City. With the option of resolving consumer disputes out of court, the parties are expected to be able to reach an agreement regarding the form and amount of compensation and/or regarding certain actions to ensure that the losses suffered by consumers will not occur again or will not be repeated. The duties and authorities of BPSK are regulated in Article 52 UUPK jo. Article 3 Kepmenperindag Number 350/MPP/Kep/12/2001 concerning the Implementation of Duties and Authorities of the Consumer Dispute Settlement Agency, namely:

- a. Carry out consumer dispute resolution, employing mediation or arbitration or conciliation;
- b. Provide consumer protection consulting;
- c. Supervise the inclusion of standard clauses;
- d. Reporting to the general investigator if there is a violation of the provisions of this law;
- e. Conduct research and examination of consumer protection disputes;
- f. Receive complaints, both written and unwritten, from consumers regarding violations of consumer protection;
- g. Summon business actors suspected of having violated consumer protection;
- h. Summoning, presenting witnesses, expert witnesses, and/or anyone who is deemed to know the violation of this law;
- i. Request assistance from investigators to prevent business actors, witnesses, expert witnesses, or any person as referred to in letters g and h, who are not willing to comply with the summons of the consumer dispute settlement agency;
- j. Obtain, examine and/or evaluate letters, documents, or other evidence for investigation and/or examination;
- k. Decide and determine whether or not there is a loss on the part of the consumer;
- l. Notify the decision to business actors who violate consumer protection;
- m. Imposing administrative sanctions on business actors who violate the provisions of this law.

Regulations on BPSK spread across several legal grounds. Specifically in the UUPK, the regulation generally starts from Article 49 to Article 58 of the UUPK. The legal basis for BPSK's general authority is illustrated in the provisions of Article 49 paragraph (1) of the UUPK, which reads: "The government establishes a Consumer Dispute Settlement Agency in Level II Regions to resolve consumer disputes out of court." This means that the UUPK explicitly gives BPSK general authority to resolve consumer disputes out of court. In addition, if we examine the provisions of Article 52 of the UUPK regarding the duties and authorities of BPSK above, it is also illustrated that the provision of letter (a) of Article 52 of the UUPK also reaffirms the general authority of BPSK, in which it is stated that the duties and authorities of BPSK are: "implementing consumer dispute resolution, by means

of mediation or arbitration or conciliation." Furthermore, the general authority of BPSK is described or reduced in several duties and authorities contained in Article 52 of the UUPK starting from the letter (b) to letter (m).

The author also observes that not all of the duties and authorities of BPSK described in the provisions of Article 52 of the UUPK are directly related to the general authority of BPSK in resolving consumer disputes. At least, there is 1 (one) point that is not in accordance with the general authority, namely the provisions of Article 52 UUPK letter (c), where BPSK supervises the inclusion of standard clauses (Nugroho, 2008).

In addition to being contained in the UUPK, the authority of BPSK can also be observed in: (1) Kepmenperindag No. 350/MPP/Kep/12/2001 concerning the Implementation of Duties and Authorities of the Consumer Dispute Settlement Body; (2) Regulation of the Minister of Trade of the Republic of Indonesia Number 06/M-DAG/PER/2/2017 concerning the Consumer Dispute Settlement Agency.

After analyzing these provisions, the author concludes that in addition to the general authority, BPSK also has at least 4 (four) special powers related to general authority in resolving consumer disputes out of court, namely: (1) Accepting consumer dispute resolution applications; (2) The authority to examine and resolve consumer disputes through conciliation, mediation, or arbitration; (3) The authority to decide and determine whether or not there is a loss on the part of the consumer; and (4) The authority to impose administrative sanctions on business actors who violate the provisions of the UUPK.

According to data obtained by the author through the Head of BPSK of Bukittinggi City, there are no special regulations governing the method of resolving consumer disputes through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic Period. Thus, the Chairman of BPSK took a policy in the form of adjustments to the Covid-19 pandemic conditions that occurred based on the principles of benefit and efficiency. The policy is regarding the methods used in resolving consumer disputes during the Covid-19 Pandemic Period. The methods are divided into 2, namely: (1) the Online Dispute Resolution (ODR) method, which is used to resolve consumer disputes whose offers and/or transactions are made online; (2) Offline/Face-to-Face Method with strict observance of health protocols, which are used to resolve consumer disputes whose deals and/or transactions are carried out directly/manually.

Of course, there is a connection between the era and the reality of current trade traffic which is carried out in 2 forms of trade models, namely the conventional business trade model and the modern trade model (Muhammad: 2019). ODR is the implementation of alternative dispute resolution using technology. The United Nations Commission on International Trade Law defines ODR as "a mechanism for resolving disputes through the use of electronic communications and other information and communication (Kaufmann-Kohler & Schultz, 2004).

