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"RECONCEPTUALISING ARTICLE 21 IN 2026: SIX EMERGING DIMENSIONS OF THE RIGHT TO LIFE AND PERSONAL LIBERTY THROUGH RECENT SUPREME COURT DECISIONS"

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ABSTRACT

Article 21 of the Constitution of India has evolved from a narrow guarantee against arbitrary deprivation into the foundation of a dignified, meaningful existence, particularly since Maneka Gandhi v. Union of India (1978). This paper examines how the Supreme Court's 2026 decisions have further reconceptualised the right to life and personal liberty through six emerging dimensions: the right to die with dignity, recognised in Harish Rana v. Union of India through the first judicially sanctioned implementation of passive euthanasia; reproductive autonomy prevailing over statutory restrictions; menstrual health as part of bodily autonomy and privacy; safe road travel and access to emergency trauma care; freedom from fear in public spaces; and the right to walk safely on demarcated footpaths.

Employing doctrinal and analytical methodology, the paper traces how each dimension builds upon established precedents, including Common Cause, Olga Tellis and Puttaswamy. It argues that these decisions signal a decisive shift from negative liberty, restraining state interference, toward positive obligations requiring governments to provide healthcare, infrastructure and public safety.

The paper concludes that Article 21 now functions as a source of enforceable state duties in everyday life, while cautioning that continued judicial expansion requires principled limits, institutional restraint and legislative cooperation to preserve legitimacy and democratic accountability. Ultimately, the study offers a framework for assessing future Article 21 jurisprudence both critically and coherently.

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KEYWORDS: Court Decision, Reconceptualising, Article 21, Emerging dimensions, Right to life& personal liberty, democratic accountability, judicial expansion

1. INTRODUCTION

In case of Maneka Gandhi v/s UOI 1978, The principle of golden triangle was established in India. In this historic ruling, the supreme court held that three fundamental rights Article 14,19,21 are deeply interconnected and cannot be read in isolation. Article 21 is the most interpreting article also fundamental right borrowed by U.S.A. "**Article 21 provides that no person shall be deprived of life or personal liberty except according to procedure established by law.**" Explanation: "NO PERSON" whether natural or artificial person shall deprived totally or partially without the test of deprivation should be Just, Fair, Reasonable, held in case of Maneka Gandhi v/s UOI 1978. And the human dignity of living life should not be compromised. No person should go through with bare survival and animal existence. Right to life includes Right to live with meaningful, complete and worthy Which was recognized in case of Kharak Singh v/s UP. Furthermore, the "Procedure Established By Law" evolved from the case of A.K Gopalan v/s UOI to Maneka Gandhi v/s UOI and the validity of this article moved from narrow interpretation to wider interpretation, Supreme court started to take liberal view over this and began the verification over the law passed by parliament to ensure they were Just, Fair, Reasonable or not, through this evolution the interpretation of Due process of law began in article 21.

1.1 What Happened in emergency?

In case of ADM Jabalpur v/s Shivakanta Shukla (1976)2 SCC 521[1](also known as the Habeas corpus case) The majority ruling of 4:1, four judges bench held that if emergency proclaimed under article 352 of the Indian constitution ,in any part of the country, Article 21 (protection of life and personal liberty) was the sole repository of the right to personal liberty, and no person has the locus standi (legal standing) to file a habeas corpus petition or move any court to challenge unlawful or arbitrary detention. Later on parliament passed the **44TH Amendment Act 1978**, which explicitly stipulated that Article 20 and 21 can never be suspended, even during a national emergency. Also Overruled by Supreme court, the majority view in ADM

[1] https://www.scobserver.in/wp-content/uploads/2025/06/Supreme-Court-ADM-Jabalpur-v-SS-Shukla-judgement-emergency.pdf

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Jabalpur case was overruled by 9 judges bench in K.S Puttaswamy v/s Union Of India 2017 (Right to privacy case).

2. HISTORICAL EVOLUTION OF DUE PROCESS OF LAW AND PROCEDURE ESTABLISHED BY LAW IN ARTICLE 21

2.1 What is "Due process of law"?

Due process alludes to Just, Rational, Impartial, and Equity under the regular judicial process. For instance, the accused must be given the chance to present their own defence before being sentenced. In simple words those standard laws who recognize natural justice principle and common law of the land.

