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E. P. ROYAPPA VS. STATE OF TAMIL NADU AND THE EVOLUTION OF ARTICLE 14

-Harshika Sinha

INTRODUCTION

Article 14¹ of the Indian Constitution is a fundamental rights that guarantees equality before the law and equal protection of the laws. It serves as the cornerstone of the right to equality, ensuring that no individual or group is treated unfairly by the State. This Article enshrines the principle of fairness, justice and the prohibition of discriminatory treatment. It ensures that all the individuals are treated equally under similar circumstances, while permitting reasonable classification to promote justice and address social inequalities.

The principal of equality before the law is derived from the Rule of Law, a concept by A. V. Dicey, rooted in English Legal Traditions. It mandates that every person, regardless of their status, is subject to the same legal standards. The equal protection of laws component ensures that people in similar situation are treated alike². However, equality under Article 14³ does not mean absolute equality, rather it allows for reasonable classification, which means that the State allows distinction between groups or individuals, provided that the classification is based on intelligible differentia and has a rational nexus with the objective sought to be achieved and opposes arbitrariness. It not only covers laws but also extends to administrative actions, ensuring that the Government policies are free from discrimination and arbitrariness.

One of the most significant cases that expanded the interpretation of Article 14⁴ is *E. P. Royappa v. State of Tamil Nadu*⁵.

¹ INDIA CONST. art. 14.

² Sneha Mahawar, *Rule of law - iPleaders, IPleaders* (July 5, 2022), <https://blog.ipleaders.in/rule-of-law-2/>.

³ INDIA CONST. art. 14

⁴ INDIA CONST. art. 14

⁵ *E.P. Royappa v. State of T.N.*, (1974) 4 SCC 3

CASE FACTS AND BACKGROUND

E.P. Royappa was a senior officer of the Indian Administrative Service (IAS) and had been serving as the Chief Secretary of Tamil Nadu, the state's top bureaucratic position. In addition to having a lot of administrative duties, this position serves as a crucial advisor to the political executive. Royappa was abruptly removed from this influential role in 1970 and assigned to the state's Planning Department as an Officer on Special Duty (OSD). Even though OSD is a senior position, Royappa was essentially marginalised in this instance because it was perceived as having no significant responsibilities.

Royappa claimed that the transfer was made for political reasons because of his tense relationship with the then Chief Minister of Tamil Nadu. He insisted that the action lacked administrative necessity and was punitive and arbitrary⁶. Crucially, Royappa had no history of wrongdoing or incompetence, and the State gave no official justification for this ruling. Feeling aggrieved, Royappa approached the Supreme Court under Article 32⁷, claiming a violation of Article 14⁸ which states equality before the law and *Article 16* which explains equality of opportunity in public employment. He maintained that rather than being based on merit or the general welfare, the transfer was an example of executive arbitrary behaviour that went against the rules of equitable administration. As a result, the case raised important questions about the limits of executive discretion, especially in light of the constitution's equality guarantee.

The Supreme Court rendered a landmark and doctrinally comprehensive ruling in a Constitution Bench decision. The Court established a revolutionary interpretation of Article 14⁹, despite rejecting Royappa's specific claim for lack of proof of personal mala fide. In the majority opinion, Justice P.N. Bhagwati made the well-known statement that "equality is antithetic to arbitrariness"¹⁰. He reasoned that since it deviates from standards of justice and reason, any capricious action by the state is fundamentally unfair. The ruling underlined that

⁶Digant Raj Sehgal, *E.P. Royappa vs. State of Tamil Nadu & Another (1973)*, (June 2, 2024), <https://blog.ipleaders.in/e-p-royappa-v-state-tamil-nadu-mala-fide-abuse-discretion/>.

⁷INDIA CONST. art. 32.

⁸INDIA CONST. art. 14

⁹INDIA CONST. art. 14

¹⁰*EP Royappa vs State of Tamil Nadu, Case Analysis* <https://testbook.com/landmark-judgements/ep-royappa-vs-state-of-tamil-nadu>.

Article 14¹¹ applies to all types of state action, whether legislative or executive, and is not just restricted to cases involving classification. It marked a dramatic shift from formal equality to substantive equality by giving courts the authority to review executive discretion based on justice, fairness, and non-arbitrariness. The scope of judicial review under Article 14¹² was greatly expanded by this interpretation¹³.

