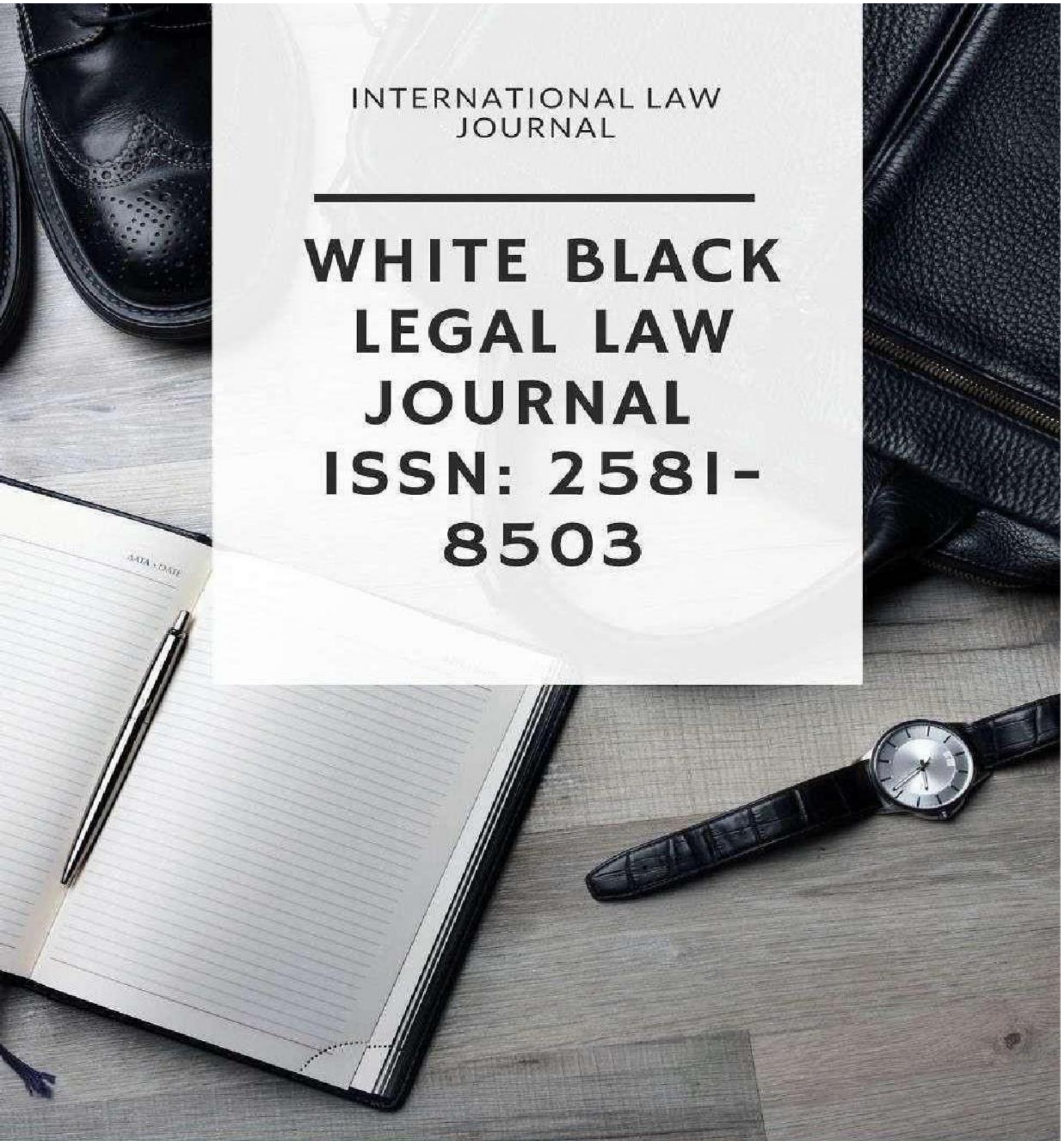




INTERNATIONAL LAW
JOURNAL

**WHITE BLACK
LEGAL LAW
JOURNAL**
**ISSN: 2581-
8503**

Peer - Reviewed & Refereed Journal

The Law Journal strives to provide a platform for discussion of International as well as National Developments in the Field of Law.

