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# **THE EFFECT OF JUDICIAL REVIEW ON ADMINISTRATION ACTION THROUGH WRITS**

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## **Abstract:**

The constitution of India greatly focuses on implicating a highly proficiency services to the society in which the one of the amalgamation of doctrine is judicial review. Judicial review serves a vital mechanism for assuring the constitutionality and legality of administrative action. The constitution of India emphasis that judicial review is basic feature of constitution which elucidate judiciary can review both executive and legislative for their action which invalidate constitution terms and provisions or performing unlawful duty by overall government authorities and public bodies where they misuse the power or arbitrary decision -making. The administrative action is the one through which the government policy and to develop the strength of the society reach to the public. In such cases where the exercise of certain duties and power by the authorities violates our fundamental and legal rights, by constitutional remedy under Article 226 and 32 can seek court in which judiciary can exercise their power as judicial review as the guardian and watch tower to protect those rights. This paper explores the growth of judicial review through writs are Habeas corpus, prohibition, certiorari, quo warranto, Mandamus that are engaged by courts to review administrative action as well as it probes into scope, function, limitations thrust on their use. Judicial not only focus on preventing citizen's right but also ensuring the accountability of administration.

## **Introduction:**

*"If judicial review means anything, it is that judicial restraint does not allow everything "*

*-Don Willet*

Judicial review of Administrative action is one of the most efficient way of dealing with the constitutional discipline over administrative agencies while performing their duties. It had its origin in England which was accepted and adopted in many of the common law countries. In

such case India is also one of the country that inherited the concept of judicial review from England. India had laid its structure on English prerogative according to the pattern that issued by the court of king's Bench in a view to exercise general superintendence over the due observance of law by authorities/officials while executing their judicial or non judicial functions. Judicial review is an extraordinary weapon through which unjust, harassing, arbitrary and unconstitutional laws are being verified<sup>1</sup>. The doctrine of judicial review is the basic feature of our constitution reached its culmination in the case of **keshvanand Bharathi v State Of Kerala**.<sup>2</sup>

Judicial review is also the thus touchstone and essence of the rule of law<sup>3</sup>. The supreme court and High courts are the ultimate interpreters of the constitution seeking through the article 226 and article 32. In **Minerva Mills Ltd v Union Of India**<sup>4</sup>, the supreme court observed that the constitution has created an independent judiciary which is vested with the power of judicial review to determine the legality of administrative action and validity of legislation. It is the solemn duty of the judiciary to make the different organs of the government under the constitution within the power limits stated upon them by the constitution by exercising the doctrine of judicial review as **sentinel on the quivive**; In recent times ,judicial review of administrative action has become extensive and expansive ; The traditional limitations have vanished and the sphere of judicial scrutiny is being expanded; Under the old theory, the courts used to exercise power only in cases of absence or excess or abuse of power ; As the state activities have become pervasive and giant public corporation have some in existence, the stake of public exchequer justifies larger public audit and judicial control<sup>5</sup> ( **Star Enterprises v City and Ind. Dev. Corpn. (1GG0) 3 SCC 280 (284)**).

### ***Meaning of Judicial review:***

Judicial review' may be defined as a "**Court's power to review the actions of others branches of government, especially the Court's power to invalidate legislative and executive actions as being unconstitutional**".<sup>6</sup>

Judicial review means the review made by the courts of administrative actions with a view to ensure

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<sup>1</sup> [https://www.iilsindia.com/study-material/616009\\_1613919442.docx](https://www.iilsindia.com/study-material/616009_1613919442.docx)

<sup>2</sup> AIR 1973 SCC 1461

<sup>3</sup> R.k.Jain v Union of India (1993) 4SCC 119(168)

<sup>4</sup> (1980)3 SCC 625(677-78):AIR 1980 SC 1789 ( 1925-26)

<sup>5</sup> C.K.Takwani. Lecture On Administrative Law., Third Edition

<sup>6</sup> [https://www.iilsindia.com/study-material/616009\\_1613919442.docx](https://www.iilsindia.com/study-material/616009_1613919442.docx)

their legality. Administrative authorities are given powers by statutes and such powers must be exercised within the limits of power drawn by such statutes.<sup>7</sup>

The Indian constitution states an express provision in the shape of Article 13 for judicial review. The supreme court at the central level and High courts at the state level have the exclusive power to review the administrative actions through writs of habeas corpus, certiorari, prohibition, mandamus, quo warranto under article 32 and 226. The writs borrowed from England where they have long history of development and have gathered many technicalities.<sup>8</sup>

### **What is administrative action:**

Administrative action is residuary action which is neither legislative nor judiciary. It is more detailed about taking care with treatment of specific situation and is empty of generality. It has no procedural obligation of collecting evidence and proceeding argument. It is completely based on subjective perspective and satisfaction where decisive is based on expediency and policy. It does not deal with deciding right even though it greatly affects a right. However, it does not mean to be completely stay away from principle of natural justice when the authorities are exercising those administrative powers

In case **A.K. Kraipak v Union of India**<sup>9</sup>, the court observed that in order to examine whether the action of the administrative authority is administrative or quasi-judicial, one has to look into the nature of power conferred, to whom power is given, within the framework of power is conferred and the consequences.

