

COUNTED BUT NOT MEASURED: LOK ADALAT DISPOSAL STATISTICS AND THE ACCESS TO JUSTICE MANDATE

by

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ABSTRACT

The performance of India's Lok Adalats is reported almost entirely in two figures: the number of cases disposed of and the aggregate value of settlements. This article argues that these are measures of institutional throughput, and that throughput cannot report on the mandate the Lok Adalat exists to serve. Article 39A of the Constitution directs the State to secure justice on a basis of equal opportunity and to prevent the denial of justice by reason of economic disability, a distributive standard concerned with who is reached. Drawing on three competing paradigms of justice measurement- output, institutional capacity, and population experience the article shows that India already subscribes to an internationally agreed indicator, Sustainable Development Goal indicator 16.3.3, which would measure Lok Adalats in the terms that matter, and that the present reporting architecture is structurally incapable of speaking to it. Using the official record of e-Lok Adalat proceedings, the article demonstrates that aggregate reporting conceals variation of a magnitude that ought to inform policy. It concludes with four proposals, none requiring legislative amendment.

Keywords: Lok Adalat; access to justice; Article 39A; Sustainable Development Goal 16.3.3; justice indicators; legal services authorities.

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I. INTRODUCTION

On a single day in 2025, the first National Lok Adalat of the year disposed of more than 3.09 crore cases across thirty-seven States and Union Territories, recording a settlement value in excess of ₹18,212 crore.²

By any measure of administrative reach, the figure is remarkable. Few institutions anywhere dispose of business at that scale in twenty-four hours. The number is routinely cited, and reasonably so, as evidence that the Lok Adalat is working.

The significance of that scale cannot be separated from the broader institutional context in which it arises. According to the India Justice Report 2025, pending cases across High Courts and subordinate courts surpassed five crore by the end of 2024, an increase of over thirty per cent from the figure recorded in 2020.³ The Lok Adalat is accordingly not a peripheral mechanism operating at the margins of a functioning system: it is convened against a backdrop of institutional stress in which the regular court system cannot, on current trajectories, reduce its own backlog. That context shapes the question this article asks, because it sharpens the cost of mismeasuring what the forum delivers.

This article asks a narrower question: what does that figure actually tell us? It reports how many files were closed. It does not report whether any person who needed justice obtained it. Those are different claims, and it is the second which Article 39A of the Constitution requires the State to secure.

The argument proceeds from a distinction familiar in the literature on public sector performance measurement but largely absent from Indian writing on legal services. Justice systems can be measured in at least three ways: by what they produce, by what they are equipped with, and by what the population experiences. The three answer different questions and can move independently of one another. India's Lok Adalats are assessed almost exclusively by the first.

² Figures of the National Legal Services Authority for the first National Lok Adalat of 2025, as reported in 'Over 3 Crore Cases Disposed of in First National Lok Adalat of 2025; Settlement Value Crosses ₹18,212 Crore'.

³ India Justice Report 2025, cited in '5 Crore Cases and Counting: India's Courts are Struggling to Clear the Pile-Up' The Wire (21 April 2025) <<https://m.thewire.in/article/law/5-crore-cases-and-counting-indias-courts-are-struggling-to-clear-the-pile-up>> accessed 9 September 2026. The report notes that total pending cases surpassed five crore by end 2024, representing a rise of over 30 per cent from 2020.

The claim advanced here is not that disposal statistics are inaccurate, nor that they are useless. It is that they are being asked to support an inference they cannot bear. A count of closures is structurally incapable of identifying the person whom economic or other disability kept out of the forum altogether and that person is precisely the subject of the constitutional mandate.

Part II describes what is presently counted. Part III establishes the mandate against which any metric must be assessed. Part IV sets out the three measurement paradigms and their respective blind spots. Part V reads the official record for what it omits, using the e-Lok Adalat returns as a worked illustration. Part VI proposes four changes, none of which requires legislative amendment.

II. WHAT IS PRESENTLY COUNTED

It is worth describing the reporting practice with some care before criticising it, because the practice is more disciplined than is often assumed.

