

INTERNATIONAL JOURNAL FOR LEGAL RESEARCH AND ANALYSIS



Open Access, Refereed Journal Multi-Disciplinary
Peer Reviewed

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“ONE NATION, ONE ELECTION: REIMAGINING ELECTORAL REFORM THROUGH CONSTITUTIONAL MORALITY AND FEDERALISM”

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Abstract: -

The proposal of “One Nation, One Election” (ONOE) has emerged as one of the most significant electoral reform debates in contemporary India, raising critical questions at the intersection of governance efficiency, federalism, and democratic accountability. This paper examines the feasibility and implications of synchronising elections to the Lok Sabha and State Legislative Assemblies within the existing constitutional framework. While proponents emphasise administrative efficiency, reduction in electoral expenditure, and policy continuity, the study critically evaluates the constitutional, federal, and practical challenges associated with such reform. Effort is made to situate the ONOE debate within the broader framework of Indian federalism and the evolving concept of constitutional morality. Paper contends that electoral reform cannot be assessed solely on considerations of efficiency but must be evaluated against the principles embedded in the Constitution. The study highlights that rigid synchronisation of elections may risk centralisation, undermine State autonomy, and dilute representative diversity. However, constitutional morality provides a critical normative lens to reconcile the tension between reform and constitutional values. Paper emphasises that democratic legitimacy, institutional integrity, and cooperative federalism must guide any electoral restructuring. The study concludes that while ONOE may offer certain administrative benefits, its implementation must be approached cautiously through calibrated, phased reforms that preserve the federal balance and uphold the constitutional ethos of India’s democratic framework.

Keywords: One nation one election, Constitutional morality, Electoral Reforms, Cooperative Federalism, Democratic Governance.

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Introduction: -

India is widely regarded as the largest democracy in the world, and the essence of any democratic system lies in the strength, integrity, and credibility of its electoral process¹. The foundation of India's electoral system is firmly rooted in its Constitution, which envisages a representative form of government based on universal adult franchise. The responsibility of conducting free, fair, and transparent elections is entrusted to the Election Commission of India, an independent constitutional authority designed to uphold democratic values.

Despite these constitutional safeguards, the electoral process has often faced criticism due to issues such as excessive election expenditure, frequent imposition of the Model Code of Conduct, voter manipulation, and increasing politicisation. In response, several reforms have been proposed over the years to strengthen electoral governance. While some have been successfully implemented, many remain under deliberation².

In recent times, the idea of 'One Nation, One Election' (ONOE) has emerged as one of the most debated electoral reforms. The proposal has gained renewed momentum with the constitution of a High-Level Committee under the chairmanship of Ram Nath Kovind in 2023 to examine its feasibility³. Supporters argue that synchronising elections both horizontally (across states) and vertically (between Union and State governments) would enhance administrative efficiency, reduce costs, and ensure policy continuity⁴. On the other hand, critics contend that such synchronisation may undermine state autonomy, shift focus disproportionately to national issues, and potentially weaken the federal structure.

In the context of electoral reforms, constitutional morality demands that such reforms be undertaken in a manner that preserves democratic values, institutional integrity, and the constitutional balance, rather than being driven solely by administrative or political considerations. This study contends that federalism would be weakened not by electoral reforms, but by a loss of constitutional morality, and that constitutional morality provides a critical normative foundation for balancing efficiency with constitutional principles and

¹ Kashyap, S. C. (2015). *Our Constitution: An introduction to India's Constitution and constitutional law* (5th ed.). New Delhi: National Book Trust.

² Law Commission of India. (2018). Report No. 255: Electoral reforms. New Delhi: Government of India.

³ Government of India (2023). High-Level Committee on Simultaneous Elections, New Delhi

⁴ NITI Aayog. (2017). Analysis of simultaneous elections: The "One Nation, One Election" proposal. New Delhi: Government of India.

preserving India's federal character.

