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Administrative Overreach: Challenges to Judicial Independence and the Constitutional Framework

Aditya Raj[1]

Abstract:

The relationship between the judiciary and the administrative bodies that exercise quasi-judicial powers have long been the subject of debate in India. While bodies such as regulatory commissions and tribunals play a crucial role in dispute adjudication and enforcement of statutory obligations, there still exist an overlapping of powers and irregularities in procedure, and instances of bias which have raised serious concerns regarding the independence and the sanctity of the judiciary. This paper undertakes a critical examination of whether the limitation of administrative powers is necessary to preserve the judicial autonomy within the constitutional framework of India. The paper further examines the historical evolution of the administrative law commencing with the early systems of governance, establishment of tribunals during the colonial era, and their extensive expansion in post-independence India. Various tribunals and institutions such as the Securities and Exchange Board of India, the National Green Tribunal, and the Income Tax Appellate Tribunal have developed their own parallel internal structures which is intended to ensure speedy disposal of cases. However, these bodies have created challenges which concern accountability, adherence, and transparency which often result in judicial scrutiny. Furthermore, constitutional safeguards against administrative actions have also been examined under Article 31, 136, and 226 which highlight the judiciary's role in maintaining oversight. The study further concludes with the proposition of enhanced judicial oversight, transparent tribunal procedures, independent appointment mechanisms, and uniformity in procedural standards to ensure that administrative efficiency can coexist with judicial independence under the modern implications of the constitutional framework.

Keywords: *Quasi-Judicial Functions, Administrative Authorities, Natural Justice, Administrative Law, Judicial Oversight, Tribunals, Regulatory Bodies, Procedural Fairness*

Introduction

Administrative agencies play a significant role in modern governance in making and enforcing laws directly affecting the daily lives of citizens. Administrative agencies ensure law enforcement, business regulation, and compliance with the law. Most of them perform quasi-judicial functions, blending elements of judicial adjudication with administrative determination. The quasi-judicial power is necessary to balance out the efficiency and equity that permits the judges to ensure expedient and fair resolution of disputes in the administrative realm. In the same vein as courts, quasi-judicial proceedings entail the examination of facts and the weighing of evidence before the drawing of conclusions based on law by the administrative

[1] Student, 5th Year B.B.A LL. B (H.), The NorthCap University, Haryana

bodies; however, they do not wield the same powers or are governed by the same procedural restrictions as courts.[2]

These decisions are often treated as final with binding authority and are supposed to follow a more pointed and expeditious course of action than normal court procedures. Through such functions, agencies resolve disputes under different spheres, including labor relations, securities regulation, competition law, and taxation. These quasi-judicial processes are guided by a parallel jurisprudential framework created by statutory and constitutional law.

Articles 14, 21, and 32 of the Indian Constitution, for example, provide for fundamental freedoms and require that administrative orders conform to natural justice and reasonableness. These provisions shield citizens from arbitrary orders of administrative bodies. Meanwhile, bodies like the Competition Commission of India (CCI), Securities and Exchange Board of India (SEBI), and Income Tax Appellate Tribunal (ITAT) have quasi-judicial powers regarding their subject matter.[3] In addition to law enforcement, these institutions ensure fairness, transparency, and legality in their decisions.

Nonetheless, the quasi-judicial function has considerable disadvantages affecting specialized decision-making and relieving the workload of ordinary courts. Concerns about bias, inconsistency in procedures, and lack of transparency can jeopardize the effectiveness of these institutions.[4] The growing tide of appeals from quasi-judicial orders indicates concerns about their safeguards and their vulnerability to capricious practice. In addition, ever-complex regulatory schemas pressurize such authorities to deliver results at an increasing rate, which on occasions results in a loss of quality in their adjudication.

Historical Evolution and Development of Administrative Law in India

With increased interaction between the administration and the citizens, the sinews of administrative law came into being as a vital segment of modern-day governance. As society was developing, the administrative law underwent development, becoming a vital instrument for dispute resolution and being a remarkable legal milestone for the 20th century.[5] All the while, the government around the globe changed from a laissez-faire, non-interventionist mode to one of active intervention as parens patria, i.e., father of the people.[6] The above-mentioned international tendency also influenced the administrative law in India, thus bringing various adaptations in the structure of administrative law in India in accordance with the changing political, economic, and social conditions of India.