State Legal Services Authorities publish periodic returns in a settled format. For each month, the returns record the number of benches constituted, the number of cases taken up, the number of cases disposed of, and the settlement amount in rupees. Figures for National Lok Adalats are reported separately from those for ordinary Lok Adalats within the same document.⁴ The architecture is consistent across States, permits month-on-month comparison, and is published without apparent delay. As administrative reporting it is a considerable achievement, and more transparent than the equivalent record for many other arms of the justice system.

Three features of the data nonetheless deserve attention.

First, every variable is institutional. Each describes something the forum did, how many benches it constituted, how much business it received, how much it closed. None describes what happened to a party. The unit of analysis is the institution, not the person.

Second, every variable is either a count or a sum. Nothing in the format is capable of registering the character of an outcome. A settlement freely negotiated between equally placed parties and one accepted under pressure by an unrepresented litigant appear in the identical

⁴ See, for illustration of the standard format, the monthly Lok Adalat returns published by State Legal Services Authorities, recording benches constituted, cases taken up, cases disposed of and settlement amounts.

column, and contribute identically to the total. This is not an oversight in the design; it is a property of counting.

Third, settlement value in rupees is more ambiguous than it appears. The figure records money moved. In a matter between two individuals it may reasonably be read as the value of relief obtained. In a recovery matter between an institutional creditor and an individual debtor, the same figure records successful collection. Whether that is an access-to-justice outcome depends on facts the metric does not capture, and the aggregate does not distinguish between the two cases.

The concern is not theoretical. Bank recovery matters and cheque dishonour cases have constituted a significant proportion of National Lok Adalat disposals across successive reporting cycles; official NALSA data confirm they are among the highest-volume categories.⁵ A settlement-value aggregate in which a substantial proportion represents successful institutional debt collection cannot sustain an inference about the relief secured by economically disadvantaged individuals. The two categories are arithmetically identical in the returns and analytically opposed in constitutional terms.

It is worth noting what the governing statute says about any of this, which is nothing. The Legal Services Authorities Act, 1987 provides for the organisation of Lok Adalats, regulates the reference of cases to them, and fixes the effect of their awards.⁶ It prescribes no evaluative criteria, requires no record of process to be maintained, and identifies no measure by which the success of the institution is to be judged. The reporting format now in use is therefore an administrative creation rather than a statutory requirement which matters, because it means the format can be revised without amending the Act.

A further structural point follows from the nature of the forum. The Supreme Court has held that a Lok Adalat exercises no adjudicatory function; its jurisdiction is conciliatory, and an order not founded on a compromise signed by the parties is not an award at all.⁷ A conciliatory

⁵ NALSA statistics on Lok Adalat case categories, as reported in 'National Lok Adalat 2026 Settles Over 2 Crore Cases Across India' Daily Pioneer (11 May 2026) <<https://dailypioneer.com/news/20766548-cases-amicably-settled-at-national-lok-adalat-across-country>> accessed 9 September 2026. The NALSA release expressly lists bank recovery cases and cheque dishonour matters among the case types settled at each National Lok Adalat.

⁶ Legal Services Authorities Act, 1987, ss. 19–22. Section 20 governs the reference of cases; s. 21 provides that an award of a Lok Adalat shall be deemed to be a decree of a civil court, final and binding on the parties, with no appeal lying against it before any court.

⁷ State of Punjab v. Jalour Singh, AIR 2008 SC 1209.

forum produces no reasons. Where there are no reasons, there is no material from which the quality of an outcome might be assessed after the event, whether by a reviewing court or by a statistician. The absence of qualitative data in the returns is thus not merely an omission in the reporting design; it reflects the fact that the process generates no qualitative record to report.

None of this is a criticism of the National Legal Services Authority or of the State Authorities. These are the metrics the reporting architecture was built to generate, and they generate them well. The difficulty lies in what is then asserted on their basis.

III. THE MANDATE BEING MEASURED AGAINST

A critique of a metric requires a yardstick, failing which it is merely a statement of preference. Two are available, one constitutional and one to which India has subscribed internationally.