Constitutional Framework of Indian Federalism: -

Federalism is the governance system where the power is not centralised with centre, but divided between union and States. In India Supremacy of Constitution and principle that every organ of the State derives its authority from Constitution is well established and accepted by legislature, executive and judiciary. The Division of power is horizontal as well as vertical. Horizontal division ensures distribution of powers amongst legislature, executive and judiciary whereas vertical division distributes legislative administrative, and financial competence across levels of government through the Seventh Schedule ensuring federal principle. While States enjoy autonomy in State List subjects, Parliament retains overriding powers in Union and Concurrent lists. Article 245 of Constitution deals with this allocation of Powers. Article 245(1) empowers parliament to enact laws for entire India while State legislatures are empowered to make laws for respective States. Opening lines of Article 245 make it clear that legislative powers are subject to the provisions of Constitution such as fundamental rights, seventh schedule and doctrine of basic structure. Indian federalism departs from classical federalism in several respects, as it provides Single Constitution, Single citizenship, Strong Centre during emergencies and retains Residuary powers with Parliament⁵.

The Supreme Court has consistently recognized India as a federal polity with a strong unitary bias. In **State of West Bengal Vs Union of India**⁶, the Court observed that though Indian federalism does not permit secession but protects state autonomy within constitutional limits. It is often argued that Indian Constitution is federal in form but unitary in spirit and therefore it is also termed as quasi-federal in nature. However, textual allocation of powers will not ensure true federalism unless centre or state does not refrain from transgressing their constitutional boundaries.

Constitutional morality envisioned by Constitution: -

Constitutional morality is a fundamental principle that vitalises the spirit of Indian Constitution. It was inspired from the reflections of Gorge Grote⁷ on Ancient Greece, suggesting that constitutional morality entails essence of restraint, responsibility and respect

⁵ Granville Austin, *The Indian Constitution: Cornerstone of a Nation*, Oxford University Press (1st ED, 1966)

⁶ AIR 1963 SC 1241

⁷ George Grote, *History of Greece*, (Cambridge Library Collection Ed. 2010) Cambridge University Press, (1846)

for constitutional processes and values even when contrary to popular sentiment. It refers to a commitment to the values, ethics and norms embedded in the constitutional frame work, beyond mere adherence to its textual provisions. The Constitution of India through Preamble and chapters envisages a democratic order grounded in liberty, equality, fraternity, justice and dignity of individual. Constitutional morality requires all stakeholders to act in fidelity to these values, even when social morality or political convenience drags in a different direction.

Dr. B. R. Ambedkar placed constitutional morality on exceptionally high pedestal. He described constitutional morality as the cultivation of respect for constitutional processes, limitations and institutions. He insisted that constitutional morality must be consciously nurtured to prevent the Constitution from being subverted by majoritarianism, social prejudices or authoritarian tendencies. He cautioned without such morality even the best drafted Constitution could fail⁸.

Justice R. F. Nariman in his speech on constitutional morality said that values enshrined in the Constitution must not be allowed to be crushed by vague apprehension of popular morality which has no legal tenability. The concept of constitutional morality would help and guide the Court to arrive at a just decision which would be in consonance with the constitutional rights of the citizens, even when popular or majoritarian morality is against it. He continued that the constitutionality of a law will have to be judged keeping in mind the dynamic and interpretative changes of the statute affected because of the passage of time. The concept of constitutional morality empowers the law keepers to interpret the Constitution in a moral way that Constitution conceives of, not the morality that public perceives.

In contemporary times, constitutional morality has emerged as a transformative tool that enables courts to reconcile constitutional text with evolving social realities while adjudicating constitutional issues. It functions as a bridge between constitutional permanence and societal change, ensuring that firmly established system of power, restrictive practices, and historical injustices do not receive constitutional sanction merely because they enjoy social acceptance. By prioritizing constitutional values over transient public opinion, constitutional morality strengthens the counter majoritarian role of the judiciary in protecting fundamental rights. It also imposes a positive obligation on constitutional authorities to act with institutional

⁸ Constituent Assembly Debates, Vol. VII

integrity, justification and restraint. Constitutional morality is not something that judges only should follow while deciding cases. It is also as duty of legislature and the executive to follow the values of Constitution while making laws and governing the country. All branches of the government must act responsibly, include diverse voices and respect disagreement or criticism, instead of suppressing it. Application of constitutional morality reinforces the idea that constitutional governance is not only about legality but also about legitimacy rooted in constitutional conscience, thereby preserving the transformative vision of the Indian Constitution.

In a historic moment of Indian Constitution, which came in the form landmark case of **Kesavananda Bharati Vs Union of India**⁹, 13 Judges of Apex Court deliberated upon the extent of Power of Parliament to amend Constitution and decisively restrained Parliament from altering or destroying basic structure of constitution by taking recourse to Constitutional Morality. Supreme Court revisited the Doctrine of Constitutional Morality in the case of **S.P. Gupta Vs Union of India**¹⁰ and clarified that breach of Constitutional Morality occurs when authorities entrusted with the duty of exercising power ignore principles underlying constitutional provisions.

