



## INTERNATIONAL JOURNAL OF HUMAN RIGHTS LAW REVIEW

*An International Open Access Double Blind Peer Reviewed, Referred Journal*

---

Volume 5 | Issue 3 | 2026

Art. 19

---

# Constitutional Symbiosis: Mapping the Relationship between Article 14 and 21

Adv. Anushka Kaushik

*Advocate*

*Guest Faculty in R. D. Rajpal School*

---

### Recommended Citation

Adv. Anushka Kaushik, *Environmental Constitutionalism in India: Analysing Indian Council for Enviro-Legal Action*, 5 IJHRLR 290-304 (2026).

Available at [www.humanrightlawreview.in/current-issues/](http://www.humanrightlawreview.in/current-issues/).

This Article is brought to you for free and open access by the International Journal of Human Rights Law Review by an authorized Lex Assisto & Co. administrator.

For more information,

please contact [humanrightlawreview@gmail.com](mailto:humanrightlawreview@gmail.com)

---

# Constitutional Symbiosis: Mapping the Relationship between Article 14 and 21

## ABSTRACT

*The Indian Constitution structural integrity is anchored in the symbiotic relationship between Article 14, representing the Right to Equality, and Article 21, representing the Right to Life and Personal Liberty. Historically interpreted through a restrictive lens, judicial jurisprudence, particularly in the post Emergency era, evolved toward a holistic Golden Triangle framework comprising Articles 14, 19, and 21. This transformation shifted the landscape from a rigid lex based approach to a substantive standard of fairness, reasonableness, and non-arbitrariness. The New Doctrine of equality, established in E.P. Royappa and solidified in cases like Maneka Gandhi, dictates that any State action encroaching upon individual freedom must be anchored in objective justification. Arbitrariness is now recognized as the antithesis of equality, while Life is defined not as mere animal existence, but as a right to live with human dignity. Through transformative rulings, ranging from the decriminalization of private consensual relations in cases like Navtej Singh Johar and Joseph Shine to the recognition of socioeconomic rights as fundamental to existence in cases like Olga Tellis and Unni Krishnan, the judiciary ensured these rights function as an integrated charter of liberty. By weaving the guarantee of non-discrimination into the protection of individual sanctity, courts effectively shielded citizens against State authoritarianism. This article explores how this synergy converts the text of the Constitution into a living, breathing, and dynamic instrument that prioritizes the inherent worth, dignity, and equality of every individual in our modern democratic society.*

## KEYWORDS

*Constitutional Symbiosis, Article 14, Article 21, Golden Triangle, Substantive Due Process*

## 1. THE CONSTITUTIONAL FRAMEWORK OF ARTICLE 14 AND 21

The structural integrity of the Indian Constitution rests largely upon the symbiotic relationship between Article 14 and Article 21. Far from being isolated guarantees, these provisions function as a collective shield against the potential for State authoritarianism. While Article 14 enshrines the mandate of equality and the prohibition of discrimination, Article 21 protects the sanctity of life and personal liberty. Historically, the Indian judiciary viewed these rights through a narrow,

compartmentalized lens however, the post-Emergency era witnessed a radical shift toward a "holistic" interpretation. This chapter examines how this evolution has ensured that any State action encroaching upon individual freedom must now be anchored in the principles of fairness, reasonableness, and non-arbitrariness.

### ***1.1 Article 14: The Right to Equality***

Article 14 mandates that "the State shall not deny to any person equality before the law or the equal protection of the laws within the territory of India."<sup>1</sup> It encompasses two distinct concepts:

- **Equality Before Law (Negative Concept):** Derived from English Common Law, it implies the absence of any special privilege in favor of any individual. No man is above the law.<sup>2</sup>
- **Equal Protection of Laws (Positive Concept):** Derived from the American Constitution, it implies the right to equal treatment in similar circumstances. It permits **Reasonable Classification**.<sup>3</sup>

In the early decades of the Republic, the Supreme Court's jurisprudence was dominated by the "**Doctrine of Reasonable Classification**." This approach recognized that the legislature must often categorize individuals to achieve specific social or economic goals. Yet, to remain constitutionally valid, such classification could not be whimsical it required an **intelligible differentia** to distinguish those grouped together from those left out, and a **rational nexus** linking that distinction to the statute's ultimate objective.<sup>4</sup> Essentially, if the State treats unequally without a valid justification, it violates the core of Article 14.