Article 39A of the Constitution directs the State to secure that the operation of the legal system promotes justice on a basis of equal opportunity, and in particular to provide free legal aid so that opportunities for securing justice are not denied to any citizen by reason of economic or other disabilities.⁸ The Legal Services Authorities Act, 1987 is the principal statutory expression of that directive, and the Lok Adalat its principal dispute-resolution instrument.⁹

The terms of the directive repay attention. Article 39A is distributive in structure. It is concerned with equality of opportunity, with the identity of those reached, and with whether a particular class of disability was overcome. It says nothing about volume. A system disposing of a great many matters while systematically failing a disadvantaged class would satisfy no part of it.

The constitutional standard is also, it should be noted, unmet by the resource position the State has adopted. The India Justice Report 2025 records that the national per capita spend on legal aid stands at approximately Rs. 6.46 per annum, representing less than one per cent of total justice expenditure, with legal aid budgets having declined across nineteen States between 2019 and 2024.¹⁰ A constitutional directive concerned with equal opportunity and the removal of

⁸ Constitution of India, art. 39A.

⁹ Legal Services Authorities Act, 1987 (Act No. 39 of 1987).

¹⁰ India Justice Report 2025, cited in 'Legal Aid in India: Challenges, NALSA Initiatives and Way Forward' Insights on India (1 August 2025) <<https://www.insightsonindia.com/2025/08/01/legal-aid-and-nalsa/>> accessed 9 September 2026. The per capita figure of Rs. 6.46 is the national average; State-level figures range from Rs. 2 to Rs. 16 per capita.

economic disability as a barrier to justice is difficult to reconcile with a legal aid architecture that is, by the government's own data, contracting in resource terms rather than expanding.

This has a consequence for the evidential burden. A State asserting compliance with Article 39A must be able to say something about the population it reached, not merely about the business it transacted. Two propositions are consistent with a disposal figure of three crore: that the forum served a population which would otherwise have gone without remedy, and that it processed at speed a body of matters which would have been resolved in any event, while those facing the most severe barriers remained outside. The figure does not discriminate between them, and the constitutional question turns entirely on which is true.

The second yardstick is Sustainable Development Goal Target 16.3, by which States undertake to promote the rule of law and to ensure equal access to justice for all.¹¹ In the measurement literature surrounding that target, access to justice is understood as the ability of people to defend and enforce their rights and to obtain just resolution of justiciable problems in compliance with human rights standards, where necessary through impartial formal or informal institutions and with appropriate legal support.¹²

The history of that target contains an instructive parallel. The two global indicators originally adopted for Target 16.3 by the United Nations General Assembly in July 2017 both addressed criminal justice exclusively, leaving out the everyday civil justice needs experienced by most of the population and particularly by the poor.¹³ The measurement framework, in other words, initially counted what was already being counted, and a substantial category of need was invisible as a consequence. Indicator 16.3.3 was subsequently developed to close that gap. It measures the proportion of the population who have experienced a dispute in the preceding two years and who accessed a formal or informal dispute resolution mechanism, disaggregated by type of mechanism.¹⁴

¹¹ Sustainable Development Goal 16, Target 16.3. See United Nations, Department of Economic and Social Affairs, Sustainable Development Goals, Goal 16.

¹² World Justice Project, 'Access to Civil Justice: A Proposed Additional Indicator for SDG Target 16.3'. The formulation derives from work of the Praia City Group on Governance Statistics.

¹³ Ibid.

¹⁴ Metadata for Sustainable Development Goal indicator 16.3.3. Technical guidance for the indicator has been published jointly by the United Nations Development Programme, the United Nations Office on Drugs and Crime and the Organisation for Economic Co-operation and Development.

Two features of indicator 16.3.3 matter here. It expressly encompasses informal as well as formal mechanisms, which places the Lok Adalat squarely within its scope. And it is described in the guidance as capable of yielding information about the overall accessibility of civil justice institutions and processes, the barriers to access, and the reasons some people are excluded.¹⁵ India therefore already subscribes to an indicator that would measure the Lok Adalat in the terms Article 39A cares about. Disposal statistics do not speak to it, and cannot be made to.

IV. THREE WAYS OF MEASURING JUSTICE

The three paradigms can be stated compactly.