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NATURAL JUSTICE IN ADMINISTRATIVE LAW: A COMPARATIVE-HISTORICAL STUDY FROM ANCIENT ROOTS TO CONSTITUTIONAL GUARANTEES IN INDIA

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ABSTRACT

Natural justice remains a core, though uncodified, procedural safeguard in administrative law, guaranteeing fairness, impartiality and accountability in the exercise of power. This study undertakes a comparative-historical examination of its evolution, tracing roots from Roman *jus naturale*, Greek philosophy (Aristotle, Plato, Socrates) and Indian *dharma* traditions reflected in the Brihaspati Smriti, Katyayana Smriti and Kautilya's Arthashastra. Despite divergent civilizational origins, these sources converge on impartial adjudication, the right to a hearing and reasoned decisions.

The principles entered English common law and were later received into Indian jurisprudence as the twin maxims *audi alteram partem* and *nemo judex in causa sua*, together with the duty to give reasons. Landmark rulings which include *Ridge v Baldwin*¹, *A.K. Kraipak v Union of India*², *Maneka Gandhi v Union of India*³, *Olga Tellis v Bombay Municipal Corporation*⁴ and *Canara Bank v V.K. Awasthy*⁵ illustrate the judiciary's progressive elevation of natural justice into a constitutional guarantee under Articles 14 and 21⁶.

Using a doctrinal method, the project evaluates the interplay of historical continuity and constitutional innovation, while noting enduring difficulties such as statutory exclusions, delay and the efficiency fairness tension. It concludes that comparative insights from Greek, Roman and Indian thought can strengthen the coherent application of natural justice in contemporary Indian administrative law.

¹ **Ridge v Baldwin [1964] AC 40.**

² *A.K. Kraipak v Union of India* AIR 1970 SC 150.

³ *Maneka Gandhi v Union of India* AIR 1978 SC 597.

⁴ **Olga Tellis v Bombay Municipal Corporation AIR 1986 SC 180.**

⁵ **Canara Bank v V.K. Awasthy AIR 2005 SC 2090.**

⁶ The Constitution of India, 1950 arts 14 and 21.

KEYWORDS

1. Natural Justice
2. Administrative Law
3. *Audi Alteram Partem*
4. *Nemo Judex in Causa Sua*
5. Constitutional Guarantees (Articles 14 & 21)

INTRODUCTION

It appears that natural justice principles are neither new nor created. It was created by a number of philosophers, jurists, rulers, and educators and has its roots in our fundamental moral sense. Being the strongest supporter of natural justice as the foundation for a moral life that improves people's lives and fosters the ideal community, Aristotle believed that people should use active reason or practical knowledge to be compatible with a moral life.

Since these principles are essential for making just and equitable decisions, the idea of natural justice emerged from man's need to protect himself. "The principles of natural justice act as a safeguard against flagrant violations of people's rights." The principles of natural justice can be defined as the guidelines established by courts over time as providing the bare minimum of protection for the rights of members of society against arbitrary actions taken and adopted by judicial, quasi-judicial, and administrative authorities when issuing orders that impact those rights. The general goal of these regulations is to stop these authorities from causing any harm to society. Natural justice, which has its roots in both tradition and conscience, is the cornerstone of just decision-making. The prevention of injustices is the goal of adhering to natural justice principles.

"The Principles of Natural Justice are very easy to proclaim; but their precise extent is very less easy to define," according to the ruling in *Abbott v. Sullivan*, 905 F.2d 918 (6th Cir. 1990)⁷. According to the court, it is only feasible to list the fundamental ideas of natural justice with some degree of clarity; it is not possible to define the term itself. In the past, "natural justice" and "natural law" were frequently used interchangeably, but today, the terms have different meanings.

⁷ *Abbott v Sullivan* 905 F.2d 918 (6th Cir 1990).