2.2 What is "procedure establish by law" ?

This phrase uses the Article 21 of Indian Constitution Denotes that if a law has been passed by the Parliament by following the proper procedure, then it will be a lawful. Enacting this concept demonstrate that a person might be deprived of his life and persona liberty according to the procedure established by law.

2.3 Historical view over both

During the formation of Part three (fundamental Rights) of the Indian constitution. Justice felix frankfurter (Jurist of U.S) suggested that Indian constitution should not add "**Due process of law"**, just because this principle will increase the burden over judiciary and lot of cases will came in existence. After the number of debates over this, "**procedure established by law"** was added in Article 21.

2.4 Scope of Interpretation of Article 21

The interpretation was start from Narrow interpretation to wide. This journey consist the scope of liberal interpretation, from the case of A.K Gopalan v/s Union Of India 1950 to Maneka Gandhi v/s union of India . the chain of the interpretation between both case set the liberal view to look on Article 21 of the Indian constitution. In case of **A.K GOPALAN V. UNION OF INDIA 1950**[2] , A.K Gopalan was detained under the preventive detention act 1950. He argues in against of illegal detention and said "that the preventive of detention act is in conflicting

[2] https://www.manupatracademy.com/legalpost/manu-sc-0012-1950

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with article 21". Supreme court made narrow and restrictive interpretation on Article 21 and held that Article 21 deals with procedure Establish by Law. Court should not go in depth that why the legislation was passed or what was the ideology beyond the act and is it justified or not, if the Parliament passed any law it will be presumed that the law is valid. This decision was dissented by the opinion of **justice saiyid fazl Ali**. Later on the concept was evolved in case of **MANEKA GANDHI V. UNION OF INDIA 1978**[3], Supreme court interpreted widely Article 21 and held that no Act will apply in absolute manner. Three type of test should apply to verify that the passed legislation must to be **JUST, FAIR** and **RATIONAL**. Court accepted the principle of Natural justice and this was the leading case law of birth of "**DUE PROCESS OF LAW "**in Article 21. And finally decided that hereinafter Article 21 is available in against Arbitrary Executive Actions and Arbitrary Legislative Actions both.

3. DIVERSE DEMENSION OF RIGHT TO LIFE AND PERSONAL LIBERTY:

Article 21 moved and evolved in different dimension time to time. There were number of cases who diverted the roots of Article 21 in many ways and connect all with Right to Life and Personal Liberty. Article 21 reads with all basic freedoms and way of living, that every human should have to not just survive but to live in worthy way. Article 21 provides the freedom of sleep, live, right to die with dignity, walk freely and with safety, protection from street dogs etc.

3.1 Therefore there are some important dimension are below who evaluate time to time with article 21:

[3] https://www.manupatracademy.com/legalpost/manu-sc-0133-1978

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RIGHT TO PRIVACY	**K.S Puttaswami v. Union Of India and Ors 2017 SC**[4] Held that right to privacy is fundamental right and it is protecting under Article 21. In 2018 supreme court upheld the validity of Adhar after reading down and striking certain provisions.
OFFENCE OF ADULTRY IS UNCONSISTUTINAL	**In Joshep Shine v. Union of India 2018 Sc**[5]**,** supreme court struck down the section 497 of Indian penal code as unconstitutional.
HOMOSEXUAL ACTS ARE CONSTITUTIONAL	**In Navtej Singh Johar v. Union of India 2019 SC,**[6]section 377 of Indian penal code. But as per the current scenario section 377 of IPC has been repealed with Bhartiya Nyaya Shinta.
RIGHT TO LIVELIHOOD	**In Olga Tellis v. Bombay Municipal Corporation, AIR 1986**[7] Supreme Court held that right to life include right to livelihood
RIGHT TO SHELTER	**In Chameli Singh v. state of U.P 1996** [8]**,** Court declared that right to shelter is the part of Article 21**.**
RIGHT TO REPRODUCTIVE CHOICE	**In Suchita Srivastava v. Chandigarh Administration AIR 2010 SC**[9]**,** Court held

[4] https://indiankanoon.org/doc/91938676/
[5] https://blog.ipleaders.in/case-analysis-joseph-shine-v-union-india/
[6] https://www.scobserver.in/wp-content/uploads/2021/10/377IPC_-_Judgement.pdf
[7] https://api.sci.gov.in/jonew/judis/9246.pdf
[8] https://indiankanoon.org/docfragment/18928039/?formInput=right%20to%20shelter
[9] https://api.sci.gov.in/jonew/judis/35395.pdf

