BLOGS

Landmark Cases on Article 14

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Introduction

Article 14 is a fundamental right enshrined in the Constitution of India. It falls under Part III, which deals with fundamental rights guaranteed to all citizens. Article 14 is based on the principle of equality before the law and prohibits discrimination on various grounds.

It states that the State shall not deny to any person equality before the law or equal protection of the laws within the territory of India. This fundamental right ensures that all individuals, irrespective of their caste, race, religion, sex, or place of birth, are treated equally and fairly under the law. Article 14 plays a crucial role in upholding the principles of justice, non-discrimination, and rule of law in the country, fostering an inclusive and just society for all citizens.

Article 14 basically states that “The State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India”. The fundamental tenet of liberalism is that all citizens should be treated equally, and Article 14 guarantees this for all the citizens.

Landmark Judgements on Article 14

1. In the case of State of West Bengal v. Anwar Ali Sarkar, it was brought up whether or not the right to equality is unalienable. In this case, the Supreme Court ruled that there is no ultimate right to equality. In this instance, it was discovered that the State of Bengal abused its authority to arbitrarily send any matter to the Special Court that they established. In light of this, it was decided that the Act of State of Bengal breaches the right to equality.
2. In the case of Ram Krishna Dalmia v. Justice Tendolkar, the jurisprudence of equality before the law is described by the Supreme Court. In this instance, the well-known “classification test” had been administered. Simply put, it permits the State to classify subjects differently

(which is otherwise prohibited by Article 14) as long as the classification is based on comprehensible differences (i.e., objects within the class are easily distinguishable from those outside) and has a rational connection to the goal it seeks to pursue.

3. Maggan Lal Chaggan Lal v. Municipal Corporation of Greater Bombay gave the reasonable classification test the clarification it required. In this case, the court distinguished between statutes that classify things on their own and those that provide the executive the authority to classify them. If the statute in the first instance does not pass the reasonable categorization test, it is invalid. In the latter scenario, only the executive action will be deemed illegal and not the statute itself if the statute offers directions, whether explicitly stated or implicitly suggested, to the executive to make classification.
4. In E.P. Royappa v. State of Tamil Nadu, Bhagwati, J. proposed the second test of Article 14—also known as the “new doctrine” or the “arbitrariness test”—in his ruling. The test assumes that the equality envisioned by Article 14 includes a protection against state action that is arbitrarily taken. In spite of its somewhat ambiguous phrasing, this test has now won the Supreme Court’s approval and, on several occasions, has served as the foundation for declaring State conduct to be in violation of Article 14.
5. The decision in Indra Sawhney v. UOI marks a turning point in the law governing reservations in India. The Court explained how Articles 14 and 16 relate to one another. According to the ruling, Article 16(1) is a feature of Article 14. Both Article 16(1) and Article 14 permit fair categorisation. Seats or openings may be reserved as part of a classification. The main goals of Articles 14 and 16 are equality and equality of opportunity, and Article 16 Clause (4) is a method for achieving this goal. Given that both articles reiterate the equality principle found in Article 14 of the Constitution, they must be reconciled.
6. Regarding certain facets of reservation in India, this ruling in Maneka Gandhi v. UOI is historic. The relationship between Articles 14 and 16 was interpreted by the Court. It was decided that one of Article 14’s features is Article 16(1). Article 14 and Article 16(1) both allowed fair categorization. Seats may be reserved or there may be openings in a classification. Equal opportunity and equality are the primary goals of Articles 14 and 16, and Article 16 Clause (4) is a method of accomplishing these goals. Both sections must be reconciled while keeping in mind that they both reiterate the equality principle stated in Article 14.
7. In Shayara Bano v. UOI, the Triple Talaq Case, the Supreme Court ruled that the practise of instantaneous triple talaq (Talaq-ul-biddat) was unlawful. The Bench noted that the equality of

status was a manifestation of the fundamental right to equality protected by Article 14 of the Constitution.

Conclusion

According to Article 14, the guarantee of equality is intimately linked to the values of gender equality, gender equity, and gender justice. It is utterly irreconcilable with the word and spirit of Articles 14 and 15 of the Constitution to grant a social standing based on patriarchal norms or on the goodwill of the male population.