ROYAPPA'S JUDICIAL LEGACY

This case has not overruled any specific prior case, but it has significantly broadened the interpretation of Article 14¹⁴ of the Indian Constitution, expanding its scope to include a guarantee against arbitrariness in state action, going beyond mere discrimination. This case built upon existing jurisprudence, adding a new dimension to the interpretation of the Constitutional provision and strengthened the Constitutional protection of equality before the law. The case of *E. P. Royappa v. State of Tamil Nadu*¹⁵ has not been overruled yet, as it remains to be a cornerstone of Constitutional Jurisprudence, defining the limits of State action and ensuring equality before the law. The doctrine of non-arbitrariness, established in this case is seen as a vital component of the Indian Constitution, ensuring that the State actions are not arbitrary or unreasonable. This case has been used as a precedent and has been referred to when dealing with arbitrary state actions.

The impact of *Royappa* was far-reaching and deeply influential in subsequent constitutional jurisprudence. In the case of *Maneka Gandhi v. Union of India (1978)*¹⁶, the Court extended the Royappa logic by holding that any "procedure" under Article 21¹⁷ must be just, fair, and reasonable. This case created the golden triangle of Articles 14¹⁸, 19¹⁹, and 21²⁰, which now serves as the backbone of Indian constitutional rights²¹. In a similar vein, the Supreme Court

¹¹INDIA CONST. art. 14

¹²INDIA CONST. art. 14

¹³*E.P Royappa v. State Of Tamil Nadu: Upholding IAS Appointment Procedures and Denying Claims of Arbitrary Transfer*, CaseMine (Nov. 24, 1973), <https://www.casemine.com/commentary/in/e.p-royappa-v.-state-of-tamil-nadu:-upholding-ias-appointment-procedures-and-denying-claims-of-arbitrary-transfer/view>.

¹⁴INDIA CONST. art. 14

¹⁵*E.P. Royappa v. State of T.N.*, (1974) 4 SCC 3

¹⁶*Maneka Gandhi v. Union of India*, (1978) 1 SCC 248

¹⁷INDIA CONST. art. 21.

¹⁸INDIA CONST. art. 14

¹⁹INDIA CONST. art. 19.

²⁰INDIA CONST. art. 21.

²¹Arnav Kumar, *Maneka Gandhi V. Union of India* Lloyd Law College, (Sept. 23, 2019), <https://www.lloydlawcollege.edu.in/blog/maneka-gandhi-vs-union-of-india.html>.

reaffirmed in *Ajay Hasia v. Khalid Mujib (1981)*²² that arbitrariness is incompatible with equality²³ and, as such, violates Article 14²⁴. The Court pointed out that the impact of State action is more important than its form. *Ramana Dayaram Shetty v. International Airport Authority (1979)*²⁵ built further on this by extending the Royappa principle to the field of public contracts, emphasizing that government decisions affecting the public must be fair and transparent²⁶. These decisions collectively embedded the arbitrariness doctrine into diverse areas such as service law, administrative contracts, tenders, and public employment.

Even in more recent cases like *Joseph Shine v. Union of India (2018)*²⁷, which decriminalized adultery²⁸, and *Navtej Singh Johar v. Union of India (2018)*²⁹, which decriminalized homosexuality, the Court relied on the expanded understanding of equality and dignity first articulated in *Royappa*³⁰. This demonstrates how the ruling set the stage for a values-based reading of the Constitution, in which equality is interpreted not just as equal treatment but also as justice, non-discrimination, and respect for human dignity. Royappa's lasting impact can be attributed to the way it has enabled the judiciary to hold the State responsible for unfair or illogical actions while also adjusting constitutional principles to shifting social values³¹.

CRITICAL ANALYSIS OF ROYAPPA

The *E. P. Royappa v. State of Tamil Nadu*³² is a judicial milestone that reshaped the interpretation of Article 14³³, transferring it from a narrow equality clause to a robust tool for

²²*Ajay Hasia v. Khalid Mujib Sehravardi, (1981) 1 SCC 722*

²³*Vanshika Kapoor, Ajay Hasia vs. Khalid Mujib AIR 1981 SC 487 - iPleaders, IPleaders (Sept. 16, 2024), <https://blog.iPLEaders.in/ajay-hasia-vs-khalid-mujib-air-1981-sc-487/>.*

²⁴INDIA CONST. art. 14

²⁵*Ramana Dayaram Shetty v. International Airport Authority of India, (1979) 3 SCC 489*

²⁶*Case Analysis - Ramana Dayaram Shetty v. The International Airport Authority AIR 1979 SC 1628 - Scholarticles | PDF | U.S. State | Appeal, Scholarticles <https://www.scribd.com/document/489815595/Case-Analysis-Ramana-Dayaram-Shetty-v-the-International-Airport-Authority-AIR-1979-SC-1628-Scholarticles>.*