According to historical records, ODR was first used in 1995 by The National Center for Automated Information Research in Philadelphia, United States, under the name Virtual Magistrate with the authority to resolve disputes between internet service providers and users (Aziz & Hidayah, 2020).

There is no specific regulation on the use of ODR in Indonesia. However, several regulations support ODR, such as (1) Law Number 11 of 2008 concerning Information and Electronic Transactions, as amended by Law Number 19 of 2016 (UU ITE); (2) Law Number 30 of 1999 concerning Arbitration and Alternative Dispute Resolution (AAPS Law); and (3) Government Regulation Number 80 of 2019 concerning Trade through Electronic Systems (PP E-Commerce). The ITE Law and PP E-Commerce explain that dispute resolution can be carried out electronically and the public can play a role in establishing dispute resolution institutions with consultation and mediation functions. Meanwhile, the AAPS Law is an umbrella act for the regulation of dispute resolution outside the court through a procedure agreed upon by the parties.

The Regulation of Consumer Dispute Resolution through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic

Settlement of consumer disputes at BPSK is optional/not tiered. This is regulated in Article 4 paragraph (2) of Kepmenperindag No. 350/MPP/Kep/12/2001 which explains that dispute resolution at BPSK is not a tiered dispute resolution process. This means that consumer dispute resolution at BPSK can be done by selecting the available method, namely conciliation, mediation, or arbitration (Afriana et al., 2018).

1. Trial by Conciliation

Settlement of consumer disputes through conciliation is carried out by the disputing parties themselves accompanied by the BPSK assembly which acts passively as a conciliator. So, in this case, the BPSK assembly fully submits the dispute resolution process to the parties, both regarding the form and amount of compensation.

Based on Article 29 of the Decree of the Minister of Industry and Trade of the Republic of Indonesia Number: 350/MPP/Kep/12/2001, the procedures for resolving consumer disputes by conciliation are: (a) The Assembly fully submits the dispute resolution process to the consumers and business actors concerned, both regarding the form and amount of compensation; (b) the Assembly acts passively as a conciliator; (c) The Assembly accepts the results of the deliberation of consumers and business actors and issues a decision.

The result of the deliberation which is an agreement between the consumer and the disputing business actor is then made in the form of a written agreement signed by the disputing parties, and submitted to the assembly to be included in the BPSK assembly decision which strengthens the agreement.

2. Trial through Mediation

Mediation is the process of negotiating dispute resolution or problem-solving in which an impartial third party cooperates with the disputing parties to help obtain a satisfactory agreement. Mediation is also defined as "the process of involving a third party in resolving a dispute as an advisor.

The mediator does not have the authority to decide the dispute. The mediator only helps the parties to resolve the issues submitted to them. In disputes where one party is stronger and

tends to show his power, a third party plays an important role to equalize. An agreement can be reached by mediation if the disputing parties manage to reach a mutual understanding and jointly formulate a dispute resolution with concrete directions from the mediator.

Compared to the dispute resolution process through conciliation, in this mediation process, the mediator acts more actively by providing advice, instructions, suggestions, and other efforts in resolving disputes.

According to UUPK, mediation is the process of resolving consumer disputes outside the court through BPSK as an advisor, and the settlement is left to the parties. Based on Article 30 of the Decree of the Minister of Industry and Trade of the Republic of Indonesia Number: 350/MPP/Kep/12/2001, in the trial using mediation, the assembly in resolving disputes using mediation has the following duties: (a) Summoning consumers and business actors in dispute; (b) Summon witnesses and expert witnesses if necessary; (c) Provide a forum for disputing consumers and business actors; (d) Actively reconcile disputing consumers and business actors; (e) Actively provide advice or suggestions for resolving consumer disputes following the laws and regulations in the field of consumer protection.

The results of the deliberation which is an agreement between the consumer and the disputing business actor, are then made in the form of a written agreement signed by the disputing parties and submitted to the BPSK assembly to be confirmed in the BPSK assembly decision to strengthen the agreement. The decision is binding on both parties. The decision of the panel in mediation does not contain administrative sanctions.

3. *Trial by Arbitration*

Arrangements related to arbitration proceedings at BPSK are regulated in Articles 32 to 36 of Kepmenperindag No. 350/MPP/Kep/12/2001. In resolving consumer disputes through arbitration, the parties choose an arbitrator from BPSK members who come from elements of business actors and consumers as members of the assembly. The arbitrator who has been selected by the parties then chooses a third arbitrator from BPSK members who come from government elements as chairman.

At the first trial, the chairman of the assembly must reconcile the two parties to the dispute. If there is peace between the two disputing parties, the assembly is obliged to decide the form of a settlement determination. On the other hand, if peace is not reached, the trial begins by reading out the contents of the consumer's lawsuit, and the response letter from the business actor. The chairman of the BPSK assembly must provide equal opportunities to both parties to the dispute to explain the matters in dispute.