[2] Arvind P Datar, *Administrative Law in India* (LexisNexis 2021).
[3] P. Shikha, *Administrative Action in India*, J. Const. L. & Jurisprudence (2024), https://lawjournals.celnet.in/index.php/Jolj/article/view/1520 (last visited Feb. 12, 2025).
[4] Ibid.
[5] S. Narain, *Evolution of Administrative Law in India: From Ancient to Modern Times*, *Indian J. Legal Hist.* (2021), https://heinonline.org/hol-cgi-bin/get_pdf.cgi?handle=hein.journals/ijlh8&section=12 (last visited Feb. 13, 2025).
[6] Ibid.

i. Ancient India: Early Foundations of Administrative Law

The foundations of administrative law in India can be traced back to the political institutions and the administration during the times of the Mauryan and Gupta empires, that is, two systems of ancient governance.[7] In these intensely centralized political frameworks, the monarch possessed absolute power over administration as well as the judiciary. The primary obligations of the king were to protect the state against foreign invasion, to see that law and order were maintained, and to supervise taxation.[8] For the resolution of disputes, administration was ordinarily led by moral norms like dharma (the teachings of justice and righteousness) with the active involvement of administrative officials like Amatyas (ministers), Rajukas (revenue officials), and local chiefs who undertook such key responsibilities of examining disputes, administering justice, and executing the royal decrees.[9]

ii. British Colonial Period: The Development of Modern Administrative Law

An important turn in the history of administrative law in India was brought in by the British colonial rule. The East India Company set up a more systematic administration, which at the same time imported a legal system to solve the new problems connected with colonial administration. With an idea of handling public safety, health, trade, and labour relations, the British came up with a series of legislation and acts that greatly increased the power of the State (such as the State Carriage Act 1861, the Bombay Port Trust Act 1879, and the Opium Act 1878).[10] The listed acts and initiatives were some of the most prominent developments in administration law during the period of British rule. In the case of the State Carriage Act 1861, it introduced a licensing system in India such that the administrative authorities were granted the powers to grant and revoke licenses for public service.[11] The Bombay Port Trust Statement, in 1879, created one of the earliest public corporations in India, vested with quasi-judicial powers to settle disputes arising from the administration of ports.[12] The British put the very first concept of Delegated Legislation into operation, wherein the executive constituted rules and regulations in consonance with the framework laid down by the legislature. World War II, in 1915, the Defence of India Act added more powers to the executive and empowered governments to make orders and ordinances in relation to the exigencies related to wartime. The entire scenario underwent a major change in politics post-independence that India got in 1947 in terms of the modification of the Ratification of the Indian Constitution in 1950, which included values such as equality, social justice, and welfare for society. It was only with the ratification of the constitution that this country turned about embracing the mode of the welfare state. In creating this systemic legal apparatus, it soon became necessary to govern the activities of administrative agencies and their alignment with constitutional measures owing to the expanding functions of the state in all its aspects. The parameters like the Rule of Law and Judicial Review were incorporated within the provision of the Indian Constitution, thus granting power to the judiciary regarding regulation of administrative actions and demanding

[7] R.K. Mookerji, *Chandragupta Maurya and His Times* (Motilal Banarsidass, 1952).
[8] B.R. Ambedkar, *The Ancient Indian Legal System and Governance* (Oxford Univ. Press, 1946).
[9] Ibid.
[10] A. Patil Sardar, *G-Governance: An Evolving Paradigm in Micro-Level Governance in India – A Case Study of Village Panutre*, *ResearchGate* (2024).
[11] J. Duncan, *British Legal Reforms and the Rise of Administrative Tribunals*, Cambridge L. Rev. (2019), https://www.cambridgelawreview.org/articles/administrative-reforms-in-colonial-india (last visited Feb. 13, 2025).
[12] Ibid.

their consistency with the constitutional standards. The setting up of administrative tribunals such as the Income Tax Appellate Tribunal and Central Administrative Tribunal paved the way for establishing specialized forums to enable speedier resolution of disputes, thereby reducing congestion in regular courts. In addition, delegated legislation was turning out to be one of the most important parts of governance whereby the rules and regulations would come into being under the legislative framework afforded to the administrative authorities.