The expansion of equality's conceptual horizon reached a watershed moment in the seminal case of *E.P. Royappa v. State of Tamil Nadu*.<sup>5</sup> In this judgment, the Supreme Court effectively dismantled the rigid, formulaic boundaries of Article 14 by ushering in what we now recognize as the "New Doctrine" of equality. Writing for the Court, Justice Bhagwati observed that equality is a dynamic and "activist" principle one that cannot be imprisoned within the narrow confines of traditional classification tests. This shift fundamentally redefined the constitutional mandate, establishing that arbitrariness is, in fact, the absolute antithesis of equality. The implications of this are profound: any State action whether it takes the form of a legislative statute or an executive decree that lacks a rational foundation or is marred by *mala*

<sup>1</sup> The Constitution of India, art. 14.

<sup>2</sup> The Constitution of India, art. 14.

<sup>3</sup> The Constitution of India, art. 14.

<sup>4</sup> *State of West Bengal v. Anwar Ali Sarkar*, AIR 1952 SC 75.

<sup>5</sup> *E.P. Royappa v. State of Tamil Nadu*, (1974) 4 SCC 3; AIR 1974 SC 555.

*fides* must be struck down as a *per se* violation of Article 14. By replacing a purely technical inquiry with a substantive standard of "reasonableness," the Court ensured that every exercise of State power remains tethered to the bedrock of fairness and objective justification.<sup>6</sup>

## 1.2 Landmark Judgements of Article 14

### 1. Magan Lal Chagga Lal v Municipal Corporation of Greater Bombay<sup>7</sup>

The court clarified that if a law itself creates unfair categories, the entire law is unconstitutional; however, if the law simply gives the executive branch the power to categorize based on certain rules, then an unfair decision only cancels that specific action, not the law itself.<sup>8</sup>

### 2. Indra Sawhney v. Union of India<sup>9</sup>

In this case, fundamentally redefined the constitutional relationship between the right to equality and the state's power to provide reservations. The Supreme Court clarified that Article 16(1) is not a standalone provision but is effectively an extension or a "facet" of Article 14. This interpretation signifies that the principle of reasonable classification inherent in Article 14 which allows the state to treat different groups differently based on logical distinctions is equally applicable to Article 16(1). Consequently, the state is permitted to classify certain groups for the purpose of reserving seats or vacancies in public employment. Furthermore, the Court held that Article 16(4) should not be viewed as an exception to the rule of equality, but rather as a specific mechanism to achieve the very objective of equal opportunity. By harmonizing these provisions, the judiciary established that both Article 14 and Article 16 are restatements of the same fundamental principle of equality. In this light, affirmative action is seen as a tool to ensure that the constitutional promise of "equality in fact" is realized for underrepresented classes, rather than merely maintaining "equality in law."<sup>10</sup>

---

<sup>6</sup> *E.P. Royappa v. State of Tamil Nadu*, (1974) 4 SCC 3 : AIR 1974 SC 555.

<sup>7</sup> *Magan Lal Chagga Lal v Municipal Corporation of Greater Bombay*, AIR 1974 SC 2009.

<sup>8</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>9</sup> *Indra Sawhney v. Union of India*, AIR 1993 SC 477.

<sup>10</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

### 3. **Air India v. Nargesh Meerza**<sup>11</sup>

In this landmark case, the state-owned carrier, Air India, enforced service regulations that mandated the retirement of female flight attendants based on three specific triggers: reaching the age of 35, entering into marriage, or their initial pregnancy. Notably, these restrictive conditions were not imposed upon their male counterparts. Upon judicial review, the Supreme Court invalidated these regulations, characterizing them as manifestations of "official arbitrariness" and "hostile discrimination." The Court held that such gender-biased mandates were a direct violation of Article 14 of the Constitution, as they lacked a rational basis and unfairly targeted women, thereby failing the test of equality and constitutional fairness.<sup>12</sup>