At the first trial before reading the answer letter from the business actor, the consumer can withdraw his lawsuit by making a statement letter of revocation of the case. In such a case, the panel is obliged to announce that the lawsuit is withdrawn. If the business actor and/or consumer is not present at the first trial, the panel will provide the final opportunity at the second trial by bringing the necessary evidence. The second trial is held no later than 5 (five) working days from the first trial and notified to consumers and business actors, with a summons by the BPSK secretariat. If the two consumers are not present at the trial, the lawsuit is declared null and void by law. On the other hand, if the business actor is not

present, the consumer's lawsuit is granted by the assembly without the presence of the business actor (Putranto, 2019).

During the dispute resolution process, evidence of goods or services, letters and documents of statements of the parties, statements of witnesses and or expert witnesses, and other supporting evidence may be submitted to the assembly. In the consumer dispute resolution process by BPSK, the burden of proof lies with the business actor, but the consumer must also submit evidence to support the lawsuit. After considering the statements from both parties regarding the disputed matter and considering the results of the evidence and the requests desired by the parties, the BPSK assembly gave a decision (Murni & MtvM, 2015).

Since it was first formed in 2001 until now, BPSK has resolved various consumer disputes, both for goods and services. The data that the author got regarding the settlement of consumer disputes carried out by BPSK throughout Indonesia from 2003 to 2017 are as seen in Table 1.

Table 1. Recapitulation of Consumer Dispute Resolution at the Consumer Dispute Settlement Agency (BPSK) throughout Indonesia 2003 to 2017

Year	Incoming Dispute			Dispute Resolved				Failed	on Process	objected
	Goods	service	Total	Conciliation	Mediation	Arbitration	Total			
2003	23	41	64	2	56	5	63	1	0	1
2004	15	55	70	6	44	16	66	4	0	0
2005	44	76	120	5	92	18	115	5	0	0
2006	79	121	200	10	159	30	199	1	0	1
2007	118	179	297	42	171	40	253	44	0	2
2008	68	103	171	25	117	24	166	5	0	0
2009	74	153	227	30	119	57	206	21	0	0
2010	112	222	334	15	210	45	270	58	6	0
2011	48	333	381	36	217	63	316	40	25	0
2012	109	337	446	20	196	117	333	48	65	0
2013	168	839	1007	62	457	292	811	139	57	13
2014	250	1133	1383	59	404	331	794	210	379	0
2015	189	1345	1534	84	414	880	1378	135	68	46
2016	173	544	717	98	369	163	630	133	91	27
2017	100	260	360	15	250	45	310	35	71	24
Total	1470	5481	7311	494	3025	2081	5600	844	691	114

(Source: Directorate of Consumer Empowerment, Ministry of Trade of the Republic of Indonesia, 2018)

From this data, it can be seen that the percentage of consumer disputes that have been successfully resolved by BPSK throughout Indonesia, either through conciliation, mediation, or arbitration, is in the range of 78%-86%. The author considers that quantitatively, this percentage of success shows a relatively good number, and of course, it makes a positive contribution in reducing the burden on the court in handling disputes.

According to the Head of BPSK of Bukittinggi City, the number of complaints and consumer disputes handled by BPSK of Bukittinggi City during the Covid-19 Pandemic increased by 20% to 30% from normal conditions. One of the most common causes is the weakening economic condition of the community during the Pandemic, resulting in many consumers who have not been able to fulfill their obligations to business actors. There are generally 2 (two) types of consumer dispute resolution carried out through BPSK Bukittinggi during this pandemic: (1) Mediation, with a success rate of 60% to 70%; and (2) Arbitration.

As explained in the previous section, consumer dispute resolution at BPSK has also implemented ODR in several categories of consumer disputes, both for dispute resolution through mediation or arbitration. The online communication methods that can be used include e-mail, instant messaging, chat, threaded discussion, video/audio stream, teleconference, and video conferencing. The application of ODR in dispute resolution does offer effectiveness and efficiency compared to conventional methods (Mansyur & Kamil, 2014).

The Regulation of Consumer Dispute Resolution through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic

In the settlement of consumer disputes carried out by BPSK during the Covid-19 Pandemic, of course, there are several obstacles faced. Based on the data that the author got from the head of BPSK Bukittinggi, the most basic obstacles are: (a) There is no internet network facilitation to support dispute resolution through ODR, so the BPSK Assembly uses a private internet quota; (b) Funding. From January until now (July 2021) operational funds for BPSK have not decreased.