In a number of ways, Natural Justice becomes a crucial procedural protection against any misuse or arbitrary, improper, or excessive exercise of its authority by the Administration. The belief that since the administration has gained significant protections, some protection of an individual's rights can be provided by requiring bureaucracy to follow proper procedures when performing its duties, which leads to the growth of natural justice in administrative processes. A great humanizing principle, natural justice aims to provide justice, prevent injustices, and infuse the law with fairness. It is an implicit requirement that must be followed; failure to do so renders the use of authority invalid. No matter how quiet a statute is, it will always be applicable.

The principles of natural justice are recognised and upheld, although the idea itself is not very clear and cannot be defined. In reply to this aforesaid criticism against the natural justice, Lord Reid in the historical decision of *Ridge v Baldwin* [1964] AC 40⁸ (Ridge observed): "In modern times, opinions have sometimes been expressed to the effect that the natural justice is so vague as to be practically meaningless. But I would regard these as tainted by the perennial fallacy that because something cannot be cut and dried or nicely weighed or measured, therefore it does not exist."

IMPORTANCE OF NATURAL JUSTICE IN ADMINISTRATIVE LAW

One key idea in administrative law is natural fairness. No code establishes or prescribes the fundamental rules of procedure for administrative action or the principles of natural justice. They are easier to declare than to define, and they are more well-known than to explain. It comes in a wide variety of colours, tints, shapes, and forms. De Smith claims that the phrase "natural justice" has a remarkable history and captures the intimate connection between morality and the common law. Fair play in action, "universe justice," "substantial justice," and "fundamental justice" are some other names for it. The goal of this wonderful humanising idea is to ensure justice, prevent injustices, and infuse the law with fairness.

⁸ *Ridge v Baldwin* [1964] AC 40.

HISTORICAL EVOLUTION OF THE PRINCIPLES OF NATURAL JUSTICE PRE-CONSTITUTIONAL ERA

Ancient Roots:

1. Roman Law:

It holds the origin of the concept of Natural Justice. In 1676, Sir Mathew Hale, the then Chief Justice of King's Bench (1671-76), set out 18 tenets for dispensing of justice. The sixth tenet read as follows, "*That I suffer not myself to be possessed with any judgment at all till the whole business of both parties be heard.*"⁹

Natural justice, originating in Roman law and later developed in English common law, is of very ancient origin. The rules of natural justice were known to the Greeks and Romans, and the notion of a natural justice system emerged from religious and philosophical beliefs about how human beings perceive themselves in relation to nature.

The earliest expression of 'natural justice' can be traced to the philosophical writings of Roman jurists, expressed through the concept of *jus naturale*. It signified rules and principles for the conduct of human beings which were independent of enacted law or customs, could be discovered by rational intelligence, and would grow out of and conform to human nature. The term 'Natural Justice' thus manifests justice according to one's own conscience. Derived from the Roman concepts *jus naturale* and *lex naturale*, it denoted the principles of natural law, natural justice, eternal law, natural equity, or good conscience.

The principle of natural justice, taken from *jus naturale* of Roman law, is closely linked with common law and moral principles, though it is not codified. It represents a law of nature which is not derived from any statute or constitution. The principle of natural justice is adhered to by all citizens of a civilized state with utmost importance. It is not confined or restricted solely to 'fairness', but takes many shades and colours depending on the context. Beyond fairness, natural justice also embodies reasonableness, equity, and equality. These principles are neither cast in a rigid mould nor capable of being confined within a strict legal straitjacket.¹⁰

Lord Evershed, in *Vionet v Barrett* (1885 (55) LJR 39, 41)¹¹, aptly remarked: "Natural Justice is the natural sense of what is right and wrong." However, natural justice has meant different things to different people at other times. In its widest sense, it was once used as a synonym for

⁹ CAM Disputes Team, 'The Principles of Natural Justice – Origin and Relevance' (CAM Disputes Blog, 2018) <https://camdisputes.com> accessed 13 August 2026.