### 4. **National Legal Services Authority (NALSA) v. Union of India**<sup>13</sup>

Initiated by the National Legal Services Authority, this litigation sought formal legal recognition for individuals existing outside the traditional male-female binary, specifically those identifying as the "third gender." In its deliberation, the Court acknowledged the pervasive and "extreme discrimination" faced by transgender individuals across all societal sectors. Crucially, the judiciary noted that Article 14 of the Constitution is articulated in strictly gender-neutral language, offering protection to "any person." By interpreting this term literally and expansively, the Court affirmed that the constitutional guarantee of equality is not limited by biological sex and must, therefore, be fully extended to include transgender persons.<sup>14</sup>

### 5. **Shayara Bano v. Union of India**<sup>15</sup>

On August 22, 2017, a five-judge Constitution Bench invalidated the practice of instantaneous triple talaq (*Talaq-ul-biddat*), declaring it unconstitutional. The Court reasoned that the guarantee of equality under Article 14 inherently includes the "equality of status" for all citizens. It emphasized that concepts of gender equity and justice are

---

<sup>11</sup> *Air India v Nargesh Meerza*, [1978] 2 SCR 621

<sup>12</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>13</sup> *National Legal Services Authority (NALSA) v. Union of India*, (2014) 5 SCC 438.

<sup>14</sup>Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>15</sup> *Shayara Bano v Union of India*, WP (C) 118/2016.

not merely peripheral but are central, inseparable components of the right to equality. Consequently, any social standing that is dictated by patriarchal norms or remains dependent on the whims of men is fundamentally at odds with the core principles of Articles 14 and 15. The judgment underscored that a woman's constitutional status cannot be subordinated to discriminatory traditional practices that undermine her dignity and legal protections.<sup>16</sup>

## 6. *Navtej Singh Johar v. Union of India*<sup>17</sup>

A five-judge Bench of the Supreme Court unanimously struck down Section 377 of the Indian Penal Code, to the extent that it criminalized same-sex relations between consenting adults. LGBT individuals are now legally allowed to engage in consensual intercourse. The above segment of Section 377 of IPC was held to be violative of right to equality which equally applied to same sex couples.<sup>18</sup>

## 7. *Harsh Mander v. Union of India*<sup>19</sup>

The Delhi High Court's ruling serves as a profound critique of the state's failure to provide social security, fundamentally shifting the legal treatment of poverty from a criminal issue to a human rights concern. The court struck down several provisions of the Bombay Prevention of Begging Act, 1959 (as applied to Delhi), asserting that criminalizing the act of seeking alms is a direct violation of the fundamental rights to equality and life guaranteed under Articles 14 and 21 of the Constitution. The bench observed that in a country where the state cannot ensure basic subsistence, food, or shelter for all its citizens, it possesses no moral or legal authority to penalize individuals who are forced into the streets by sheer destitution. The judgment emphasized that "begging" is a symptom of systemic socio-economic failure rather than a chosen profession of convenience. By invalidating the power of the police to arrest someone simply for looking poor or being homeless, the court dismantled a colonial-era logic that sought to "cleanse" public spaces by hiding the impoverished. The justices noted that while the state remains responsible for protecting children from forced begging rackets and trafficking, it cannot use the law as a tool to incarcerate the victim of poverty. Ultimately, the ruling underscores that the constitutional

---

<sup>16</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", Legal Vidhiya, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>17</sup> *Navtej Singh Jauhar v Union of India*, WP (C) 572/2016.

<sup>18</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>19</sup> *Harsh Mander v. Union of India*, AIR 2018 DELHI 188.

promise of dignity is hollow if the law treats the struggle for survival as a punishable offense, mandating instead that the government focus on rehabilitation and social welfare.<sup>20</sup>