Paradigm	What it measures	Indian example
Output	Files closed; value of settlements recorded	NALSA and SLISA disposal returns
Institutional capacity	Personnel, infrastructure, budgets, workload, diversity	India Justice Report
Population experience	Whether persons with disputes reached a mechanism and resolved them	SDG indicator 16.3.3 (not yet operationalised in India)

Table 1: Three paradigms of justice measurement

A. Output measurement

Output measurement is what the Lok Adalat returns provide. Its virtues are real: it is inexpensive, timely, comparable across jurisdictions, and reasonably resistant to crude manipulation, since a disposal must correspond to a closed file. For administering a system-allocating benches, planning sittings, identifying bottlenecks, it is indispensable.

Its limitation is definitional. Throughput is silent as to outcome. The measure counts events, and the events it counts are events in the life of the institution rather than in the life of the litigant.

B. Institutional capacity measurement

The India Justice Report assesses the capacity of four pillars of the justice system - police, prisons, judiciary and legal aid, together with State Human Rights Commissions through the

¹⁵ United Nations Economic and Social Commission for Western Asia, 'Access to Dispute Resolution Mechanisms (16.3.3)'.

filters of human resources, infrastructure, budgets, workload and diversity, and compares data across a five-year period to discern whether States are improving.¹⁶ This is a different and valuable exercise. Because Article 39A directs its command at the State, a measure of the State's own effort is directly responsive to the constitutional text in a way that a disposal count is not.

The limitation is equally clear: capacity is a precondition, not a result. A well-staffed and well-funded legal services authority is better placed to deliver justice, but the inference from capacity to delivery is precisely what requires demonstration.

The data on legal aid uptake makes this limitation concrete. The India Justice Report 2025 records that only 15.5 lakh persons availed legal aid services in 2023-24, notwithstanding that approximately eighty per cent of India's population satisfies the eligibility criteria under the Legal Services Authorities Act, 1987.¹⁷ A figure of 15.5 lakh beneficiaries in a country of over 140 crore, set against a pending caseload of five crore, suggests that the eligible population is not being reached at anything approaching its scale. Whether the deficit is attributable to awareness, geography, quality of service, or distrust of formal institutions is a question that capacity-side data cannot answer.

The point can be illustrated without leaving the present subject. The 2025 edition of the Report records Chhattisgarh among the States showing the greatest improvement, alongside Bihar and Odisha.¹⁸ That is an improvement in inputs, and a welcome one. Whether it corresponds to any change in what a litigant in a Scheduled Area of the State experiences when a dispute arises is a distinct empirical question, and neither the Report nor the disposal returns are constructed to answer it. This observation constrains the present argument as much as it constrains the metrics: the article does not contend that outcomes in Chhattisgarh are poor, only that the available instruments cannot tell us.

C. Population-experience measurement

The third paradigm inverts the direction of inquiry. Rather than asking what an institution processed, it asks what a population experienced: of those who had a justiciable problem, how

¹⁶ India Justice Report 2025. The 2025 edition extends its assessment to forensics, mediation and disabilities.

¹⁷ India Justice Report 2025, cited in 'Legal Aid in India: Challenges, NALSA Initiatives and Way Forward' Insights on India (1 August 2025) <<https://www.insightsonindia.com/2025/08/01/legal-aid-and-nalsa/>> accessed 9 September 2026.

¹⁸ India Justice Report 2025; see also the Report's State factsheet for Chhattisgarh.

many reached a mechanism of any kind, which mechanism, and with what result. Indicator 16.3.3 is constructed on this logic.

Its decisive advantage is that it can see people the other two paradigms cannot. Output measurement counts only those who arrived; by construction it cannot register the person who never came. Capacity measurement counts what was provided, not who used it. Only a population-based instrument can identify unmet need, and unmet need is the entire concern of Article 39A.

Its disadvantages are practical rather than conceptual. Household surveys are expensive, slow, methodologically demanding, and cannot be produced monthly. No serious proposal would substitute them for administrative reporting.

There is also a foundational empirical gap that this paradigm would address. Unlike several comparable jurisdictions, India has not conducted a large-scale nationwide household survey that systematically measures the legal needs of its population.¹⁹ The consequence is that unmet legal need, which is the central concern of Article 39A, cannot be estimated from any available data source; it can only be inferred, and those inferences are not contestable by reference to any evidence about population experience. Without a baseline measure of the incidence of justiciable problems and the rate at which they reach any kind of mechanism, no disposal figure can be situated within a picture of the need it is meant to address.