Main Features in Emergence of Administrative Law in India

Delegated Legislation is where the executive earned the power to make laws within the framework defined by the legislature at the time of emergence of delegated legislation, which becomes indispensable to sustain the growing complexity of governance and ensure that effective and efficient administrative decision-making would take place under it.[13] The Indian judiciary has played an important role in the broader development of administrative law by mandating adherence to the rule of law and principles of the constitution in administrative decisions. Classic cases such as *A.K. Kraipak v. Union of India*[14] (1969) and *Maneka Gandhi v. Union of India*[15] (1978) highlighted the paramount importance of procedural fairness and enforcement of natural justice in administrative decisions. Quasi-judicial functions have evolved more recently with the development of administrative law. They have assumed a significant proportion in administrative law and deal with redressal of grievances, providing licenses, and settling disputes.[16] Special tribunals bring procedural efficiency in resolving types of disputes through separation and also reduce the burden on traditional courts Indian Administrative Law has a much-discussed characteristic of adaptability and flexibility that is the adjustment to the changing needs of governance.

Classification of Administrative Functions and the Distinction between Judicial, Administrative, and Quasi-Judicial Roles

Judicial functions are the exercise of authority and responsibility by courts and judges over the interpretation of laws, the adjudication of disputes, and ensuring justice by impartial and equitable means. Courts, the established institutions with the prerogative to interpret legal provision as required under the constitution or legislatures, perform these responsibilities.[17] According to laws, precedents, and irrefutable evidence adduced through hearings, judgments are made by courts of law between disputing parties. Judicial functions are related to the resolution of conflicts; they include holding hearings as required by procedural statutes and rendering legally binding judgments. These decisions are final and can only be contested through legal means.

Judicial functions, unlike quasi-judicial and administrative ones, employ a formal process for resolving disputes, with a definite commitment to objectivity and impartiality. Legal reasoning is used in decisions made by the courts and is based on the pre-established precedents of

[13] Arvind P Datar, *Administrative Law in India* (LexisNexis 2021).
[14] *A.K. Kraipak v. Union of India*, (1969) 2 S.C.R. 430 (India).
[15] *Maneka Gandhi v. Union of India*, (1978) 1 S.C.C. 248 (India).
[16] Shikha, *Administrative Action in India*, J. Const. L. & Jurisprudence (2024), https://lawjournals.celnet.in/index.php/Jolj/article/view/1520 (last visited Feb. 12, 2025).
[17] R. Pathak, *Challenges in Indian Administrative Law: The Role of Quasi-Judicial Functions*, *Indian J. Legal Res.* (2023), https://heinonline.org/hol-cgi-bin/get_pdf.cgi?handle=hein.journals/injlolw8&section=57 (last visited Feb. 11, 2025).

judicial decisions. Decisions from the courts, which are always final, cannot be reconsidered except on appeal to a higher court. Administrative functions involve the daily operations conducted by either an administrative unit or governmental institution. Such functions include enforcement of laws and policies, such as issuance of licenses, rules, public services, and compliance with legal orders. Broadly, administrative actions are speedy, often quick and efficient, more flexible, and generally policy-directed than judicial cognition.