## 8. Joseph Shine v. Union of India<sup>21</sup>

In the landmark case of *Joseph Shine v. Union of India* (2018), the Supreme Court of India delivered a transformative judgment that struck down Section 497 of the Indian Penal Code, effectively decriminalizing adultery. The five-judge Constitution Bench unanimously ruled that the provision was archaic, arbitrary, and fundamentally violative of the rights to equality and dignity. The Court observed that the law, as it stood, treated a married woman as the "chattel" or property of her husband, as it only punished the man who had sexual intercourse with a married woman without her husband's consent, while providing no recourse if the husband committed the same act. This gender-based discrimination was found to be in direct conflict with Article 14 (Right to Equality) and Article 15 (Prohibition of discrimination) of the Constitution. Furthermore, the judiciary emphasized that the state should not interfere in the private, consensual lives of individuals unless there is a compelling public interest. Justice D.Y. Chandrachud, in his concurring opinion, highlighted that Section 497 perpetuated gender stereotypes by assuming women lacked sexual agency and were subordinate to their husbands. By declaring the law unconstitutional, the Court reinforced the principles of Article 21, protecting an individual's right to privacy and sexual autonomy. While the judgment clarified that adultery remains a valid civil ground for the dissolution of marriage (divorce), it firmly established that the "sanctity of marriage" cannot be preserved through the threat of criminal prosecution, nor can it justify the denial of a woman's constitutional identity.<sup>22</sup>

### 1.3 Article 21: Right To Life and Personal Liberty

Article 21 declares that "no person shall be deprived of his life or personal liberty except according to procedure established by law."<sup>23</sup> Article 21 is perhaps the most transformative provision in our constitutional scheme, stating that no person shall be deprived of life or personal liberty except

---

<sup>20</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>21</sup> *Joseph Shine v. Union of India*, AIR 2018 SC 4898.

<sup>22</sup> Top 10 Landmark Judgement Article 14 Indian Constitution", *Legal Vidhiya*, available at: <https://legalvidhiya.com/top-10-landmark-judgement-article-14-indian-constitution/> (last visited on Feb. 24, 2026).

<sup>23</sup> The Constitution of India, art. 21.

according to "procedure established by law." Initially, the judiciary adopted a very literal and pedantic view.<sup>24</sup> In *A.K. Gopalan v. State of Madras*,<sup>25</sup> the Court held that Article 21 offered no protection against legislative action so long as a law was formally enacted and a procedure was followed, the right to liberty could be suppressed.<sup>26</sup> This "Lex-based" approach left the individual vulnerable to any law, no matter how harsh or oppressive it might be.

This restrictive era ended with the transformative judgment in *Maneka Gandhi v. Union of India*.<sup>27</sup> The Court famously ruled that the "procedure" mentioned in Article 21 must not be just any procedure, but one that is just, fair, and reasonable. By weaving Article 14 into the fabric of Article 21, the Court created what we now call the "Golden Triangle" (Articles 14, 19, and 21). This move effectively introduced a version of "Substantive Due Process" into Indian law. Life was no longer defined as mere "animal existence" but as a right to live with human dignity, encompassing everything that makes existence meaningful.

#### **1.4 Landmark Judgements of Article 21**

##### **1. Kharak Singh v. State of Uttar Pradesh<sup>28</sup>**

The landmark case serves as a cornerstone for privacy rights in India. In this ruling, the Supreme Court struck down specific police regulations as unconstitutional violations of Article 21 (the right to life and personal liberty) and Article 19(1)(d) (the right to move freely). The Court specifically condemned the practice of "domiciliary visits" late-night police intrusions into the petitioner's home to monitor his activities. The justices famously reasoned that "personal liberty" is not limited to mere physical survival or "animal existence." Instead, it encompasses a broader right to live with dignity and without constant, invasive state surveillance that restricts a person's freedom of movement and private life.<sup>29</sup>

##### **2. R.C. Cooper v. Union of India<sup>30</sup>**

This case is popularly known as the Bank Nationalization Case, is a cornerstone of Indian Constitutional Law, particularly regarding the

---

<sup>24</sup> The Constitution of India, art. 21.

<sup>25</sup> *A.K. Gopalan v. State of Madras*, AIR 1950 SC 27.

<sup>26</sup> *A.K. Gopalan v. State of Madras*, AIR 1950 SC 27.

<sup>27</sup> *Maneka Gandhi v. Union of India*, (1978) 1 SCC 248 : AIR 1978 SC 597.

<sup>28</sup> *Kharak Singh v. State of Uttar Pradesh*, AIR 1963 SC 1295.

<sup>29</sup> Article 21 of the Indian Constitution with Top 10 Cases", *LawBhoomi*, available at: <https://lawbhoomi.com/article-21-of-the-indian-constitution-with-top-10-cases/> (last visited on Feb. 24, 2026).