D. An illustration: two statutes, two reputations

The distorting effect of output measurement can be seen by placing the Lok Adalat beside a second institution created for substantially the same purpose. The Gram Nyayalayas Act, 2008, which came into effect on 2 October 2009, was intended to provide affordable and quick access to justice to citizens at their doorsteps.²⁰ Approximately 2,500 Gram Nyayalayas were targeted.

¹⁹ V Aithala and others, 'Reforming the Indian Bar: The Limits of Technological Solutionism' (2025) India Policy and Practice Review <<https://ippr.in/index.php/ippr/article/download/397/150>> accessed 9 September 2026. The paper concludes that 'a large-scale annual nationwide household panel survey, with state participation, that systematically assesses people's legal needs, has not been conducted so far in India'.

²⁰ Gram Nyayalayas Act, 2008, as described in answers of the Ministry of Law and Justice, Department of Justice, in Parliament.

On the Government's own answers in Parliament, of the order of 257 to 320 are operational, across ten to eleven States.²¹

A parliamentary question put the reasons for the shortfall on the record directly, citing lack of priority at the State level, lack of financial resources, unavailability of human resources and particularly of trained judges and conciliators, and the high operational costs involved.²²

More recent official data indicate that the shortfall has not materially improved. As of April 2025, the Ministry of Law and Justice recorded 488 Gram Nyayalayas as notified across India, a figure considerably below the original target of 2,500 and one that encompasses courts notified but not necessarily operational.²³ The Supreme Court has separately expressed concern about the failure of States and High Courts to submit the affidavits it directed them to file on the establishment and functioning of Gram Nyayalayas, which suggests that the reporting gap identified in this article for Lok Adalats is not confined to that forum.

The comparison is instructive in two directions. Read through a capacity lens, the two institutions are a study in contrast: one requires permanent premises, a presiding officer and a recurring budget line; the other convenes, disposes and dissolves. Read through an output lens, only one is visible at all. A National Lok Adalat reporting figures in crores appears as a triumph of access to justice; the near-absence of the institution that Parliament designed for the same population does not register in that account.

The point is not that the Lok Adalat has displaced the Gram Nyayalaya by design, nor that its figures are inflated. It is that output measurement systematically favours the institution which is cheap to convene, and offers no vantage from which to ask whether the population would have been better served by the institution that was never built. That question is a distributive one, and only Article 39A and indicator 16.3.3 are framed to put it.

E. Why the distinction matters

²¹ Answers of the Minister of State, Ministry of Law and Justice, to questions in the Lok Sabha and Rajya Sabha concerning the establishment and functioning of Gram Nyayalayas. The figure has been variously stated as 257 operational in ten States and 320 operational in eleven States in successive answers.

²² Question and answer, Ministry of Law and Justice, concerning whether the Gram Nyayalaya scheme is being implemented at the desired level.

²³ Ministry of Law and Justice, Government of India (Twitter/X, 30 April 2025) <https://x.com/MLJ_GoI/status/1918009392294777233> accessed 9 September 2026 (recording 488 Gram Nyayalayas notified). For the Supreme Court's concern about non-compliance, see Drishti IAS, 'Gram Nyayalayas' (16 July 2024) <<https://www.drishtiiias.com/daily-updates/daily-news-analysis/gram-nyayalayas>> accessed 9 September 2026.

These paradigms do not merely differ in technique. They answer different questions, and they can move in opposite directions without contradiction. A State may improve its capacity scores, report record disposals, and leave a substantial part of its population no better able to resolve a dispute than before. Nothing in the present architecture would disclose that outcome. The gap between the three is where policy error is likely to breed, because it is the space in which success on one measure is read as success on another.

V. READING THE OFFICIAL RECORD FOR WHAT IT OMITTS

The foregoing would be of limited interest if the official data raised no questions of its own. It does, and two are visible on the face of the published record.