In another landmark case of **Navtej Singh Johar Vs Union of India**¹¹ Supreme Court changed view taken in earlier Judgment in the case of **Suresh Kumar Kaushal Vs Naz Foundation**¹² and maintained that constitutional morality encompasses virtues of a broad scope, such as fostering an inclusive and pluralistic society, while simultaneously upholding the other principles of constitutionalism. This means that the concept of constitutional morality is not restricted to the simple observance of the fundamental principles of constitutionalism, as its scope and extend beyond the provisions and literal text that a constitution contains.

Thereafter in the case of **Independent Thought Vs Union of India**¹³ the court was called upon to decide validity of second exception to Section 375 of the Indian Penal Code which says that a man who has sexual intercourse with his wife who is fifteen years of age or over does not commit rape. Court observed that “constitutional morality forbids us from giving

⁹ AIR 1973 SC 1461

¹⁰ AIR 1982 SC 149

¹¹ AIR 2019 SC 432

¹² AIR 2014 SC 563

¹³ AIR 2017 SC 4904

an interpretation to Exception 2 to Section 375 IPC that sanctifies a tradition or custom that is no longer sustainable” and hence ruled in favour of criminalizing rape in child marriages.

In Joseph Shine Vs Union of India¹⁴ supreme court while decriminalising Adultery took recourse to Constitutional morality and observed that, the provision of Adultery is violative of right to privacy which is an important facet Article 21 as held in **Puttaswamy’s**¹⁵ case. It maintained that constitutional morality guarantees the rights enshrined in the constitution, which are essential in a democracy. Sections 497 IPC and 198(2) of Code of Criminal Procedure violate Articles 14, 15(1), and 21 of the Constitution because a commitment to constitutional morality necessitates the enforcement of certain rights, such as equality before the law, non-discrimination, and dignity. The law must adapt to the evolving needs of society while upholding the principles enshrined in the constitution. Court quoted maxim *cessante ratione legis, cessat ipsa lex*, (when the reason of the law ceases, the law itself ceases) and held that Law of Adultery is outdated and has lived their purpose.

Constitutional and Legal Provisions regulating elections: -

Elections are the foundation of representative democracy, as they provide citizens with the opportunity to choose their representatives and participate in the governance of the country. The Constitution of India lays down a comprehensive legal framework for the conduct and regulation of elections in order to ensure a democratic system of governance. The constitutional provisions regulating elections are primarily contained in Part XV of the Constitution (Articles 324 to 329). These provisions establish the institutional structure, powers, and safeguards necessary for conducting free and fair elections in India¹⁶.

Article 324 vests the superintendence, direction, and control of elections in the Election Commission of India (ECI)¹⁷.

Article 325 establishes the principle of one general electoral roll for every territorial constituency and prohibits discrimination in the preparation of electoral rolls on grounds of religion, race, caste, or sex¹⁸.

¹⁴ AIR 2019 SC 489

¹⁵ Justice k. S. Puttaswamy (retired) Vs Union of India, AIR 2017 SC 4161

¹⁶ Kashyap, S. C. (2015). *Our Constitution: An introduction to India’s Constitution and constitutional law*.

¹⁷ Jain, M. P. (2016). *Indian constitutional law* (8th ed.). Gurgaon: LexisNexis.

¹⁸ Jain, M. P. (2016). *Indian constitutional law*.

Article 326 provides for universal adult suffrage, which is one of the most significant democratic features of the Indian Constitution¹⁹.

Article 327 empowers Parliament to make laws regarding all matters related to elections, including the preparation of electoral rolls, delimitation of constituencies, and regulation of election procedures²⁰.

Article 328 grants similar powers to State Legislatures to make laws with respect to elections to their respective legislatures, subject to the provisions of the Constitution and parliamentary legislation²¹.

Article 329 places restrictions on judicial interference in electoral matters. It provides that the validity of any law relating to the delimitation of constituencies or the allotment of seats cannot be questioned in any court²².

In addition to these Articles 84 and 173 prescribe qualifications whereas 102 and 191 deal with disqualifications for membership of parliament. It can be seen that constitution has provided very robust mechanism for free and fair elections and every care is taken to uphold the autonomy of states while preserving supremacy of centre²³.