<sup>30</sup> *R.C. Cooper v. Union of India*, AIR 1970 SC 564.

relationship between fundamental rights and the state's power of eminent domain. In this landmark 11-judge bench decision, the Supreme Court overruled the long-standing "object-and-form" test established in the A.K. Gopalan case. The Court held that the validity of a law must be judged by its effect on an individual's rights rather than just the government's legislative objective. By striking down the Banking Companies (Acquisition and Transfer of Undertakings) Act, 1969, the judiciary asserted that the "right to property" (then a fundamental right under Article 31) could not be bypassed by providing illusory or non-judicial compensation. The judgment is most significant for introducing the "Effect Test" (Directness of Doctrine), which mandates that any state action even if aimed at social welfare must pass the scrutiny of being reasonable and non-arbitrary under Article 19 and Article 21. The Court clarified that fundamental rights are not isolated "silos" but an integrated charter of liberty; therefore, a law depriving a person of property must also satisfy the test of being a "reasonable restriction" in the public interest. Although the 25th Amendment was later passed to circumvent this ruling, the R.C. Cooper case remains a vital precedent for ensuring that executive and legislative actions are subject to judicial review whenever they infringe upon the core liberties of a citizen.<sup>31</sup>

### **3. Olga Tellis v. Bombay Municipal Corporation<sup>32</sup>**

The Supreme Court of India fundamentally expanded the scope of the "Right to Life" under Article 21 of the Constitution. The five-judge Constitution Bench, led by Chief Justice Y.V. Chandrachud, ruled that the right to life is not merely about physical existence but encompasses the right to livelihood. The Court reasoned that if a person is deprived of their means of earning a living, their very life is put in jeopardy, as no one can live without the means of subsistence. By addressing the plight of pavement dwellers in Mumbai who were being forcibly evicted, the judiciary established that any state action depriving an individual of their livelihood must follow a procedure that is fair, just, and reasonable, rather than being arbitrary or oppressive. The judgment is also a cornerstone for the principle of Audi Alteram Partem (the right to be heard) within administrative law. While the Court recognized the municipal corporation's power to remove encroachments from public footpaths, it held that such power must be exercised with human dignity and procedural due process. Even though the petitioners were technically "trespassers" on

---

<sup>31</sup>Article 21 of the Indian Constitution with Top 10 Cases", *LawBhoomi*, available at: <https://lawbhoomi.com/article-21-of-the-indian-constitution-with-top-10-cases/> (last visited on Feb. 24, 2026).

<sup>32</sup>*Olga Tellis v. Bombay Municipal Corporation*, AIR 1986 SC 180.

public property, the Court ruled they could not be evicted without being given a chance to explain their circumstances or being provided with a reasonable notice period. Although the Court did not grant an absolute right to housing, it mandated that the state should provide alternative sites or rehabilitation where possible, reinforcing the idea that Social Justice is an integral part of the Indian Constitutional framework.<sup>33</sup>

#### **4. Unni Krishnan, J.P. v. State of Andhra Pradesh<sup>34</sup>**

The case is a monumental milestone in Indian jurisprudence that paved the way for the 86th Constitutional Amendment and the eventual enactment of the Right to Education (RTE) Act. In this judgment, a five-judge Constitution Bench of the Supreme Court significantly expanded the interpretation of Article 21, declaring that the right to life and personal liberty is incomplete without the right to education. The Court reasoned that education is the primary vehicle for achieving individual dignity and empowering citizens to exercise their other fundamental rights. By reading the Directive Principles (specifically Article 45) into the fundamental rights, the judiciary established that every child has an enforceable right to free and compulsory education until they reach the age of fourteen. However, the judgment also introduced a nuanced distinction between basic and higher education. While the right to primary education was held to be absolute, the Court ruled that the right to professional and higher education is subject to the economic capacity and development of the state. Addressing the commercialization of education, the Supreme Court struck down the practice of charging "capitation fees" by private professional colleges, labelling it as a violation of the right to equality. To balance institutional autonomy with social justice, the Court formulated the "Unni Krishnan Scheme," which regulated admissions and fee structures in private unaided colleges. This case remains a definitive authority on the principle that education is a noble mission and a social obligation of the state, rather than a mere commercial commodity or business adventure.<sup>35</sup>

#### **5. S.S. Ahuwalia v. Union of India<sup>36</sup>**

The Supreme Court, in this pivotal ruling, reinforced the positive

---

<sup>33</sup>Article 21 of the Indian Constitution with Top 10 Cases", *LawBhoomi*, available at: <https://lawbhoomi.com/article-21-of-the-indian-constitution-with-top-10-cases/> (last visited on Feb. 24, 2026).