Administrative agencies, unlike judicial courts, do not usually settle legal disputes between parties; instead, they act to enforce the law or make decisions that affect individuals or organizations as a whole in a broader, non-adversarial context.[18] Administrative agencies, for example, may exercise their authority in regulating various sectors, issue or revoke licenses, and investigate an infraction of policies. Their choices will, however, be guided by considerations of policy rather than enforcement of legal requirements or the dictates of justice. In terms of levels of formality and autonomy, quasi-judicial functions fall in between administrative and judicial functions. Like judicial duties, quasi-judicial functions entail disputes and application of legal norms; however, they are carried out by organizations where levels of autonomy and formality are less than those of courts.[19] For any organization to qualify as quasi-judicial, generally the principles of natural justice have to be followed. That is, it affords the parties a deal of opportunity to present their case by considering relevant information and then decides using such information with regard to the rights and liabilities of the parties. Although their decisions are final and subject to judicial review, they are so to keep the path of justice and standards of law. Regulatory agencies like the Securities and Exchange Board of India (SEBI), the National Green Tribunal (NGT), and the Income Tax Appellate Tribunal (ITAT) are examples of quasi-judicial institutions.[20]

i. Criteria for Examining Lapses in Judicial or Quasi-Judicial Functions

On July 12, 2016, in the case of *R.P. Parekh v. State of Gujarat*[21] (Civil Appeal Nos. 6116-6117 of 2016), the Supreme Court laid down the criteria for testing judicial or quasi-judicial misbehavior. The judgment notes that while lapse of judgments is accepted in most situations as also sometimes unavoidable, misconduct happens mainly when the established legal procedures are deliberately or negligently infringed upon, improper pressure is brought to bear, or a pattern of questionable judgments is established.

The Court mentions that the cavalier neglect of procedural norms is one of the important considerations.[22] When a law enforcement official consciously violates legal norms, that mostly goes beyond the realm of inadvertent errors into one of misconduct. In addition, this conscious or habitual neglect of procedural norms, therefore, not only taints the fairness of particular decisions but also brings the credibility of the entire legal process into disrepute.[23] While periodic breaches may be attributed to innocent mistakes, surveyors ought to be on the lookout for evidence showing consistent negligence in the observance of legal norms, as such established patterns could indicate serious concerns. The speculation of firsthand evidence is

[18] Ibid.
[19] M. Jain, *Comparative Administrative Law: India and U.K.* (Cambridge Univ. Press, 2019).
[20] Ibid.
[21] *R.P. Parekh v. State of Gujarat*, Civil Appeal Nos. 6116–6117 of 2016 (India).
[22] Ibid.
[23] Ibid.

also a major consideration. That said, any apparent absence of evidence on bias and misconduct would not amply heal another stain on the officer's name. Rather, this case calls for a full exploration of circumstantial evidence that sufficiently indicates undue influence in the decision-making process. The method acknowledges that misconduct is not always identifiable by some very visible most tangible mark; however, a collection of subtle shadows may overbear that a shadow of doubt looms on the fairness of the decision.[24] Thus, alongside making assessments regarding direct evidence, much credence should equally be given to the finding of the universal backdrop and the more subtle signs of misconduct.

The Court also lays emphasis on its responsibility to give a clear and convincing rationale for its findings.[25] Failure to do so casts undue doubts as to whether the litigation was conducted on reasons not entirely pertaining to its legal merits. Such rationale is also confirmed by spotting a pattern in behavior; an unbroken string of such suspicious decisions or actions constitutes a fair case for chronic misconduct and something more than isolated errors.[26] This is a necessity in the interests of maintaining the integrity of the system and public confidence therein: a distinction between knowing breaches of legal standards and genuine judicial error.

The Classification Challenge

It cannot be prima facie determined that whether a function is of judicial, administrative, or quasi-judicial nature. The most common dividing line is drawn by close scrutiny of the relevant statute, applicable norms, and nature of very powers conferred. Where a body shall henceforth be performing the function of settling disputes, evaluating evidence, and pronouncing judgments affecting the rights of an individual, courts may insist upon such body finding its functions quasi-judicial.[27] However, it is always necessary to consider contextual aspects, as this classification may not have always been purely black and white. The kind of legal rights affected may as well affect classification.

ii. Legal Consequences of Classification

A function classified as judicial, administrative, or quasi-judicial has significant legal consequences. It will be subject to judicial standards and the requirement of natural justice. This power of the courts has been exercised by writs of certiorari or prohibition to ensure that quasi-judicial authorities meet standards of law and promote procedural fairness. Administrative would be entitled to a very limited exercise of judicial review. The courts would not be concerned with the decision being procedurally fair; rather, they would examine whether the authority was acting within the law and whether its decision was reasonable.