Apart from Constitution Representation of People Act, 1950 and Representation of People Act, 1951 also regulate election process in India. Both Acts are aimed at free and fair elections as well as regulate the conduct of candidates contesting the election.

This framework reflects not only a legal design but also an expectation of constitutional morality, whereby institutions exercise their powers with restraint, fairness, and respect for the federal scheme envisioned by the Constitution.

¹⁹ Jain, M. P. (2016).

²⁰ Jain, M. P. (2016).

²¹ Jain, M. P. (2016).

²² Jain, M. P. (2016).

²³ Seervai, H. M. (2013). Constitutional law of India (4th ed.). New Delhi: Universal Law Publishing

‘One nation, One election’: -

As the title suggests concept of one nation one election is all about structuring electoral calendar to synchronise Lok Sabha, state assemblies and local body elections. It promotes conducting all elections together and/or at predetermined cycles. Under this system, voters would cast their votes for both the central and state governments at the same time, either on a single day or within a closely coordinated election schedule. The objective behind this proposal is to streamline the electoral process, reduce the frequency of elections, and improve governance by minimizing disruptions caused by repeated election cycles²⁴. However, constitutional morality demands that such efficiency-driven reforms must not compromise democratic participation, federal diversity, or the representative character of elections.

Interestingly, the idea of simultaneous elections is not entirely new to India. In fact, during the initial decades after independence, elections in India were conducted in a synchronized manner. The first general elections held in 1951–52 were conducted simultaneously for the Lok Sabha and all State Legislative Assemblies. This practice continued in the subsequent elections of 1957, 1962, and 1967, when the electoral cycles of the central and state legislatures largely coincided. During this period, the stability of governments allowed the election schedule to remain aligned²⁵.

However, the system of simultaneous elections began to break down in the late 1960s and early 1970s due to political instability. Several State Legislative Assemblies were dissolved prematurely, often because of defections, loss of majority, or imposition of President’s Rule under Article 356 of the Constitution. These premature dissolutions disturbed the synchronized electoral cycle, and since then elections to the Lok Sabha and State Assemblies have been conducted at different times²⁶.

The proposal to revive the system of simultaneous elections has gained renewed attention in recent years. Concern about heavy burden on administrative machinery, security forces, and financial resources due to frequent elections is the root cause for revitalising ONOE. Conducting elections almost every year and sometimes even twice a year in different parts of nation also leads to the repeated imposition of the Model Code of Conduct, which temporarily

²⁴ NITI Aayog. (2017). Analysis of simultaneous elections

²⁵ Law Commission of India. (2018). Draft report on simultaneous elections. New Delhi: Government of India.

²⁶ NITI Aayog. (2017). Analysis of simultaneous elections.

restricts government policy decisions and thereby adversely affects development initiatives²⁷.

Another argument in favour of “One Nation, One Election” is that it may enhance voter participation and administrative efficiency. It will also reduce political polarisation as it would result in less campaign rhetoric and parties would concentrate on governance instead of constant electioneering. When elections are held together, the electoral machinery including polling personnel, electronic voting machines, and security arrangements can be deployed more effectively. While these objectives are desirable, constitutional morality requires that governance efficiency must not overshadow the democratic ethos of accountability, periodic evaluation, and responsiveness to public will.

In August 2018, the Law Commission of India issued a preliminary report advocating simultaneous elections. It proposed amendments to the constitution, the Representation of the People Act 1951, and the Rules of Procedure of Lok Sabha and state Assemblies to enable this synchronisation. The commission stressed the need for approval from at least 50% of the States for these amendments. Highlighting the advantages of simultaneous polls, it emphasised savings in public funds, reduced strain on administrative and security forces, timely execution of government policies, and a shift in administrative focus towards developmental activities instead of electioneering²⁸.

In 2023 High-Level Committee on Simultaneous Elections under the chairmanship of Ram Nath Kovind is constituted to examine feasibility of simultaneous elections and suggest necessary amendments as well as administrative framework. The committee has submitted its report to the President of India in March 2024, suggesting constitutional and legal amendments, and implementation framework for synchronising elections²⁹. This marks a significant step in advancing the ‘One Nation, One Election’ proposal from a conceptual debate to an institutional policy initiative.