### **Judicial review of administrative action:**

Judicial review of administrative action is perhaps the most important development in the field of public law. The judiciary, therefore, has its duty to find out the extent and limits of power of their coordinate branch executive and legislative and to see that they do not transgress their limits. Administrative action may be non-statutory (lack of legal force) or statutory (enforce of law); but bulk of administrative action is statutory due to statute or constitution gives it absolute legal force; In some cases it implicates non-statutory like directing to subordinate which has no legal force, However its violation may take pathway to disciplinary action. In those process of judicial review of executive and legislative action, the courts choose the golden thread of reason behind it

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<sup>7</sup> Prof. I. P. Massey, Administrative Law, pp.62, 8th edition.

<sup>8</sup> Basappa v. Nagappa, AIR 1954 SC 440; (1951) 1 SCR 250.

<sup>9</sup> AIR 1970 SC 150



and meaning of law; reveals it's fitness and disturbances; they shape the law; cut down the bad law or illegal enforcement.

If any administrative action like by legislature who acted beyond his competence (ultra vires) to the distribution of power (under article 246), or any controversy with fundamental rights or any other mandatory provision of constitution (for instance., article 301,304) in those cases the judiciary under the judicial review power can declare a law or legislation unconstitutional. Thus, Under the article 132, the supreme court referred to the substantial question of law as to the interpretation of constitution. The exercise of 'reasonable restrictions' can also take into effect in case of fundamental rights is noted to court's supervision. Judicial review is thus the result of "the interposition of judicial restraint on executive as well as legislative organ of the government".

In **A.k.Gopalan v State of Madras**<sup>10</sup>, the power of judicial review was established and the limitations for its exercise were detailed in a obvious manner.

In **state of Bihar v Subhash Singh**<sup>11</sup>, the court held that, judicial review of administrative action under article 32 and 226 of the Indian constitution is a valid, judicial review of administrative action is an essential part of the rule of law.<sup>12</sup>

In **Federation of Railway officers Association and Others v UOI**<sup>13</sup>, the supreme court observed that, where a policy evolved is inconsistent with Indian constitution and the law is arbitrary or irrational or its leads to abuse of power, the court will interfere with such matters because judicial review of administrative action is an essential part of rule of law.

In **Noble Resources Ltd. v. State of Orissa**<sup>14</sup>, the court stated that it can intrude in the contract given by government to avoid any malafide intention and to avoid the favoritism of government for the charges alleged may be not suitable.

### Grounds of judicial review:

The doctrine of ultra vires is the core and basic rule of administrative law. Administrative action for which using judicial review, using the concept of intra-ultra vires and the rules of natural justice those things which ensure that the executive and legislative acts within the power conferred upon them. The main classes of action may be continued; those alleging infringement of statutory needs, disregard of natural justice rules, alleging that decision was reached in unreasonable manner.

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<sup>10</sup> AIR 1950 SC 27

<sup>11</sup> State of Bihar v. Subhash Singh, AIR 1997 SC 1390 and N.R. Nair v. Union of India, AIR 2001 SC 2337.

<sup>12</sup> Minerva Mills v. Union of India, (1980) 3 SCC 625.

<sup>13</sup> Federation of Railway officers Association C others v. Union of India, AIR 2003 SC 1344.

<sup>14</sup> Noble Resources Ltd. Vs. State of Orissa, AIR 2007 SC 119.

Following those granting a court to go for judicial review to check whether the administrative action was within or outside of its power (intra- vires or ultra -vires).

The grounds of judicial review were stated by Lord Diplock in the case of **Council of Civil Service Union v Minister Of Civil Service**<sup>15</sup>. Although these grounds for judicial review are not tiresome, yet those provide base for courts to exercise their respective jurisdiction.

Basically, there are five grounds for judicial review in India:

**Jurisdictional error:** The term 'jurisdiction' means the power to make decision. There may be "lack, excess or abuse of jurisdiction". The court may restrain an administrative action on the ground of ultra vires in all those three circumstances.