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	that right to make reproductive choice (decision to produce child or not) is included in Article 21.
RIGHT TO HEALTH	**In Parmanand Katara v. Union of India AIR 1989 SC,** Supreme Court held that all doctor (private or government) are obliged to extend medical assistance to injured immediately without asking for legal formalities.
RIGHT TO SLEEP	**In Ramlila Maidan v. Home Secretary,** Right to sleep is fundamental right as it is biological and essential element of basic necessities of life.
RIGHT TO FREE LEGAL AID	**In M.H Hoskot v. State of Maharashtra, AIR 1978 SC,** Held that right to free legal Aid is the part and parcel of right to life and liberty.
RIGHT TO SPEEDY TRIAL	**In Hussainara Khatoon v. State of Bihar AIR 1979 SC[10],** right to speedy trial is fundamental right and it is implicit in Article 21.
BAN ON SMOKING IN PUBLIC PLACES	**In Murli S. Deora v. Union Of India ,AIR 2002 SC[11],** supreme court issued guidelines to government to issue order banning smoking in public places considering the adverse effect of smoking on non-smokers.
PUBLIC HANGGING	**In Attorney – General of India v. Lachma Devi, AIR 1986 SC 467,** Execution of death sentence by public hanging is violation of Article 21.

[10] https://api.sci.gov.in/jonew/judis/4873.pdf
[11] https://indiankanoon.org/doc/1495522/

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KEEPING UNDERTRIALS WITH CONVICT	**In Sunil Batra v. Delhi Addministration, AIR 1980 SC** [12]declared that keeping undertrials with convicts in jail offends Article 21.

4. SIX EMERGING DIMMENSSION OF ARTICLE 21 IN 2026 : 6 DIFFERENT CASES IN 2026

- HARISH RANA v. UNION OF INDIA AND Ors 2026 SCC/ SC 358
- IN - RE CITY HOUNDED BY STRAYS, KIDS PAY PRICE, 2025 9 SCC
- PRAJWALA v. UNION OF INDIA AND OTHERS 2026 SCC /SC 1053
- IN-RE PHALODI ACCIDENT v. NATIONAL HIGHWAYS AUTHORITY OF INDIA AND OTHERS 2026 SCC /SC 646
- Dr. JAYA THAKUR v. GOVERNMENT OF INDIA AND ORS 2026 SCC /SC 133
- MANIYAR ILIYAZ ALIAS SHAIK RIYAZ AND ANOTHER v. P. AYYAPPAN AND OTHERS 2026 SCC Online SC 1162

ALL ABOVE MENTIONED HAS UPHELD THE VALIDTY OF ARTICLE 21

RIGHT TO DIE WITH DIGNITY (Passive Euthanasia)

CASE NO.1 - HARISH RANA V. UNION OF INDIA AND ORS 2026 SCC SC 358 [13]

KEY POINTS

1. This case upholds the validity of Article 21
2. Court has explained the meaning and scope of LIFE

[12] https://api.sci.gov.in/jonew/judis/4638.pdf
[13] https://www.scconline.com/blog/post/2026/03/11/supreme-court-india-first-ever-passive-euthanasia/

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3. In this case there are some selective Rights has covered such as Dignifying life and death and right to euthanasia.

What is Euthanasia?

There are two type of Euthanasia. Active euthanasia and passive euthanasia. Active euthanasia involves direct positive action such as injections and passive euthanasia is withholding or withdrawing life sustaining medical treatments such as turning of ventilator or removing feeding tube.