[24] M.P. Jain & S.N. Jain, *Principles of Administrative Law* (7th ed., LexisNexis, 2011).
[25] Ibid.
[26] Ibid.
[27] N.N. Hidayah, F. Amyar & A. Lowe, *Therapeutic Governance: The Art of Mediating Shame and Blame and Quasi-Judicial Pragmatic Technologies in Indonesian Government Auditor-Auditee Engagements*, *Critical Persp. on Acct.* (2024), https://www.sciencedirect.com/science/article/pii/S1045235424000649 (last visited Feb. 14, 2025).

Role of Principles of Natural Justice in Quasi-Judicial Functions

The edifice of administrative and quasi-judicial decision-making rests upon the principles of natural justice, which is to be employed to ensure that the acts of public authority shall remain fair and open to examination. The fundamentals of natural justice are as follows:

iii. **Right to Fair Hearing (Audi Alteram Partem)**[28]**:** It requires every party to be afforded an opportunity to present its side of the case before a decision is rendered. This principle entails the protection of the rights of the individuals or groups affected by decisions in quasi-judicial fora to be notified before the hearing, to present such evidence as they may wish, to cross-examine opposing views presented for consideration, and generally, to be afforded the opportunity to be heard on the issues at stake. It is equally important that the parties interested be notified of the issues that are going to affect them, the venues for the hearings, and the timeframe given for the public to make their claims.

iv. **The Rule Against Bias (Nemo Judex in Causa Sua)**[29]: Before a decision is made, all parties should have a chance anywhere along the way to be heard. Under this doctrine, people or organizations subjected to judgments in quasi-judicial settings ought to also be duly notified in advance, given the necessary opportunities to present relevant pieces of evidence, given reasonable opportunities to cross-examine opposing views presented for consideration, and ordinarily given an opportunity to present their case. It is equally important to ensure that persons who would likely be affected are duly notified concerning the issues in question, the venues for the hearings, and the time given for them to make their claims.

v. **Reasoned Decisions**[30]: One of the cornerstones of natural justice is that quasi-judicial authorities should give well-reasoned decisions. This means that decisions have to be based upon sound legal principles, good rational considerations, and clear articulation of reasons. The essence of a well-reasoned decision is clarity in its making and the ability of the interested parties to appreciate why the decision was made. It is of great advantage for the higher authorities and courts of law to see whether the decision was made fairly and legally, thus guaranteeing proper judicial review. The absence of reasoning would result in allegations of arbitrariness in decision-making and would shake the very foundation of the people once trust is reposed in the quasi-judicial system.

The Interaction between Judicial, Quasi-Judicial, and Administrative Functions

i. Supervision and Control

The judiciary effectively supervises and controls quasi-judicial acts through the doctrine of judicial review. The courts are entitled to check whether the quasi-judicial organs have acted in accordance with the law without transgressing legal tenets such as natural justice and fairness.

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[28] U. Kumar & P. Choudhary, *Exploring Natural Justice: Its Evolution, Application and Implications in Contemporary Legal Systems*, *Anubooks* (2025), https://anubooks.com/uploads/session_pdf/172001759514.%20Dr.%20Umesh,%20Dr.%20Poonam%20109-118.pdf (last visited Feb. 14, 2025).

[29] K. Raj, *Principles of Natural Justice*, *Int'l J. L. Mgmt. & Human.* (2020), https://heinonline.org/hol-cgi-bin/get_pdf.cgi (last visited Feb. 14, 2025).

[30] B. Kamal, *Principles of Natural Justice*, *Indian J. L. & Legal Res.* (2022), https://heinonline.org/hol-cgi-bin/get_pdf.cgi?handle=hein.journals/injlolw8&section=226 (last visited Feb. 14, 2025).