<sup>34</sup> *Unni Krishnan, J.P. v. State of Andhra Pradesh*, AIR 1993 SC 2178.

<sup>35</sup>Article 21 of the Indian Constitution with Top 10 Cases", *LawBhoomi*, available at: <https://lawbhoomi.com/article-21-of-the-indian-constitution-with-top-10-cases/> (last visited on Feb. 24, 2026).

<sup>36</sup> *S.S. Ahuwalia v. Union of India*, AIR 2001 SC 1002.

duty of the State to protect the lives of its citizens under Article 21. Arising from the 1984 riots, the judgment established that when the government fails to maintain public order resulting in the loss of life by private mobs it cannot escape its constitutional responsibility. The Court held that victims of such administrative negligence are entitled to just and uniform compensation as a public law remedy. By framing relief as a constitutional right rather than mere state charity, the judiciary ensured that the government is held accountable for its failure to prevent foreseeable violence, grounding the "Right to Life" in tangible state accountability.<sup>37</sup>

## 6. **Bandhua Mukti Morcha v. Union of India**<sup>38</sup>

The Supreme Court transformed the nature of judicial intervention in India by entertaining a letter as a Public Interest Litigation (PIL). The case centered on the inhumane conditions of laborers in stone quarries, whom the Court recognized as "bonded" despite the legal ban on the practice. The Bench, led by Justice P.N. Bhagwati, ruled that the Right to Life under Article 21 must include the right to live with basic human dignity, free from exploitation. The judgment is landmark for establishing that the State has an affirmative constitutional duty to identify, release, and rehabilitate bonded labourers. Furthermore, the Court introduced the use of commissioners to conduct independent on-ground investigations, ensuring that fundamental rights are accessible even to the most impoverished citizens who cannot approach the courts themselves.<sup>39</sup>

## 7. **Vishakha v. State of Rajasthan**<sup>40</sup>

The judgment is one of the most significant examples of judicial activism in Indian history. In the absence of enacted legislation, the Supreme Court stepped in to protect the fundamental rights of women under Articles 14, 15, and 21, establishing that gender equality includes protection against sexual harassment at the workplace. The Court famously utilized international law specifically the CEDAW convention to fill a legislative vacuum, creating the "Vishakha Guidelines." These mandates required every employer to establish an Internal Complaints Committee and defined sexual

---

<sup>37</sup> Article 21 of the Indian Constitution with Top 10 Cases", *LawBhoomi*, available at: <https://lawbhoomi.com/article-21-of-the-indian-constitution-with-top-10-cases/> (last visited on Feb. 24, 2026).

<sup>38</sup> *Bandhua Mukti Morcha v. Union of India*, AIR 1984 SC 802.

<sup>39</sup>Article 21 of the Indian Constitution with Top 10 Cases", *LawBhoomi*, available at: <https://lawbhoomi.com/article-21-of-the-indian-constitution-with-top-10-cases/> (last visited on Feb. 24, 2026).

<sup>40</sup> *Vishakha v. State of Rajasthan*, AIR 1997 SC 3011.

harassment broadly to include any unwelcome physical, verbal, or non-verbal conduct of a sexual nature. This case fundamentally shifted the legal burden onto the employer to ensure a safe and dignified working environment, remaining the law of the land until the enactment of the POSH Act in 2013.<sup>41</sup>

## 8. Aruna Ramchandra Shanbaug v. Union of India<sup>42</sup>

The Supreme Court of India navigated the complex ethical and legal terrain of the "Right to Die" with dignity. While the Court rejected the plea for active euthanasia, it took a historic step by legalizing passive euthanasia under strict judicial safeguards. The Bench distinguished between actively ending a life and the passive withdrawal of life-sustaining treatment for patients in a Permanent Vegetative State (PVS). Drawing a vital link to Article 21, the Court clarified that while the "Right to Life" does not inherently include a "Right to Die," it does encompass the right to a dignified exit from life. This judgment shifted the decision-making power from the state to the "next friend" or medical staff, overseen by the High Courts, ensuring that patients are not kept alive in a state of suffering through artificial means against their best interests.<sup>43</sup>