¹⁰ 'Origin and Development of Principles of Natural Justice' (*The Column of Curae*, 2019) <https://thecolumnofcurae.com> accessed 13 August 2026.

¹¹ *Vionet v Barrett* (1885 (55) LJR 39, 41).

natural law. Over time, it has also been used to imply that reasons must be given for decisions, and that a body deciding an issue must act only on evidence of probative value.[17]

2. Greek Philosophy:

The principles of natural justice are said to have emerged from Cicero's Latin renderings of Greek Stoic philosophy, written in the first century BC. These ideas became the underpinnings of Thomas Aquinas's philosophy and were regarded as divine law informing creation and binding human beings. The idea of natural law, however, had already developed in ancient times, especially in the classical world. The Greek Sophists and Aristotle used it and was central to Stoicism.¹²

The expression "natural justice" is ambiguous, confusing, and misleading—not to the Greeks, who believed in civic education and generation, but to us who have inherited a two-thousand-year-old Christian tradition. For us, the expression "natural law" has a definite Christian connotation, but it had none in pagan Greece, where natural law was considered a thing of human reason alone.¹³

Aristotle noted that natural justice is a species of political justice, namely, the scheme of distributive and corrective justice that would be established under the best political community. If such a scheme were to take the form of law, it could be called natural law, though Aristotle does not discuss this explicitly and even suggests in *Politics* that the best regime may not rule by law at all. The best evidence of Aristotle's belief in natural law comes from the *Rhetoric*, where he notes that aside from the "particular" laws each people sets for itself, there is a "common" law according to nature. **Universal law is the law of nature**, for there really is, as everyone to some extent divines, a natural justice and injustice binding on all, even those without association or covenant:

"Not of to-day or yesterday it is, But lives eternal: none can date its birth."

Nevertheless, Aristotle's theoretical paternity of the natural law tradition remains disputed.¹⁴

Although Plato does not present an explicit theory of natural law (he almost never uses the phrase "natural law," except in *Gorgias* 484 and *Timaeus* 83e), his concept of nature, according to John Wild, contains many elements later found in natural law theories. For Plato, we live in an orderly universe. At the basis of this order are the Forms, most fundamentally the Form of

¹² Yamini Dalvi, 'Natural Law Theories in Greek and Medieval Period' (*Legal Vidhiya*, 2021) <https://legalvidhiya.com> accessed 13 August 2026.

¹³ *ibid.*

¹⁴ *ibid.*

the Good, described as "the brightest region of Being." The Good is the cause of all things and, when apprehended, leads individuals to act wisely. In the *Symposium*, the Good is closely identified with the Beautiful, while in the *Republic*, the ideal community is "...a city which would be established in accordance with nature." Here Plato emphasized the need for perfect division of labour, holding that "each man ought to do his work to which he is called upon by his capacities."

Socrates, for his part, argued that the reasonableness of a law must be judged by human insight. Only those laws consistent with the principles of natural law and supported by human reasoning could be deemed proper. While Socrates did not deny the authority of positive law, he insisted on the necessity of natural law for the security and stability of the community.

3. Indian Principles:

In ancient India, the foremost duty of a judge was integrity, implying impartiality and complete absence of bias. Even kings were bound by *dharma* and required to remain detached in decision-making. An impartial tribunal, proper notice, opportunity to be heard, and orderly justice were core essentials of natural justice.

The concept of *dharma* as justice ensured that natural justice was deeply embedded in Indian traditions. Ancient texts such as Brihaspati Smriti emphasized that judges must decide cases without bias or personal gain, while Katyayana held that judges had a duty to prevent the king from giving unrighteous decisions. Similarly, Emperor Ashoka promoted fairness, caution, and tolerance in judicial administration, and Kautilya's *Arthashastra* recognized the rule of fair hearing and impartiality.¹⁵

The Indian judiciary consistently upheld these ideals. In *A.K. Kraipak & Ors. Etc. v Union of India* AIR 1970 SUPREME COURT 150¹⁶, the Supreme Court held that natural justice applies to both administrative and quasi-judicial functions, reinforcing the principle against bias (*nemo judex in causa sua*). This was aligned with the broader common law understanding seen earlier in *Ridge v Baldwin* 1964 [AC] 40¹⁷.