By scrutinizing the way in which the jurisdiction to make decisions has been exercised, the courts ensure that the very manner of making decisions is aligned with the relevant legal and constitutional principles and is not exercised in a manner contrary to the requirements of natural justice.[31] Whenever the state intervenes in quasi-judicial institutions, it acts as another layer of control to ensure that such institutions exercise their discretion within the limits of law. For instance, if a person believes that a decision by a licensing body violates procedural fairness or is an excess of powers, he or she can take that decision to court for judicial review.

ii. Legal Precedents

Court pronouncements on the law create precedents which quasi-judicial bodies should have regard to in their own processes. For example, if jurisprudential precedent has been set by a court on one interpretation of a law providing for some statutory remedy, the implication is that any licensing or regulatory authority would tend to use that rule in the making of its decisions with the same focus in future.[32] The courts also mark the boundaries and extent of the powers of quasi-judicial institutions so as to ensure they are conforming with evolving interpretations of the law.

iii. Appeals

Every legal system permits aggrieved parties, for instance, by a decision of a quasi-judicial body like a licensing body or a regulatory authority, to appeal to court. Not only is the process itself one of the stimuli toward observance of natural justice principles, procedural fairness, and rule of law, but it has also a corrective function.[33] Appeals serve as important checks against arbitrary or illegal behavior by quasi-judicial bodies. The courts shall ascertain whether the decision was legal, whether the proceedings were fair, and whether the quasi-judicial body acted within its authority.

Scope of Judicial Review under Articles 32, 136, and 226

i. Article 32: Enforcement of Fundamental Rights

Under Article 32, the Supreme Court is empowered to issue writs for the enforcement of fundamental rights. A person whose fundamental rights have been violated by a quasi-judicial authority may approach the Supreme Court. For example, if a quasi-judicial order violates the right to personal liberty (Article 21) or the right to equality (Article 14), the Supreme Court may quash the order. As in the case of *Maneka Gandhi v. Union of India*[34] (1978), the Supreme Court of India emphasized procedural fairness stating that quasi-judicial functions are subject to the principles of natural justice. The Court extended the scope of these principles as it was held that natural justice is not only applicable to judicial or quasi-judicial functions but also extends to administrative decisions. To this broader interpretation, the prominent and well-known English decision Ridge v. Baldwin (1964) has added more strength, which did away with

[31] N.N. Hidayah, F. Amyar & A. Lowe, *Therapeutic Governance: The Art of Mediating Shame and Blame and Quasi-Judicial Pragmatic Technologies in Indonesian Government Auditor-Auditee Engagements*, *Critical Persp. on Acct.* (2024), https://www.sciencedirect.com/science/article/pii/S1045235424000649 (last visited Feb. 14, 2025).
[32] Ibid.
[33] Ibid.
[34] *Maneka Gandhi v. Union of India*, (1978) 1 S.C.C. 248 (India).

the bitterly maintained stark dichotomy between quasi-judicial and administrative contexts of natural justice.

ii. Article 226: Writ Jurisdiction of High Courts

Article 226 of the Constitution provides that the High Courts shall have power to issue orders for legal rights as well as fundamental rights. According to Article 226, judicial review is comprised of learning whether quasi-judicial authorities had done so beyond their jurisdiction (ultra vires). - irrationally or in an arbitrary manner with regard to the canons of natural justice. High Courts normally take cognizance of petitions at the instance of quasi-judicial orders on grounds of procedural impropriety or abuse of discretionary powers. It has, for instance, been concluded by the Supreme Court in *A.K. Kraipak v. Union of India*[35] (1969) that since quasi-judicial elements are included in the administrative orders, these can be contested in courts with reference to the principles of natural justice. The Court noted: "The dividing line between administrative power and quasi-judicial power is quite thin and is being gradually obliterated. To ascertain whether a power is an administrative power or quasi-judicial power, one must refer to the nature of the power granted, the individual or individuals on whom it is granted, the structure of the law granting that power, and the effects following from the exercise of that power, and the way in which that power shall be exercised."

iii. Article 136: Special Leave Petition

The Supreme Court is given the responsibility of granting special permission to appeal against any order passed by any Indian tribunal or court as per Article 136. Here, such a provision is available where quasi-judicial proceedings have caused miscarriage of justice.