Conclusion

There are no special regulations governing the method of resolving consumer disputes through the Consumer Dispute Resolution Agency during the Covid-19 Pandemic. Thus, the Head of BPSK took a policy in the form of adjustments to the Covid-19 pandemic conditions that occurred based on the principles of expediency and efficiency, namely by making dispute resolution in two methods, namely: (1) Online Dispute Resolution (ODR) method, which is used to resolve disputes consumers whose offers and/or transactions are made online; (2) Face-to-Face Method with strict observance of health protocols, which are used to resolve consumer disputes whose deals and transactions are carried out directly. The number of consumer complaints and disputes during the Covid-19 pandemic increased by 20% to 30% from normal conditions. There are generally two types of consumer dispute resolution carried out through BPSK Bukittinggi during this pandemic as well as: (1)

Mediation, with a success rate of 60% to 70%; and (2) Arbitration. The obstacles faced by BPSK in resolving consumer disputes during the Covid-19 Pandemic are: (1) There is no internet network facilitation to support dispute resolution through ODR, so the BPSK Assembly uses personal internet quotas; (2) BPSK operational funding that has not been disbursed since the beginning of this year.

References

- Afriana, A., Mantili, R., & Rahmawati, E. (2018). Konseptualisasi Penyelesaian Sengketa Konsumen Melalui Small Claims Prosedure Di Indonesia. *Arena Huk.*, 11(3), 454–470. <https://doi.org/10.21776/ub.arenahukum.2018.01003.2>
- Aziz, M. F., & Hidayah, M. A. (2020). Perlunya Pengaturan Khusus Online Dispute Resolution (Odr) Di Indonesia Untuk Fasilitasi Penyelesaian Sengketa E-Commerce. *J. Rechts Vinding: Media Pemb. Huk. Nas.*, 9(2), 275. <https://doi.org/10.33331/rechtsvinding.v9i2.449>
- Dewata, M. F. N., & Achmad, Y. (2010). *Dualisme Penelitian Hukum Normatif dan Empiris*. Pustaka pelajar.
- Jeretina, U., & Uzelac, A. (2015). Alternative dispute resolution for consumer cases: Are divergences an obstacle to effective access to justice? *Central European Public Administration Review*, 12(4), 39–74. <https://doi.org/10.17573/ipar.2014.4.a02>
- Kaufmann-Kohler, G., & Schultz, T. (2004). *Online dispute resolution: Challenges for contemporary justice*. Kluwer Law International. <https://uncitral.un.org/en/texts/onlinedispute>
- Mansyur, M. A., & Kamil, H. (2014). Kajian Hukum Online Dispute Resolution (Odr) Di Indonesia Berdasarkan Undang-Undang Nomor 30 Tahun 1999. *J. Pembaharuan Huk.*, 1(2), 111. <https://doi.org/10.26532/jph.v1i2.1461>
- Murni, M., & Mtv, S. (2015). Badan Penyelesaian Sengketa Konsumen Sebagai Perwujudan Perlindungan Hak Konsumen. *Arena Huk.*, 8(2), 203–216. <https://doi.org/10.21776/ub.arenahukum.2015.00802.4>
- Nugroho, S. A. (2008). *Proses Penyelesaian Sengketa Konsumen Ditinjau dari Hukum Acara serta Kendala Implementasinya*, Kencana. Kencana.
- Nurhalis. (2015). *Perlindungan Konsumen dalam Perspektif Hukum Islam dan Undang-Undang Nomor 8 Tahun 1999* (Vol. 9, Issue 3, p. 532). Jurnal Ius. <https://jurnalius.ac.id/ojs/index.php/jurnaliUS/article/download/267/237>
- Putranto, I. A. (2019). Kajian Hukum Terhadap Pelaksanaan Putusan Badan Penyelesaian Sengketa Konsumen (Bpsk) Di Pengadilan Negeri. *Masal.-Masal. Huk.*, 48(2), 178. <https://doi.org/10.14710/mmh.48.2.2019.178-185>
- Sewu, P. L. S. (2020). The prospect of online dispute resolution (ODR) and business dispute resolution in the legal system in Indonesia. In *Proceedings of the 2nd International Conference of Law, Government and Social Justice (ICOLGAS 2020)* (pp. 490–497). Atlantis Press. <https://doi.org/10.2991/assehr.k.201209.329>
- Shinde, D. U. (2012). Conciliation as an effective mode of alternative dispute resolving system. *IOSR j. Humanit. Soc. Sci.*, 4(3), 1–7. <https://doi.org/10.9790/0837-0430107>
- Shofie, Y. (2013). Optimalisasi Peran Badan Penyelesaian Sengketa Konsumen (bpsk) dalam penyelesaian sengketa Pembiayaan Konsumen Di tengah terjadinya Disharmonisasi Pengaturan. *ADIL: Jurnal Hukum*, 4(1), 49–85. <https://doi.org/10.33476/ajl.v4i1.28>
- Suparman, E. (2004). *Pilihan Forum Arbitrase Dalam Sengketa Komersial Untuk Penegakan Keadilan*. PT Tatanusa.