Ancient practices also show recognition of legal representation. Texts by Narada, Katyayana, and Brihaspati suggest that skilled persons could assist parties for fees, similar to modern legal counsel. Moreover, examples from the epic age, like King Rama banishing Sita to preserve

¹⁵ Kalpana Rajeev Desai and Samraggi Chakraborty, 'Understanding the Principles of Natural Justice' (*Academia*, 2020) <https://www.academia.edu> accessed 13 August 2026.

¹⁶ *A.K. Kraipak & Ors. Etc. v Union of India* AIR 1970 SUPREME COURT 150.

¹⁷ *Ridge v Baldwin* 1964 [AC] 40.

public confidence, illustrate how justice was not only done but seen to be done.

Thus, the Indian notion of *dharma* closely parallels natural justice, ensuring fairness, impartiality, and accountability across ages, much like Hammurabi's code that imposed penalties on errant judges.

PRINCIPLES OF NATURAL JUSTICE IN THE POST-CONSTITUTIONAL ERA

1. Nemo Judex in Causa Sua

The rule against bias, *nemo judex in causa sua* ("no one shall be a judge in their own cause"), ensures impartiality in decision-making. It applies to judicial, quasi-judicial, and administrative bodies alike, maintaining public confidence by preventing conflicts of interest. In *P.D. Dinakaran v. Judges Inquiry Committee* AIR 2011 SUPREME COURT 3711¹⁸, the Supreme Court held that justice must not only be done but also appear to be done, and that judges must remain free from pecuniary, personal, or official bias. Similarly, in *Mukhtar Singh v. State* AIR 1959 ALLAHABAD 569¹⁹, it was emphasised that any authority deciding a matter must remain impartial, as biased decisions are liable to be struck down. The Court has also held that denial of independent enquiry officers or adequate legal representation where circumstances require can amount to a "failure of justice."

2. Audi Alteram Partem

The second core principle, *audi alteram partem* ("hear the other side"), guarantees that no one is condemned unheard. It requires prior notice, disclosure of evidence, and adequate opportunity for representation before a decision affecting rights is taken. In *Canara Bank v V.K. Awasthy* AIR 2005 SUPREME COURT 2090²⁰, the Supreme Court reaffirmed that notices must be precise and unambiguous, giving parties sufficient time to prepare their defence. Absence of fair notice or reasonable opportunity vitiates proceedings. This principle ensures transparency and fairness across judicial, quasi-judicial, and administrative actions, preventing arbitrary exercise of power.²¹

¹⁸ *P.D. Dinakaran v. Judges Inquiry Committee* AIR 2011 SUPREME COURT 3711.

¹⁹ *Mukhtar Singh v. State* AIR 1959 ALLAHABAD 569.

²⁰ *Canara Bank v V.K. Awasthy* AIR 2005 SUPREME COURT 2090.

²¹ Rimali Batra and Rajeev Anand, 'Principles of Natural Justice: Definition, Application to Administrative Proceedings and Contours of Application' (SCC Online Blog, 22 April 2025) <https://www.scconline.com/blog/post/2025/04/22/principles-of-natural-justice-application-scope-administrative-proceedings/> accessed 14 August 2026.

3. Reasoned Decision

The duty to give reasons is integral to fair administration and judicial review. It ensures decisions are based on law, not whim, and enables effective appellate scrutiny. In *Maharashtra State Board v K.S. Gandhi* 1991 SCALE (1)187²², the Supreme Court held that unless expressly excluded, recording of reasons is implicit in natural justice, even for administrative decisions. While reasons need not be elaborate, they must be precise and disclose the rationale. Similarly, in *Mahabir Prasad Santosh Kumar v State of U.P.* AIR 1970 SUPREME COURT 1302²³, cancellation of licences without reasons was struck down, as unreasoned orders are arbitrary and deny parties the right to know why their claims were rejected.