Background of the Case

- In **Gian Kaur v. State of Punjab 1994**, court held that "Right to life" under the Article 21 of the constitution does not include "Right to Die".
- In **Aruna Shanbaug v. Union of India 2011**, supreme court had officially recognized passive euthanasia. for the first time Court passive euthanasia legalise in India
- In **Common cause v. Union of India 2018**, supreme court declared the Right to die with dignity as integral part of Article 21. Validate the concept of "living wills'' and issued detailed procedural guidelines to Execute passive euthanasia. Later on guidelines were modified in 2023.
  - **JUDGEMENT:** on 11 march, 2026 before Supreme court this case was become the first case of the Indian history where passive euthanasia was executed in real life. Applicant was patient of mind injury and suffering from the illness from past 13 years. Court ordered to withdrawal application seeking of Clinically Assisted Nutrition and Hydration (CANH) given to the applicant for 13 years. Court held that , Right to die with dignity is inseparable from the right to receive quality palliative and EOL care . court directed to remove feeding tube in the best interest of patient and clarifies that providing nutrition by feeding tube are not just basic nursing care but it is an special medical treatment and if hope of recovery is about to end , then removing feeding tube will cover under lawful passive euthanasia. Court also determined the best interest of patient without living Will, court determined that in such situation Family's consent, Patient's dignity and Medical Board Assessments will also consider as best interest of patient.

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PROTECTION AGAINST THE MENACE OF STRAY DOGS

CASE NO. 2 – IN RE CITY HOUNDED BY STRAYS , KIDS PAY PRICE , (2025) 9 SCC[14]

- **JUDGEMENT**: On august 11, 2025 honourable supreme court deal with the protection against the menace of stray dogs , 50% increase in dog bite cases in 2024 being due to rapid increase in dog population. Court assumes that fundamental right of public health, public safety and right to freedom of movement and corresponding mandatory duty of state to protect the same. court issued some guidelines such as

1. Authorities directed to immediately create dog shelter pounds all over the NRC and report compliance to court within eight weeks.
2. CCTV monitoring directed do that dogs are not released or taken out of the shelters.
3. All authorities directed to maintain records of daily stray dogs capture as well as the number of dogs housed in shelter pounds.
4. Authorities directed to provide sufficient personnel to sterilise, deworm and immunise stray dogs and also looking after them.
5. Authorities directed to create helpline number within one week for timely and effective action.
6. Medical authorities directed to ensure immediate victim treatment.
7. Authorities directed to ensure the availability of rabies vaccines and put detailed monthly information regarding the number of human immunisation.

RIGHT TO WALK SAFETLY

CASE NO. 3 – IN RE: PHALODI ACCIDENT V. NATIONAL HIGHWAY AUTHORITY OF INDIA AND OTHERS 2026 SCC SC 646

- **JUDGEMENT**: On April 13, 2026 court held that commuter safety an integral part of Article 21 of constitution. Right to life enshrined under Art. 21 not merely a guarantee against the unlawful taking life, but also a positive mandate upon state to ensure safe environment where human life is preserved and valued . interim directions issued vis-à-vis prevention of highway accidents and ensuring road safety. Construction/operation of any dhaba /eatery/commercial structure within right of way of any national highway prohibited with immediate effect.

[14] https://www.scconline.com

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RIGHT TO WALK ON DEMARCATED FOOTPATH

CASE NO. 4 – MANIYAR ILIYAZ ALIAS SHAIK RIYAZ AND ANOTHER V. P. AYYAPPAN AND OTHERS 2026 SCC Online SC 1162

- **JUDGEMENT**: court recognized the freedom of movement and personal liberty. On June 19, 2026 court consider Right to walk on Demarcated footpath is part of Article 21 and fundamental Right. Held that right to walk is a fundamental right under part 3 of the constitution and integral to the freedom of movement guaranteed under Article 19(1)(d), read with Article 19(1)(b),19(1)(c) and Article 21. This right include access to safe and demarcated footpath and has priority over the movement by motorised vehicles. Urban Development Authorities, Municipal corporation, municipalities and panchayats have a corresponding enforceable duty to provide, maintain and safeguard pedestrian infrastructure. Violation of such rights entities citizen to seek constitution of India. Meaning and scope of "LIFE" was broadly construed. Rights covered basic amenities, development, shelter and food.

RIGHT TO MENSTRUAL HEALTH

CASE NO.5- Dr. JAYA THAKUR V. GOVERNMENT OF INDIA AND OTHERS. 2026 SCC SC 133[15]

- **JUDGEMENT**: on January 30, 2026 court recognized that right to menstrual health is part of right to life. Court held that inaccessibility of menstrual hygiene management measures undermines the dignity of a girl child. Right to health reproductive life embraces the right to access education and information about sexual health- directions issued . right to life under Article 21 of the constitution includes the right to menstrual health, Access to safe, effective and affordable menstrual hygiene management measures helps a girl child attain the highest standard of sexual and reproductive health.