In *Union of India v. R. Gandhi*[36] (2010), to indicate the role and working of tribunals, the Supreme Court reiterated the crucial need for these bodies to be independent, unbiased, and judicious. The Court again mentioned the fact that the tribunals and administrative tribunals would have to attempt at being unbiased and just in decision-making even though without formal judicial competencies.

The Court observed: *"In every State, there are administrative agencies or authorities, and these must deal with matters relevant to their existence in an administrative way, and their orders are called administrative orders. In arriving at their administrative orders, administrative authorities may and generally do consider questions of policy. It cannot be denied that even in arriving at administrative orders, such administrative authorities or bodies must act fairly and reasonably and would be binding in the majority of cases to observe the canons of natural justice; but such power to make orders vested in such administrative bodies is well distinguished and distinct from the judicial power vested in courts, and administrative orders made by such bodies are also well distinct and separate in character from orders made by courts."*[37]

[35] *A.K. Kraipak v. Union of India*, (1969) 2 S.C.R. 430 (India).
[36] *Union of India v. R. Gandhi, (2010) 11 S.C.C. 1 (India).*
[37] Ibid.

iv. Examples of Judicial Review of Quasi Judicial Action

In the case of *State of Orissa v. Dr. Binapani Dei (1967)*[38] the Supreme Court reiterated the principle of fair hearing, and struck down an administrative order that did not afford the plaintiff an opportunity to be heard before proceeding to contravene her rights. Furthermore, in *Keshav Mills Co. Ltd. v. Union of India (1973)*[39] the Supreme Court emphasized that quasi-judicial orders should be passed on relevant evidence, and not on arbitrary or capricious grounds. In *Rajasthan State Road Transport Corporation v. Bal Mukund Bairwa (2009)*[40] the Supreme Court stated that a tribunal exercising quasi-judicial powers must conform to the principles of natural justice, and its order can be called into question on the ground of a procedural lapse. Additionally, in *Ridge v. Baldwin (1964)*[41] although it is a case from the UK, it affected Indian jurisprudence by stressing the fact that a failure regarding the principles of natural justice by a quasi-judicial authority may keep any order invalid.

Conclusion and Suggestions

Procedural and structural reforms to quasi-judicial authorities will address the identified problems and make those quasi-judicial authorities more effective. Firstly, procedures must be rationalized, wherein common procedural rules for quasi-judicial authority from all sectors should be established, hearing regulations, evidence submission, and decisions to make unified rules should be streamlined, and specific deadlines for adjudication to avert lags should be indicated. Secondly, capacity development of administrative authorities should be conducted wherein training courses on principles of natural justice and legal processes that would be regularly attended by quasi-judicial members should be conducted, knowledgeable legal or jurisdiction experts in the functions of the authority should be appointed, and quasi-judicial bodies from external influences for autonomy should be shielded.[42] Thirdly, enhanced transparency and accountability should be ensured by making decisions public, with its reasoning and evidence, to ensure transparency, independent audit mechanisms for quasi-judicial authorities so that accountability is achieved should be established and online portals for grievance redressal, tracking case status, and publishing verdicts all contributing towards making the process more accessible and at the same time reducing the chances of corruption should be ensured.[43]

[38] *State of Orissa v. Dr. (Miss) Binapani Dei*, A.I.R. 1967 S.C. 1269 (India).
[39] *Keshav Mills Co. Ltd. v. Union of India*, A.I.R. 1973 S.C. 389 (India).
[40] *Rajasthan State Road Transport Corp. v. Bal Mukund Bairwa*, (2009) 4 S.C.C. 299 (India).
[41] *Ridge v. Baldwin*, [1964] A.C. 40 (H.L.) (appeal taken from Eng.).
[42] N.M.H. Carrim, *Employment Equity in Corporate South Africa and Its Implications for Governance*, in *Elgar Encyclopedia on Gender in Management* (Edward Elgar, 2025), https://www.elgaronline.com/abstract/book/9781803922065/ch37.xml (last visited Feb. 14, 2025).
[43] Ibid.