Challenges in implementation: -

However, the implementation of this policy is not as straightforward as it may appear. Several constitutional and practical concerns must be addressed to ensure its effective

²⁷ NITI Aayog. (2017). Analysis of simultaneous elections.

²⁸ The Hindu. (2018, August 31). Law Commission bats for simultaneous polls. <https://www.thehindu.com>

²⁹ Government of India (2024). Report of High-Level Committee on Simultaneous Elections, New Delhi

execution. India is a federal democracy, wherein State governments derive independent constitutional authority, and any attempt to synchronise elections may require substantial constitutional amendments, particularly to provisions relating to the tenure and dissolution of legislatures under Articles 83, 85, 172, and 174³⁰.

Moreover, situations where a government falls before completing its full term will have to be taken into consideration. The implementation of simultaneous elections may necessitate mechanisms such as fixed legislative terms or the introduction of caretaker governments, which would significantly alter the existing framework of parliamentary democracy. Similarly, a rigid electoral cycle may restrict democratic flexibility, as a government that loses legitimacy mid-term may have to continue until the next synchronised election, thereby undermining the democratic will of the people³¹ and constitutional morality.

Even if legal challenges are addressed through constitutional amendments, certain structural and practical concerns remain that cannot be resolved merely through legislative intervention. One of the foremost concerns relates to India's vast geographical and cultural diversity. India is a pluralistic society where different States exhibit distinct social, geographical, linguistic, cultural, and economic characteristics. Additionally, variations in climatic conditions and the continuous cycle of regional festivals across the country pose significant logistical challenges in election scheduling³².

At present, the Election Commission of India takes these factors into account while determining election schedules. However, under the ONOE framework, such flexibility may be significantly curtailed. Furthermore, simultaneous elections may result in the marginalisation of regional issues such as agrarian distress, local infrastructure, regional identity, and individual developmental concerns of states which may receive comparatively less attention during electoral discourse dominated by national narratives³³.

³⁰ Seervai, H. M. (2013). Constitutional law of India

³¹ Election Commission of India. (n.d.). Conduct of elections. <https://eci.gov.in>

³² Election Commission of India. (n.d.). Election scheduling and logistics. <https://eci.gov.in>

³³ Ritu. (2025). Implications of simultaneous elections in India, International Journal of Political Science and Governance,

Federal Concerns: -

Apart from constitutional and legal challenges critics of the policy express apprehension that proposal may threaten the federal balance of power between the Union and the States. India's Constitution establishes a quasi-federal structure where states enjoy autonomy within their sphere³⁴. Synchronising elections may indirectly centralize political processes and reduce the political independence of states. The same runs contrary to the ethos of constitutional morality, which envisages a cooperative federal structure based on mutual respect, dialogue, and institutional balance between the Union and the States.

Similarly, simultaneous elections may shift focus more on national leadership and national issues, and local concerns may get eclipsed. In turn this may result in weakening of regional political parties and give rise to bi-party political system, which again may prove harmful for local concerns³⁵.

Another practical concern relates to the political stability of state governments. Parliamentary democracy allows governments to fall due to loss of majority or shifting political alliances. If elections are synchronized and fixed for a particular cycle, it may become difficult to respond democratically to such changes without disturbing the national electoral calendar³⁶. In such circumstances, constitutional mechanisms like prolonged President's Rule or temporary governments may be used merely to maintain the election schedule, which could undermine the spirit of federal autonomy³⁷. Constitutional morality does not support the artificial prolongation of governments solely to maintain electoral uniformity, as democratic legitimacy must prevail over administrative convenience.

Judicial Perspective: -

Supreme Court has not directly adjudicated on ONOE till date. However, the approach of judiciary towards issues of federalism, democratic governance, and the electoral process provides an important framework for understanding how courts may view such a proposal. In the landmark case of **S.R. Bommai V. Union of India**³⁸ and in many other judgments Supreme Court has consistently held that federalism forms part of the basic structure of the Constitution,

³⁴ Seervai, H. M. (2013). Constitutional law of India

³⁵ Law Commission of India. (2018). Draft report on simultaneous elections.

³⁶ Ritu. (2025). Implications of simultaneous elections in India.

³⁷ Jain, M. P. (2016). Indian constitutional law (8th ed.).

³⁸ (1994) 3 SCC 1

and since constitution creates delicate balance between union and states, any reform affecting state autonomy must therefore respect this federal equilibrium.