## 2. RELATIONSHIP BETWEEN ARTICLE 14 AND 21 OF INDIAN CONSTITUTION

| Feature         | Article 14: Right to Equality   | Article 21: Right to Life and Liberty   |
|-----------------|---|---|
| Core Philosophy | <b>Non-Arbitrariness:</b> Ensures that the State treats equally and avoids whims. | <b>Individual Dignity:</b> Ensures that life is more than "animal existence." |
| Primary Scope   | Covers "Equality before Law" and "Equal Protection of Laws."                      | Covers "Life" and "Personal Liberty" as per procedure.                        |
| Applicability   | Available to <b>all persons</b> (including aliens and                             | Available to <b>all persons</b> (citizens and                                 |

<sup>41</sup>Important Rights under Article 21 with Case Laws", *LawBhoomi*, available at: <https://lawbhoomi.com/important-rights-under-article-21-with-case-laws/> (last visited on Feb. 24, 2026).

<sup>42</sup> *Aruna Ramchandra Shanbaug v. Union of India*, AIR 2011 SC 1290.

<sup>43</sup> Important Rights under Article 21 with Case Laws", *LawBhoomi*, available at: <https://lawbhoomi.com/important-rights-under-article-21-with-case-laws/> (last visited on Feb. 24, 2026).

|                         |   |   |
|-------------------------|---|---|
|                         | legal corporations).  | non-citizens alike).  |
| <b>Nature of Right</b>  | A <b>Negative Obligation</b> (State must not discriminate).                   | Both <b>Negative</b> (State must not deprive) and <b>Positive</b> (State must protect). |
| <b>Judicial Inquiry</b> | Focuses on whether the State has acted arbitrarily or created an unfair bias. | Focuses on whether the State has respected human dignity and due process.               |

The symbiotic relationship between Article 14 and Article 21 represents the transition of the Indian Constitution from a literal text to a living, breathing instrument of justice. Article 14 serves as the constitutional conscience, ensuring that the State's power is never exercised with bias or whim, while Article 21 stands as the guardian of the soul, protecting the fundamental essence of human existence. Together, they mandate that any law affecting a citizen's life or liberty must be "right, just, and fair," rather than merely "existent." By merging the requirement of non-arbitrariness with the guarantee of dignity, the judiciary has created an unbreakable shield against executive overreach. For any legal professional or scholar, understanding this interplay is essential: it proves that in a true democracy, the "Rule of Law" is not just about following a process, but about ensuring that every process respects the inherent equality and worth of every individual.

### 3. THE ARTICLE 14, 19 AND 21 OF INDIAN CONSTITUTION AND GOLDEN TRIANGLE

In the landscape of contemporary constitutional jurisprudence, Articles 14 and 21 are no longer viewed as distinct islands of protection but as mutually reinforcing pillars of liberty. The modern understanding is rooted in the realization that a violation of Article 21 the deprivation of life or liberty is almost inherently a violation of Article 14. This is because any legal procedure that is found to be unjust, biased, or fundamentally unfair is, by its very nature, an act of State arbitrariness.<sup>44</sup>

This judicial synergy has served as a powerful engine for constitutional growth, empowering the Courts to "discover" a vast spectrum of

<sup>44</sup> Golden Triangle under Constitution of India", *LawBhoomi*, available at: <https://lawbhoomi.com/golden-triangle-under-constitution-of-india/> (last visited on Feb. 24, 2026).

unenumerated rights within the existing text. The most transformative of these discoveries is undoubtedly the recognition of the right to privacy in the *Puttaswamy* verdict, where the Court affirmed that dignity and privacy are the core of our constitutional existence.<sup>45</sup> Consequently, the validity of any law impacting personal liberty is now subject to a rigorous "triple test." To survive judicial scrutiny, such a law must not only be validly enacted but must also serve a legitimate and reasonable objective under Article 19, while remaining strictly non-discriminatory and rational under Article 14. This integrated approach ensures that the individual remains the true focal point of the Constitution, shielded by a network of rights that are as interconnected as they are absolute.<sup>46</sup>