In 'lack of jurisdiction' is where the authority or tribunal holds no power or jurisdiction to deliver an order. In such situation the court may intervene to review whether the administrative action by authority who exercised jurisdiction which is not supposed to do.

In 'excess of jurisdiction' the authority had jurisdiction initially over case but then it exceeded and later it's action become illegal.

All administrative power exercise by the authority should be bona fide, fair and reasonable. If these powers are abused, it will definitely give up hand to a ground of judicial review.

**Irrationality:** A established general principle is that discretionary power of administrative authority should be exercised fairly and reasonably. The decisive of administrative authority can declare unreasonable whether it is so outrageous in its confrontation of logic or common moral standards that no reasonable man who has applications of mind to that subject could have arrived at it.

In the case **Associated Provincial Picture House v Wednesbury**<sup>16</sup>, 'Irrationality' was developed as a ground for judicial review. This case later came to known as the 'wednesbury test.'

**Procedural impropriety:** This talks about failure to cope up with the laid down procedures. It is to cover two areas, the one in which failure to observe rules stated in the statute and the second is failure to observe the basic common-law rule of justice.

**Ridge v Baldwin**<sup>17</sup> is an case where procedural fairness showed great insistence on judicial review irrespective of the kind of body examining the matter. Ridge, the Chief Constable of Brighton was suspended on the charges of conspiracy to obstruct the course of justice. Despite the clearance of allegations against Ridge, The Judge made comments which criticized Ridge's

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<sup>15</sup> Council of Civil Service Union v. Minister of Civil Service (1984).

<sup>16</sup> Associated Provincial Picture House v. Wednesbury (1947).

<sup>17</sup> Ridge v Baldwin (1963). <https://www.questjournals.org>

conduct. Following that, Ridge was dismissed from the force but he was not invited to attend the meeting which had decided his dismissal. Later, he was given an opportunity to be heard before the committee which had dismissed his appeal. Ridge then appealed to the House of Lords that the committee had totally violated the rules of natural justice. This case has been important because of the emphasis on the link existing between the right of a person to be heard and the right to know the case brought against him.

**Proportionality:** It means that exercise of administrative action should not be out of control or force than it requires to be. The principle of proportionality indicates that the court definitely goes into question about advantage and disadvantage of necessary action Unless the said administrative action is in its advantageous stage and in the public interest, such an action is said to be cannot upheld. This doctrine holds to balance means with ends. Courts In India have been functioning by adhering to this doctrine for a long time but the courts in England had started using this doctrine only after passing of the Human Rights Act, 1988. The court quashes the performance of discretionary power in which there is no reasonable relation between objectives to be achieved and means of achieving it in the test of proportionality. If the administrative action by authority is mischief of disproportionate, it will be quashed.

In **Hind Construction Co. v. Workmen**<sup>18</sup>, some workers called for a holiday and remained absent. They were later dismissed from service. The court held that the workers should have been warned and fined instead of abruptly being dismissed in a permanent manner. It was out of the question to think that any reasonable employer would have given such extreme punishment. The court held that the punishment imposed on the workmen was not only severe but also disproportionate.<sup>19</sup>

**Legitimate Expectation:** This doctrine acts as a ground of judicial review for the protection of interest when a public authority abrogate from a representation made to person. In such cases a legitimate expectation rises in the mind of the complainant who has been comprehend expressly or impliedly that certain procedures will be pave way in reaching a decision. The expectation should possess with reasonable basis. This doctrine plays a major role to give relief to those person who were mistaken by violation of their legitimate expectation and have not in position to claim justification on the basis of law.

Two consideration ascertain legitimate expectation:

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<sup>18</sup> Hind Construction Co. v. Workmen (1965).

<sup>19</sup> <https://www.questjournals.org>

1. Where an individual or a group believe expressly or impliedly that a certain procedures will be applicable.
2. Where an individual or a group depends upon a particular guidelines or policy which has previously governed a part of executive action.

In **Regina v. Liverpool Corporation ex parte Liverpool Taxi Fleet Operators Association**<sup>20</sup>, the Corporation had given undertakings to the effect that the taxi drivers' licenses would not be revoked without their prior consultation. But the corporation acted in the breach of its undertaking. The court ruled that the taxi drivers had a right to be consulted.<sup>21</sup>

### **Remedies against Administrative action through writs:**

The India that is democratic country, the administrative authorities which includes three organ of the government one in which the judiciary exercise the power of judicial review. The administrative authorities are vested with broad discretionary powers. The exercise of those powers often becomes more subjective in case of absence of specific guidelines etc. Hence, there is essential need for control over the discretionary power to ensure that 'rule of law' which talks about supremacy of, equality before law should exist in all governmental action. Lord Dyson said that, "there is no principle more basic to our system of law than the maintenance of rule of law itself and the constitutional protection afforded by judicial review. "Therefore the judicial review of administrative action in the embodiment of writ jurisdiction is to make sure that decisiveness taken by authorities are fair, legal, reasonable and proper.