Similarly, in **Mohinder Singh Gill V. Chief Election Commissioner**³⁹ Court underlined constitutional importance of the electoral process and the wide powers of the Election Commission to conduct elections in a fair and effective manner and held that any structural reform in the electoral system must not undermine the independence and functioning of the Election Commission.

However, if the proposal for One Nation, One Election is implemented through constitutional amendments, the judiciary would certainly evaluate the same to ascertain if reforms preserve the federal balance enshrined by Constitution and the principles of basic structure laid down by **Kesavananda Bharati V. State of Kerala**⁴⁰ are followed or not.

Conclusion: -

The literature surrounding “One Nation, One Election” reflects a complex intersection of constitutional ideals, administrative efficiency, and democratic values. When viewed through the lens of constitutional morality, it becomes evident that electoral reform must go beyond cost reduction and administrative convenience, and instead uphold the core constitutional principles of federalism, democratic accountability, and institutional integrity. It is evident that while the proposal seeks to address genuine concerns such as escalating electoral costs, administrative burden, and policy disruptions caused by frequent elections, its implementation raises equally significant constitutional and federal challenges⁴¹. Provisions dealing with elections are carefully designed to ensure free and fair elections and any attempt to reform electoral cycle would therefore necessitate substantial constitutional amendments affecting the tenure and dissolution of legislatures.

Moreover, existing electoral system, despite its limitations, allows a degree of flexibility that is essential for a dynamic parliamentary democracy. Hence, One Nation, One Election cannot be viewed merely as an administrative reform but must be treated as a significant constitutional transformation. The path forward lies in a calibrated approach

³⁹ (1978) 1 SCC 405

⁴⁰ (1973) 4 SCC 225

⁴¹ Ritu. (2025). Implications of simultaneous elections in India.

involving synchronisation, and phased implementation. In short, the success of any such reform will depend on its ability to harmonise efficiency with constitutional morality, ensuring that the foundational principles of federalism, democratic accountability, and representative governance remain intact.

References

Acts

- Constitution of India, 1950
- Representation of Peoples Act, 1950
- Representation of People Act, 1951

Books

- Constituent Assembly Debates, Vol. VII
- George Grote, History of Greece, (Cambridge Library Collection Ed. 2010) Cambridge University Press, (1846)
- Granville Austin, The Indian Constitution: Cornerstone of a Nation, Oxford University Press (1st ED, 1966)
- Jain, M. P. (2016). Indian constitutional law (8th ed.). Gurgaon: LexisNexis.
- Kashyap, S. C. (2015). Our Constitution: An introduction to India's Constitution and constitutional law (5th ed.). New Delhi: National Book Trust.
- Seervai, H. M. (2013). Constitutional law of India (4th ed.). New Delhi: Universal Law Publishing

Papers and Articles

- Election Commission of India. (n.d.). Conduct of elections. <https://eci.gov.in>
- Election Commission of India. (n.d.). Election scheduling and logistics. <https://eci.gov.in>
- Government of India (2023). High-Level Committee on Simultaneous Elections, New Delhi
- Government of India (2024). Report of High-Level Committee on Simultaneous Elections, New Delhi
- Law Commission of India. (2018). Report No. 255: Electoral reforms. New Delhi: Government of India.

- NITI Aayog. (2017). Analysis of simultaneous elections: The “One Nation, One Election” proposal. New Delhi: Government of India.
- Ritu. (2025). Implications of simultaneous elections in India, International Journal of Political Science and Governance,
- The Hindu. (2018, August 31). Law Commission bats for simultaneous polls. <https://www.thehindu.com>

List of Cases

- S. R. Bommai V. Union of India, (1994) 3 SCC 1
- Mohinder Singh Gill V. Chief Election Commissioner, (1978) 1 SCC 405
- Kesavanada Bharati V. State of Kerala, (1973) 4 SCC 225
- Navtej Singh Johar Vs Union of India AIR 2019 SC 432
- Suresh Kumar Kaushal Vs Naz Foundation AIR2014 SC 563
- Independent Thought Vs Union of India AIR 2017 SC 4094
- Joseph Shine Vs Union of India AIR 2019 SC 489
- State of West Bengal Vs Union of India AIR 1963 SC 1241
- Justice k. S. Puttaswamy (retd) Vs Union of India, AIR 2017 SC 4161

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