### 1. *Ajay Hasia v. Khalid Mujib*<sup>47</sup>

The Supreme Court of India fundamentally reshaped the reach of fundamental rights by adopting a dynamic interpretation of Article 14. Moving away from a rigid, traditional "classification test," the Court established that equality is a pervasive principle that cannot be restricted to narrow technicalities. It famously declared that arbitrariness is the natural enemy of equality; where a state action is based on a whim rather than a rational principle, it is inherently discriminatory. This case is crucial because it brought administrative actions under the scanner of "reasonableness," asserting that even in matters like college admissions, the government cannot act without a logical and transparent basis. The significance of this judgment lies in its deep integration of Article 14 and Article 21. The Court recognized that an unfair or "whimsical" selection process such as the brief and superficial interview conducted in this case is not just a procedural error but a direct threat to an individual's professional life and future dignity. By linking the right to fair treatment with the right to a meaningful life, the judiciary ensured that any procedure affecting a person's livelihood must be "fair, just, and reasonable." Consequently, the case established that the constitutional guarantee of "Life" is effectively hollow if the State is allowed to make life-altering decisions through arbitrary or biased methods.<sup>48</sup>

### 2. *Sunil Batra v. Delhi Administration*<sup>49</sup>

The Supreme Court of India redefined the legal status of prisoners,

---

<sup>45</sup> *Justice K.S. Puttaswamy (Retd.) v. Union of India*, (2017) 10 SCC 1.

<sup>46</sup> "Golden Triangle under Constitution of India", *LawBhoomi*, available at: <https://lawbhoomi.com/golden-triangle-under-constitution-of-india/> (last visited on Feb. 24, 2026).

<sup>47</sup> *Ajay Hasia v. Khalid Mujib*, AIR 1981 SC 487.

<sup>48</sup> *Ajay Hasia v. Khalid Mujib*", *LawBhoomi*, available at: <https://lawbhoomi.com/ajay-hasia-v-khalid-mujib/> (last visited on Feb. 24, 2026).

<sup>49</sup> *Sunil Batra v. Delhi Administration*, AIR 1978 SC 1675.

asserting that "fundamental rights do not end at the prison gates." The case was triggered by the brutal treatment and solitary confinement of a death row convict. The Court, led by Justice V.R. Krishna Iyer and Justice P.N. Bhagwati, rejected the antiquated notion that a prisoner is a "slave of the state" who loses all civil liberties upon conviction. Instead, the judiciary established that while certain freedoms (like movement) are restricted, the core of human dignity remains intact and legally protected.<sup>50</sup>

## CONCLUSION

The intersection of Article 14 and Article 21 has fundamentally redefined the Indian constitutional landscape, marking a decisive shift from a rigid, procedure-focused legal environment to one that prioritizes substantive human dignity and reasonableness. In the early decades of the Republic, the judiciary often adhered to a literal interpretation where the State's mere compliance with legislative procedure was deemed sufficient to justify the curtailment of liberties. However, this narrow, "lex-based" perspective was eventually supplanted by a holistic and progressive doctrine. By effectively synthesizing these two provisions, the courts successfully forged a protective "Golden Triangle" that mandates that every government action whether legislative or executive must transcend mere procedural compliance to pass the rigorous tests of fairness, proportionality, and non-arbitrariness. This reorientation established that the constitutional right to life is not simply about biological survival, but about the right to exist with full human dignity, free from the capricious whims of State power. This evolving judicial philosophy has empowered the courts to actively challenge systemic inequality, providing a robust legal shield for marginalized groups against everything from bonded labor and discriminatory social practices to administrative apathy and executive overreach. Today, this jurisprudence stands as the bedrock of Indian democratic values, ensuring that the Rule of Law is not merely a procedural formality but a profound commitment to equality and individual autonomy. Consequently, the Constitution has been transformed into a responsive, living instrument that continues to safeguard the fundamental worth of every citizen, ensuring that the promise of a dignified life remains an enforceable reality rather than a theoretical ideal.

---

<sup>50</sup> Sunil Batra vs Delhi Administration", *LawBhoomi*, available at: <https://lawbhoomi.com/sunil-batra-vs-delhi-administration/> (last visited on Feb. 24, 2026).