

CASE LAW UPDATES

Landmark Cases on Administrative Law You Must Know

Shruti chauhan · 08 Sep 2026

Administrative law rarely gets the glamour of constitutional law, yet it touches your life more often than you realise. Every time a government body issues a licence, cancels a tender, or dismisses an employee, administrative law decides whether that action was fair.

Unlike many other branches of law, administrative law in India has grown almost entirely through judicial decisions rather than a single codified statute. This makes case law absolutely central to understanding the subject.

In this article, we walk through the most important judgments that built Indian administrative law, explaining the facts, the ruling, and why each case still matters today.

A.K. Kraipak v Union of India: Blurring the Administrative and Quasi Judicial Line

[A.K. Kraipak v Union of India \(1969\)](#) is often called the starting point of modern Indian administrative law. The case arose when the Central Government set up a Selection Board to choose officers from the Jammu and Kashmir State Forest Service for promotion to the Indian Forest Service.

One member of the Selection Board, Naqishbund, was himself a candidate being considered for selection. Although he did not sit on the Board while his own name was discussed, his mere presence as a member raised serious doubts about the fairness of the entire process. Officers who were not selected challenged the recommendations.

The Supreme Court held that the principles of natural justice are not confined to judicial or quasi-judicial functions alone, and apply equally to administrative decisions that affect a person's rights or career. The Court famously observed that the dividing line between administrative and quasi-judicial power is thin and being gradually erased.

Illustration: If a government department forms a committee to shortlist candidates for a promotion, and one committee member is also competing for that same promotion, the presence of that member alone can taint the entire selection, even without proof that he actually influenced the outcome.

State of Orissa v Dr Binapani Dei: Even Administrative Orders Need a Hearing

Another early case that expanded the reach of natural justice was *State of Orissa v Dr (Miss) Binapani Dei* (1967). Here, the government unilaterally revised a doctor's recorded date of birth, which effectively forced her into premature retirement, without giving her any opportunity to be heard.

The Supreme Court held that even a purely administrative order which results in civil consequences for a person must be preceded by an opportunity of hearing. This case is significant because it rejected the older idea that natural justice applies only where a statute expressly demands it.

Illustration: If a government employer decides to change an employee's official service record in a way that affects their pension or retirement date, that employee must be given a chance to explain their side before the change is finalised.

Maneka Gandhi v Union of India: Fairness Enters Article 21

Maneka Gandhi v Union of India (1978) is one of the most celebrated judgments in Indian constitutional and administrative law combined. The Regional Passport Officer impounded the petitioner's passport under the Passports Act, 1967, citing public interest, without giving her any reasons or a hearing.

The Supreme Court held that any procedure which deprives a person of personal liberty under Article 21 must be fair, just, and reasonable, not arbitrary or oppressive. The Court read the principle of *audi alteram partem*, meaning the right to be heard, into the passport law by necessary implication.

Importantly, the Court held that even if impounding a passport is treated as an administrative action rather than a quasi-judicial one, natural justice still applies wherever a decision seriously affects a person's rights.

Illustration: If the government wishes to cancel someone's passport for reasons connected to an ongoing inquiry, it must, at the very least, offer that person a chance to respond, either before the cancellation or immediately afterward through a post-decisional hearing.

Barium Chemicals Ltd v Company Law Board: Limits on Subjective Satisfaction

Barium Chemicals Ltd v Company Law Board (1966) dealt with the Company Law Board's power to order an investigation into a company's affairs, based on its own subjective opinion that certain statutory conditions existed.

The Board ordered an investigation into Barium Chemicals Ltd, which the company challenged, arguing the Board had not genuinely formed the required opinion, and had instead acted on irrelevant considerations.

The Supreme Court held that while courts generally cannot question the adequacy or sufficiency of the grounds behind a subjective satisfaction, they can examine whether the authority actually applied its mind at all, and whether the grounds relied upon were relevant to the power being exercised. If the grounds are entirely irrelevant or non-existent, the exercise of power itself can be struck down.

Union of India v Tulsiram Patel: When Natural Justice Can Be Excluded

Natural justice is important, but it is not absolute. Union of India v Tulsiram Patel (1985) dealt with government employees who were dismissed from service without any inquiry, under a constitutional provision that allows this in specific circumstances, such as when holding an inquiry is not reasonably practicable.

A five judge Constitution Bench upheld the validity of dismissing an employee without a prior hearing in such exceptional situations, but clarified that these exceptions must be interpreted narrowly and applied only where genuinely justified by the facts.

Illustration: If a government employee is caught engaging in violent misconduct during a riot, making it genuinely unsafe or impractical to conduct a formal inquiry at that time, disciplinary action can proceed without the usual hearing, but this exception cannot be stretched to cover ordinary disciplinary matters where a hearing is entirely feasible.

Ramana Dayaram Shetty v International Airport Authority: Fairness in Government Contracts

Ramana Dayaram Shetty v International Airport Authority of India (1979) dealt with a very different but equally important issue, fairness in awarding government contracts. The Airport Authority invited tenders for running a restaurant, specifying a minimum of five years of experience as a registered second class hotelier as an eligibility condition.

The contract was awarded to a bidder who did not actually meet this stated condition. A rival who had not even submitted a tender, believing he was ineligible, challenged the award as arbitrary.

The Supreme Court held that the Airport Authority, being an instrumentality of the State under Article 12, was bound by Article 14 even while exercising contractual powers. Once an authority lays down an eligibility standard, it cannot arbitrarily depart from that standard to favour one party, since doing so denies equal opportunity to others.

Why These Cases Still Matter

Together, these judgments form the backbone of Indian administrative law. A.K. Kraipak and Dr Binapani Dei established that fairness applies to administrative action generally, not just formal judicial proceedings. Maneka Gandhi tied this fairness directly to the fundamental right to life and liberty.

Barium Chemicals set the outer limits of judicial review over discretionary power, Tulsiram Patel defined the narrow exceptions to natural justice, and Ramana Dayaram Shetty extended constitutional accountability into the world of government contracts and tenders.

A Simple Way to Remember This Topic

When analysing any administrative law problem, ask three questions in sequence.

Did the action affect someone's rights, interests, or legitimate expectations in a real way? If yes, some form of fairness or hearing is likely required, regardless of whether the action is labelled administrative or quasi-judicial.

Did the authority act on genuine, relevant grounds, or did it rely on irrelevant considerations or no real application of mind at all? And finally, did the authority follow its own stated standards consistently, without arbitrary favouritism?

If you can answer these three questions using the cases above, you can resolve almost any administrative law problem with confidence.

Conclusion

Indian administrative law has been shaped far more by courtroom battles than by legislation, and these five cases show exactly how that happened. From a forest service selection board to an airport restaurant tender, the common thread running through every judgment is simple: public power must be exercised fairly, reasonably, and without arbitrariness.

Understanding the facts and reasoning behind each of these cases, rather than memorising them as isolated citations, will give you a genuinely strong foundation in this subject.