²⁷*Joseph Shine v. Union of India, (2019) 3 SCC 39*

²⁸*Joseph Shine v. Union of India, 2018 SC 1676, <https://www.drishtijudiciary.com/constitution-of-india/joseph-shine-v-union-of-india-2018-sc-1676>.*

²⁹*Navtej Singh Johar v. Union of India, (2018) 10 SCC 1*

³⁰*Navtej Singh Johar and Ors. vs. Union of India, <https://privacylibrary.ccnlud.org/case/navtej-singh-johar-and-ors-vs-union-of-india-uo-i-and-ors>.*

³¹*Right To Equality: Article 14 And Its Landmark Judgments, https://legaleye.co.in/blog_news/right-to-equality-article-14-and-its-landmark-judgments/.*

³²*E.P. Royappa v. State of T.N., (1974) 4 SCC 3*

³³INDIA CONST. art. 14

promoting fairness and reasonableness, also strengthening the concept of equality under Article 14³⁴. The judgment in this case was a groundbreaking expansion of equality doctrine. By holding that equality and arbitrariness are incompatible, the Court ensured that state actions are subjected to judicial review if they were arbitrary and unjust.

The *Royappa* judgment didn't just reinterpret Article 14³⁵, it also breathed life into it. Until then, equality was often boxed into narrow legal formulas, reduced to classification tests that, in practice, allowed inequality to persist beneath the surface. What the Court did here was open the door to a more intuitive and humane understanding of fairness. By saying that arbitrariness and equality can't coexist, the Court shifted the conversation, it reminded the State that legality alone isn't enough, decisions must also be just³⁶.

That shift had both moral and legal weight. It meant that citizens could now question not only whether they were being treated differently, but whether they were being treated fairly. It's a subtle but significant change. All of a sudden, the Constitution was more than just a set of rules, it was a mirror held up to authority, asking, "Was this action justified? Was it based on principles?"

Definitely, there are boundaries. The arbitrariness test can be imprecise even though it is flexible. Although judges have many options, this can sometimes result in unsettling outcomes. Still, it's hard to deny how necessary this tool has become. In a democracy where power is uneven and often opaque, courts need a way to probe the silences between written rules. In that sense, *E.P. Royappa* didn't just change how Article 14³⁷ is read, it also changed how we think about governance itself. It told the State, justice isn't only about following the law, it's about honouring the spirit behind it³⁸.

CONCLUSION

³⁴INDIA CONST. art. 14

³⁵INDIA CONST. art. 14

³⁶*E.P. Royappa V. State Of Tamil Nadu: Case Summary & Study Notes, Oleum Gas Leak Case (Apr. 5, 2024)*, <https://legalfly.in/e-p-royappa-v-state-of-tamil-nadu-case-summary/>.

³⁷INDIA CONST. art. 14

³⁸*Reimagining Equality: The Doctrine of Non-Arbitrariness in E.P. Royappa v. State of Tamil Nadu | Legal Service India - Law Articles - Legal Resources*, <https://www.legalserviceindia.com/legal/article-17372-reimagining-equality-the-doctrine-of-non-arbitrariness-in-e-p-royappa-v-state-of-tamil-nadu.html>.

Article 14³⁹ was not simply reinterpreted in the E.P. Royappa⁴⁰ case. It altered our perception of equality in general. Prior to this, equality was primarily viewed as a legal formula that was centred on categories and classifications. However, there was more to this judgement. It established the notion that all state actions must be fair and reasonable, and that merely following the rules is insufficient if the result is arbitrary or unfair.

Most notable is how the Court introduced a sense of moral responsibility for the State and transcended strict tests. It posed the questions, "Is this fair?" as well as "Is this legal?" That change seems significant, particularly in the modern era when choices frequently have invisible effects on actual people.

Naturally, judges must apply the arbitrariness test carefully because it can be ambiguous. Despite its shortcomings, the doctrine provides us with a means of holding those in positions of authority responsible. In the end, the Royappa decision reminds us that the Constitution is more than a collection of laws. It is an assurance of fairness. Fundamentally, justice entails treating individuals with respect, equity, and reason. As courts continue to use it to contest unjust State actions, its significance has only increased over time. It remains one of the strongest reminders that power must always be exercised with responsibility.

³⁹INDIA CONST. art. 14

⁴⁰E.P. Royappa v. State of T.N., (1974) 4 SCC 3