A. Cases taken up and cases disposed of

The returns record both quantities. The arithmetical difference between them is a residue: matters brought before a Lok Adalat which produced no settlement. Those parties leave without resolution and, on the statutory scheme, the matter returns to the referring court. Their experience is a failure of the forum to deliver what it offered.

That residue is collected. It is not, however, what is reported publicly or cited in the press. Attention attaches to the disposal figure, which is presented as the measure of the exercise. A reader encountering the headline number would not know that a second figure exists, still less that it may be substantial.

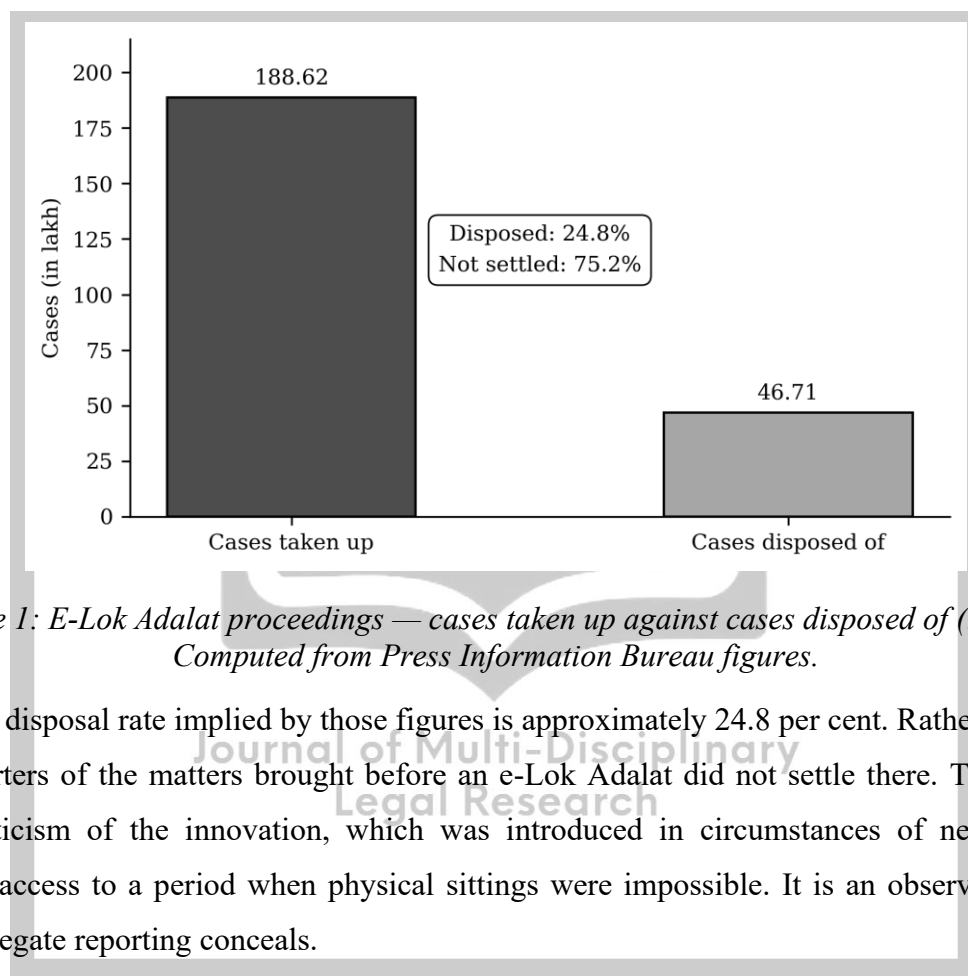
That this is a choice rather than a necessity is demonstrated by the treatment of the same problem in more recent legislation. The Mediation Act, 2023 requires a non-settlement report where mediation fails.²⁴ Parliament thereby accepted, in respect of a cognate process, that the failure to settle is itself an outcome warranting a formal record. The Legal Services Authorities Act, 1987 contains no equivalent, and the administrative returns, though they capture the

²⁴ Mediation Act, 2023 (Act No. 32 of 2023), s. 21. The Act received the assent of the President on 14 September 2023 and was published in the Gazette of India on 15 September 2023.

underlying quantity, do not surface it. The newer statute treats non-settlement as information; the older architecture treats it as residue.