Court issued some direction for all states and union territories ensures that every school run privately or publicly:

1. Should establish functional, gender segregated toilets with usable water connectivity.
2. All new toilets or existing toilets shall be designed, constructed and maintaining so as to ensure privacy and accessibility, including needs of disable children
3. All school toilets with function hand washing facilities, with soap and water available all the time.

[15] https://www.scconline.com

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4. All school should provide oxo- biodegradable sanitary napkins manufactured in compliance with ASTM D- 6954 standards free of cost.
5. All school should establish menstrual hygiene management corners. Such MHM corners shall be Equipped with including but not limited spare innerwear, spear uniform, disposable bags and other necessary materials to address menstruation related exigencies. Each toilet unit should be covered waste bin for collection of sanitary napkins, in accordance with latest solid waste management rules.

RIGHT TO REHABLITATION OF VICTIM

CASE NO. 6 – PRAJWALA V. UNION OF INDIA AND OTHERS 2026 SCC SC 1053[16]

- **JUDGEMENT:** A crime control approach to human trafficking treats the protection of victims as secondary to the prosecution and punishment of perpetrators. It views trafficking primarily as a crime involving criminals who must be prosecuted and punished. In this framework, the victim, though not entirely absent, appears at the margins. A human rights approach, by contrast, recognises that trafficking is not only a crime to be prosecuted but also an act that violates the fundamental rights of real people. It shifts the lens from the perpetrator to the victim, placing the victim and her needs at the centre of the response. In the Indian legal landscape, this human rights approach finds its clearest articulation in Articles 21 and 23 of the Constitution respectively, which, read together, establish the right to rehabilitation for victims of trafficking for CSE. A combined reading of Article 21, i.e., the right to live with dignity, and Article 23, i.e., the right against exploitation, establishes that the obligations owed to victims of exploitative structures extend well beyond identification and rescue to include rehabilitation. The reason is that rescue without rehabilitation returns the victim to the very same conditions that made her a target in the first place. Thus, it is the plainest requirement of Articles 21 and 23 respectively that victims of exploitative structures must be suitably rehabilitated. The right to rehabilitation, in line with this Court's interpretative approach under Article 23, must be understood broadly and expansively. At its most fundamental sense, it includes the right to be protected from further harm. At the most basic level, this would require the State to take measures to protect the victim's physical safety from her traffickers. At a further level, it should address the consequences of wrongdoing and place the victim in a position to build a

[16] https://www.scconline.com

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life that is not defined by the wrong she suffered. For victims of trafficking for CSE, this would mean provision of measures that would ensure material well-being, aid in reducing stigma, help in recognition and, providing a voice to the victim's wishes and choices in her rehabilitation.

CONCLUSION

This paper consist the content that shows legality of Article 21. From the origin to the development, there were number of facets made periodically. The journey of validity of Article 21 started from the restricted interpretation to wide interpretation. Article 21 covers different facets such as right to shelter, right to sleep, right to livelihood, right to die with dignity etc. likewise in early 2026 Article 21 again interpreted. In first 8 month six different cases that showed the legality of Article 21. In January **Dr. JAYA THAKUR V. GOVERNMENT OF INDIA AND OTHERS. 2026 SCC SC 133** established right to menstrual health and right to education, In month of March **HARISH RANA V. UNION OF INDIA AND ORS 2026 SCC SC 358** was become the first case in India where right to die with dignity and passive euthanasia was executed, In month of April **IN RE : PHALODI ACCIDENT V. NATIONAL HIGHWAY AUTHORITY OF INDIA AND OTHERS 2026 SCC SC 646** recognized the right to save passage on roads to be an integral part of Article 21, In May **PRAJWALA V. UNION OF INDIA AND OTHERS 2026 SCC SC 1053** where Supreme court recognized that the right to rehabilitation of victim of trafficking under Article 21 and 23 and **IN RE CITY HOUNDED BY STRAYS , KIDS PAY PRICE , (2025) 9 SCC** court recognized that right to live with dignity includes right to live without fear of dogs, In month of June **MANIYAR ILIYAZ ALIAS SHAIK RIYAZ AND ANOTHER V. P. AYYAPPAN AND OTHERS 2026 SCC Online SC 1162** court recognized the right to walk on demarcated footpath is part of Article 21. These are the new facets of Article 21 who originated in 2026.