Article 226 and 32 of constitution of India has drawn for executing or enforcement of fundamental rights and for a judicial review of administrative action, in the configuration of writs. It is one of the most vital Constitutional remedy accessible to a aggrieved person to bring their complaints or grievances for redressal against any administrative action before the court to notice. The importance of those remedies are highlighted or reflected by the maxim **ubi jus ibi remedium- where there is right, there is a remedy**. Under those articles the supreme court and the High court exercise their appropriate processing of judicial review through writs in the nature of habeas corpus, mandamus, certiorari, prohibition and quo warranto for the protection of fundamental rights enlightened in part three of the constitution of India.

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<sup>20</sup> Regina v. Liverpool Corporation ex parte Liverpool Taxi Fleet Operators Association (1972)

<sup>21</sup> <https://www.questjournals.org>

**Five types of writs<sup>22</sup> are obtainable for judicial review of administrative action:**

- **Habeas corpus:** It means “have the body”. This writ is issued as an order calling upon the person who has detained another person to produce the detainee before the court of law. If the court finds out that the detention has been illegal or without legal justification, it will order for the immediate release of the detainee. The main objective of this writ is not to punish the detainer but to release the detainee from wrongful detention.
- **Mandamus:** It means ‘to command the public authority’ to perform its duty. It is a command given by the higher courts (High Courts and supreme Court) to the Government, Inferior courts, tribunals, corporations, authorities or any other person to do any act or refrain from doing an illegal act. The purpose of this writ is to compel the performance of public duties and to keep control over the activities of the administration.
- **Quo warranto:** The word ‘quo warranto’ means by what authority. Such writ is issued against a person who usurps a public office. The court directs the concerned person to show by what authority he holds that office. The unauthorized or illegal usurper would be removed by judicial order and the right person belonging to it would be entitled to it.
- **Prohibition:** Prohibition is issued by a superior court to an inferior court tribunal or body exercising judicial or quasi-judicial functions to prevent them from exceeding their jurisdiction. It is based upon the maxim ‘Prevention is better than cure’.
- **Certiorari:** This writ is issued by the Superior Courts (High Courts and the supreme Court) to the inferior court or tribunal or body which may exercise judicial or quasi-judicial functions, for the correction of jurisdiction or error of law committed by them. If any order passed by them is illegal, then the Superior Court may quash or demolish it. Grounds of this writ are (a) excess or failure to exercise the jurisdiction (b) violation of the principles of natural justice authority has failed to correct an error which has been apparent on the face of the record.

**Suggestion for the scenario:**

In the administrative law, the judicial review of administrative action is one of the most important factor to take into consideration; which is inherent in the constitution of India that is based on separation of power and rule of law. It is one of the foremost accessible remedy against administrative action

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<sup>22</sup> Five types of writs <https://mchrdrdi.gov.in/splfc2023/week9/2-%20%20Presentation%20-%20%20Judicial%20Review%20of%20Administrative%20Action%20in%20India.pdf>



who exercise beyond their scope. The center point is to ensure that administrative actions of authorities are within the limits of law conferred upon on them and to protect, safeguard the rights and interest of the citizens. It is thus the very heart and soul of administrative law.<sup>23</sup>

The steps suggested that:

- Administrative law should be codified for showcase in transparent manner and make them working efficiently and effectively.
- In order to provide speedy and cost friendly justice, it should be ensured that tribunals should work reasonably, properly, fairly, effectively through legislation.
- Judiciary has to always in the pursuance of evolving new guidelines, principles, standards, rules, procedures and parameters so that discretionary powers conferred on those administrative authorities may not go in track away from that power conferred.
- Administrative authorities should use those discretionary powers in conscience, good faith and only exercise for authorized purpose. In such case they need to act in reasonable and unbiased manner.
- To enforce and establish a resonate administrative laws and procedures for public welfare, the operative participation of people is crucial.
- There should be accurate and uniform administrative law definition which defines it in more obvious manner; that leads to take into consideration of the contemporary trend of administrative law and paves a way to deal with times to come.

### **Conclusion:**

Judicial review plays an enhancing role in ensuring accountability on administrative action through various writs. This form makes the authorities to stick on the power empowered on them by constitution.

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<sup>23</sup> T.K.Rangarajan v. Government of T.N., AIR 2003 SC 3032; L.Chandra Kumar v. Union of India, AIR 1997 SC 112.

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