B. The e-Lok Adalat illustration

The point can be demonstrated on official figures. E-Lok Adalats have been organised in twenty-eight States and Union Territories. Across those proceedings, 188.62 lakh cases were taken up and more than 46.71 lakh cases were disposed of.²⁵



*Figure 1: E-Lok Adalat proceedings — cases taken up against cases disposed of (in lakh).
Computed from Press Information Bureau figures.*

The disposal rate implied by those figures is approximately 24.8 per cent. Rather more than three-quarters of the matters brought before an e-Lok Adalat did not settle there. The figure is not a criticism of the innovation, which was introduced in circumstances of necessity and extended access to a period when physical sittings were impossible. It is an observation about what aggregate reporting conceals.

The candidate explanations are numerous and, for present purposes, that is the point. Connectivity and device access; digital literacy; the difficulty of conducting conciliation without physical presence; the absence of an intermediary to explain terms; language. Each is plausible. None can be distinguished from the others on the available data, because the data records how

²⁵ Press Information Bureau, Government of India, 'Lok Adalats'. The disposal rate stated in the text is computed from these figures by the present author.

many matters closed and nothing about why the remainder did not. A metric that cannot discriminate between competing explanations cannot guide the design of a remedy.

The digital divide provides independent empirical grounds for expecting a lower settlement rate in e-forum proceedings than in physical sittings. According to the Telecom Regulatory Authority of India's performance indicator report for the quarter ending December 2024, internet penetration in urban India exceeds 111 per cent while rural penetration stands at approximately 45 per cent.²⁶ A further barrier operates at the device level: a 2024 survey by the Internet and Mobile Association of India and Kantar found that approximately sixty-seven per cent of rural internet users depend on shared rather than personal devices, a rate that has grown year-on-year.²⁷ The population that the constitutional mandate is most concerned with reaching is therefore, by the same data, the population least equipped to engage with a forum that requires an independent internet-connected device and the digital literacy to operate it.

The natural extension of this analysis is to perform the same computation on State-level returns, comparing the taken-up and disposed-of columns across ordinary Lok Adalats, National Lok Adalats and e-Lok Adalats within a single jurisdiction and across a run of years. The data required is published. So far as the present author is aware, that comparison has not been undertaken, and it is offered here as a direction for further work rather than as a finding.

C. What the aggregate settlement figure does not disclose

A settlement value of ₹18,212 crore is a gross sum. It does not disclose the direction of payment, the composition of the parties, or the distribution across case categories. A single figure aggregates a maintenance award to a deserted wife and the recovery of a defaulted loan by

²⁶ Telecom Regulatory Authority of India, Indian Telecom Services Performance Indicator Report: Quarter Ending December 2024 (TRAI 2025), cited in 'Urban Internet Penetration Exceeds 111%, Rural Lagging at 44.99%: TRAI Report' Adgully (24 April 2025) <<https://www.adgully.com/post/1049/urban-internet-penetration-exceeds-111-rural-lagging-at-4499-trai-report>> accessed 9 September 2026.

²⁷ Internet and Mobile Association of India and Kantar, 'How India Used Internet in 2024' (January 2025), cited in 'Rising Rural Adoption, AI Integration: How India Used Internet in 2024' Medianama (16 January 2025) <<https://www.medianama.com/2025/01/223-rural-adoption-ai-india-internet-2024-kantar-iamai-report/>> accessed 9 September 2026.

a bank. Both are lawful outcomes; they are not equivalent for the purpose of assessing whether economic disability was prevented from denying access to justice.

Nor is the difficulty confined to a single event. A later National Lok Adalat in the same reporting cycle was recorded as settling over one crore disputes with a total settlement amount of the order of ₹90 billion.²⁸ The figures are reported in the same form, with the same aggregation and the same silences. The consistency is precisely the concern: a reporting practice repeated at quarterly intervals accumulates into an authoritative account of institutional success, and the account is composed entirely of quantities that cannot address the mandate.

The observation generalises. Aggregation across heterogeneous categories produces a figure that is arithmetically sound and analytically inert. Where the categories differ in the very respect the mandate cares about the relative position of the parties the aggregate cannot be interrogated for compliance with the mandate.