DEVELOPMENT OF PRINCIPLES OF NATURAL JUSTICE IN INDIA THROUGH LANDMARK CASES

The application of natural justice in India has evolved through judicial interpretation. A key question has been whether fairness requires adherence to strict judicial procedure or whether flexible standards suffice. Following the English precedent in *Aldridge v. United States* 283 U.S. 308 (1931)²⁴, Indian courts have accepted that administrative hearings need not mirror judicial trials, provided fairness is ensured.

1. *A.K. Kraipak v Union of India* AIR 1970 SUPREME COURT 150²⁵

In *A.K. Kraipak*, the Supreme Court emphasised that the aim of natural justice is to secure justice and prevent miscarriage of justice. The Court clarified that these rules supplement the law where statutes are silent, but do not supplant it.

2. *Maneka Gandhi v Union of India* 1978 AIR 957²⁶

In *Maneka Gandhi*, the Court held that even in the absence of statutory provisions, the duty to provide a reasonable opportunity of being heard must be implied wherever administrative action affects individual rights. This case firmly embedded natural justice within constitutional guarantees.

3. *Olga Tellis v Bombay Municipal Corporation* 1986 AIR 180²⁷

In *Olga Tellis*, Section 314 of the Bombay Municipal Corporation Act, 1888 allowed removal of encroachments without notice. The Court applied the doctrine of “reading down” to uphold

²² *Maharashtra State Board v K.S. Gandhi* 1991 SCALE (1)187.

²³ *Mahabir Prasad Santosh Kumar v State of U.P.* AIR 1970 SUPREME COURT 1302.

²⁴ *Aldridge v. United States* 283 U.S. 308 (1931).

²⁵ *A.K. Kraipak v Union of India* AIR 1970 SUPREME COURT 150.

²⁶ *Maneka Gandhi v Union of India* 1978 AIR 957.

²⁷ *Olga Tellis v Bombay Municipal Corporation* 1986 AIR 180.

the provision's validity, ruling that while the Commissioner may act without notice, it was not mandatory. This interpretation aligned the statute with the principles of natural justice.

CONSTITUTIONAL EMBODIMENT OF NATURAL JUSTICE

The Indian Constitution incorporates the essence of natural justice through various provisions. The Preamble assures social, economic, and political justice along with liberty and equality. Articles 14 and 21 are the core pillars²⁸: Article 14 guarantees equality before law and equal protection of laws, while Article 21 ensures the right to life and personal liberty. Together, they form the constitutional foundation for fairness and due process. Several other provisions reinforce these principles. Article 22 secures fair hearing for arrested persons; Article 39-A provides free legal aid to the disabled and indigent; and Article 311²⁹ extends protection to civil servants against arbitrary dismissal. Further, Articles 32, 136, and 226³⁰ empower citizens to seek remedies against violations of fundamental rights, thereby strengthening procedural justice.³¹

CONCLUSION

Natural justice began as judge-made principles rooted in Roman law, Greek philosophy, and ancient Indian jurisprudence, aiming to ensure fairness, prevent bias, and uphold equity. Initially, these principles—like *nemo iudex in causa sua* (no one should be a judge in their own cause) and *audi alteram partem* (hear the other side)—were applied through common law traditions to safeguard individual rights against arbitrary actions by authorities.

Today, these principles are not only part of judicial and quasi-judicial decisions but also govern administrative actions, ensuring transparency, fairness, and accountability.

Thus, natural justice has evolved from moral and common-law roots into a constitutional guarantee, becoming a cornerstone of modern administrative law to prevent arbitrariness and secure procedural fairness.

²⁸ The Constitution of India, 1950 arts 14 and 21.

²⁹ The Constitution of India, 1950 art 311.

³⁰ The Constitution of India, 1950 arts 32, 136 and 226.

³¹ BYJU'S, 'Indian Constitution and Principles of Natural Justice' (BYJU'S, 2021) <https://byjus.com> accessed 15 August 2026.

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