VI. WHAT SHOULD BE COUNTED

Four proposals follow. None requires legislative amendment, and three require no new data collection.

Proposal	What it requires	Cost
1. Report the non-settlement figure with equal prominence	Publication of a quantity already collected	Nil
2. Disaggregate by party type, distinguishing matters involving an institutional party	A single additional field recorded at the bench	Marginal
3. Disaggregate by case category and by district	Reporting at existing levels of collection	Marginal
4. Pilot a 16.3.3-style survey through one State Authority	A household survey in a single State	Substantial

Table 2: Four proposals for reform of Lok Adalat reporting

The first proposal is the most consequential relative to its cost. The non-settlement figure exists in the returns. Publishing it alongside the disposal figure, with equal prominence, would alter the public understanding of what a National Lok Adalat achieves without imposing any

²⁸ National Legal Services Authority figures for a subsequent National Lok Adalat, as reported in ‘Over One Crore Cases Settled In National Lok Adalat’, BW Legal World.

additional burden on any authority. The precedent is already in Indian law: Parliament required exactly such a record in the Mediation Act, 2023, and there is no evident reason why the principle should apply to a commercial mediation and not to a Lok Adalat.²⁹

The second addresses the ambiguity identified in Part II. Whether a matter lies between two individuals or between an individual and an institutional party is known to the bench at the time of disposal. Recording it would permit the settlement-value figure to be interrogated rather than merely reported.

The third responds to the concern that State totals absorb precisely the variation that matters. District-level reporting would render visible the performance of Lok Adalats in Scheduled Areas and in districts affected by conflict, where the population the mandate contemplates is concentrated.

The fourth is the only expensive proposal, and is offered as a pilot rather than a national programme. India has subscribed to indicator 16.3.3; technical guidance for its implementation exists. A survey in a single State, conducted through the State Legal Services Authority, would establish feasibility and cost, and would for the first time permit the disposal figures to be read against an estimate of the need they are meant to address.—

The experience of other jurisdictions demonstrates that the fourth proposal is operationally feasible at manageable cost. An OECD policy paper on monitoring SDG 16.3.3, published in 2023, records that Colombia has conducted the relevant survey module on a two-year frequency and that South Africa has incorporated an additional measure of access to free legal aid into its reporting cycle.³⁰ Both jurisdictions integrated the module into existing governance surveys rather than commissioning standalone instruments, substantially reducing the cost of a first iteration. A pilot in a single Indian State, conducted through the State Legal Services Authority, could follow the same design: the technical guidance is published and freely available, and the institutional infrastructure already exists.

²⁹ Mediation Act, 2023, s. 21.

³⁰ OECD, Improving the Monitoring of SDG 16.3.3: Towards Better Access to Justice (OECD Publishing 2023) <https://www.oecd.org/content/dam/oecd/en/publications/reports/2023/09/improving-the-monitoring-of-sdg-16-3-3_ba6098ca/c5fbed7e-en.pdf> accessed 9 September 2026. The paper notes that Colombia aims to maintain a two-year survey frequency and that South Africa plans to include access to free legal aid as part of its indicator reporting.

A concession is owed in closing this Part. Output metrics should not be abandoned, and nothing above proposes that they should. They serve administrative purposes that no survey can serve, and they do so cheaply and promptly. The argument is directed against their use as a proxy for a mandate on which they are structurally silent.

VII. CONCLUSION

Return to the figure with which this article began. More than 3.09 crore cases disposed of in a single day is an accurate number and a genuine achievement of institutional reach. The difficulty is not the number but the inference commonly drawn from it.

Article 39A asks whether the operation of the legal system promotes justice on a basis of equal opportunity, and whether economic or other disability has denied any citizen the opportunity to secure justice. A disposal count cannot answer either question. It reports the throughput of a forum, and it reports it well. But the person the mandate is chiefly concerned with the one for whom cost, distance, language or unfamiliarity foreclosed the forum entirely never appears in the column, and by the construction of the metric never can.

India already subscribes to an indicator built to see that person. The instruments to begin are largely in place, and the first and most useful step costs nothing at all: to publish, alongside the number of matters the Lok Adalat closed, the number it did not.